

#### **G20 ACTION ON SPORT INTEGRITY**

**Draft Concept Note** 

## **Background**

## 1. The double "disvalue" of corruption in sport

Sport is a source of shared values, a factor of progress and human fulfilment, a global economic and social feature that significantly affects billions of people. It is universally recognized as a powerful vehicle for education, health and inclusion. Sport has the power to bring people together, to overcome language and cultural barriers, to spread the values of friendship, solidarity and fair competition. It is also a key socio-economic driver in advancing the Sustainable Development Goals.

Malfeasance in this sector is particularly widespread and dangerous. Besides the criminal justice aspects, relevant *per se*, its consequences have a harmful impact on the Olympic-inspired values and on sport principles at large: their effects must then be appraised in a broader perspective. Illegality in sport is particularly detrimental to our societies because it undermines and corrodes the ethical values that sport embodies, also affecting hopes and trust of younger generations, hence affecting the quality of communities as a whole.

#### 2. The economic dimension of sport

Sport is a multi-billion dollar industry with intricate ties to public and private interests. High levels of public expenditure, large-scale investment from sponsors, together with high-value media contracts, create an environment that presents significant corruption risks, including foreign bribery. These risks are particularly heightened when it comes to the selection and organisation of major sporting events: from the selection of sites, land acquisition and construction, procurement and security contracts, to supply chains, media rights, sponsorship deals and financial management, these events carry high corruption risks throughout the entire life-cycle. Private sector involvement in large scale contracts and expectations of strong financial returns further amplify the vulnerabilities surrounding the selection and organisation of major sporting events. In this context, companies may also use sport sponsorship, hospitality and gifts to deepen relationships and advance marketing and communication strategies. These include lobbying and territorial rooting through local image/reputation building. The risks of corruption, bribery and related crimes are serious both in the regular sport seasons and tournaments and on special occasions of major sport events.

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<sup>&</sup>lt;sup>1</sup> OECD (2016), Organising sporting events: Preventing corruption and promoting responsible business conduct.

#### 3. The need of a holistic vision

A modern approach to this issue should recognize, through a holistic vision, how new avenues of corruption thrive also in sports, both on-the-field and off-the-field: illegal betting, match fixing, adjudication of major sport events or concessions like TV broadcasting rights through corruption or bribery, deviance of related public procurement, inter alia, are examples of illicit behaviors in this broad risk area. These multifaceted forms of unlawfulness often feature specific crimes, proportionate to the relevance of the business related to sport.

These phenomena highlight the need for a broader view of corruption affecting sport, taking also into account the links between sport, organized crime and money laundering, and how such phenomena affect public and private integrity.

Namely in the era of globalization and multilayered legal systems, preventing and fighting corruption in the world of sports becomes a strategic endeavor that requires in-depth assessment and implementation, also according to the UN Sustainable Development 2030 Agenda.

## 4. The issue appears on the global agenda

The growing relevance of this objective at policy level has recently inspired several multilateral initiatives such as, among the others, the Council of Europe Convention on the Manipulation of Sports Competitions concluded in Macolin on September 18, 2014; the launch of IPACS initiative at the UK Anticorruption Summit in London, in May 2016; the initial focus on this issue under the German G20 Presidency; the Resolutions on corruption and sport adopted at the last two CoSP UNCAC (in Vienna [7/8] and Abu Dhabi [8/4]); the consideration given in the framework of the OECD Anti Bribery Convention.

The Italian Presidency is aware of the need to tackle with growing resolve the threat that corruption and other forms of crime pose to sport integrity, in order to strengthen the legal and policy dimensions alike. For that reason, it has chosen sport integrity as one of its priorities for the 2021 G20 Anti-Corruption Working Group activities.

## I. An (old) new risk area, claiming engagement by policy-makers

Since the 70s till the turn of the century, scientific and systematic doping appeared as the most serious wrongdoing in sports and featured high on media exposure. In the last fifteen-twenty years new phenomena of sport-related corruption and crimes have come to the headlines: bribery of officials of international sport organisations, organized crime within sport bodies, mafia infiltration, frauds in the assignment of major sport events and in the procurement for the related infrastructures, tax evasion and other financial crimes, all exposing corruption schemes. In this context, match-fixing related to illegal betting and money-laundering have become the major concern, since betting on-line amazingly expanded the capacity of criminal groups to operate through the dark internet from far away bases and through networks able to make huge profits along well tested schemes.

Since 2015 other crimes in sport have also come to the fore, some directly or indirectly linked to corruption: violence, gender discrimination, child trafficking, minors abuses, racism, bullying, sexual harassment and other offenses to human rights, illegal labor conditions, lack of basic health and safety conditions for athletes and workers. The "dark side" of sports has emerged more and more. *Sport Integrity* as an overarching concept and issue - a relatively recent topic - has then taken a recognized form in the last five years.

