SECTION 5

Gender and corruption in sport
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FOREWORD

Sport contributes to peace, enables sustainable development, creates jobs and plays a vital role in promoting healthy lifestyles. It inspires, teaches and brings people, young and old, together.

But in our increasingly globalized world, sport is exposed to complex risks posed by corrupt actors who seek to exploit it for illicit gain.

Corruption strips sport of its positive, transformative power. There is widespread recognition of the negative economic and societal consequences of corruption in sport, and in particular its impact on youth. To effectively address this problem, more work is required to understand the scale, scope and manifestations of corruption in sport worldwide.

The international community is acutely aware of the need to close this knowledge gap. At its eighth session in Abu Dhabi in 2019, the Conference of the States Parties to the United Nations Convention against Corruption adopted resolution 8/4 on Safeguarding Sport from Corruption, which requests the UN Office on Drugs and Crime to "develop, within its mandate, in close consultation with States parties and in cooperation with interested stakeholders, a comprehensive thematic study on safeguarding sport from corruption, including consideration of how the Convention can be applied to prevent and counter corruption in sport."

In response to this request, the first-ever UNODC Global Report on Corruption in Sport seeks to inform States parties and sports organizations on the different forms of corruption in sport, through an analysis of trends and case studies. The Report presents policy recommendations on how to tackle the various problems identified, supported by examples of good practices. Close to 200 experts and practitioners were involved in the elaboration of this document.

The Report also highlights the need for greater international, regional, national, and local cooperation between government authorities, sports organizations, and other key stakeholders to tackle corruption in sport.

UNODC is dedicated to supporting these actors in developing and implementing coordinated responses for sport integrity, through its Programme on Safeguarding Sport from Corruption, an integral part of the Global Programme against Corruption.

I encourage all governments, sports organizations, and other key stakeholders to make full use of this Report, and of UNODC’s assistance in using the international anti-corruption framework to keep sport clean, for prosperity, for development and for fairer societies.

Ghada Waly, Executive Director
UN Office on Drugs and Crime
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INTRODUCTION

Professional women’s sport is both rising in status and increasing in popularity. This is translating into greater commercial success and an increasing number of sponsorship deals with major brands. The 2019 FIFA Women’s World Cup in France generated record viewership: a total of 993 million people watched it on television, with a further 482 million accessing it via digital platforms. The 2019 Women’s World Cup final was more popular among viewers in the United States of America than the men’s final in 2018, with the audience for the women’s game 22 per cent larger. In cricket, the International Cricket Council (ICC) Women’s T20 World Cup 2020 was the most watched ICC women’s T20 event in history; the final was watched by 53 million viewers. In 2016, for the first time in history, women represented 45 per cent of athletes competing at a Summer Olympic Games.

These milestones were reached against a backdrop of historical and contemporary gender-based discrimination. Patriarchal values and social constructions that associate sports with masculine characteristics, such as toughness and durability, have led to discrimination against female athletes, who are perceived as having feminine characteristics and as being too soft and weak to participate in sports.

Sport has an important role to play in achieving the Sustainable Development Goals, including Goal 5, which is focused on achieving gender equality and empowering all women and girls. On 18 October 2010, the General Assembly adopted resolution 65/4, in which the use of sport as a vehicle to empower girls and women was emphasized and encouraged.

However, it is acknowledged at the international level that corruption is undermining the ability of sport to achieve gender equality and the empowerment of women, as highlighted in the preamble of and paragraph 11 resolution 8/4 on safeguarding sport from corruption, which was adopted by the Conference of States Parties to the United Nations Convention against Corruption at its eighth session, in December 2019. Based on concerns that the challenges posed by corruption could undermine the potential of sports to advance gender equality and the empowerment of women, States parties and relevant stakeholders are invited to, with a view to promoting gender equality and the empowerment of women, actively encourage the greater participation and representation of women in sports-related activities, programmes and initiatives and in sports

3 International Cricket Council (ICC), “ICC’s Women’s T20 World Cup 2020 is the most watched ICC women’s T20 event in history”, Media Release, 22 June 2020.
6 Ibid. Traditional gender stereotypes influence women’s participation and experience in sport; for example, female athletes who defy gendered stereotypes are likely to be marginalized and ignored by mainstream media. For more information, see Kirsten Rasmussen and others, “Marginalization in sports participation through advertising: the case of Nike”, International Journal of Environmental Research and Public Health, vol. 18, No. 15 (July 2021).
governing bodies, including by developing robust awareness programmes that address gender-related barriers in sport caused by corruption.

Although, there is no implied positive correlation between increasing popularity in sport and corruption, an argument can be made that the rising popularity and the increasing commercialization of women’s sport are offering those intent on corruption more opportunities to exploit and abuse competitions, games and people. Notably, the gender pay gap in sport, with many professional female athletes not able to live off their earnings, makes women’s sport particularly vulnerable.

While there exists a growing body of research on the interlinkages between gender and corruption, there are gaps in data and knowledge regarding the relationship between gender and corruption in sport. Some discussion of the gender dimensions of corruption in sport has taken place in the context of doping. A challenge faced in the study of criminality and deviant behaviour is the inherent gender biases that fail to acknowledge complexities and nuances relating to the issue of female criminality. Empirical data showing that women continue to offend at lower levels than men adds complexity to the discussion; albeit such rates may also reflect socio-cultural norms that prescribe behaviour.

With the growth of women’s sport, the aim of the section is to highlight the impact of different forms of corruption on women’s participation in sport and to support the development of targeted responses aimed at ensuring that corruption does not undermine sport’s contribution to the advancement of gender equality and the empowerment of women. It looks to achieve this by identifying the prevalence and main types of corruption risks specific to women in sport to better understand their causes and impact. The section examines literature on gender and corruption to set the context before outlining the gender dimensions of corruption in sport. Vulnerabilities to corruption in women’s sport are identified and examined and gender-sensitive anti-corruption initiatives are highlighted before conclusions and policy considerations are offered.

The concept of gender is applied throughout this document to equate a binary understanding of men and women simply because this is where research can support the findings, without the intention of diluting the rainbow representing the community of lesbian, gay, bisexual, transgender and intersex people.

