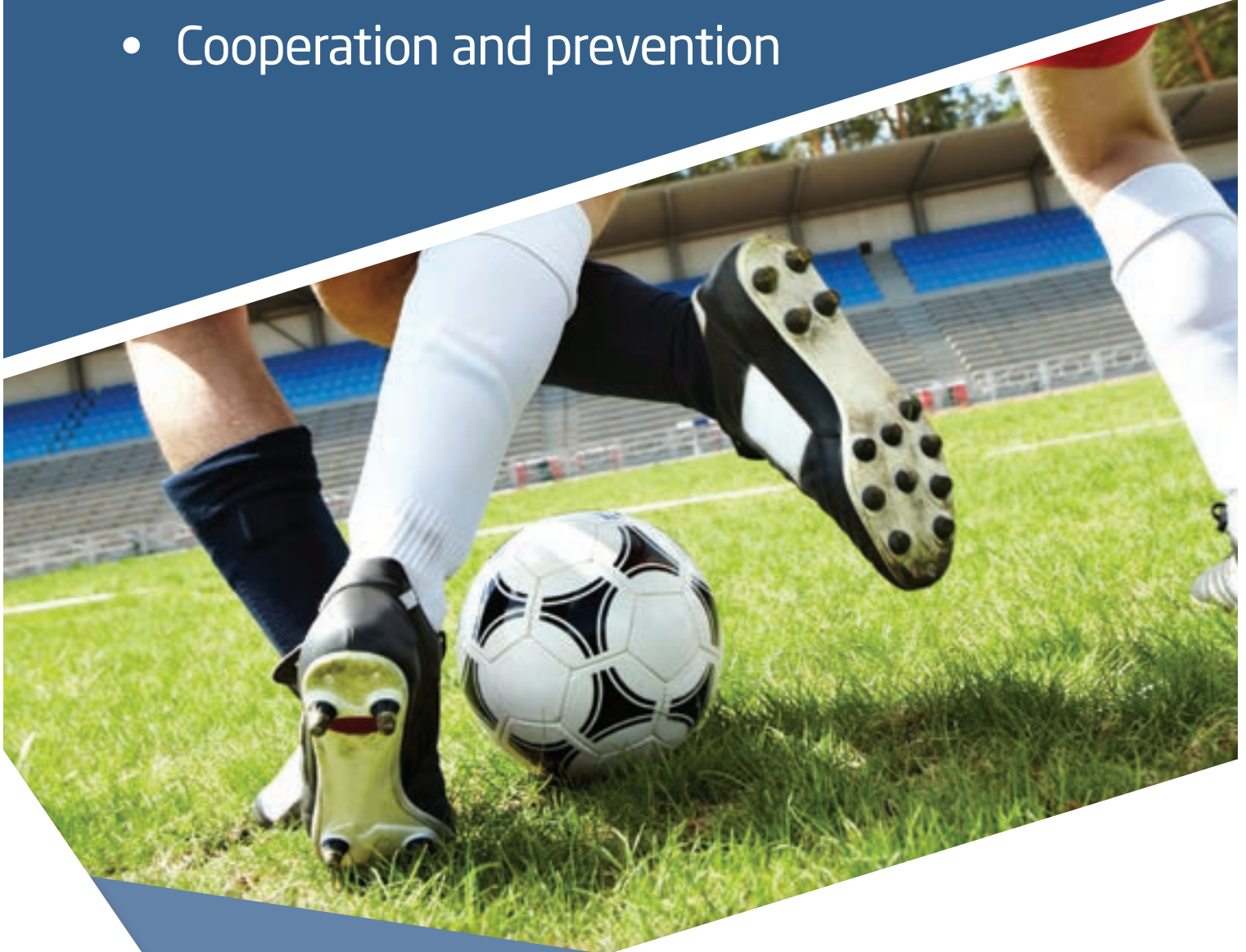


Match-fixing in the Nordic countries

- Scale and risks
- Measures and control
- Cooperation and prevention



September 2013

1. Background and objective

The directors of the Nordic gambling authorities met on the Danish island of Bornholm on 29 August 2012 and resolved to establish a joint Nordic working group to chart match-fixing in the Nordic region in a joint report. After the meeting, a mandate for the group was devised. The purpose of the work is to strengthen the authorities' awareness of match-fixing. By this, we mean exchanging information and assessing possible measures and regulations to effectively counteract manipulation of the outcome of sports events.



Malta's Kevin Sammut is banned for life by UEFA after contributing to fixing a European qualifying match against Norway in 2007.

2. Mandate and composition of the working group

Mandate:

1. To prepare an overview of risks of the occurrence of match-fixing in Nordic sports events involving betting provision in the countries in question.
2. To chart the measures and controls that gambling operators have in place to prevent match-fixing, including measures for responding to any identified match-fixing. Consideration will also be given to the need to strengthen the regulations.
3. To chart what measures and controls the regulators have established, and whether these are sufficient and appropriate for reducing the risk of match-fixing. To prepare an overview of the measures available to the regulators to apply in order to reduce the risk of match-fixing.
4. To assess the risk of manipulation of totalisator betting in the Nordic countries.
5. To propose how the regulators can work with sports and how the Nordic gambling operators can contribute to preventing match-fixing.

Composition:

Country	Name	Position
Norway The Norwegian Gaming and Foundation Authority	Frank Hana	Advisor
Norway The Norwegian Gaming and Foundation Authority	Liv Røthe	Advisor
Norway The Norwegian Gaming and Foundation Authority	Rune Timberlid	Senior Advisor
Denmark (consultant) Danish Gambling Authority	Kia Hee Gade	Special Adviser
Sweden Swedish Gambling Authority	Erika Grybb	Compliance officer
Sweden Swedish Gambling Authority	Åse Didriksson	Compliance officer
Finland National Police Board, Gambling Administration	Saaramia Varvio	Senior officer
Finland National Police Board, Gambling Administration	Sari Ikkala	Senior officer

3. Working method

Norway assumed administrative responsibility for the reporting work. Three working meetings were held – in Norway on 18 December 2012, in Sweden on 12 March and in Finland on 10 June 2013. Denmark has only had the role of a consultant in this working group and only when specifically mentioned is the report an expression of the Danish Gambling Authority. Updates on the work were submitted to the directors of the national gambling authorities on 15 February and 20 June this year.

To improve awareness of what measures and controls the gambling operators have established, at their respective working meetings, Svenska Spel and Norsk Tipping explained how to work to prevent, respond to and follow up on match-fixing in their particular countries.

4. Definition

Various types of cheating or criminal actions can come under the concept of match-fixing. The working group underpins its work with the following definition. The definition is wide, but it includes manipulation to influence the outcome of a gambling object in a specified sports event.

«Match-fixing is defined as manipulation of a sports competition where the actors involved (players, trainers, managers, referees, etc.), for financial gain for themselves or for others, seek to influence the outcome of the competition or of individual events in the competition.»

This definition does not cover cases where a team or a player chooses, for example, to lose a match in order to come up against an easier opponent in the next round. Taking sporting values as the starting point, it is important for the world of sport itself to engage in in-depth discussions of problem areas such as these. However, influencing sports outcomes in this way is outside the remit of this report.

The definition is identical to the definition used in the «National action plan against match-fixing» (Norway 2012).

5. Country-specific reports

Below are status reports from each individual country. Known instances of match-fixing and suspicions of match-fixing are discussed here. These cases are primarily a result of disclosures from the world of sport.