This alarming situation can be seen as the other side of the coin, looking at the enormous success of sport as social practice at global level in the last four decades. From grassroots to high professional tournaments, cross-gender, involving all generations and social groups, sport has become a business too, growingly affected by market dynamics. However, the ruling mechanisms have basically remained those conceived more than a century ago, when sport was fully amateur.

Corruption and other sport-related crimes can be properly understood and countered only through the awareness of the whole range of risks posed to sport nowadays. The traditional infrastructure of the sport environments, cultural as well as organizational, both on the side of sport bodies and on those of State authorities and private actors, is no longer functional to effectively address the new challenges. Different approaches and solutions are required to successfully cope with a "dark dimension" of sport that reached a consistency by large unpaired to the past: in its quantitative dimension and global articulation, something unknown so far and deeply interconnected with recent trends towards markets of sports.

### II. From the UNCAC CoSP Resolutions to a High Level Principles document

Corruption and other sport-related crimes are complex phenomena. The most effective modality to address them is to adopt a holistic vision and multifaceted approach, aligned with G20 commitments and recommendations.

In coherence with the above, UNCAC Resolution 8/4 in 2019 (recalling UNCAC Resolution 7/8 of 2017) acknowledges the growing relevance of these threats when in PP6 states: "Noting with great concern that corruption and organized and economic crime can undermine the potential of sport and its role in contributing to the achievement of the Sustainable Development Goals and targets contained in the 2030 Agenda for Sustainable Development"<sup>2</sup>. Sources and causes of corruption, crimes and other illegal behaviors in sport are diverse since the appeal of sport is deeply entrenched in its economic dimension: moreover, a perceived and real low risk due to weak defenses, to a huge popularity which makes the public opinion less uncompromising to illegal practices, expose the vulnerability of sport as an ideal play-ground for criminal networks.

While fully safeguarding the principle of autonomy of sport as stated in the Olympic Charter - the pillar of independent modern sport - corruption and wrongdoing in sports must be tackled by a stronger political will and technical skills by State authorities, so as to undertake effective multi-stakeholder initiatives, in close coordination with sport bodies<sup>3</sup>, other public bodies<sup>4</sup>, international organizations and private actors<sup>5</sup>.

## III. The G20 advocacy: leading by example

Being the G20 the group of leading economies called to identify new areas and new avenues of corruption and to contribute to a better understanding, preventing and fighting relevant challenges, corruption and other sport-related crimes are an important issue where stronger

<sup>3</sup> International sport organizations, national federations, sport clubs, NOCs, Leagues.

<sup>&</sup>lt;sup>2</sup> Reference 8/4.

<sup>&</sup>lt;sup>4</sup> Such as municipalities, local governments, other local public entities.

<sup>&</sup>lt;sup>5</sup> Such as private sponsors, agents, sport event organizing companies, media.

international coordination is required, also to the benefit of countries beyond the same group. Specific needs range from robust in-depth understanding, appropriate awareness raising, shared reference frameworks enabling effective cooperation, specialized know-how and related technical assistance, clearer definition of roles among actors, effective intervention programs. In recent years the G20 has already adopted a risk-based approach in order to highlight which policy areas appear more vulnerable to corruption, malfeasance and exposure to unlawful interests. From this standpoint, the ACWG has addressed specific concerns related to corruption in customs activities, in wildlife protection, in the development of quality infrastructure. Sometimes the G20 has delivered a set of High Level Principles on these issues, to help legal systems to better cope with the risks for integrity of those sectors.

Against this background the G20 can play a pivotal and triggering role for gearing up further political attention and commitment to sport integrity by the international community at large. The G20 and its members could promote more policy coherence at international level, more effective cooperation and stronger technical capability, *inter alia* by <u>addressing consistent messages</u>, recommendations, information and valuable elements towards its own constituency as well as to larger audiences.

## IV. G20 Anti-Corruption Working Group References

An initial proposal to establish an alliance on sport integrity was sketched by the Russian Presidency. The G20 approached again the issue in 2017 in the framework of the Hamburg Summit Leaders' Declaration: We will continue our work to address integrity in sports and urge international sports organizations to intensify their fight against corruption by achieving the highest global integrity and anti-corruption standards. In this respect, we strive for a common understanding regarding corruption risks in bids to host major sport events <sup>6</sup>.

A substantial follow-up is represented by the Concept Note *Potential G20 Action against Corruption in Sport* presented by the German Presidency later that year. Its focus again was almost entirely on sport organizations' accountability and responsibilities. At any rate the Concept Note helped to raise awareness and spur initiatives in that regard.