Also, the terms “woman” and “female” are used interchangeably as an editorial choice to make the text more readable, even though it is acknowledged that these terms are not perfect synonyms.

Gender is defined as the differences between males and females that are socially constructed, changeable over time, and have wide variations within and between cultures. As opposed to biologically determined characteristics (sex), gender refers to learned behaviour and expectations to fulfil an image of masculinity and femininity. Gender is also a socioeconomic and political variable with which to analyse people’s roles, responsibilities, constraints and opportunities. The term ‘gender’ is not synonymous with women; rather the term is used to refer to human or social attributes concerning both women and men collectively.

As women are not a homogenous group, it is important to capture an intersectional view on inequalities between women, men, boys and girls in corruption in sport. Notably, the gender pay gap in sport, with many professional female athletes not able to live off their earnings, makes women’s sport particularly vulnerable.

The concept of gender is applied throughout this document to equate a binary understanding of men and women simply because this is where research can support the findings, without the intention of diluting the rainbow representing the community of lesbian, gay, bisexual, transgender and intersex people.

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### Section 5: Gender and Corruption in Sport

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<td>Against a background of the increasing profile and popularity of amateur, semi-professional and professional women's sport, gender issues in sport are gradually becoming part of the national and international agenda.</td>
<td>Corruption in sport poses a range of gender-specific threats to girls and women, most notably in the form of sexual harassment and abuse by those in positions of authority. A growing number of cases are being reported or uncovered, and brought to the attention of authorities and the public. However, the exact nature and scale of this form of corruption is still unknown because of the challenges that exist in relation to the reporting of gender-based violence. Inequality in pay leaves women in sport vulnerable to corruption on various levels, including in connection with betting-related competition manipulation. A lack of representation of women in sport governance roles plays a part in hampering the fight against corruption in sport.</td>
<td>» Increase investment in the development of women's sport and support equal opportunities for girls in sport, physical activity and physical education. » Strengthen legislation to prevent and respond to violence against women and girls in sport. » Promote women to decision-making roles in sports organizations and build a pipeline for female candidates for governance roles. » Reduce the likelihood of women in sport engaging in corruption because of financial vulnerability by ensuring fair pay and considering supportive maternity leave policies. » Conduct empirical studies to enhance understanding of the risk factors, social norms and cultural traditions that influence women's participation in and resistance to different forms of corruption in sport.</td>
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The Conference of the States Parties to the United Nations Convention against Corruption (UNCAC) held its eighth session in Abu Dhabi, from 16 to 20 December 2019. During this session, the Conference adopted resolution 8/4 on Safeguarding Sport from Corruption which requested the United Nations Office on Drugs and Crime (UNODC), inter alia, to:

“...develop, within its mandate, in close consultation with States parties and in cooperation with interested stakeholders, a comprehensive thematic study on safeguarding sport from corruption, including consideration of how the Convention can be applied to prevent and counter corruption in sport”

The present document seeks to implement this request by providing relevant stakeholders, in particular representatives of States parties and sports organizations with information, including trends, case studies, examples and good practices, on the different forms and manifestations of corruption in sport. It also presents policies for consideration on how to tackle the various problems identified.

The report is multidisciplinary in its approach. It is based on data from official sources, academic journals, studies and articles. Examples used are based on adjudicated cases.

The Report’s structure and areas of focus have been reviewed by a wide variety of experts and officials as part of an extensive review process. This involved the review of sections of the report by over 180 representatives of governments, international organizations, sports organizations and the private sector. This process was designed to ensure that the report was developed in an inclusive and transparent manner. Representatives were able to provide their feedback in written form and also through contributing to nine virtual meetings of experts that were organized by UNODC to review various sections of the report.

1 Section 1: Evolutions in sport related to corruption – 8 June 2021; Section 3: Overview of initiatives to tackle corruption in sport – 9 June 2021; Section 4: Detecting and reporting corruption in sport – 22 June 2021; Section 5: Gender and corruption in Sport – 20 April 2021; Section 6: Organized crime and sport – 9 July 2021; Section 7: Corruption and abuse in sport – 23 July 2021; Section 8: Understanding the manipulation of sports competitions – 16 July 2021; Section 9: Illegal Betting and sport – 5 May 2021; Section 10: Major sport events and corruption – 27 May 2021
1. UNDERSTANDING THE LINK BETWEEN GENDER AND CORRUPTION

This section seeks to summarize research pertaining to the relationship between gender and corruption. In general, there is evidence that suggests women are disproportionately affected by corruption, in part because in most societies women as a group have less socioeconomic power than men, and in part because of social and cultural norms that influence how people interact and how they access public services. In many societies, women remain the primary caretakers of the family and are regularly confronted with corruption when dealing with education, health and other public services. Furthermore, gender itself implies a greater risk of exposure to particular forms of corruption, prominently among them “sexual corruption”, where sexual favours rather than money (or assets with obvious monetary value) are paid as a bribe (the corruption and abuse in sport section expands upon this discussion).

The relationship between gender and corruption was put in the spotlight by two World Bank studies published in the early 2000s. While these seminal studies seemed to reveal that higher representation of women in Government was empirically associated with lower corruption levels in that Government, the causality of this relationship has remained an evolving area of study. Essentialist views,
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such as women being intrinsically more honest than men,\textsuperscript{16} have been put forward to seek to explain why women are less corrupt than men, although this viewpoint has been successfully challenged.\textsuperscript{17} Nonetheless, this stereotype has been used by women seeking leadership roles. For example, Amanda Clinton, a prominent Ghanaian lawyer, stated in an interview during her campaign for the presidency of the Ghana Football Association\textsuperscript{18} that “women are more noted for actually doing the work, and going out there and not wanting to be associated with something corrupt, so, they don’t employ corrupt tactics.”\textsuperscript{19}

While literature on gender and corruption reveals that women are often excluded from corrupt networks, which are frequently male-dominated patronage networks,\textsuperscript{20} there is some evidence suggesting that some women are included in these patronage networks if they are able to maintain the status quo.\textsuperscript{21} In Nigeria, the phenomena of “godfathers” – a term referring to powerful political figures who support both men and women politicians with the expectation that they use their public office to distribute lucrative State contracts in a way that reaffirms loyalty to their patrons, in the process maintaining and strengthening the patronage network\textsuperscript{22} – is a case in point. This is no different in the sport context as illustrated below, which in many ways shows the complex nature of corruption.

