Match-Fixing: Detection and Sanctioning

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UEFA Vision for Integrity

“…dare to think ahead, dare to think differently. We have the power to shape the football of the future. We must not take it lightly. And we must not disappoint. We are agents of change.”

February 2018 – 42nd UEFA Congress - Bratislava

“UEFA will soon have an ‘army’ of people to fight [Match Fixing, Doping & Corruption]”

March 2017 – Sports Forum - Lisbon
UEFA’s Approach

- Legal Framework
- Sanctions
- Education
- Monitoring Investigations
Legal Framework

UEFA Congress Resolution

UEFA Disciplinary Regulations

Admission Criteria for UEFA Competitions
Education

- It is vital that all participants, including players, officials and referees, are made fully aware of the anti-fraud rules, including their duty to report improper approaches.

- For a number of years, UEFA has run an education programme for players, referees and match officials to inform, educate and provide them with general advice on the issues surrounding sports betting, including perils they may encounter and ways in which they can report suspicious approaches.

- Briefing sessions and workshops are organised all year round alongside UEFA tournaments. Particular attention is given to youth competitions.
Prevention speeches to Youth players / Referees...
Monitoring & Investigations

- Over **32,000** matches analysed / p.a.
  Over 1,800 UEFA matches – increasing!
- 24/7/365 coverage
- Domestic 1st & 2nd Tier + Cup

- Source Development
- Intelligence & Analysis
- Database Management
- Exchange of Information

- Partnerships with Betting Monitoring, Bet Integrity Units, Other Consultants
  - Integrity Officer Network
  - Future Regional Integrity Approach

- UEFA Disciplinary Inspectors
  - Two Investigators + 1 Intel Coord.
  - Advanced Investigative Techniques
  - Side-by-side with Police & Prosecutors

Over 32,000 matches analysed / p.a.
Over 1,800 UEFA matches – increasing!
The UEFA BFDS
Betting Fraud Detection System

UEFA Matches
Investigations. Disciplinary and possible criminal proceedings

Domestic League & Cup Matches
BFDS Report to integrity officer

Other BFDS partners

MoU

Bet Monitors
GLMS
ESSA
EUROPOL

UEFA Intelligence database

UEFA

ASIA

EUROPE

SBObet
IBCbet
188bet
Betting Company
Betting Company

NA Integrity Officers

POLICE & PROSECUTORS

BFDS partners

Plausibility check

Betting Analysts
Monitoring – The big puzzle!

- Monitoring of ~32’000 Matches
- UEFA and Domestic
- Previous History of:
  - Team
  - Player
  - Referee

Investigations
- Conspiracy of Silence from players and referees
- Costly
- Time-consuming

Legal System
- Is Sporting fraud recognised as a criminal offence?

Disciplinary and Criminal Sanctions
- UEFA’s Response “Zero Tolerance”

Organised Crime
- UEFA needs cooperation to tackle this!

Betting Reports
- Match and betting data
  - 1X2
  - AHC & Totals
1. Monitoring/Reporting

- SBObet
- MAXbet
- 188bet
- Betting Company
- Betting Company

UEFA Matches
Investigation, Disciplinary and possible criminal proceedings

Domestic League & Cup Matches
BFDS Report to integrity officer

2. Legal framework

- Betfair
- GLMS
- Europol

UEFA BFDS
Betting Fraud Detection System

Integrity Officers

MoU
UEFA Integrity Reporting

- This can be used to report information concerning **match-fixing** or **doping**

- Phone line  
  **+800 0001 0002**  
  (international free-phone number)

- Reporting platform  
  [https://uefa.integrityline.org](https://uefa.integrityline.org)

- Also available as an **App** in seven languages
  
  (can be downloaded for iPhone and Android)

Search for ‘**UEFA Integrity**’ in the App Store (iPhone) or in Google Play (Android)
HOW THE FIX WORKS
Comparison between on field match action & Betting Market Analysis
Calculated odds – Asian Totals

*Statistically proven values based on mathematical probability*
Calculated odds – Asian Handicap

Statistically proven values based on mathematical probability
INVESTIGATIVE PROCESS
Some considerations
Investigative Cycle (in phases)

I. **Trigger** -> Alert or Report of incident

II. **Triage** -> Establishment of jurisdiction
   - Dissemination of initial info / “Referral of Investigation”
   - Assessment of involved parties

III. **Investigation** -> Inquiry process starts
   - Collection / exchange of info - open & background collection
   - Summary report / context and scope of investigation
   - Continued investigation action and inquiry cycle

IV. **Reports and Closure** - -> Seeking sanctions
   - Final Report containing facts collected ; Judicial Proceedings started
The Trigger (Phase One)

All Match Fixing cases start from a “Trigger”