Corruption in sport has then been acknowledged as an emerging risk area in the current G20 ACWG Action Plan<sup>7</sup>. Key features are: i. the recognition of a "multifaceted issue"; ii. the emphasis on approaches that need to be at the same time international, multi stakeholder and pragmatic; iii. the request for robust political commitment; iv. the engagement starting from ongoing initiatives and expertise, without "reinventing wheels"; v. the indicative goal of sharing information and good practices; the support to "integrity and anti-corruption standards and compliance frameworks", referring to IPACS and other advocacy initiatives.

<sup>&</sup>lt;sup>6</sup> https://www.g20.org/Content/EN/ Anlagen/G20/G20-leaders-declaration.pdf? blob=publicationFile&v=11 (see page 15).

<sup>&</sup>lt;sup>7</sup> Under Section B (Develop further targeted actions where the G20 can best add value), the Plan says: "To this end, the ACWG will take concrete actions to: (...) Sports: Corruption in sports is a multifaceted issue which demands an international, multi-stakeholder and pragmatic approach as well as political commitment. Building on the work and initiatives launched in previous years, the ACWG will share information and good practices on addressing various forms of corruption in sport as well as follow and support as appropriate the ongoing development of integrity and anti-corruption standards and compliance frameworks in sport, including the work of IPACS and other relevant organizations".

## V. An overview of the Safeguarding Sport from Corruption process

In the past the main task of preventing and countering corruption and other crimes in sport fell mainly on sport organizations. Since 2017 the focus of policies and actions shifted to the duties of public authorities, whose complementary efforts are needed to adequately address criminal offences and breaches to the rule of law, according to national criminal laws and multilateral Conventions. Phenomena that can no longer be labelled as simple sport frauds are the cause of serious social damage, thus requesting consistent detection and enforcement.

UNCAC Resolutions 7/8 (2017) Sport and Corruption and 8/4 (2019) Safeguarding Sport from Corruption are key steps towards innovative and more effective policies to address corruption and other crimes in sport. These Resolutions call on public sector authorities (Ministries of Interior and Justice, specialized bodies such as Anti-Corruption and Anti-money laundering Agencies, Foreign Ministries) to enhance engagement on sport integrity. They contain also framework references for sport bodies (mainly clubs, federations, leagues, NOCs) and for private actors (such as sponsors, event organizers, agents).

Both Resolutions provide a clear set of qualifying and innovative elements for public authorities such as recognizing with "great concern" the issue<sup>8</sup> and placing it in the right perspective of the awareness as a main pillar. This set of elements includes: i. the link with organized crime and financial crimes that is emphasized; ii. the rationale of ensuring sport integrity as a precondition for its societal and economic role in adherence to the SDGs<sup>9</sup>; iii. leveraging the multi-stakeholder approach; iv. highlighting the use of reporting mechanisms and the protection of whistleblowers; v. the gender dimension of corruption, framed as a substantial component of governance models; vi. the cooperation among Law Enforcement Agencies, sport bodies and other actors.

It is remarkable too PP4 of Resolution 8/4 which states the principle of autonomy of sport as expressed in the Olympic Charter, also referring to its obligations 10.

Match-fixing and illegal betting are addressed in Paragraph 10 of Resolution 7/8 and Paragraphs 15 and 16 of Resolution  $8/4^{11}$ .

<sup>&</sup>lt;sup>8</sup> PP6 8/4: "Noting with great concern that corruption and organized and economic crime can undermine the potential of sport and its role in contributing to the achievement of the Sustainable Development Goals and targets contained in the 2030 Agenda for Sustainable Development".

<sup>&</sup>lt;sup>9</sup> Home | Sustainable Development | Surthermore the United Nations General Assembly at its 73rd session adopted the Resolution 'Sport as an enabler of sustainable development' on 3 December 2018: United Nations General Assembly acknowledges important role of Kazan Action Plan in advancing sport for development and peace. The DESA Department is playing currently a key role which includes the integrity dimension: Sport for Development and Peace | DISD. Within the UN system it has to be referred to the very recent Points of Consensus on Decent Work on Sport adopted at ILO on January 2020 as well: points for consensus (see also: Global Dialogue Forum on Decent Work in the World of Sport).

<sup>&</sup>lt;sup>10</sup> "Recognizing that sports organizations within the Olympic movement have the rights and obligations of autonomy, which include freely establishing and controlling the rules of sport, determining the structure and governance of their organizations, enjoying the right to elections free from any outside influence and the responsibility for ensuring that principles of good governance be applied".