CEO OF THE ZIMBABWE FOOTBALL ASSOCIATION BANNED FOR LIFE FOR COMPETITION MANIPULATION

In October 2010, the first female chief executive officer of the Zimbabwe Football Association, was banned for life after an independent investigative panel found her guilty of working with Asian syndicates to fix football matches. The investigative panel described her as an individual who “wielded so much power in the association as to be untouchable and a mini-god and could manipulate players and coaches alike to do her will. Players were afraid of her and board members also felt intimidated by her.”

The match-fixing scandal, referred to as Asiagate, took place between 2007 and 2009 and involved approximately 80 football players, administrators, journalists and politicians. Players were paid between 2,500 and 3,500 euros in cash by Asian syndicates to participate in match-fixing. This was a significant sum of money for poorly paid players at a time of national economic crisis.

Corruption is a complex human behaviour which is context specific, dependent on the institutional and cultural setting.\textsuperscript{23} Research demonstrates this complexity, in that marital status, care-giving responsibilities and other variables can have an influence. In Ghana, Alolo\textsuperscript{24} has conducted extensive research into the relationship between gender and corruption and has found that female public officials engage in corruption to fulfil cultural expectations, such as assisting family members in need of help. The relevance of Alolo’s research to gender and corruption in sport lies in the sense of obligation connected to care-giving responsibilities.

The next section explores the notion that female athletes are vulnerable to corruption because they are underpaid and do not earn enough to support their families.

\textsuperscript{16} Dollar, Fisman and Gatti, “Are women really the ‘fairer’ sex?”
\textsuperscript{18} Kwesi Nyantakyi, the former president of the Ghana Football Association, had been banned for life by the FIFA Ethics Committee in October 2018 for breaking bribery and corruption rules. See Piers Edwards, “Ex-Ghana FA boss’ lifetime FIFA ban reduced to 15 years”, BBC Sport Africa, 9 October 2020.
\textsuperscript{19} Emmanuel Ayamga, “GFA race: ‘vote for me; women don’t associate with corruption’ – Amanda Clinton to delegates”, Pulse.com.gh, 9 October 2019.
\textsuperscript{21} UNODC, The Time is Now.
\textsuperscript{23} Justin Esarey and Gina Chirillo, “‘Fairer sex’ or purity myth? Corruption, gender, and institutional context”, Politics & Gender, vol. 9, No. 4 (December 2013), pp. 361–389.
2. GENDER DIMENSIONS OF CORRUPTION IN SPORT

The gendered dimensions of corruption in sport are multifaceted and highlight cross-cutting issues that require the addressing of underlying gender bias and harmful social norms. Although not an exhaustive list, this section explores key issues relating to the role of women in corruption in sport: lack of representation in leadership, inequality in pay and gender-based violence.

2.1 LACK OF WOMEN’S REPRESENTATION IN SPORT GOVERNANCE

The historical overrepresentation of men in leadership roles in sports organizations is undisputed. In 1984, the first World Conference on Women and Sport was held in Brighton. This eventually led to the 1994 Brighton Declaration, which called for “a more fair and equitable system of sport and physical activity, fully inclusive of women and girls.” Thirty years later, the Brighton plus Helsinki 2014 Declaration on Women and Sport emphasized the importance of female leaders to facilitating equal opportunities for women and girls in sport. On the same subject, the Sydney Scoreboard, which collects data on the gender composition of sports governance structures, including national sport organizations, international sport federations and national Olympic Committees, has found that women remain underrepresented in sport governance structures in different regions of the world. Research by the United Nations shows that increasing women’s representation on corporate boards improves business outcomes in multiple ways, ranging from increased revenues and profits to strengthened environmental, social and governance performance, and this is arguably the same for different sectors, including sport. Similarly, the Target Gender Equality programme of the United Nations Global Compact calls for all companies to set and meet ambitious targets for women’s representation and leadership, including at the board level. Studies show that diversity in corporate boards contributes to good governance. Taking the intersectional approach to diversity in boards is not just about gender but also about ethnicity, race, income level, geographic location, religion, age, sexual orientation, etc.

Gender equality as part of good governance

The International Olympic Committee (IOC) has made significant progress in terms of female representation and reaching its target of the percentage of decision-making positions held by women.

Currently, women account for 37.5 per cent of IOC membership, up from 21 per cent in 2014. Female representation on the IOC Executive Board stands at 33.3 per cent, versus 26.6 per cent pre-Olympic Agenda 2020. Also, women account for 47.8 per cent of the members of IOC commissions, compared with 20.3 per cent pre-Olympic Agenda 2020, while 11 of these commissions are chaired by women.

IOC also supports and works closely with the United Nations Office on Drugs and Crime regarding the implementation of resolution 8/4 on safeguarding sport from corruption (adopted by the Conference of States Parties to the United Nations Convention against Corruption in 2019).

Paragraph 11 is of particular importance as it invites States to encourage greater representation of women in sports governing bodies, and encourages the creation of awareness programmes that address gender-related barriers in sport caused by corruption.

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25 An intersectional approach shows that women’s experiences in sport differ between sports. Some female-centric sports, such as netball, were “initially designed and traditionally administered as an activity for promoting appropriate forms of femininity”. In such sports, women’s representation is generally higher at all levels. For more information, see Brendon Tagg, “Imagine, a man playing netball! Masculinities and sport in New Zealand”, International Review for the Sociology of Sport, vol. 43, No. 4 (2008), pp. 409–430.


28 Ibid.

Diversity in the boards of sports organizations is essential to breaking up group thinking, which is a step that can lead to less corruption.\(^\text{30}\) Scholarly work on gender and corruption reveals that homogenous political governance systems act as barriers to accessing political participation for women and reinforce “old boys” patronage networks that facilitate corrupt transactions unchallenged.\(^\text{31}\) A recent study from the FIFA Task Force for Women’s Football found that better gender balance delivers improvements in critical aspects of football governance by creating a better, more diverse decision-making environment and a culture that is less prone to corruption.\(^\text{32}\) The collection of data to enable evidence-based policymaking to address the adverse effects of corruption on gender equality in sport is vital.