- The trigger is the alert which starts the process:
  - Media Accusations
  - Whistleblower Report to App, Website, or to trusted persons
  - Betting Monitoring or Betting Operator alerts
Limitations

- Match-fixers know how betting monitoring works
- Not all sports / matches are monitored
- ‘Black’ markets are not monitored
- Liquidity and volumes not provided
- Sporting fixing (*often*) not captured = no test
Triage (Phase Two)

• Basic assessment
  • Assessment of involved parties & Establishment of Jurisdiction
    General Rule: Organizer of the match/competitions is competent

• Betting indicators
  • Which team to lose (Team A vs Team B)
  • Total goals (Team A, Team B, or Referee)
  • Specific result / Lose by a certain number of goals
  • Which persons could deliver this specific result (Defenders/Goalkeeper; Referee?)

There always has to be someone on the pitch involved for a fixed match!
Investigations (Phase Three)

• “Fact-finding” must be based and guided on regulations or applicable law

• Purpose is to find facts, not “innocence” or “guilt”

• Information collected in an impartial, unbiased manner

• According to applicable “Standards of proof”
  - Criminal vs Sporting considerations
Investigations (Phase Three)

• All investigations have a natural cycle

• Inquiry/Investigation Process
  • Info Gathering
  • Evaluation
  • Risk Management
  • Action
  • Assessment

• Did the inquiry prove the necessary elements?
LEGAL CONSIDERATIONS - SANCTIONS
Important to remember on betting alerts...

The betting alert is only the start - not the end!

KS Skënderbeu v UEFA (CAS/2016/A/4650) held that:

• Escalated matches are "by no means conclusive evidence that such match was fixed, but remains subject to review"

• Analytical information is to be supported by "other, different and external elements pointing in the same direction"

The absence of irregular betting patterns does not mean that the match was not fixed!
“The Panel notes the similarities between the procedures followed in respect of the BFDS and the athlete blood-passport (the “ABP”) in doping matters. Both rely initially on analytical data which is subsequently interpreted by experts/analysts before conclusions are drawn as to whether a violation is presumed to be committed or not.

“...the analytical information needs to be supported by other, different and external, elements pointing in the same direction, i.e. a differentiation must be made between the so-called quantitative information and a qualitative analysis of that quantitative information.”
"In analysing the BFDS reports, the Panel notes that the final conclusions drawn are not only based on analytical data and the absence of any “normal” explanation, but indeed take into account several external factors corroborating the theory that the abnormal betting behaviour was likely to be explained by match-fixing."

1. Suspicious Actions of Players
2. Suspicions Raised by Opponents
3. Emergence of a Betting Pattern that suggests “late-goals”
4. Bookmakers refusing to offer matches of the Club

“The Panel observes that the analytical information derived from the BFDS is valuable evidence, that particularly if corroborated by further evidence, can be used in order to conclude that a club was directly or indirectly involved in match-fixing...the BFDS is a reliable means of evidence to prove INDIRECT match-fixing.”
Working with law enforcement agencies

The purpose of this Convention is to prevent, detect, punish and discipline the manipulation of sports competitions, as well as enhance the exchange of information and national and international cooperation between the public authorities concerned, and with sports organisations and sports betting operators.

Traditionally, the principle of sports autonomy has meant that the world of sports and law enforcement have seldom cooperated. However, sport cannot deal alone with the criminal threat posed by competition manipulation and requires police support, particularly with regards to obtaining the evidence in order to sanction an individual under their jurisdiction.

Coordination between a sports fact-finding inquiry and a criminal investigation is in the interest of both law enforcement agencies and sports organisations in order to protect sport’s integrity, given the significant positive impact and role of sport within society. It is also in their mutual interest to facilitate law enforcement investigations into the criminal networks behind competition manipulation to prevent further cases. As such, it is important that both the law enforcement investigation and the fact-finding inquiry by sport are coordinated to ensure that neither is negatively impacted by the activity of the other. Recognition of the distinctions between the two proceedings assists in ensuring cooperation, continued respect for the autonomy of sport and the independence of the police.
UEFA Match-Fixing Working Group
As from 2013

As from 2014
Joint cases – UEFA Competitions based on collaboration w L.E.

2008-2018

- **Bochum Saga**
  - Oriekhov (CAS 2010/A/2172)
  - Sammut (CAS 2013/A/3062)

- **Greek cases**
  - Olympiacos Volou (TAS 2011/A/2528)

- **Turkish Saga**
  - Fenerbahce (CAS 2013/A/3256)
  - Besiktas (CAS 2013/A/3258)
  - Eskihesispor (CAS 2014/A/3628)
  - Sivasspor (CAS 2014/A/3625)

- Access to criminal files
- Access to police digest
National level cases – based on collaboration btwn UEFA and National L.E.