<sup>&</sup>lt;sup>11</sup> Paragraph 15 "Encourages States parties, in order to tackle the problems of competition manipulation, illegal betting and related money-laundering activities, to periodically evaluate national policies, effective practices and national law with a view to determining their efficiency and effectiveness in preventing and combating corruption in sport and to make use of the booklet entitled "Model criminal law provisions for the prosecution of competition manipulation" and the study entitled Criminalization Approaches to Combat Match-Fixing and Illegal/Irregular Betting: A Global Perspective, joint publications of the United Nations Office on Drugs and Crime and the

UNCAC Resolutions 7/8 and 8/4 also mention SDG 16 which pursues "peace, justice and strong institutions" 12. As a matter of fact, they have been conceived, drafted and negotiated with the scope of combining the required qualified technical dimension with the necessary global outreach of international cooperation, which has to keep together diverse environments, backgrounds, dynamics featuring sport, a global fact.

The two Resolutions paved the way for the UNODC *Programme on Safeguarding Sport from Corruption and Crime*<sup>13</sup> and for the relevant Conferences held in 2018 and 2019<sup>14</sup>. In the same vein UNODC has launched a comprehensive thematic study on *Corruption in Sport*, requested to the Office by OP9 of Resolution 8/4. The study shall include "consideration of how the Convention can be applied to prevent and counter corruption in sport".

#### VI. Other relevant initiatives of the international community

Looking at other multilateral initiatives, besides the Council of Europe Magglingen Convention, a *Sport Integrity UNESCO Charter process* was launched in 2013 in Berlin, on the occasion of MINEPS V (the fifth conference of Ministers of Sports). The Conference paved the way for a significant revision of the *UNESCO Charter on Physical Education and Sport* which has robustly included sport integrity as a priority issue through a dedicated Article 10<sup>15</sup>. The adoption of the revised Charter in 2015 has led to the KAP (Kazan Action Plan) adopted at MINEPS VI in July 2017<sup>16</sup>: three main policy areas have been defined, one namely targeting Sport Integrity. The same for the five action lines, where Action III is on Sport Integrity as well. An advanced common definition of Sport Integrity concept is currently taking place within this framework<sup>17</sup>.

Among others, it is worth mentioning the Sport Integrity Global Alliance (SIGA), an independent and neutral coalition involving international stakeholders from across multiple

International Olympic Committee, and of the Resource Guide on Good Practices in the Investigation of Match-Fixing and National Anti-Corruption Strategies: A Practical Guide for Development and Implementation, published by the United Nations Office on Drugs and Crime"; Paragraph 16. "Also encourages States parties to enhance international cooperation to tackle illegal betting, given its cross-border dimension"; While Resolution 7/8 had stated in Paragraph 10: "Also invites States parties, when reviewing their national legislation, to consider the problems and issues of illegal betting, competition manipulation and other offences related to sport when associated with corruption, and in that regard takes note with appreciation of the joint publication by the United Nations Office on Drugs and Crime and the International Olympic Committee of the booklet and study entitled Model Criminal Law Provisions for the Prosecution of Competition Manipulation". In both Resolutions, the Council of Europe is referred to as long as international legal frameworks and instruments are concerned.

<sup>&</sup>lt;sup>12</sup> Official link at UN website: <u>Peace, justice and strong institutions – United Nations Sustainable Development</u>.

See the Program "Safeguarding Sport from Corruption and Crime" <a href="https://www.unodc.org/unodc/en/safeguardingsport/index.html">https://www.unodc.org/unodc/en/safeguardingsport/index.html</a> based on Resolutions 7/8 and 8/4: International legal framework

<sup>&</sup>lt;sup>14</sup> Safeguarding Sport from Corruption Conference, Vienna, Austria, 3 to 4 September 2019; Vienna 5-6 June 2018: Conference. In the process of implementing the Resolutions, UNODC is currently designing a Comprehensive Study on Corruption in Sport.

<sup>&</sup>lt;sup>15</sup> International Charter of Physical Education, Physical Activity and Sport

<sup>&</sup>lt;sup>16</sup> UNESCO KAP: <u>Kazan Action Plan</u>; MINEPS VI Conference: <u>MINEPS VI - Kazan 2017</u>

<sup>&</sup>lt;sup>17</sup> A first version of Guidelines for Sport Integrity has been developed by the Council of Europe: <a href="https://rm.coe.int/coe-2020-07-07-final-guidelines-sport-integrity/16809f161d">https://rm.coe.int/coe-2020-07-07-final-guidelines-sport-integrity/16809f161d</a>. The final version will be elaborated and released in the process to MINEPS VII currently scheduled on June 2021 in Nairobi.

industry sectors, which assess, monitors and rates the sports organisation's level of implementation of and compliance with the SIGA Universal Standards on Sport Integrity<sup>18</sup>.

