



GUIDELINES

For optimising EU policies related with the creation, promotion and proper use of protecting reporting systems on wrongdoing at grassroots level and professional sport, mainly match-fixing

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For optimising EU policies related with the creation, promotion and proper use of protecting reporting systems on wrongdoing at grassroots level and professional sport, mainly match-fixing

Addressed to:

- European Commission and European Parliament;
- European National Governments;
- Sports Governing Bodies;
- Sports Organisations and Federations;
- National Platforms.



Training on Protected Reporting from Professional and Grassroots Sports

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INTRODUCTION

Effective system to report illegal and unethical behaviour, which protect those who disclose such information, is essential for strengthening transparency, integrity and identify illegal and/or unethical behaviour¹. Regardless of the sector it is evident that majority of illegal and/or unethical activities are identified by employees. Whistleblowing remains the best way to uncover corruption² and without effective protection of whistle-blowers, corruption risks are thus enhanced³.

While acknowledging the importance of whistleblowing for uncovering illegal and/or unethical behaviour it is crucial to highlight the fact that this remains a rare practice in both public and private sectors, due to significant risk of retributions and weak protection systems.⁴ Risks for retribution and lack of willingness to speak up in sport are highlighted by the so called 'omerta'⁵ or by what others label as 'esprit de corps'⁶, both effectively discouraging athletes to report wrongdoings. Thus, effective protection of those who speak up is essential to strengthen the number and relevance of reports.

Establishment of protected reporting systems organisation remains one of the fundamental provisions laid down in different frameworks, such as Olympic Movement Code on the Prevention of the Manipulation of Competitions, World Anti-Doping Code and the Council of Europe Convention on the Manipulation of Sports Competitions.

However, effective protection of whistleblowers in sports and elsewhere should be comprehensive and surpass the minimum establishment of secure reporting systems. Top-class reporting mechanisms without an athlete-centred and compliance framework designed to protect whistleblowers cannot be successful to meet high standards in sports integrity.

Policies to protect whistleblowers should be customized to specific environments, taking into consideration specific sectoral risks, stakeholders, organisational structures and cultural features.

¹ OECD. 2016. Committing to Effective Whistleblower Protection. Paris: OECD Publishing.

² Association of Certified Fraud Examiners, Inc. (ACFE). 2016. Report to the Nations on Occupational Fraud and Abuse. Accessible at: www.acfe.com/rtn2016/docs/2016-report-to-the-nations.pdf

³ OECD. 2012. Whistleblower Protection. Accessible at: <http://www.oecd.org/cleangovbiz/toolkit/50042935.pdf>

⁴ Ardigo, Inaki Albisu. 2018. Best Practices for Whistleblowing in Sport. Accessible at: <https://knowledgehub.transparency.org/helpdesk/best-practices-for-whistleblowing-in-sport>

⁵ Perez Trivino, Jose Luis. 2017. Whistleblowing in Sport: Psychological challenges. Barcelona: Universitat Pompeu Fabra. Accessible at: <https://playthegame.org/media/7491989/Jose-Luis-P%C3%A9rez-Trivi%C3%B1o.pdf>

⁶ Ardigo, Inaki Albisu. 2018. Best Practices for Whistleblowing in Sport. Accessible at: <https://knowledgehub.transparency.org/helpdesk/best-practices-for-whistleblowing-in-sport>

While there are different guiding principles on how to address reporting of wrongdoing in sports, the aim of this set of guidelines is to take wider principles and understanding of whistleblowing and to introduce them to specific needs in sports.

PRESENTATION OF THE PROJECT

The project “Training on Protected Reporting Systems for Professional and Grassroots Sport” (T-PREG) is a European Commission funded project within the *Erasmus+ Sport Programme 2014/2020*, aimed at promoting and introducing, in a structured way, the use of protected reporting systems in sport.

T-PREG project has piloted a specific eLearning platform on the proper creation, implementation and use of protecting reporting systems about wrongdoing at grassroots level and professional sport in Portugal, Italy, Belgium, Spain, Slovenia and Austria, available at <http://www.tpreg-training.eu/>.

The creation of content and training materials has been supported by previous robust data collection⁷ on sport actors’ perception about deviant behaviour in sport, mainly match-fixing, and reporting practices.

T-PREG data collection has shown that sport actors in the partners countries recognize that reporting wrongdoing in sport is dangerous and can damage your career and/or having negative impact in your personal life⁸. There are athletes who have been excluded of the national teams for reporting corruption in their sports, while their colleagues who fell continue their careers normally.

The objective of T-PREG is based on two important facts.

First, all around Europe, education and awareness campaigns to fight against wrongdoing in sport have created the following 3Rs schemes. The 3Rs train sports actors to (a) **Recognise** the characteristics of the problem, (b) **Resist** any proposal and, more importantly, (c) **Report** it. In practice, this model united the preventive pillars of education and sanction, helping to create the ethical,

⁷ For complementary scientific evidence see T-PREG (2019) Report: Data setting and analysis on protected reporting practices. T-PREG Global Data Collection Report – Intellectual Output 1. Online in: <http://www.tpreg-training.eu/>
See also Moriconi, M. (2019). Manipulación de resultados deportivos: relatos, percepciones y recomendaciones para mejorar su prevención. Encuentros multidisciplinares, (63).

⁸ Moriconi, M., & de Cima, C. (2019). To report, or not to report? From code of silence suppositions within sport to public secrecy realities. *Crime, Law and Social Change*, 1-22

disciplinary, and, in some countries, legal frameworks that delimit the desired behaviours of the sports players.