Norway

Norwegian football saw its first match-fixing case in July 2012, when it became apparent that the outcomes of two second-division matches (level three) in June had been fixed. The matches involved were between Østsidan-Follo and Frigg-Asker – both in the same section. Many bet on both the favourites, Follo and Asker, losing.

In addition, at around the same time, it emerged in legal proceedings in Germany that a European Cup qualifying match between Norway and Malta in Oslo had been fixed in 2007 by bribing Maltese players. Allegedly, an elite league match (Tippeligaen) had also been fixed by the same individuals in 2008.

There are also strong indications that a qualifying match for the Europa League between Aalesund FK and the Albanian team Tirana in August 2012 was fixed. Norsk Tipping pulled the plug on betting on this match.

The match-fixing that occurred in the second division was immediately reported to the police, who are still investigating the matter in June 2013. The police stated in December that six individuals had been questioned – including two in Sweden. This match-fixing is expected to come before the courts during 2013.

In addition to actual match-fixing, a number of breaches of Norsk Tipping's agent contracts were identified. For example, agents had been collaborating to place larger bets than permitted within the limit set by Norsk Tipping for individual terminals.

As a result, seven of Norsk Tipping's agents were suspended in December 2012. In June 2013, two of the agents had their contracts reinstated, while one contract was permanently revoked.

Once the match-fixing came to light, the bodies responsible in Norway acted swiftly. Contact was initiated between central bodies within football and sports in general, the Gaming Authority, Norsk Tipping and the Ministry of Culture, which is responsible for gaming policy in Norway.

As early as December 2012, the "National action plan against match-fixing in sports 2013-2015" was launched. This includes proposals of various measures by the various actors. The proposals include:

- Improving awareness of match-fixing.
- Giving priority to working to sway attitudes against match-fixing in sports.
- Monitoring and regulating the gaming business.
- Strengthening sports regulations against match-fixing.
- Stronger Norwegian participation in international cooperation to combat match-fixing.

The Gaming Authority is responsible for five specific measures (see 6.3 a)

Denmark

In Denmark, the extent of (known) match-fixing is still quite limited.

As far as the gambling authority is aware, the published cases of match-fixing are restricted to football and to what the Danish Football Association (DBU) designates as Level 1 cases (covering an individual's unlawful gambling activity) or Level 2 cases (covering "bookmaking in organised communities").

The first case is from June 2010, when a footballer from the third division placed a bet that his team would lose a home match. The DBU regarded this as a test case, and the footballer got off with a caution.¹

The second case is from September 2010, when a footballer from the third division placed a bet that his team would lose an away match. The DBU regarded this as a test case, and the footballer got off with a caution.²

The third case is from November 2011, when a footballer from the top division placed a bet that his team would lose an away match against one of the top teams. The football club informed DBU of the matter, and the player was issued with an 8-day game ban (6 for betting on his own match and 2 for lying to the DBU).³

The fourth and final publicised case, according to the DBU's hierarchy of cases, is a Level 2 case involving multiple gamblers. The footballer was given a 6-month ban for having bet that his own team would win a championship cup in a match that he was due to play in, played in August 2011. The DBU has evidently not yet reported the case to the police.⁴

As the cases cited here illustrate, match-fixing cases in Denmark have been about betting and football. This is not to say that match-fixing in Denmark cannot occur other than by the involvement of betting, or in sports other than football.

Sweden

Sweden has so far been spared the major gambling scandals with regard to match fixing; however, several official agencies and players on the market, independently of each other, have begun to realise that there is a problem and they have started working on ways to counteract this.

Historically, there is an old incident dating back to 1990 which is often known as «the gambling scandal». The Swedish newspaper Expressen published a column dealing with a gambling fraud incident against Tipstjänst, currently known as AB Svenska Spel. According to the column, five bandy matches had been fixed in advance. There was an enormous reaction in Swedish sporting circles. The team identified with the fraud denied the accusations and reported the paper and the publisher to the press ombudsman⁵. The matter went to the court as a breach of the press law, but in the end, the paper was acquitted on all 176 counts in the indictment. Ten years later, in January 2000, once the case had exceeded the statute of limitations, it came to light that at least one bandy match had indeed been fixed. The claim was now that the team was very much aware of the scandal, namely, that they had been bought, but that they had been harshly silenced by the team's own organisation in order to maintain the association's reputation and to save face.

¹ The bet was for a total of DKK 5,000 placed with a bookie. He won the bet, as his team lost the match after what the team's own website described as a poor show to say the least. The bookie reported the bet to DBU's anti-cheating e-mail hotline and DBU initiated an investigation. The footballer explained that this was not the first time he had gambled on losing a match that he was playing in himself. He had done the same thing on four or five previous occasions.

² His bet was for a total of DKK 4,285 placed with two bookies and he won his bets, as his team lost the match. Both bookies reported the bets to DBU's anti-cheating e-mail hotline and DBU initiated an investigation. The footballer explained that this was not the first time he had gambled on a match that he was playing in himself, but that it was the first time he had placed a bet on his own team losing. He explained that he had not bet on the match in conjunction with anyone else, and that, due to an injury, at the time of placing the bet he did not know if he would be selected for the match.

³ The total bet amounted to DKK 6,500 at a local filling station, and three of his 13 bets were on his own future matches. The filling station attendant brought the matter to the attention of the footballer's club.

⁴ At the centre of the case are 96 odds coupons for DKK 500. Attempts were only made to redeem 35, and according to the DBU, the footballer has at least 18 odds coupons and has gambled at least DKK 9,000 (on a match he was playing in himself). According to the DBU, the footballer used straw men to redeem his winnings. The footballer has declared his innocence and appealed against a six-month ban.

⁵ The self-disciplinary system of the Swedish press is not based on legislation. It is entirely voluntary and wholly financed by four press organizations: The Swedish Newspaper Publishers' Association, The Magazine Publishers' Association, The Swedish Union of Journalists and The National Press Club. These organizations are also responsible for drawing up the Code of Ethics for Press, Radio and Television in Sweden.

Incidents receiving minor media attention include a few basketball games in 2005, at which time inter alia Ockelbo basketball was involved. Most often when match-fixing takes place, it pertains to a bet placed through a proxy where you can be anonymous when you play, but these games pertained to online-gambling, and Ladbrokes and other such companies completely suspended all betting on basketball for a period of time.

In the autumn of 2012, the Swedish Gambling Authority was informed that AB Svenska Spel filed a report to the police of a suspected fixed division-2 football match after observing suspicious gambling patterns in bets placed through proxies within a limited geographical area. The police corruption unit began a preliminary investigation into the matter. Neither did this matter receive any media attention in Sweden nor was it likely well known within the football world.

At the beginning of 2013, the Swedish Gambling Authority got wind that in December a basketball match was played that involved a dubious ruling by the referee. Following an investigation, the referee in question was suspended due to serious administrative errors, something that had never before happened according to the Swedish Basketball Association. At the same time, Svenska Spel conducted its own investigations and found suspicious patterns for bets placed with proxies. This incident was also reported to the police and a preliminary investigation is underway.

Sports in Sweden have traditionally had a very independent roll. This is the reason why the Ministry of Culture decided to abstain from the Council of Europe's task force on the new convention (EPAS). However, the Swedish Gambling Authority's senior legal counsel and an official from the Swedish Ministry of Finance are members of the commission's expert panel known as «The European Commission Expert Group on Gambling Services». Expert group's task is to exchange experiences and good practices with regard inter alia to safeguarding the integrity of sports and to prevent match fixing

Finland

Indications of match-fixing and international organised crime have come to light in the Finnish sports world. Manipulation of results has affected both the national gambling company, Veikkaus Oy, and

international betting agencies. Nonetheless, judging from the number of exposed cases, manipulation of sports results is rare in Finland.