In addition to those work-streams, other dynamics and qualified passages form part of the overall process. The IPACS<sup>19</sup> initiative was launched at the IOC's International Forum on Sport Integrity (IFSI) in 2017 by the UK government as a prominent follow-up to the Anti-Corruption Summit a year before<sup>20</sup>, in partnership with the IOC, the OECD and the Council of Europe. UNODC also joined as a founding member. IPACS is an open technical platform, with no legal entity, whose task forces<sup>21</sup> address specific issues in order to deliver solutions and tools available to any interested country. IPACS embodies the multi-stakeholder approach aiming at more concrete dialogue and cooperation among interested subjects. It focused so far efforts to eliminate corruption and promote a culture of good governance in and around sport, know-how on corruption prevention in procurement and in bids for sports events and, more recently, on developing the cooperation between LEAs and sport bodies.

Besides promoting IPACS, OECD on its own included sport in its anti-corruption agenda, including through the Working Group on Bribery<sup>22</sup>. From its perspective, corruption risks are inherently embedded in sport organizations which nowadays form a multibillion industry with close ties to public and private interests. The further recognition of risks coming from the infiltration of organized crime brought about the call to a stronger informal and substantial international cooperation among prosecutors, police officials and other law enforcement agencies, in a synergic effort with all relevant stakeholders.

As for the law enforcement agencies like Interpol<sup>23</sup>, they have set up or strengthened dedicated units on sport integrity, initially focused on information exchange and training.

The Commonwealth is also addressing the issue<sup>24</sup>. Civil Society and Multi-stakeholder initiatives are part of the process<sup>25</sup>, while in Africa<sup>26</sup>, Latin America, Asia and Pacific Islands the topic is more and more addressed at national and regional level.

<sup>&</sup>lt;sup>18</sup> The Sport Integrity Global Alliance (SIGA) Independent Rating and Verification System (otherwise known as SIRVS) has the purpose of independently assessing, monitoring and rating the sports organisation's level of implementation of and compliance with the SIGA Universal Standards on Sport Integrity which address, inter alia, the issues of good governance, financial integrity, and sports betting integrity.

<sup>&</sup>lt;sup>19</sup> IPACS Official Website: <u>IPACS.sport</u>.

<sup>&</sup>lt;sup>20</sup> Anti-Corruption Summit: London 2016 - GOV.UK

<sup>&</sup>lt;sup>21</sup> The Task Forces currently active are four. Task Force 1 and 2 have consolidated outcomes: the first one, led by the OECD, developed a vulnerability assessment tool for screening dimensions influencing the exposure to corruption risks of entities in charge of delivering sport-related infrastructure and events. Task Force 2, cofacilitated by the OECD and IOC, developed 11 Recommendations supporting international sport organisations in managing conflicts of interest relating to the voting for the selection of hosts of major sport events.

<sup>&</sup>lt;sup>22</sup> Within the OECD Anti-Bribery Convention, the WGB agreed in December 2019 to consider ways to address corruption in sports in the context of its mandate. It also paid particular attention to the topic of cooperation between law enforcement authorities and sport organisations in the context of the 2019 meeting of the Global Network of Law Enforcement Practitioners against Transnational Bribery (GLEN), See <a href="https://www.oecd.org/corruption/anti-">www.oecd.org/corruption/anti-</a>

 $<sup>\</sup>underline{bribery/global network of lawen forcement practitioners against transnational bribery 2019 meeting. htm}$ 

<sup>&</sup>lt;sup>23</sup> Corruption in sport

<sup>24 &</sup>lt;u>Uncompromising Commonwealth commitment to sport integrity and governance</u> + Community of Practice on Indicators.

<sup>&</sup>lt;sup>25</sup> See Paragraph References of this Document. See also 2015: <u>Global Corruption Report: Sport - Publications - Transparency.org</u>

<sup>&</sup>lt;sup>26</sup> First Regional Conference of African Ministers on the Implementation of the Kazan Action Plan in Africa

It is also worth mentioning the adoption of the *Points of Consensus on Decent Work on Sport*<sup>27</sup> early this year at the ILO in Geneva: an innovative focus correctly considers the athletes as workers; the labor perspective on the world of sports includes, among other aspects, integrity as well<sup>28</sup>.

To complete this overview, it can be noted the reference to sport integrity in the UNGASS 2021 draft Political Declaration<sup>29</sup>. The text confirms the prioritization of this topic: key-words are the deeper understanding of the issue, the multi-stakeholder approach and the awareness within sport organizations<sup>30</sup>.

# VII. Looking forward to an enhanced G20 role. Leading by example to address existing needs and future challenges: inspiring elements towards G20 deliverables

To better manage corruption risks in sport, it is time to move from the issue advocacy to the call to action dimension. Nowhere like in sport the criminal justice response is an end in itself and detection may come too late. Since the sports world features public as much as private entities, sport bodies responsible for its governance are subjects to closely involve not just to consult.