- **Greek:**
  - Season 2010/2011 (Olympiacos Volou & Asteras Tripolis)

- **Romania**
  - Season 2014/2015 (FC Gloria Buzau)

- **Portugal**
  - Season 2015/2016 (Oliveirense)

- **Lithuania**
  - Season 2014/2015 (Vsl Pakruojo)

- **Estonia**
  - Season 2013/2014
Greek match-fixing scandal leads to 58 jail sentences

Originally 84 people were named in the match-fixing scandal, including Olympiakos boss Vangelis Marinakis who along with 24 others were acquitted.

Greek judicial authorities began the investigation after a list of 41 suspicious matches were submitted to the country's football federation by European football's ruling body UEFA.
Evidence – sports disciplinary procedures

**CAS 2011/A/2528**
(At para. 136)

“...before the ordinary courts, the applicable rules in terms of procedure, proof (types of evidence and standard of proof) and substance are not the same as those that apply before UEFA and the CAS”

**CAS 2014/A/3628**
(At para. 130)

“...even if evidence may not be admissible in a civil or criminal state court, this does not automatically prevent a sport federation or an arbitration tribunal from taking such evidence into account”
WHAT DOES IT MEAN?

“This standard of proof is greater than a mere balance of probability but less than proof beyond a reasonable doubt”
“...UEFA is entitled to rely or not on findings of a state court, especially in cases of match-fixing where it does not have the same resources and cannot undertake the same type of investigations that the public authorities do. **UEFA must make its decision autonomously and independently on basis of all the factual circumstances and evidences available to it**”
Notitia Criminis – notification that a crime has (potentially) been committed...

“...whenever they happen to know of possible violations of .... from whatever source, be it a court decision, a police report, the confession of an implicated person or the testimony of a direct witness”

CAS 2005/C/841 CONI – Advisory Opinion – (At para. 74)

- Timing considerations – Police/Prosecution versus Sports Sanctions
- Applicable rules are different (evidence, standard of proof, etc).
- Consideration of restricted investigatory tools and measures.
OPERATIONAL PERSPECTIVE
Linking UEFA and the 55 Integrity Officers

Platform for Integrity Officers
- Sharing with UEFA
- Info & Intel
- Linking Nat. Assc.

Sharing of:
- Repository of Legal Docs and awards
- Training material
- Alerts/Reports
- Investigative Templates
- Best Practices
- Reference Guides
Integrity Action Plan

The action plan proposes a number of comprehensive elements to mitigate the risk of match-fixing at Uefa games by including a programme of education and training, appropriate structures and procedures, monitoring matches, providing appropriate measures and procedures, and ensuring transparent and efficient use of information. All the necessary communications and research are part of the key factors in the success of the project, with the active cooperation of all stakeholders, in particular law enforcement and the betting regulators in France.

Risk Assessment

The Uefa anti-fraud task force group works and fights against the fight against match fixing, with the aim of protecting the integrity of the competition. The task force group will be based on the risk analysis of the match-fixing, which will ensure the most effective and efficient use of resources for the investigation and prevention of match-fixing.

Rules and Regulations

All the relevant provisions of the Uefa anti-fraud task force group will be implemented. The task force group has the right to impose sanctions on any person or organisation that commits an act of match-fixing. Any person or organisation that receives a penalty within the scope of the action plan may appeal to the relevant authorities.

Integrity Assessment Group (IAG)

EDUCATION

MONITORING
Group stage + Round of 16
Group stage + Quarter Final
Semi-Finals + Final
* Opening Match not yet assigned
EURO 2020 – Key Facts

➢ 4 Time Zones
➢ 9 Currencies
➢ 12 Languages
➢ 12 Hosts
➢ 24 Teams
➢ 60 years
➢ 259 tourn. sites
➢ 28m inhabitants
STAKEHOLDER ENGAGEMENT
UEFA landmark agreements
Challenges ... and solutions

• Trust between public authorities and football officials

• Lack of understanding and capabilities

• Exchange of information (or lack of...)

• Jurisdiction and cross-border/extra-territorial challenges

• “Omerta” of reporting & protection of whistleblowers
WE CARE ABOUT THE INTEGRITY OF FOOTBALL

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SPECIFIC SANTIONING CONSIDERATIONS
What is UEFA doing to fight match-fixing?

• We monitor the betting patterns of all UEFA matches (2’000) and over 30’000 domestic league and cup matches per season.

• We investigate match-fixing cases and guilty players: match officials or coaches will be sanctioned (ban on exercising any football-related activity)

• We work closely with state authorities who will sanction the offenders (prison sentences; fines)

• We give match-fixing awareness presentations to Players; Referees; Coaches and administrators to warn them of the dangers they face if they become involved in match-fixing.

• We have opened a Hotline and Reporting platform to enable individuals to contact UEFA if they have information concerning match-fixing.