The Finnish sports world's first match-fixing case to be brought before a court occurred in 1998. It involved fixing the results of matches in the men's Finnish baseball league. Several teams from the highest division were involved, with several persons, from players to officials, benefiting from the match-fixing through betting. Eventually, dozens of suspects were convicted of fraud. All those involved in the match-fixing were Finnish. The case led to the removal of Finnish baseball matches from Veikkaus' betting product offering for several years. Nowadays, Veikkaus is again offering betting on Finnish baseball.

In recent years, several match-fixing cases have been exposed in Veikkausliiga, Finland's premier league for men's football. These have led to convictions for fraud and bribery. In some cases, some of the primary offenders were foreigners internationally known for match-fixing. More than one reason has been suggested for the interest shown by international operators in Finnish football. These include the poor financial situation of Finnish football clubs and the time of year in which the Veikkausliiga is played, from April to October: most football leagues in other countries take a break during this period, and Veikkausliiga enables betting even during these months.

In all of the above cases, match-fixing was related to betting, and the operating methods varied from attempted bribery of players and/or coaches, to the use of inside information. Cases unrelated to betting, in which the course and/or result of a match has been fixed, have also been brought before the courts.

No single party in Finland is responsible for the prevention of manipulation of sport competitions. The fight against match-fixing has been taken up by various operators in the fields of sports and betting, both among the public authorities and in the private sector, either working independently or in collaboration with other operators. The general opinion is that a single operator cannot face such a huge challenge alone – collaboration has therefore been deemed necessary to preserve the integrity of sport and prevent gambling-related malpractice. No national operating plan has so far been developed to prevent the manipulation of sports competitions.

6. Mandate

The countries have contributed to each point in the mandate. For point 6.1, contributions are grouped together in tables for each particular area.

We have grouped together the risks associated with match-fixing in sport (see point A), risks associated with the gambling operators (see point B), and risks associated with the regulators (see point C). The following listings of risks are not exhaustive.

6.1 Task 1

«To prepare an overview of risks of the occurrence of match-fixing in Nordic sports events involving betting provision in the countries in question.»

As well as listing the risks, we also explain why the individual points increase the risk of match-fixing (see column 2).

A) Risks associated with sport

Risk	Why this is a match-fixing risk
Low level of pay	<ol style="list-style-type: none"> 1. Low-paid individuals have greater motivation to secure additional income, and would therefore be easier to recruit for match-fixing (cf. examples from Eastern Europe). 2. Low-paid individuals have less to lose if they are discovered.
Failure to pay salaries	Clubs in financial difficulties that are unable to pay their players' salaries could exert their powerful position to influence players to manipulate sports events.
Lack of a sense of belonging to the club	Players who do not have a sufficient sense of belonging to their club care less about their club's integrity and reputation. They would be more likely to seek personal gain.
Lack of monitoring of the sports event.	Lack of monitoring (e.g. media coverage, cameras, observers) would increase the opportunity for manipulation of sports outcomes because the chance of being discovered is lower than with closely-monitored events.
Failure to report suspicions to the authorities, gambling operators, etc.	If the sports world does not report suspicions, the gambling operators will not have sufficient information to link with gambling activities (which, viewed in isolation, could appear normal).
Lack of awareness of match-fixing. - Unclear ethical rules. - Unclear regulations about involvement with match-fixing	<p>Insufficient awareness of match-fixing in the sports world reduces the likelihood of discovering any such instances.</p> <p>Uncertainty about the boundaries of lawful and unlawful activity (ethical rules) increases the risk of match-fixing.</p> <p>Uncertainty about how parties involved should behave when there is any suspicion of match-fixing can result in the matter not being taken any further. This increases the risk of instances of match-fixing not being discovered.</p>

Failure to follow up on suspicions	If the world of sport does not properly follow up qualitatively on suspicions, this increases the risk of match-fixing occurring.
Choosing referees too early	Delaying the selection of referees for as long as possible would reduce the risk of manipulation because the match fixers would not know who to involve.
Unclear picture of who finances sports.	If we do not know how sport is financed, it is difficult to identify/monitor whether financing is coming from sources that offer financial support in exchange for manipulation of outcomes.
Events in which players or referees can determine the outcome of the bet, without significantly affecting the overall sporting result of the match.	E.g. spot fixing (who scores the first goal, who gets the first yellow card, etc.)
Poor administration of the sporting organisation	If the sporting organisation's internal administration is not organized properly, the administration system and all activities performed under it will be at risk of misuse/exploitation.
Lack of codes of conduct for the sport	The sport is more vulnerable to manipulation if there are no sport-specific rules concerning internal management or handling of affairs.
Monitoring and rules do not apply to the stakeholders	If the monitoring and/or rules concerning manipulation do not apply to all key operators in the sporting sector, they can become more conducive to manipulation.

B) Risks associated with the gambling operators

Risk	Why this increases the risk of match-fixing
<p>Allowing betting on matches</p> <ul style="list-style-type: none"> - involving juveniles - in lower-rated leagues - on sports events that do not focus sufficiently on match-fixing 	<p>Juveniles – easier to influence and frequently not organised. In lower- rated leagues there is less to lose by manipulating the outcome.</p> <p>Quality-assuring the awareness of sports event organisers regarding match-fixing would reduce the risk of manipulation.</p>
<p>Lack of monitoring of the gambling business.</p>	<p>Irregular/suspicious betting activity is often the first indication that the outcome could be subject to manipulation. Poor monitoring of betting activity would thus increase the risk of match-fixing going undiscovered.</p>
<p>Failure to report suspect bets</p>	<p>To reduce the risk of match-fixing, it is vital for the gambling operators to report their suspicions of match-fixing both to the sports world and to the responsible authorities. Armed with such knowledge, the sports world can then devote resources to the events that are at highest risk.</p>
<p>Allowing employees/odds-setters to bet on matches for which they have set the odds.</p>	<p>Odds-setters could manipulate the odds, and could omit to act against abnormal betting activity.</p>
<p>Non-registered players.</p>	<p>Registering players simplifies the work of tracing those involved in match-fixing retrospectively.</p>
<p>Allowing betting on the gambling object where the outcome is by reason of the sports, known as “side bets”</p>	<p>Offering bets on “the next red card”, penalties etc.: these bets can easily be manipulated, as they do not necessarily jeopardise the entire match</p>
<p>Bets where an individual player has complete control over the outcome of the bet, and where the player bets on winning, are of little or no sporting significance</p>	<p>E.g. spot fixing (who scores the first goal, who gets the first yellow card, etc.)</p>
<p>Cooperation between sporting and gambling</p>	<p>The attempts of gambling operators to influence the sporting sector and their role as sponsor or ownership position are examples of factors that may increase the risk of manipulation.</p>
<p>Head to head bets in totalisator betting</p>	<p>In these forms of gambling the gambling company sets two horses against each other and gives them fixed odds. Here it is enough for cheating players to only influence the driver/trainer/ owner of one horse.</p>

C) Risks associated with the regulatory authorities (police, prosecuting authority, gambling authority, etc.)