The G20 bears a special responsibility to ensure that sport environments remain healthy and immune from the risk of corruption and infiltration of criminal interests, as well as to keep its role of catalyzer for promoting ethical values especially among youth.

The G20 has the opportunity to adopt a ground-breaking policy document, in the form of High Level Principles, that may offer guidance namely in terms of better prevention and more effective detection and investigation.

In this scenario, and based on the analysis of existing needs, critical points, demands, weaknesses, the G20 may lead by example in addressing the challenge of corruption and other crimes in sport, building on the following initial elements:

<sup>&</sup>lt;sup>27</sup> See: points for consensus (see also: Global Dialogue Forum on Decent Work in the World of Sport).

<sup>&</sup>lt;sup>28</sup> ILO is also co-founder together with the Swiss Government, the Canton de Vaud and IHRB of the Centre for Human Rights and Sports in Geneva: Centre for Sports and Human Rights: Home.

<sup>&</sup>lt;sup>29</sup> Special session of the General Assembly against corruption 2021 (UNGASS 2021).

<sup>&</sup>lt;sup>30</sup> OP38 of the draft for second reading (18 November 2020) says: "We will address corruption in sport and ensure a deeper understanding of this issue by strengthening cooperation in an inclusive and impartial manner, including between law enforcement authorities and sports organizations, and, inter alia, but not limited to multistakeholder partnerships, to ensure the mainstreamed consideration of efforts to safeguard sport from corruption, as well as to facilitate the exchange of expertise and the dissemination of methodologies, and to raise awareness within sports organizations, at all levels, and the sports community of the gravity of corruption offences".

## **Draft G20 High Level Principles on Corruption and Sport**

Principle 1: Developing a firm grasp of the nature and forms of corruption and crime in sport

A substantial knowledge-based understanding of the manifold dimensions of the issue is crucial for the design and implementation of impact-oriented policies to prevent and fight the spread and entrenchment of corruption and crime in sport. G20 Countries should enhance efforts to tailored data-collection, data-analysis and data-elaboration in view of a shared robust interpretation framework.

To implement this principle the G20 will draw from the following actions:

- Conduct comprehensive and international specialized research building upon the already existing literature with a special attention to the cooperation with Law Enforcement Agencies; so that the analyses are utmost functional to operations on the field, including risk assessments of the different types of corruption and crimes in sport at global, regional, national and local levels
- Making available the results of research and study where feasible.
- Promoting an open access to specialized analysis for policy makers and operators, both from State Authorities and sport organizations.

Principle 2: Raising public awareness about the threats that corruption and crime pose nowadays to sport and consequently a corrupted sport pose to society

A full and consistent awareness of the real dimension of the threats of corruption and crime in sport, both at top decision-makers and on-ground officials' level, is a strategic precondition for effective prevention. Taking into account the hurdles to recognize the "dark side" of sport, such awareness should be tailored to the features of sport activities and organisations in which corruption may occur.

To implement this principle the G20 will draw from the following actions:

 Conduct well targeted information and communication processes within State Authorities and sport bodies, also using existing forums and platforms, to raise awareness of relevant stakeholders to the threats of corruption to sport

- Promote communication campaigns to make sport practitioners and public opinion properly informed about the issue
- Flagging the risks for sport integrity during the sport regular season and specifically on occasion of major sport events.

Principle 3: Underlying the specific role and responsibilities of State Authorities<sup>31</sup> and Law Enforcement bodies. Effective detection and prosecution of corruption in sport as a necessary complement to prevention strategies

When corruption in sport is perpetrated, State Authorities have a specific responsibility and must take a pivotal role in addressing the related crimes, through adequate detection and prosecution, thus complementing the preventive tools put in place by sport bodies and other entities (private, public or private-public). Without an effective consistency of this component, prevention may bring limited outcomes. Conversely, detection and prosecution have a limited potential for success without strong preventive strategies.

To implement this principle the G20 will draw from the following actions:

- Engaging national and local governments about the importance for public bodies to address related corruption risks, by promoting inter alia internal meetings, seminars, workshops, conferences
- Promote the advocacy about corruption and crime in sport by State Authorities and Law Enforcement bodies
- Promote exchange of practices of balanced approaches of prevention and enforcement developed by State Authorities and other public bodies in each country, through bilateral or multilateral cooperation.