Below are factors linked to increasing the participation of women in the governance of sport.

### 2.1.1 Gender-Sensitive Policies and Practices

Language, policies and practices in sport organizations tend to portray men in a good light and put women at a disadvantage.\(^\text{33}\) Research on gender relations in sport governance in Australia shows a prevalent perception that it is difficult to find qualified, experienced women to serve as board members.\(^\text{34}\) A study exploring how gendered meanings influence access to leadership roles on national sport governing boards in the Netherlands found that women were viewed as lacking the time for board membership.\(^\text{35}\) Adriaanse and Schofield\(^\text{36}\) point out that the difficulty governance boards have in identifying suitable women is because of “homosocial reproduction”, as “the directors were looking for a woman of ‘their kind’, which severely limited the pool of candidates.” These challenges point to sport being a masculine environment; therefore, there is the perception that women are not qualified as they do not exhibit masculine traits. As discussed earlier, the dynamics between femininities and masculinities in sport occur within a masculine context.\(^\text{37}\)

An important tool for increasing female representation in different spheres has been the use of quotas, whereby there is a mandatory requirement of a minimum percentage of

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\(^{30}\) Isabelle Westbury, “FIFA, gender and corruption: everything is fine today, that is our illusion”, The Sports Integrity Initiative, 23 November 2015.

\(^{31}\) UNODC, The Time is Now.

\(^{32}\) “FIFA, football and women: why reform must specify inclusion and investment”, Submission to Mr Francois Carrard, Chair of FIFA Reform Committee, October 2015, https://digitalhub.fifa.com/m/6f529bb72b443b014/original/12ber8927oydjoj9hq.pdf.pdf.

\(^{33}\) Sally Shaw and Trevor Slack, “It’s been like that for donkey’s years: the construction of gender relations and the cultures of sports organizations”, Culture, Sport, Society, vol. 5, No. 1 (2002), pp. 86–106.


\(^{36}\) Adriaanse and Schofield, “Analysing gender dynamics in sport governance”.

\(^{37}\) United Nations, Women, Gender Equality and Sport.
women participating in leadership roles. The use of quotas has been generally effective in increasing the number of women in such roles. In Brazil, the gender quota practice in the Antidoping Court has been relatively successful and is included in the sports law of Brazil, although it is not mandatory. However, the use of quotas has also been criticized for undermining the principle of merit and perpetuating the view of women as tokens hired to meet gender requirements. On temporary special measures, it should be noted that the criticism of lack of merit is erroneous because merit applies to the application of quotas. Studies suggest that gender quotas in sports governance are effective when used in combination with other measures, including the adoption of gender equality as an organizational value, the allocation of influential roles on boards to women and the provision of support by male colleagues.

### 2.1.2 Gendered Social Norms as Barriers

Social and cultural factors also contribute to women’s underrepresentation in the governance of sport. A United Nations Development Programme and United Nations Development Fund for Women report noted that gendered responsibilities affect the ability of women and girls to participate in sport and other leisure activities. For example, in rural areas in different parts of the world, girls are responsible for time-consuming household chores, including fetching water, which leaves no time for participation in sport. Research from Malawi highlights the role of pervasive traditional norms informed by cultural and religious norms, which reflect the general status and role of women in society, in preventing women and girls from participating in sport. Examples of these gender norms include the perception of women in sport leadership as being “opportunists”, “loose” and “only interested in men”. As a result, less than three per cent of those in leadership positions in sport governance in Malawi are women.

**THE RUSSIAN FEDERATION**

In 2019, the Russia Football Union Executive Committee adopted the 2030 Programme for the Development of Women’s Football. The programme is a comprehensive roadmap aimed at promoting development at all levels of the women’s game: national teams, club football, talent development, grassroots, female refereeing and female coaching. The programme has the following key goals:

- Further professionalize the women’s game and ensure long-term sporting success
- Increase female participation in football
- Improve the image of women’s football and enhance its visibility, thereby increasing its audience and ensuring commercial development
- Ensure female participation in football-related professions

A new Women’s Football Department was created to implement the programme. The Russia Football Union ensures that women’s football development receives adequate attention, staffing and investment. Results of the programme have already included:

- The qualification of the women’s national team for the UEFA Women’s Euro 2022 championship
- The implementation of major changes to club football, with the top league rebranded and four new women’s clubs affiliated with top men’s clubs taking part in the championship, and a major increase in audience and a landmark media rights deal with a federal television and digital platform
- The introduction of new under-16 and under-21 competitions for elite youth teams
- The launch of the UEFA Playmakers programme, which is designed to increase girls’ participation in football, in 27 centres throughout the country to engage over 800 girls per year in playing football

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39 Adriaanse and Schofield, “The impact of gender quotas on gender equality”.
40 Ibid.
43 Ibid.
2.2 INEQUALITY IN PAY

Notably, while gender pay gaps exist in most industries, UN Women has signalled that the sports industry has one of the largest gender pay gaps, with the exception of a small number of sports, such as tennis. For example, in the National Basketball Association in North America, the top salary in the men’s league in 2018 was $37.4 million, compared to $117,500 in the Women’s National Basketball Association. These gaps create vulnerability. A sport identified by experts as particularly vulnerable to corruption is women’s football in South America, where the game is growing at a faster rate than players’ salaries.

Financial vulnerability is one reason why athletes engage with and participate in corruption. Athletes have short competitive careers and many are poorly paid, or in some cases not paid. It must be noted that all actors within the sports ecosystem are susceptible to engaging in corruption. As such, highlighting that financial vulnerabilities are a key risk for corruption in sport does not negate the fact that corruption occurs amongst athletes who are not necessarily financially vulnerable. A study of competition manipulation in football revealed that while the main driving factor for the activity was money, the reasons “for acquiring that money varies in each case, from conditions of relative deprivation to simple greed”. In other words, corruption acts are carried out by athletes from across the socio-economic spectrum for a range of different reasons.