Risk	Why this increases the risk of match-fixing?
Unclear and inadequate regulations about criminalisation of match-fixing	Uncertainty what kind of actions are allowed
Failure to prioritise reported cases of match-fixing	If match-fixing have low prioritise in the regulatory authorities, the risk not detecting match-fixing increase.
Low level of awareness	The authority does not act as soon as they should.
Inadequate interaction among authorities	When the interaction is inadequate, there is always the risk for wrong decisions/actions
Ambiguity concerning the responsibility for anti-manipulation work by the authorities	Poor coordination or complete lack of monitoring makes possible manipulation easier.
Lack of awareness of the manipulation problem	Influencing the prevention of manipulation requires that the authorities acknowledge the problem and its extent, for example.

6.2 Task 2

“To chart the measures and controls that gambling operators have in place to prevent match-fixing, including measures for responding to any identified match-fixing. Consideration will also be given to the need to strengthen the regulations.”

Here, each country will provide an overview of the measures the gambling operators have implemented or are planning to implement.

Norway

In autumn 2012, Norsk Tipping performed a quality audit on match-fixing and financial malpractice among agents. This was dealt with by Norsk Tipping’s board of directors at the board meeting on 13 December 2012. At Norsk Tipping’s board meeting in February, the administration put forward a plan outlining how the proposals from the audit should be implemented.

Below is a summary of measures either already implemented or yet to be implemented by Norsk Tipping:

1. Measures implemented

1	Certification	<p>NT is certified to:</p> <ul style="list-style-type: none"> • ISO 27001 (info. Security) • WLA SCS 2012 (lottery-specific standard) • WLA Responsible Gaming
2.	Monitoring/alerting	<p>NT has a monitoring system that triggers alerts when gambling goes against historical statistics, assessments of volumes, monitoring of changes in odds (Betradar). These systems are handled by employees experienced in identifying suspect gambling.</p> <p>In case of suspicion:</p> <ul style="list-style-type: none"> • Reports are filed with ELMS (European Lottery Monitoring System), which passes them on to FIFA/UEFA. • Changing of odds/blocking of gambling.
3	Technical measures	<ul style="list-style-type: none"> • Registration of all gambling • Age limit of 18 • Max. amount NOK 5,000 per combination per terminal per day. • Max. NOK 10,000 per day for electronic channels. • Text message notification to customer in the event of any changes to registered data.

4	Administrative measures	<ul style="list-style-type: none"> • Updated risk assessment of malpractice in agents' processes. • Clear delineation of responsibilities and roles within NT for control documents in relation to match-fixing/malpractice. • Clarification of the concept of malpractice (preventing uncertainty about what this covers in relation to the agents). • Tough requirements for reporting of deviations by employees involved in agents' processes. • Preparation of a consistent sanctions regime (clear description of the consequences of deviations). • Financial conduct requirements for agents where there is a high risk. • Up-to-date agent contracts/security instructions for agents • Implemented new requirements of WLA SCS 2012 (12 controls to reduce risk in gambling on sports)
5	Organisational measures	<ul style="list-style-type: none"> • Evaluated the situation in relation to organisation and resources as regards preventing, identifying and handling financial malpractice among agents • Established an interdisciplinary group comprising representatives of units of NT involved in agents' processes • Evaluated training of agents

2. Planned measures

In addition, the following technical measures have been planned at NT – all scheduled for 2013:

- Implementation of the Andelsspill project (several customers are playing together) to give NT better control over which customers actually provision gambling.
- Implementing volume limits, alerts and monitoring in relation to suspect betting comparing odds to sales per agent/net payout per betting object/ per betting combination differentiated according to various sports. At the moment, seven different categories (A–G) have been implemented, with three levels of alerts.
- Expand on the need to acquire an effective system of sharing information if there is any suspicion of financial malpractice among agents.

Denmark

Online and land-based gambling operators offering betting shall take measures designed to reduce the risk of collusion ("match-fixing") in betting, and shall refuse to accept wagers in betting where there are grounds to suspect collusion.

Gambling operators taking bets on horses or dogs and competitive pigeon racing, i.e. Danske Spil A/S and local pool betting are not covered by this.

One year after gaining their licence, gambling operators are required to prepare a report to the gambling authority. One of the areas covered in the report is match-fixing, where an explanation is required of the measures put in place by the gambling operator in question to reduce the risk of match-fixing.

In addition, rules have been established to the effect that gambling operators shall not offer betting on sports events to adolescents under the age of 18, and there are requirements for gambling operators to be certified under the gambling supervision authority's certification programme.

Sweden

Svenska Spel's group management has adopted a policy statement for its work regarding issues of integrity within the world of sport. The policy statement states that Svenska Spel shall

- Counteract manipulation of sports results and betting by cooperating with other parties affected,
- Only offer gaming objects whose results are based on athletic grounds,
- Monitor its gaming operations in an attempt to discover any manipulations,
- Moreover, they shall stay abreast of the development in the field, and,
- In the appropriate forum, point out any deficiencies in the legislation and regulation that may constitute an obstacle in the way of effectively working with these issues.

1	Monitoring/alerts	Svenska Spel's monitoring system triggers the alarm on several occasions, e.g., when there are large bets placed with a proxy, unusual betting patterns, large wagers on a particular gaming object. Svenska Spel uses Betradar. In case of suspicious activity: <ul style="list-style-type: none"> • Report to ELMS (European Lottery Monitoring System) that forwards the report to FIFA/UEFA. • Modification of the odds or suspension of game
2.	Technical measures	<ul style="list-style-type: none"> • Limited to those 18 years old and up. • Requirement for game card when playing on single and double games. • Betting limitations, e.g., maximum SEK 500 bet on Oddset for single games (not system games); however, a maximum of two bets per person. • Limitation entailing that the bet placed may not pay out an expected win of more than SEK 300,000.
3	Limitation on selection	Only gaming objects associated with match results are available. Betting on some uncertain leagues and games is not available through Svenska Spel.
4	Training of agents	Svenska Spel has implemented a feature in its training of new agents that addressed the problem of match-fixing.
5	Collaboration with sports organisations	Through a number of sponsorship agreements, Svenska Spel has a good cooperation with the major sports associations and with the Swedish National Athletics Association (RF). Svenska Spel and RF have together created a job position at RF. This full-time position will inter alia be responsible for information, training support and coordination with the special athletics association. The position will also work with the authorities, international organisations, gaming companies, researchers and other interested parties. Recruiting is in progress.
6	International collaboration	Svenska Spel is a member of European Lotteries (EL) and is signatory to the European Lotteries' Sport Betting Code of Conduct.

AB Trav and Galopp have developed an Early Warning System (EWS) that is continually updated in order to discover anomalous betting patterns.