Principle 4: Strengthening cooperation and enhancing partnerships between public and private stakeholders, with a special attention to public-public coordination and to complementarity with sport bodies, to safeguard sport integrity

Impact-oriented actions require, on one side, an enhanced public-public cooperation (through systemic coordination among State Authorities and other public bodies, including local authorities such as municipalities); on the other side, building a trustful and mutual understanding interaction environment with sport bodies and other private or independent bodies such as betting operators, sponsoring companies, academia and civil society.

Given the manifold nature of the subjects involved in multilevel systems, it is necessary to promote any possible form of coordination - be it inter-institutional, cross-sector or interdisciplinary - for coherent application of preventive tools and enforcement measures.

To implement this principle the G20 will draw from the following actions:

• Draft specific guidelines, governance models and, where appropriate, codes of conduct for ensuring effective multi-stakeholder approaches applied to protect sport integrity

<sup>&</sup>lt;sup>31</sup> Representatives of Ministries of Justice and Interior and relevant Government Departments and Agencies, including: Law enforcement and criminal justice representatives; national integrity in sport units; Financial Investigation Units; judges and prosecutors; anti-corruption and anti-money laundering authorities; betting regulators (where established).

- Establish mechanisms such as national platforms, task forces, working groups, contact groups, to act as an information and exchange hubs at a national level and point of contact for international cooperation
- Provide technical, financial and human resources assistance to international initiatives designed to strengthen cooperation between relevant stakeholders
- promote the dialogue between public prosecution offices and sport justice bodies.

# Principle 5: Supporting and developing specialized capacity and skills to detect corruption and crime in sport

The local, national and international challenge to protect sport integrity from corruption and crime requires specific competencies and know-how: specialized skills are a crucial precondition to effectively counter the ability of criminal networks to use sport for illegal purposes.

To implement this principle the G20 will draw from the following actions:

- Promote specialized training for policy makers, LEAs officials, sport officials
- Improve detection channels, with a strategic focus on effective reporting mechanisms, as well
  protected as anonymous or personal, ICT-based or human-based, in view of collecting relevant
  information functional to trigger investigations
- Foster specialisation of investigative authorities as well as of training addressed to sport bodies
- Support measures to provide protection against unjustified treatment for any persons who reports in good faith and on reasonable grounds any facts concerning wrongdoing in sport.

## Principle 6: Establishing and strengthening legal frameworks and policies to tackle corruption in sport, in a framework of international coordination

Establishing enhanced legal frameworks and improved cooperation and coordination mechanisms at international and national level is essential, given the prevailing transnational nature of corruption and crime in sport.

To implement this principle the G20 will draw from the following actions:

- Harmonization of national legislations
- Strengthening of international legal frameworks, binding and not binding, as well as their effective implementation
- Support and strengthen existing international, regional, national and transnational task forces, expert groups and initiatives that promote information exchange, cooperation and best practices at legal level and in policy making
- Identify and disseminate good practices related to law enforcement measures used to effectively tackle corruption in sport
- define codes of conduct applicable to agents, counselors and representatives of athletes and players to set the criteria for their transfer value from one club to another.

#### Principle 7: Countering corrupt business thriving in sport by the organized and economic crime

Organized and economic crime are the background dimension of the most relevant situations of

corruption and crime in sport, either embedded or from outside or mixed. G20 countries should tackle the systematic exploitation of the organizational weaknesses of sport by criminal groups that use it for money-laundering, illicit gains and other illegal actions.

To implement this principle the G20 will draw from the following actions:

- Develop specific analysis and risk assessments focused on the organized and economic crime dimension of corruption and crime in sport
- Promotion of ad-hoc public and restricted meetings to raise awareness on the crucial need to address the organized and economic crime dimension of corruption and crime in sport
- Enhance national strategies in the framework of international cooperation on the organized and economic crime dimension of corruption and crime in sport

## Principle 8: Strengthening efforts aimed at tackling the manipulation of sports and illegal betting in sport

Illegal betting and the manipulation of sport competitions are specific and relevant features of corruption and crime in sport. They are systematically used by criminals to launder money coming from illegal activities and to make further illicit gains. Since these are major threats not only to the integrity of sport, but also to its nature, they must be tackled in a tailored way.

To implement this principle the G20 will draw from the following actions:

- Develop specific legal provisions to criminalize the manipulation of sport competitions and illegal betting in the national legislations and harmonize at least the most serious forms of these crimes
- Set up national units/platforms or contact points for international cooperation
- effectively and comprehensively criminalizing bribery of officials of international sport organisations (art. 21 UNCAC) and set up qualified reporting mechanisms, also anonymous, to protect whistleblowers
- Seizing illicit assets acquired through the commission of crimes listed above
- Require all licensed betting operators to publish an official list of shareholders, parent companies and subsidiaries, to show their ultimate beneficial owners
- Require betting operators to comply with anti-money laundering regulations, exchange information on irregular and suspicious betting activity with relevant authorities

## Principle 9: Ensuring that women empowerment helps preventing corruption in sport; ensuring that progress on gender equality is not undermined by corruption in sport

It is widely recognized that women's contribution to the fight against corruption and crimes may be highly beneficial - and to some extent game changing and crucial - since it provides complementary points of view, approaches, modalities and a strong priority given to ethical and educational issues. The weak involvement of women often allows the spreading of corruption in sport across the board. At the same time, under a variety of situations corruption in sport may jeopardize and undermine gender equality.