The financial vulnerability of female athletes is exacerbated by the fact that most sports organizations lack structures “to support women who are pregnant or who have parental responsibilities.” However, there have been important developments, such as the initiative by FIFA to introduce measures such as mandatory maternity leave with pay, which is designed to protect female players and coaches from pregnancy-related discrimination. The Women’s Tennis Association maternity leave policy provides a two-year period for an athlete to return to competition by using the ranking she had on the day she stopped playing to go on maternity leave.

44 Puri, “Making equality a reality”.
49 Laura Douglas, “Say it ain’t so ... Josephine?” The risk of match-fixing in women’s sport”, The ANZSLA Commentator, vol. 97 (December 2016), pp. 29–42.
50 “FIFA steps up protection of female players and football coaches”, 19 November 2020.
51 WTA Staff, “In focus: WTA maternity leave policy, rankings and seedings” WTA Tour, 27 June 2018.
The role of women as professional athletes and officials continues to undergo important changes and efforts are being made to equally reward men and women for winning tournaments. However, pay parity in sport is still far away.

2.3 ABUSE INCLUDING ABUSE OF AUTHORITY AND GENDER-BASED VIOLENCE IN SPORT

The sports sector is particularly vulnerable to sexual harassment and abuse of authority because of the nature of relationships in the workplace environment, in particular between female athletes and their coaches, who are predominately male; and other actors, such as doctors (see the section on corruption and abuse in sport for a more in-depth examination of this issue). At the international level, it has been increasingly recognized in the resolutions of United Nations bodies that women and girls are frequently subjected to violence, including sexual harassment, at work and that they face increased risks of violence in particular contexts, such as when working in male-dominated workplaces. Furthermore, female athletes are pressured to conform to relative standards of the ideal body and remain vulnerable to bullying and body shaming in a way that their male counterparts are not.

There are numerous incidents in which women and girls in sport have been subjected to gender-based violence, sexual harassment and abuse by various authority figures. This form of abuse, a crime in most countries, undermines the integrity of sport and includes acts of sexual, physical, emotional and psychological abuse and neglect. Indeed, anecdotal evidence from cases around the world showing officials abusing their positions of authority to receive or request sexual favours is alarming and needs to be urgently addressed by sports organizations and Governments. In what has been heralded as the largest sexual abuse case in American sports history, a former USA Gymnastics national team doctor was sentenced to 40 to 175 years in prison for sexually abusing more than 150 female athletes, including minor athletes, over decades. His abuse of female athletes reveals the consequences of failure at the institutional level to implement policies and practices to protect athletes. Investigations by the United States Senate into the case found that abuse of young athletes occurred “because of a lack of oversight, independence, and transparency.” This case reiterates the importance of strengthening accountability mechanisms in sports organizations, creating a culture of putting athletes first and fortifying the independence of the investigative bodies responsible for investigating allegations of sexual abuse against athletes.

In June 2019, a former president of the Afghanistan Football Federation and a former FIFA Standing Committee member was banned for life from all football-related activities after the FIFA Ethics Committee found him guilty of having abused his position and sexually abused a number of female players, including children, in violation of the FIFA Code of Ethics.

In May 2021, a former supervisor of the under-20 women’s national team at the Haitian Football Association (FHF) was found guilty of having failed to protect the physical and mental integrity of various female players, including minors who were under her authority and responsibility at the Centre Technique National in Croix-des-Bouquets in Haiti. The former supervisor was condemned for actively coercing and threatening the players into engaging in sexual relationships with the former FHF president in violation of the FIFA Code of Ethics. The former FHF president was banned for life from all football-related activities by FIFA after its Ethics Committee found him guilty of having abused his position and of sexually harassing and abusing female players, including minors, in violation of the FIFA Code of Ethics. The abuse case in Haitian football shows that gender-based violence can be perpetuated by figures in authority (both male and female) as sport, both professional and amateur, can create particular vulnerabilities as a result of power imbalances and dependencies between individuals.

57 Judicial Circuit Court for Eaton County, People v Nassar, Case No. 17-002017-FC; Judicial Circuit Court for Ingham County, People v Nassar, Case No. 17-143-FC.
Generally, gender-based violence is highly underreported because of the complex nature of the crime and the social stigma it carries, disproportionately affecting women.\textsuperscript{64} The extent of sexual harassment and abuse of female athletes in professional sport and grassroot sport around the world is unknown. There is, however, a growing awareness that, as in other parts of society, harassment and abuse does occur in sport with many cases not being reported primarily because of fear and mistrust of reporting and the sensitivity and shame that surround these cases. This represents a blind spot for many sport organizations, either through fear of reputational damage or through ignorance, silence and collusion.\textsuperscript{65} Furthermore, survivor-centred support for victims of abuse in sport is essential as sex crimes require specialist investigators, safe refuge and psychological and care providers experienced in sexual abuse. Often victims have been groomed over a long period, coerced, threatened and harmed, and threats have issued to family members.\textsuperscript{66}

\section*{2.4 Competition manipulation}

Financial vulnerability is a key driver in motivating athletes to engage in competition manipulation (see the section on competition manipulation for more details). In many countries, athletes are poorly remunerated, increasing their vulnerability to competition manipulation, particularly at lower levels where sport competitions are less scrutinised:\textsuperscript{67} One study exploring competition manipulation in cricket revealed that players accepted bribes because they were paid low salaries.\textsuperscript{68} Examples of competition manipulation involving the offering of money to female athletes to engage in such activities are almost entirely lacking, with the exception of the two female volleyball players from the Republic of Korea that were banned for life for competition manipulation in exchange for five million won ($4,400).\textsuperscript{69} Studies into the factors motivating female athletes to engage in competition manipulation are needed.