1	Certification	<p>Veikkaus Oy is certified to:</p> <ul style="list-style-type: none"> • ISO 9001 • ISO 27001 • WLA Responsible Gaming • EL Responsible Gaming
2	Monitoring/alerts	<p>Veikkaus Oy:</p> <p>Veikkaus tools and functions include monitoring the international betting market (SportRadar system), receiving tip-offs, UEFA/ELMS (the European Lottery Monitoring System), the clubs, the media, the players, and the development of the company's own sales.</p> <p>If, after evaluating the information, it is considered that there is something suspicious about the match, Veikkaus contacts the Football Association of Finland and/or the Finnish league and launch their own measures to examine the match and decide on possible announcement. Contact is also made with UEFA/ELMS if there is cause to do so. The Football Association of Finland takes mainly care of contact with the authorities.</p> <p>According to the betting regulations laid down by the Ministry of the Interior, Veikkaus has the right to fully or partially refuse to accept bets for risk management reasons.</p> <p>Fintoto Oy:</p> <p>Betting behaviour is monitored using the odds. If the odds for a particular horse "fall" or "rise" considerably, particular attention is paid to the horse's competitive performance. This is done by the officials at the trotting track, who are monitored by Suomen Hippos, the Finnish trotting and breeding association. If the horse's performance level is significantly different (good/bad) the horse is usually subjected to a doping test. The cooperation agreement between Fintoto and the trotting tracks contains a clause on "cheating". If the trotting track suspects that a race or horse at that track is associated with a "suspicion of cheating", the track must immediately contact Fintoto.</p>

3	Technical measures	<p>Regulations governing Veikkaus Oy and Fintoto Oy:</p> <ul style="list-style-type: none"> • The age limit for gambling activities is 18 (as provided in the Lotteries Act) • Online gambling is a recognised form of gambling (as provided in the Lotteries Act) <p>Veikkaus Oy' Rules of Play include the following:</p> <ul style="list-style-type: none"> • The limit for live betting is EUR 300 in 24 hours. • In live betting, unregistered customers who win EUR 1,000 or more must be identified. <p>Veikkaus Oy' self-ban options:</p> <ul style="list-style-type: none"> • maximum stake of EUR 100 on a single betting slip in pitkäveto and tulosveto • daily maximum stake of EUR 3,000 for online gambling
4	Administrative measures	<p>Veikkaus Oy: Persons involved in fixed-stake betting have a betting limit for such games. Veikkaus Oy's cooperation agreement prohibits players, coaches and umpires of upper league games of football and ice hockey, for example, from betting on the games they are participating in. Standard internal monitoring and audit procedures are used to prevent possible misuse. The possibility of misuse is taken into account in the setting of targets and stakes: as a rule, events with significance for the sporting sector are selected.</p> <p>Fintoto Oy: The trotting racing rules of Hippos ry lay down betting restrictions for the competition and betting staff of trotting races. Drivers are not permitted to bet on races in which they are personally participating. In each race, the owner of a horse is permitted to purchase only single games or combinations of games in which that particular horse is participating.</p>
5	Organisational measures	<p>Veikkaus Oy: Processes in which measures require approval from several individuals or a group, on a case-by-case basis.</p>
6	Collaboration with organisations in the field of sports integrity	<p>Veikkaus Oy, the Ministry of Education and Culture, the Finnish Sports Federation FSF, and Transparency Finland arranged a Finnish Sport Integrity Day seminar in October 2012. Expert speakers from both Finland and abroad gave talks about the potential threats to sports integrity and the means to prevent them.</p>
7	International collaboration	<p>Veikkaus Oy is a member for example of the World Lottery Association WLA and the European Lotteries EL.</p>

2. Planned measures

Veikkaus Oy:

Up until now, Veikkaus' focus has largely been on football (particularly Finnish football) but similar systems are being developed for other sports too. At international level, a Global Monitoring System is being developed which will enable members of the World Lottery Association to cooperate with each other more broadly. This will lead to monitoring outside the European area and possibly new data on sports other than football.

Fintoto Oy:

Because betting on horses is more international than ever before, in the future more cooperation will also be needed between the central horse racing organisations and gambling operators of different countries.

6.3 Task 3

"To chart what measures and controls the regulators have established, and whether these are sufficient and appropriate for reducing the risk of match-fixing. To prepare an overview of the measures available to the regulators to apply in order to reduce the risk of match-fixing."



Norway

The Gaming Authority's measures and controls are closely linked to measures in the "National action plan against match-fixing" as well as to work by the Council of Europe and supervision of gambling operators Norsk Tipping and Norsk Rikstoto. This action plan sets out five measures for which the Gaming Authority is responsible:

1	The Gaming Authority establishes a forum for collaboration with participation from sports organisations, Norsk Tipping and public authorities. Its purpose is to share information and expertise. The forum is led by the Gaming Authority.	Status: The first meeting was held in May 2013. The main focus of the first meeting was for participants to update one another on their work to combat match-fixing. A mandate for the collaboration forum is currently being prepared, and the plan is to hold regular meetings twice a year.
2	The Gaming Authority establishes a knowledge base about match-fixing on its website. The knowledge base is to include up-to-date information and links to relevant organisations working to combat match-fixing.	Status: The knowledge base was discussed at the first meeting of the collaboration forum. We discussed in general terms what type of knowledge base we wanted. The Gaming Authority will set up a project during the summer to get the knowledge base up and running.
3	The Gaming Authority inspect the systems Norsk Tipping has set up to handle risks of match-fixing and malpractice among agents.	Status: The Gaming Authority will carry out inspections at Norsk Tipping autumn 2013.
4	The Gaming Authority works with the gambling sector and the sports organisations to devise procedures to enable rapid sharing of relevant information pertaining to match-fixing between affected parties in order to provide the best tool for preventing, identifying and responding to match-fixing.	Status: The Gaming Authority will wait before preparing formal procedures for information sharing until aspects of the work have been clarified by the Council of Europe. In the short term, the exchange of information will contribute to rapid sharing of information among actors.

5	The Gaming Authority will participate actively in cooperation to combat match-fixing on international forums in which it participates.	Status: The Gaming Authority is the organiser of IAGR 2013 (International Association of Gaming Regulators), which will have a separate session dedicated to match-fixing. The Gaming Authority is also involved in the EU panel of experts which is to deliver its recommendations to the European Commission regarding joint regulation in matters including match-fixing. The Gaming Authority has two representatives involved in the work the Council of Europe is doing to put in place a convention on match-fixing.
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Denmark

Executive Order No. 65 of 25 January 2012 on the provision of Online Betting and Executive Order No. 66 of 25 January 2012 on the provision of Land-based Betting were issued Pursuant to Section 11 of Act No. 848 of 1 July 20[10] of the Danish Act on Gambling (spilleloven).

The Executive Orders lay down provisions relating to match-fixing, etc., designed to reduce the risk of match-fixing.

Sections 22 and 23 of the Executive Order on the provision of Online Betting and sections 7 and 8 of the Executive Order on the provision of Land-based Betting have identical wording, as follows:

Section 7, section 22. The licence holder shall take measures designed to reduce the risk of collusion ("match-fixing") in betting, and shall refuse to accept wagers in betting where there are grounds to suspect collusion.

Section 8, section 23. The licence holder shall not offer betting on sports events to adolescents under the age of 18.

The categories of events with the greatest risk of match-fixing is indicated, for example, in comments on section 11 of the Danish Act on Gambling:

- Betting where an individual sportsman has complete control over the outcome of the bet, and where the players bet on winning, is of little or no sporting significance.
- Events where a few sportsmen or the referee can influence the outcome of the bet, without this significantly affecting the overall sporting aspect of the match.
- Betting on matches in lower divisions.
- Betting offered on youth sports events.

Section 43(1) of the Danish Act on Gambling obliges licensed gambling operators to prepare a report one year after their licence was issued. The report must explain whether, in the first year, the licence holder has provided gambling in accordance with the conditions of the licence. One of the areas in the report is match-fixing, where the licence holder must explain what measures have been put in place to reduce the risk of match-fixing.

Sweden

The Swedish Gambling Authority in its appropriation directives from the Ministry of Finance for the 2013 budget year was given an assignment by the government with regard to fixed matches. The assignment is very reminiscent in its content of the mandate for this Nordic task force; see the assignment below. As the government assignment is still in progress, we have not yet implemented any measures. However, we have created a link to the Swedish Gambling Authority's homepage where there is a means for people provide tips on fixed matches. Of course, the informant can remain completely anonymous.