To implement this principle the G20 will draw from the following actions:

- Actively promote the involvement of women in the top decision making process within the governance of sport bodies, activities, events
- Actively encourage and promote greater participation of women in activities, projects, programs and initiatives aimed at preventing, detecting and investigating corruption in sport
- Conduct and make available the results where feasible, research, study and risk assessment
  practices at the global, regional and national levels of the types of corruption and crime risks
  specific to women in sport in order to raise public awareness of their existence, causes, and
  gravity.

Principle 10: Ensuring that the duties and obligations of the autonomy of sport, as stated in the Olympic Charter, are effectively put in place by sport organizations by introducing and enforcing transparency, accountability, integrity, compliance and ethical requirements in the governance models

The principle of autonomy is a founding principle of modern sport and it brings with both rights and obligations. Rights include freely establishing and controlling sport rules, determining the structure and governance of their organizations, and enjoying the right to elections free from any outside influence. These rights are complemented by the obligations ensuring that principles of good governance are fully applied. State Authorities must promote formal and effective implementation of these principles.

To implement this principle the G20 will draw from the following actions:

- Encourage the leaderships and the highest political levels of relevant stakeholders to express their support for ethical practices and transparency in the governance of sport
- Support efforts aimed at developing and implementing codes of conduct for relevant stakeholders involved in sport related activities
- Enhance transparency and accountability in the management of sports organizations, in particular through facilitating access to information concerning the administration of sports organizations and requiring periodic reporting and audit
- Implement the regimes for Liability of legal persons and the role of compliance within sport bodies, in line with the G20 High-Level Principles on the Liability of Legal Persons for Corruption
- Develop policies to implement transparent, accountable, resilient and responsive governance frameworks and impact-oriented programs and actions. The highest integrity models shape and inspire the governance of sport bodies, the strongest becomes the protection of sport from corruption and crime risks.

# Principle 11: Sport integrity is crucial to preserve its high potential to promote economic, social and cultural development of countries

The high potential of sport as a driver for growth, social inclusion and cultural development of people and humanity at large, including the promotion of peace, living together and mutual understanding among different nations and communities, is widely recognized in ancient and modern history. It is a source of great concern that this potential may be significantly jeopardized by corruption and crime. G20 countries should fully preserve and further enhance sport integrity as

a pillar for ensuring the social role of sport, also in view of its contribution to the achievement of UN Sustainable Development Goals, with a special attention to SDG16.

To implement this principle the G20 will draw from the following actions:

- To promote wide awareness of the strategic societal role which sport plays in society and communities
- To strengthen the social role of sport in society and communities through dedicated programs, projects and activities which embed the sport integrity dimension.

## VIII. References

- 1. G20 Hamburg Summit Declaration
- 2. 2018 G20 German Presidency Concept Note
- 3. UNCAC Resolutions 7/8 and 8/4 + UNODC process "Safeguarding Sport from Corruption" (Conferences 2018 e 2019, Program + Comprehensive Study)
- 4. UNESCO MINEPS KAP Action III
- 5. ILO Points of Consensus
- 6. UNGASS 2021 second draft Political Declaration
- 7. G20 ACWG-OECD WGB Joint Meeting and Special event, Paris 10 October 2018
- 8. CoE Magglingen and other Conventions + KCOOS + Group of Copenaghen
- 9. EC Expert Group: Study on Sport and Corruption
- 10. Interpol
- 11. Europol
- 12. Commonwealth Community of Practice
- 13. Civil Society and Multistakeholder:
  - 13.1 PlaytheGame
  - 13.2 IPACS
  - 13.3 SIGA
  - 13.4 Sport4Impact
- 14. Sport Bodies
  - 14.1 IOC
  - 14.2 FIFA
  - 14.3 TIU Tennis Integrity Unit
  - 14.4 ICC International Cricket Council
  - 14.5 World Rugby
  - 14.6 FIA
  - 14.7 UEFA
  - 14.8 Asian Football Federation
- 15. Other References
  - 15.1 15 IACC Transparency International Brasilia 2012
  - 15.2 Italian Presidency of the EU Council Workshop, September 2014
  - 15.3 International Conferences AMFF Rome 2017 and High-Level Meeting Rome 2018