A survey measuring the prevalence of competition manipulation among 425 German elite athletes (gender ratio of the participants was 52 per cent male and 48 per cent female) concluded that there was no gender dimension to competition manipulation involving German elite athletes.\textsuperscript{70} A target group-specific survey of over 5,000 athletes, coaches and officials carried out by the Evidence-based Prevention Of Sporting-related Match-fixing project of the Erasmus+ Programme showed that competition manipulation is much less widespread among female athletes, coaches and officials than among their male colleagues.\textsuperscript{71} A study to investigate high-performance athletes’ involvement in non-betting-related competition manipulation in the Republic of Korea found that out of 731 Olympic sports athletes who took part in the survey, 74 respondents (10 per cent) had been approached to manipulate a competition.\textsuperscript{72} The study findings revealed that female athletes had been approached proportionately slightly more often than males (females: 10.74 per cent, males: 9.70 per cent). Out of the 74 respondents, 33 athletes (5 per cent) actually participated in competition manipulation, with the involvement of female athletes slightly higher than that of males (5.03 per cent versus 4.16 per cent). However, as a result of the limited availability of relevant data, the present report was not able to make any conclusions regarding the role of gender in non-betting-related competition manipulation.

\section*{2.5 Betting on women’s sport}

Bet-related competition manipulation is often linked to other forms of criminal activity (see the section on competition manipulation and the section on illegal betting and sport for additional information). As noted by Anderson, because “the traditional liquidity of gambling markets, sports betting can, and has long been, an attractively accessible conduit for criminal syndicates to launder the proceeds of crime.”\textsuperscript{73} Technological advancement, such as the arrival and growth of the Internet, has increased opportunities for participating in illegal betting.\textsuperscript{74} The illegal betting syndicates providing avenues to engage in illegal sport betting may also have an impact on women’s sport.

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\textsuperscript{64} UNODC, Global Study on Homicide: Gender-related Killing of Women and Girls (Vienna, 2020).
\textsuperscript{65} Mountjoy and others, “The IOC consensus statement”.
\textsuperscript{66} “FIFA welcomes CAS decision in the case of former president of Afghan Football Federation Keramuudin Karim”. FIFA has also recently published a “Minimum Package of Care in cases of harassment and abuse (with reference to cases under article 23 of the FIFA Code of Ethics)” to support victims who wish to come forward and has adopted survivor-centred management when investigating reports of abuse. https://digitalhub.fifa.com/m/5b5359a41539e520/original/jwsfapaqn0bf1r4vgffn-pdf.pdf.
\textsuperscript{69} Yonhap News Agency, “S. Korea bans 11 volleyball players for life over match-fixing scandal”, 19 March 2012.
\textsuperscript{70} Monika Frenger, Elke Emrich and Werner Pitsch, “Corruption in Olympic sports: prevalence estimations of match-fixing among German squad athletes”, SAGE Open, vol. 9, No. 3 (2019).
\textsuperscript{71} “EPOSM project tackles non-betting-related match-fixing”, https://www.eposm.net/kopie-van-kick-off.
For example, senior figures in cricket have highlighted the vulnerability to corruption of women’s cricket, pointing to an exponential increase in betting on women’s competitions in recent years.¹⁵ Similar observations have been made about women’s football.¹⁶

Research from Hong Kong, China¹⁷ reveals that women’s involvement in betting, whether legal or illegal, has been underestimated,¹⁸ suggesting that the traditional gender gap in illegal betting may be shrinking. Illegal bettors of both genders share broadly similar demographic profiles, insofar as they are typically middle-aged, blue-collar workers with relatively low levels of education and income when compared to national averages.¹⁹

Studies conducted by the Hong Kong Jockey Club (HKJC)²⁰ reveal the multifaceted roles of women operating within Asian illegal betting networks. HKJC noted that, in the Asian context, women are typically employed as marketers, croupiers and agents within illegal betting operations.²¹ In addition, women advertise and operate such betting businesses primarily by enticing male bettors to bet with them. Women have also been identified as being illegal bookmakers and as managing illegal betting operations throughout Asia, including in Thailand.²² Furthermore, women are increasingly taking up more leadership roles within illegal betting networks despite these positions being historically male dominated.²³

The Australian Criminal Intelligence Commission (ACIC) Project Petram²⁴ identified that while women and girls in Australia do not regularly bet using offshore platforms, there have been incidences where they act as betting agents to facilitate access to these platforms for professional, high-value gamblers, including for entities linked to organized criminal groups. The Project also identified that criminal entities are likely to exploit legal betting accounts operated by women through third-party betting arrangements in order to obfuscate corrupt betting and to bet using illicit funds. Third-party betting arrangements provide anonymity to gamblers and obscure the identity of the person placing the bet. These arrangements reduce the ability of law enforcement agencies to conduct accurate financial profiling and to identify unexplained wealth linked to criminal entities, and create significant vulnerability to criminal exploitation. As a result, women are at a significant risk from both a criminal and sports integrity perspective.

In addition, ACIC has identified a trend of organized crime entities betting anonymously using criminal proceeds, potentially using gains from corrupted sporting events, by directing close female associates to place bets using accounts in their names. However, it is worth noting that professional athletes use this as a method to avoid their betting activity being detected.²⁵ Whilst this is often to hide prohibited betting rather than competition manipulation, this method can also be used by athletes involved in competition manipulation, and it is possible that a "sense of loyalty" or "coercion" could be factors at play in such scenarios.

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¹⁷ Francis T. Liu, Report on Marketizing of Illegal Betting Market in Hong Kong (Oliver Wyman, November 2017).
¹⁹ Oxford Economics, Impact of Illegal Gambling in Hong Kong (Sydney, 2016).
²⁰ Written responses to interview questions, 13 November 2020. In Hong Kong, China, betting of any sorts is illegal except for the betting on three products provided by the HKJC, which is the government’s licensed operator. The products are betting on horse racing, betting on football and betting on the lottery.
²¹ “17 arrested in connection with illegal gambling site”, The Standard, 6 May 2020.
²⁴ Written responses to interview questions, 16 January 2021. Project Petram is aimed at developing an understanding of the nature and extent of the links between transnational serious organized crime/serious organized crime entities, offshore unregulated bookmarking sectors, domestic bookmarking sectors and the impact on the wagering industry and identify and assessing the threats to Australian sporting sectors.
²⁵ Gregor Robertson, “Footballers use girlfriends and dads so they’re not caught gambling”, The Times, 24 January 2018.
BETTING-RELATED AND OTHER INTEGRITY ISSUES
FACING TENNIS

In 2016, the international governing bodies principally responsible for governing professional tennis at the international level appointed an Independent Review Panel to address betting-related and other integrity issues facing the sport. The Panel’s comparative analysis of match specific alerts from the men’s and women’s game between 2009 and 2017 showed that, while women’s professional tennis has become responsible for an increasing share of match specific alerts, the incidence of match specific alerts for professional women’s matches remains much lower than that for men’s events. In 2017, there was approximately one match specific alert per 165 men’s matches calculated as bettable matches, while it took 557 bettable matches in the women’s game to produce a single match specific alert.⁸⁶

The gender-disaggregated data captured in the above graph on match specific alerts and bettable matches in tennis are important to understanding differences in men’s and women’s games. However, more research and analysis are needed to further interpret this type of data to inform evidence-based gender-sensitive anti-corruption initiatives.