"Fixed matches

The Swedish Gambling Authority shall investigate the occurrence of gambling-related match-fixing and similar phenomena in Sweden. The assignment involves mapping out what measures those in the athletics field and on the gaming market have taken in order to discover and prevent such incidents, as well as to assess how effective these measures have been and the need for future measures. The Swedish Gambling Authority shall also examine the need for cooperation between those involved in a wider circle. Such assessments shall be made based on an analysis of the involved parties' areas of responsibility, taking into account the independence of the athletic association.

The assignment shall be carried out after consulting with the Swedish School of Sport and Health Sciences (Centre for Sports Research) and, regarding matters concerning methods etc., the Swedish National Council for Crime Prevention (Brå). The Swedish Gambling Authority shall also offer the Swedish National Athletics Association an opportunity to express its opinion. The work shall be conducted keeping in mind the discussions that are ongoing within EU institutions and the Council of Europe and that which is stated in the commission's notice concerning an overall European framework for online gaming [KOM(2012596)]. The presentation may contain suggested measures. The assignment shall be presented to the government (Ministry of Finance) no later than 31 December 2013." As part of the government mandate, the Swedish Gambling Authority has arranged a workshop for 13 June 2013 in Stockholm. Those participating were professionals in the gaming business, bookmakers, security and compliance managers within the

betting sector reached by Swedish gaming consumers. Participants even came from the sports associations as well as from the Ministry of Culture and Ministry of Finance. The business of the day focused largely on measures to prevent match-fixing and what effects such measures have.

Finland

Authorities have taken measures to prevent the manipulation of sports results, at both national and international level:

- A working group comprising representatives of the authorities, the gambling community, and the sports world is developing measures to prevent sports result manipulation.
- The Finnish National Police Board Gambling Administration, responsible for supervising gambling operations in Finland, as well as the Ministry of Education and Culture and the Ministry of the Interior, are involved in work related to the Enlarged Partial Agreement on Sports (EPAS) Betting Group.
- Nordic collaboration between Finland, Denmark, Sweden and Norway began in autumn 2012.
- In the EU, the issue of match-fixing has been raised by the European Commission, the European Parliament, and the Council of the European Union. In October 2012, the European Commission released a communication entitled "Towards a comprehensive European framework on online gambling", consisting of five parts, one of which deals with match-fixing. This communication was preceded by a Green Paper, with the integrity of sport as a major focus area. In the European Parliament, match-fixing has been discussed in the Schaldemose, Creutzmann, and Fisas reports. The Council of the European Union's efforts include, for example, the preparation in summer 2012 of recommendations to be applied in the fight against sports results manipulation, by a working group dealing with good sports administration. In November 2012, the Council also published its conclusions on the strategy for combating sports results manipulation.
- Finland is also involved in the International Olympic Committee's and UNESCO's match-fixing prevention work.

Key operators in the prevention of sports results manipulation can be found in the field of sport itself. Sports organisations and/or their parent organisations have various ways of preventing such manipulation. The following is a brief summary of the measures taken by Suomen Palloliitto, the umbrella organisation for Finnish football, and the Finnish Sports Federation (FSF), the largest sports organisation in Finland, in order to prevent the manipulation of sports results.

Suomen Palloliitto has drawn up a manual with instructions on what actions to take if match manipulation is suspected. Among other information, the manual lists systems and organisations from which information can be sought, persons in charge and their backups; responsibilities for ensuring an effective information distribution chain, and contact information for key persons. It also presents a media plan.

The Finnish Sports Federation prepared recommendations for its member organisations with regard to the prevention of betting fraud in autumn 2011. This document includes, for example, recommendations concerning disqualification, prevention, discipline and communication. The purpose of these recommendations is to promote the integrity of sports and to prevent malpractice. The FSF has also been actively involved in other work related to the prevention of sports results manipulation. In April 2012, it participated in a match-fixing workshop organised by Interpol, FIFA, and Suomen Palloliitto. It has also been represented on the Council of the European Union's expert working group, which provided the Council's sports working group with draft recommendations in autumn 2012. FSF has over 130 members. At the beginning of 2013, FSF, the Nuori Suomi – Young Finland Association and the Finnish Sport for All Association joined forces to form Valo ry, which will continue the FSF's work on the prevention of sports results manipulation.

In October 2012, the Finnish Sports Federation FSF, Veikkaus, the Ministry of Education and Culture, and Transparency Finland held a seminar on the integrity of sports, attended by participants from nearly 100 member organisations and interest groups. Speakers at the seminar included international experts on match-fixing.

6.4 Task 4

"To assess the risk of manipulation of totalisator betting in the Nordic countries."

The Norwegian and Finnish contributions to this chapter are based on information from the national companies that offer totalisator betting. The Swedish contribution is based on information both from gambling operators and from the public, while the Danish contribution is based on information from the gambling authorities.

The pattern of betting on horses in the Nordic countries differs quite significantly from the pattern in most other European countries. This also applies to the distribution of bets.

Many countries have "vertical betting" – dominated by fast-repeating bets as to placement, winner, duo and triple bets. In countries such as France and the UK, these types of betting account for more than 80% of the total volume.

Norway

In Norway, “vertical” types of betting on horses account for just under 19% of volume. The major “horizontal” types of gambling such as Dagens Dobbel (daily double), V4, V5, V65 and V75 account for more than 81% of overall volume for totalisator gambling.

Match-fixing of this type is defined by the Council of Europe, and the national action plan, the changes of successfully manipulating the outcome is very slight for the majority of Norwegian betting on horse races. Therefore, the risk inherent in these bets is low, but correspondingly higher in bets based on the result of one race.

Winnings on Norwegian totalisator betting also indicate that the risk here is low. On average, less than NOK 39,000 is paid out on bets for each race. This does not, of course, rule out manipulation, but the financial gain would usually be limited.

A large volume of Norwegian betting on horses is also remains unregistered. More than 60% of this volume is unregistered – whether online or via agents. The proportion of registered betting rises by approx. 10% a year. This also makes it more feasible to monitor betting habits, which reduces the chance of manipulating the outcome of races.

In all the horizontal types of betting, the betting depends on the results of more than one race with up to 15 participating in each race. Thus, for example, V75 has more than 170 million possible combinations of winners, with only one producing any winnings.

Denmark

Danske Lotteri Spil A/S has the monopoly on provision of betting on dog and horse racing, under the name of Dantoto.

Dantoto provides land-based services via retailers and on the race tracks, as well as online. Gambling via retailers and at the race tracks is anonymous, i.e. the identity of the gambler is unknown. For online gambling, customers have to disclose their identity via their digital signature (NemID).

Vertical bets in Denmark accounted for 65% during Q1 of 2013, with horizontal bets accounting for 35%. Gambling by Danes on horses and dogs in Sweden (ATG) in Q1 of 2013 comprised approx. 58% vertical and 42% horizontal bets.

When paying out winnings for land-based gambling, Danske Lotteri Spil AS has decided that a retailer has to pay out winnings of DKK 5,000 and, if possible up to DKK 10,000. Winnings in excess of these amounts are paid out through a bank, where the recipient must produce identification to receive the payout.

Sweden

In Sweden, the so-called simple game forms (vertical) on horses represent only 21 percent of turnover. System games (horizontal) such as *Dagens Dubbel*, V4, V5, V64, V65, V75 and V86, make up over 79 percent of the total net sales of all bets taken.

The media has given a certain amount of attention to trainers and riders with regard to so-called “stall runs” where riders do not run to win races. This can either be to allow another horse in-training win, or to give an advantage *e.g.*, to his son who is also a driver in the race. Such behaviour is not necessarily associated with gambling; however, the phenomenon still arouses the ire of gamblers and the public and has given rise to debates in social media and in the newspapers. French PMU groups together horses from the same trainer/owner in a race as one gaming object, *i.e.*, one gets horses from the same trainer/owner in a race when placing bets. This way, the players do not suffer from stall runs.

For many years, ATG has noticed that some account customers make use of statistics-based computer programs in order to construct systems for the V games. These players set up systems that are tremendous in scope with multiple coupons and at very high monetary amounts. As of May 2013, ATG has decided to limit the scope of the system and of the wagers and now has the means to refuse bets from players using statistics-based computer programs. These players do not manipulate the horse-racing sport as such, but their way of placing bets and manipulating the odds and the breakdown makes them unwanted players at ATG.

Finland

Fintoto Oy is the only gambling operator in Finland which can operate totalisator betting. Fintoto Oy operates totalisator betting online, in kiosks and market and also in the trotting tracks. Fintoto Oy’s revenue was approx. 250 million EUR at 2012 (GGR approx. 68 million EUR). Fintoto Oy operates totalisator betting 363 days per year (not on Christmas days). Horizontal betting has been accounted for 57 % and vertical 43 % in 2013 so far

Trotting races remain reliable as the object of betting when the prizes paid for these are significant. If the prizes for trotting races are high, there is a minimal risk of manipulation. 8-16 starters compete in each race, which means that it would be necessary to influence several participants to guarantee a “pre-arranged result” for a trotting race. If the prizes are low, it is naturally easier to influence the favourite.

The nature of totalisator betting differs from other sport betting. Fintoto Oy uses pari-mutuel odds. These kinds of odds are not so vulnerable for match-fixing. The types of gambling also essentially affect the potential manipulation risk. The risk of manipulation increases if the form of gambling for trotting races is player against the company. Here several players can try to influence the end result, so that the company loses.

Particularly “dangerous” forms of gambling are what are known as “head to head” types of gambling. In these forms of gambling, the gambling operators sets two horses against each other and gives them fixed odds. Here it is enough for cheating customers to only influence the driver/trainer/owner of one horse.

7. Current legislation to combat match-fixing

Below is an overview of legislation applicable to the prevention and punishment of match-fixing in the Nordic countries.

Norway

Norway does not have a specific Act dealing with manipulation of sports results. Four other Acts are applicable to match-fixing, however:

- 1) **Fraud** – Sections 270 and 371 of the Penal Code, applicable inter alia to anyone who deceives someone into acting in a manner that inflicts loss or danger of loss of a financial nature.
- 2) **Corruption** – Sections 276 and 387 of the Penal Code, applicable to anyone who gives or receives an unfair advantage by virtue of the person's position, profession or assigned task.
- 3) **Financial disloyalty** – Sections 275 and 390 of the Penal Code, which establish inter alia that it is an offence for anyone in a controlling or supervisory position to benefit from actively or passively acting against the interests of the party thus controlled or supervised.
- 4) **Coercion** – the numerous paragraphs of the Penal Code that relate to coercion and threats can also be used if match-fixing involves coercion and/or threats.

Denmark

Gambling legislation

Section 11 of Act No. 848 of 1 July 20[10] of the Danish Act on Gambling (spilleloven) states that the Minister of Taxation may lay down rules prohibiting the provision of betting on specified categories of events. Executive Order No. 65 of 25 January 2012 on the provision of Online Betting and Executive Order No. 66 of 25 January 2012 on the provision of Land-based Betting were issued pursuant to this provision.

The Executive Orders lay down provisions relating to match fixing, etc., designed to reduce the risk of match fixing.

Sections 22 and 23 of the Executive Order on the provision of Online Betting and sections 7 and 8 of the Executive Order on the provision of Land-based Betting have identical wording, as follows
Section 22/ section 7. The licence holder shall take measures designed to reduce the risk of collusion ("match-fixing") in betting, and shall refuse to accept wagers in betting where there are grounds to suspect collusion.

Section 23/ section 8. The licence holder shall not offer betting on sports events to adolescents under the age of 18. The categories of events where the risk of match-fixing is the greatest according to the explanatory remarks to section 11 in the Danish Gambling Act are e.g.:

Betting where one single sportsman or sports-woman has total control of the outcome of the bet and where the bets placed by the players are only of little or no importance in so far as the sport is concerned;

Events where a few sportsmen or the referee may decide the outcome of the bet without it having any noticeable effect on the match as a sporting match;
Betting on matches in low-ranking leagues;
Betting provided on youth sport

Section 43(1) of the Danish Act on Gambling obliges licensed gambling operators to prepare a report one year after their licence was issued. The report must explain whether, in the first year, the licence holder has provided gambling in accordance with the conditions of the licence. One of the areas in the report is match-fixing, where the licence holder must explain what measures have been put in place to reduce the risk of match-fixing.

The Penal Code

The Penal Code does not include any provision that inherently criminalises manipulation of sports events. However, the Penal Code does include a number of provisions that, depending on the circumstances, may be applied in cases where individuals

inappropriately change – or attempt to change the course of a sports event.

The key provision in this context must be assumed to be Section 279 of the Penal Code relating to fraud.

In addition, other provisions of the Penal Code may come into play where independent criminal influence has been exerted on actors in the world of sport, e.g. coercion.

The Sports Confederation of Denmark (DIF)

In May 2013, DIF adopted regulations designed to prevent and counteract match-fixing. The regulations prohibit match-fixing, and a number of other similar types of unethical conduct, including betting on a player's own matches.

The regulations apply to all 61 specialist federations in DIF. The Danish Football Association has signed up to these regulations.

Sportsmen and women, referees, trainers, team managers and other individuals involved in DIF sports are covered by the new regulations.

Match-fixing involves irregularly changing or influencing the course/result of a sports competition in order to derive benefit or gain for oneself or others and in order to eliminate some of the uncertainty associated with the course and outcome of sports competitions.

A match-fixing office has been set up to investigate and prepare cases. All those covered by the rules is obliged to inform the office if any violation of the rules comes to their attention.

A match-fixing board will rule on the cases. Sanctions can include temporary or permanent bans, fines, retraction of prize money and disqualification of results achieved and similar disciplinary sports sanctions.

Sweden

Chapter 10 Article 5a is what applies most.

This is the paragraph that specifically addresses match-fixing.

Swedish Penal Code (SFS 1962:700)

Chapter 10, Article 5a

Those who are employed or who carry out assignments and receive or accept a promise or requests an undue advantage for practicing his employment or assignment shall be sentenced for receiving bribes and be ordered to pay fines or to a prison sentence of a maximum of two years. The same applies to those who participate or who are functionary in a competition that is subject to a publically arranged bet and receives an undue benefit for his or her fulfilment of tasks upon for the competition.

The first paragraph also applies if the act has been committed prior to the perpetrator having such a position so indicated or after such position has been terminated.

In receiving bribes according to the first and second paragraphs, the party who receives, accepts a promise or requests a benefit for someone other than himself is also sentenced.

Chapter 9, Article 1

Those who through deception get someone to act or fail to act, which results in a gain to the perpetrator and detriment to the deceived party or to someone in his stead, shall be sentenced for fraud to a prison term of a maximum of two years.