88 Ibid, In 2017, the men’s game accounted for 289 match specific alerts (and 47,689 bettable matches), whereas the women’s game accounted for 65 match specific alerts (and 36,229 bettable matches).

### COMPARISON OF MATCH SPECIFIC ALERTS AND BETTABLE MATCHES, BY LEVEL OF TENNIS AND GENDER, 2013-2017

<table>
<thead>
<tr>
<th>LEVEL OF TENNIS (GROUP)</th>
<th>MEN’S GAME</th>
<th>WOMEN’S GAME</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. LOWEST LEVEL</td>
<td>167,571 491 ALERTS</td>
<td>218,952 155 ALERTS</td>
</tr>
<tr>
<td>2. MID-LEVEL</td>
<td>51,821 361 ALERTS</td>
<td>22,927 19 ALERTS</td>
</tr>
<tr>
<td>3. TOUR LEVEL</td>
<td>21,575 710 ALERTS</td>
<td>20,557 23 ALERTS</td>
</tr>
<tr>
<td>4. GRAND SLAM</td>
<td>6,100 16 ALERTS</td>
<td>5,660 19 ALERTS</td>
</tr>
</tbody>
</table>

The Referral Ratio is fixed as a 0.0% to 1.0% (or higher) range and is displayed as an eight-step (0.125%) gradient. The eighth and darkest red therefore represents a Referral Ratio of 0.875% or higher. For more information refer to Adam Lewis QC, Beth Wilkinson, Marc Henzelin, Independent Review of Integrity in Tennis, Final Report 2018.
3.

GENDER ASPECTS TO ENHANCING PREVENTION, COOPERATION AND DETECTION

3.1. PREVENTION OF CORRUPTION IN SPORT THROUGH EDUCATION

Education is essential for successful and sustainable efforts aimed at preventing corruption in sport. The point was made earlier in the section that professional women’s sport is both rising in status and increasing in popularity. It can be assumed that amateur women’s sports will also grow in parallel given this increasing interest. As such, it is important that women athletes, coaches and referees are included in sports integrity education programmes. Education is a context-specific activity and it is important that such education is tailored to specific audiences. For example, in order to help women in sport to mitigate risks to their careers and to their sports, it is important that they understand the different types of corrupt approaches and wrongdoing that they would be vulnerable to (see the section on abuse and corruption in sport), understand their reporting obligations and how to use reporting mechanisms, and see relevant examples of corruption in women’s sport. Although education and training are key elements of corruption prevention in sport, they need to be complemented by other measures, such as the commitment of senior management, corruption risk mapping and the adequate monitoring and control of training programmes.\textsuperscript{89}

\textsuperscript{89} The guidelines of the French Anti-Corruption Agency (AFA) provide valuable recommendations on how to design and implement robust measures to prevent and detect corruption in public and private organizations, which include training and awareness programs: https://www.agence-francaise-anticorruption.gouv.fr/files/2021-03/French%20AC%20Agency%20Guidelines%20in%20pdf.pdf.

3.2 ENHANCING COOPERATION THROUGH COMMUNITY FOCUSED APPROACHES

Engaging local communities to support the integrity of women’s sport can be an effective method to tackle corruption and wrongdoing. A report by UNODC based on research from South-East Asia highlights the role of female officers in enhancing the operational effectiveness of law enforcement through improving responses to gender-based crimes and increasing community trust and perceived legitimacy, which contributes to a reduction in corruption.\textsuperscript{90} Involving women from local communities can help foster cooperation between sports organizations and law enforcement and criminal justice authorities. Also, as examples from South America show, women in law enforcement can play a key role in the implementation of anti-corruption policies and initiatives, which could be effective if duplicated in a sports context to tackle corruption and wrongdoing in sport.

The Global South is a source of good practices relating to women-led initiatives that can be used to inform the creation of gender-sensitive anti-corruption initiatives in sport.

\textsuperscript{90} UNODC, INTERPOL and UN Women, Women in Law Enforcement in the ASEAN Region (2020).

INTERNATIONAL CRICKET COUNCIL INTEGRITY UNIT

Women are strongly represented in the International Cricket (ICC) Integrity Unit across tournament management, intelligence, investigations and education. At the time of writing, there were ten anti-corruption and security managers employed by the ICC Integrity Unit (based and deployed globally). This includes three women from India, New Zealand and the United Kingdom of Great Britain and Northern Ireland, respectively.

Within the ICC Integrity Unit team based in the United Arab Emirates, there is a 50-50 gender split, which includes three women in intelligence. The head of anti-doping is also female. While their primary responsibility is anti-corruption and security at ICC events, international matches and relevant franchise events, these employees may also be first responders to safeguarding or other integrity matters. ICC women’s events involve the delivery of tailored education, often by female anti-corruption managers and other staff.
Team Lioness, an all-women ranger unit, with members recruited from the Maasai community to fight poaching around the Amboseli National Park in Kenya, including the corruption involved. The Maasai community is dominantly patriarchal, therefore, Team Lioness is a powerful symbol of the importance of gender equality.

The Akashinga (The Brave Ones) ranger unit is an all-female armed ranger unit in the Zambezi Valley in Zimbabwe. The unit was created by Damien Mander, a former member of the Royal Australian Navy. Akashinga members comprise vulnerable women, including survivors of domestic abuse, orphans and others made vulnerable by AIDS, and single mothers. The Akashinga rangers receive the same military training as male rangers, challenging cultural and social norms about arming women.