Also sentenced for fraud is anyone who by means of submitting incorrect or incomplete information, by changing programs or recordings or in any other way unlawfully affecting the result of an automatic information processing system and any similar automatic process, such that it entails a gain for the perpetrator and a loss to some other party.

Chapter 4, Article 4

Those who by means of assault or otherwise by means of violence or by threat of criminal activity force another party to do, tolerate or fail to do something shall be sentenced for unlawful coercion to pay a fine or to a prison term of a maximum of two years. If someone with such effect exerts force by means of threat of prosecuting or informing on another for a crime or in submitting a false statement about another, even he is sentenced for unlawful coercion to the degree that such force is unlawful.

If a crime indicated in the first paragraph is aggravated, the sentence is a prison term of at least six months and at most six years. When determining whether the crime is aggravated, what shall be considered in particular is whether the act involved extracting confessions through torture or any other form of torture.

Finland

There is no specific criminal or other legislation dealing with manipulation of sport competitions. However the Criminal Code of Finland (39/1889) does include several provisions that may be applied to match-fixing:

Chapter 30 (769/1990) - Business offences

Sections 7 – Giving of bribe in business (637/2011) and 7 a – Aggravated giving of bribes in business (637/2011) are applicable if a person who promises, offers or gives an unlawful benefit (bribe) intended for the recipient or another, in order to have the bribed person, in his or her function or duties, favour the briber or another person, or to reward the bribed person for such favouring. Depending on the level of seriousness of the crime sentence may vary from a fine to imprisonment for at most two years or imprisonment for at least four months and at most four years.

Sections 8 – Acceptance of a bribe in business (637/2011) and 8 a – Aggravated acceptance of a bribe in business (637/2011) are applicable if a person who demands, accepts or receives a bribe for himself or herself or another or otherwise takes an initiative towards receiving such a bribe, for favouring or as a reward for such favouring, in his or her function or duties, the briber or another. Depending on the level of seriousness of the crime sentence may vary from a fine to imprisonment for at most two years or imprisonment for at least four months and at most four years.

Chapter 32 - Receiving and money laundering offences (61/2003)

Sections 6 – Money laundering (191/2011) and 7 – Aggravated money laundering (61/2003) are applicable if a person who

(1) receives, uses, converts, conveys, transfers or transmits or possesses property acquired through an offence, the proceeds of crime or property replacing such property in order to obtain benefit for himself or herself or for another or to conceal or obliterate the illegal origin of such proceeds or property or in order to assist the offender in evading the legal consequences of the offence or

(2) conceals or obliterates the true nature, origin, location or disposition of, or rights to, property acquired through an offence, the proceeds of an offence or property replacing such property or assists another in such concealment or obliteration. Depending on the level of seriousness of the crime sentence may vary from a fine to imprisonment for at most two years or imprisonment for at least four months and at most six years. An attempt is also punishable.

Chapter 36 - Fraud and other dishonesty (769/1990)

Sections 1 - Fraud (769/1990), 2 – Aggravated fraud (769/1990) and 3 – Petty fraud (769/1990) are applicable if a person who, in order to obtain unlawful financial benefit for himself or herself or another or in order to harm another, deceives another or takes advantage of an error of another so as to have this person do something or refrain from doing something and in this way causes economic loss to the deceived person or to the person over whose benefits this person is able to dispose. Depending on the level of seriousness of the crime sentence may vary from a fine (petty fraud), fine or to imprisonment for at most two years or imprisonment for at least four months and at most four years. An attempt of fraud and aggravated fraud is also punishable.

8. Conclusion – proposed measures – the way ahead in the work of preventing match-fixing in Norway, Sweden and Finland.

Status: sports in general

All the Nordic countries that participated in this project have experienced manipulation of sports outcomes. Football seems particularly vulnerable in the Nordic region as well, but match-fixing has also affected sports such as bandy, basketball and baseball.

In other words, match-fixing is a problem that the sports world, gaming operators and responsible authorities, including the police, need to take seriously in the Nordic countries.

Status: horse racing

Currently, there is no specific information to indicate manipulation of totalisator betting in the Nordic region, although it would be irresponsible to conclude that this could not occur. Nevertheless, the Nordic pattern of horse betting and the average size of winning are such that the risk of manipulating totalisator betting is deemed to be relatively low for most races.

Role and responsibility of the gambling authorities

Match-fixing has to be combated at three levels – nationally, regionally and internationally. This report deals with the regional, Nordic level.

All the Nordic countries have put the work of combating match-fixing on their national agendas. Finland, Denmark and Norway are also involved in the Council of Europe's efforts to introduce a convention to counter manipulation of sports results.

From what we know of match-fixing in the Nordic countries, there are a number of common traits. First and foremost, team sports have been vulnerable to match-fixing – especially football. With the exception of cases relating to football in Finland and pos-

sibly Norway, it seems the greatest vulnerability to match-fixing is

in the lower division levels where salaries are low and monitoring is poor

in sports that are relatively small and are thus poorly monitored

Responsibility for preventing and identifying match-fixing lies primarily with the sports world itself and with the police. Match-fixing is a cross-border criminal activity. An example of this is the Norwegian match-fixing case that appears to have links with Sweden.

Internationally, powerful criminal elements are behind match-fixing. For this reason, it is important for the police to make the prevention and investigation of match-fixing a priority internationally.

The role of the gaming authorities needs to be more about monitoring to ensure that the gaming operators have effective systems in place and are capable of quickly identifying match fixing and attempted match fixing. However, the gambling authorities can also contribute to working actively to combat match-fixing by coordinating the exchange of information and organisation cooperation among key actors in the sports world, gaming operators and responsible authorities, including the police.

The authorities in all the Nordic countries have taken the initiative to put combating match-fixing on the agenda (see country reports under point 5). Norway appears to have made the most progress, as a national action plan has already been adopted, and a collaboration forum has been set up as a regular meeting point for the sports world, gambling operators, the police and other authorities.

In Finland there is also a group of experts, a working group comprising representatives of the authorities, the gambling community and the sports world which is developing measures like prevent, identify and monitor manipulation of sport competitions. One thing that could be considered is bringing the concept of sport fraud into legislation. Sport fraud is valid in approximately 10 European countries. It could be evaluated if the sport fraud offence should be applicable also in Nordic Countries. One reasoning for this can be that fulfilling the defining criteria for fraud can be difficult to prove when the damage caused by the crime is only seen in illegal gambling operators abroad.

Also the participation to the work of the European Convention on the Manipulation of Sport Competitions, EPAS, is one way to combat against the manipulation of sport competitions together with several other countries. This work against the manipulation of sport competitions is the matter of all countries, no one can't prevent this phenomenon by itself.

Annual updates from meetings of the gambling regulators

The working group believes it is important to strive actively to combat match-fixing in the Nordic region as well. The gambling authorities play an important coordinating role in establishing the lines of communications among actors who have not been in the habit of sharing information. This could include, for example, notification procedures where there any suspicion of possible manipulation.

The working group believes today's monitoring systems can be improved. They can be strengthened by establishing a collaboration forum to devise notification procedures and to clarify the delineation of responsibilities among actors.

We believe the appropriate response to this report should be to make match-fixing a separate point on the agenda of the annual meetings of the gambling regulators in the Nordic countries. The national gambling authorities should also endeavour to keep one another informed between meetings if any relevant, major cases crop up.

Lotteritilsynet

www.lottstift.no

Lotteriinspektionen

www.lotteriinspektionen.se

National Police Board Gambling Administration

www.poliisihallitus.fi