The Black Mamba Anti-Poaching Unit in the Balule Nature Reserve, a protected area in the Kruger National Park in South Africa, is made up of young women from the local community. The Unit focuses on “visible policing, as well as outreach and awareness-raising in their communities”, encouraging “communities to understand that their benefits will be greater through rhino conservation than through poaching.”

Anti-corruption responses in sport can draw from these and other relevant initiatives in the implementation of whole-of-society initiatives focused on empowering local communities to counter crime and corruption.

3.3 GENDER-SENSITIVE REPORTING MECHANISMS

Gender mainstreaming in all relevant bodies responsible for receiving and investigating complaints is imperative to facilitating an environment in which women are comfortable about reporting wrongdoing. Understanding the different motivations and patterns of behaviour, as well as incentives and barriers, relating to reporting that exist between men and women is vital to the creation of gender-sensitive reporting and reporting mechanisms.

As the 2019 UNODC guide to reporting mechanisms in sport notes, committing to integrity in sport requires frameworks for reporting, identifying and resolving issues of wrongdoing in sport. Notably, effective reporting mechanisms are a crucial part of the fight against corruption in sport, as a means of both detecting and deterring such activity (see the section on detecting and reporting corruption in sport). As with reporting different forms of crime, men and women report different forms of corruption differently. For example, there are studies showing that women are more likely to report corruption if they are interacting with other women. In the sports context, further research is needed to understand the how women and men engage with reporting and reporting mechanisms to disclose corruption.

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95 Gender mainstreaming considers the human implications of any activity, highlighting the differences between women and men and the potential differential impacts and designing the activity to ensure that both men and women will benefit equally. For more information, see UNODC, Gender Mainstreaming in the Work of UNODC.
Research on how women and men engage with reporting mechanisms has revealed that women and men are motivated by different factors to report.\(^{99}\) The type of reporting mechanism made a difference in the frequency of women’s reporting, with women valuing policies that provide protection from retaliation and confidentiality provisions more than men.\(^{100}\) A “victim-centred” approach, which ensures that the victim has access to relevant services, is essential to creating efficient whistle-blowing systems.\(^{101}\)

Key elements contained in effective reporting mechanisms include confidentiality and anonymity, accessibility (including access to health and financial services), clearly identifiable reporting channels, guidance for the reporting persons on the reporting processes, protection against different forms of retaliation, inclusive language and communication, and the training of officials receiving complaints to avoid possible biases.\(^{102}\)

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\(^{101}\) UNODC, The Time is Now

\(^{102}\) Feigenblatt, Breaking the Silence around Sextortion.
CONCLUSION AND POLICY CONSIDERATIONS

CONCLUSION

The participation of women in sport governance is key to promoting gender equality and addressing corruption in sport. However, while an increment in the number of women participating in sport governance is essential, “numbers alone do not constitute gender equality”. Gender equity in sport should be centred on addressing discriminatory practices that undermine real transformation in sport governance, as well as buy-in and a significant shift in mindset across the entire sports ecosystem. This requires an acknowledgment of the social and cultural norms that deter girls and women from playing sport, the biases and stereotypes relating to women’s capacity to fulfill leadership roles and the lack of skill and experience that serve as barriers to women accessing decision-making roles in sport.

Financial vulnerability is identified as a key driver in motivating athletes to engage in corrupt practices, potentially exacerbated for female athletes because of gender pay gap in sport. However, there is a lack of data on the role of financial vulnerability in motivating female athletes to engage in competition manipulation. This is an important gap because as women’s sport becomes increasing popular and profitable, it creates new opportunities for criminal syndicates to corrupt women’s sport and for women to engage in corrupt practices.

The involvement of women in anti-corruption initiatives in sport is imperative for the creation of effec-tive policy and programming. There are two aspects that are critical to the creation of gender-sensitive anti-corruption responses in sport: prevention and law enforcement. To develop appropriate solutions the prevention aspect of anti-corruption efforts requires context-specific education and awareness programmes that recognize the diversity of women’s lived experiences. Effective measures to address corruption in sport requires trust building and enhanced cooperation between government departments, anti-corruption authorities, law enforcement authorities, sports organizations and other relevant stakeholders, at the national and international levels, complimented by relevant capacity-building activities. To inform both prevention and law enforcement policymaking and implementation efforts, the collection and analysis of sex-disaggregated data on the key drivers and the key risk factors relating to women’s involvement in corruption in sport would be useful.

Increasing investment in the development of women’s sport and supporting equal opportunities for girls in sport, physical activity and physical education

Strengthening legislation to prevent and respond to violence against women and girls in sport, including sextortion

Ensuring that cooperation and coordination between law enforcement agencies and criminal justice authorities, sports organizations and relevant stakeholders aimed at addressing the manipulation of sports competitions include women’s sport

Supporting and encouraging academic and research institutions to conduct empirical studies to enhance understanding of the risk factors, social norms and cultural traditions that influence women’s participation in and resistance to different forms of corruption in sport

Developing initiatives that are focused on promoting women as anti-corruption agents who can counter gender stereotypes about women’s corruptibility by educating people about the relationship between women and corruption in sport.

Sports organizations can enhance the development and application of initiatives, policies and programmes to tackle corruption in women’s sport by:

Promoting women to decision-making roles in sports organizations and increasing training opportunities to increase women’s capacity for advancement and to remove any discrimination or bias with regard to women’s access to leadership roles

Increasing opportunities for female athletes to benefit from sponsorships and ensuring an equal living wage for women in sport

Implementing policies aimed at eliminating harmful gender stereotypes and promoting positive role models, including through promoting women’s equal participation and bias-free representation in sports media, including communications

Enlisting male athletes to voice their support for gender equality and to tackle gender bias and stereotypes

Increasing support to ensure tailored education and training activities on anti-corruption in sport and the integrity of sport is available to women in sport

103 Madeleine Pape, “Gender segregation and trajectories of organizational change: the underrepresentation of women in sports leadership”, Gender & Society, vol. 34, No. 1 (2020), pp. 81–105. Critical mass theory postulates that minorities need to reach a threshold or critical mass of approximately a third of the group to be able to tilt the culture of the organization. Therefore, it is not enough to have a few token women given leadership positions in sport governance.