In consequence, integrity educational trainings, codes of conduct and ethics, and disciplinary norms have included the obligation to report any suspicion, approach or tentative suggestion to get engaged in competition manipulation practices. In some countries, such as Portugal, the obligation to denounce is incorporated into criminal law and failure to report and cooperate with disciplinary or law enforcement bodies could be sanctioned.

Second, promote reporting is considered one of the main effective measures to fight against any type of corruption. Thus, it is mandatory to promote efficient channels to do it and secure protection to those who blow the whistle. In fact, the recent *Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law* has been created following this premise.

Within this scope of public and private policies and actions undertaken against wrongdoing in sport, T-PREG's outcomes (education and policy-making materials) have become a useful tool to enhance regional and national policies. The aim of this guide is therefore to streamline and significantly strengthen the security and effectiveness of these mechanisms, building capacity through the delivery of key skills for the competent implementation, management and accurate use of the different possible models of protected reporting systems.

These practical guidelines encapsulate the outcome of the expertise and findings gathered through the data collection and analysis, together with the implementation and delivery of pilot trainings⁹.

The objective is to highlight the fact that a holistic approach would strengthen internal governance, embed a compliance culture and risk management arrangements, as well as intensive use of protected reporting systems within sport, would help sports organisations to become more resistant to potential misconduct regarding to sports competitions.

⁹ For more information and in-depth data analysis see T-PREG (2019) Report: Data setting and analysis on protected reporting practices. T-PREG Global Data Collection Report – Intellectual Output 1. Online in: <http://www.tpreg-training.eu/> Other recommended reference are:

De Cima and Moriconi (2019) Silêncio ruidoso: Percepções e atitudes dos atores desportivos sobre mecanismos de denúncia de manipulação de resultados. T-PREG Portuguese data collection report. Online in: <http://www.tpreg-training.eu/>

Bertaccini Bonoli, P. (2019). Deporte y corrupción en clave transdisciplinar: Marcos teóricos actuales y programas de actuación. *Encuentros Multidisciplinares*.

Visschers, J., Paoli, L., & Deshpande, A. (2019). Match-fixing: Football referees' attitudes and experiences. *Crime, Law and Social Change*, 1-19.

Moriconi, M. (2019). Manipulación de resultados deportivos: relatos, percepciones y recomendaciones para mejorar su prevención. *Encuentros multidisciplinares*, (63).

CONTEXT AND NEED FOR THE GUIDELINES

Given that:

- a) According to the Macolin Convention, Match-fixing is “an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others” (Art. 3.4). Match-fixing and unethical/illegal actions in sport is one of the most serious threats to sports integrity and sustainability. This practice is linked with organized crime, which sees in match-fixing and other corruption practices in sport an high-impact and low-risk opportunity to launder money from other criminal practices (drug, weapons, or organ trafficking), in the illegal (and also legal) betting market.
- b) The proliferation of a wide array of scandals, with an European and global dimension, has placed the issue on top of the agenda of sport governing bodies (IOC, FIFA, UEFA, ICC or ITF), transnational anti-corruption organisations (TI and ICSS), international organisations (European Union, Council of Europe, UNODC), law enforcement agencies (Interpol and Europol), States and sports betting operators.
- c) New regulatory framework has been created and the Macolin Convention has entered into force in 2019. The recognition of the complexity of the phenomenon ushered the adoption of a set of political and sport reforms. The draft of the Council of Europe Convention on the Manipulation of Sports Competitions, in 2014 (entered into force on 1 September 2019), is considered the most important political initiative and only international legally binding document to tackle the problem, as it requires cooperation between all stakeholders and establishes a roadmap of practical and political recommendations for the creation and promotion of institutional, legal and criminal structures to combat this scourge. In particular, Article 7.2. (C) of the Convention recommends the adoption and implementation of “appropriate measures in order to ensure effective mechanisms to facilitate the disclosure of any information concerning potential or actual cases of manipulation of sports competitions, including adequate protection for whistle blowers”.
- d) Reporting any attempt is an obligation provided in the EU Whistleblower Protection Directive (2019). Although the directive does not refer specifically to sport, it can be a guiding document for sports organisations for the implementation of its own protected reporting systems.

Match-fixing is “an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others”

Macolin Convention Art. 3.4

EU WHISTLEBLOWER PROTECTION DIRECTIVE (2019)

In October 2019, the European Union adopted the Directive on the “Protection of persons reporting on breaches of Union law”¹⁰, aimed at introducing high-level protections for whistleblowers reporting breaches of EU law in areas such as financial services, anti-money laundering and terrorist financing, privacy and personal data, the environment, public health and public procurement.

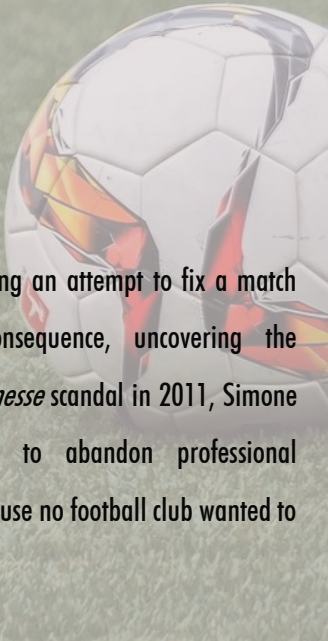
Over the next two years, the EU Member States will have to transpose the Directive into national law, granting protection to any person working in the private or public sector who is reporting information on breaches acquired in a work-related context (including individuals outside the traditional employee-employer relationship, such as consultants, contractors, volunteers, board members, former workers, and job applicants), and those who facilitate the report and assist whistleblowers, as well as individuals and legal entities connected with whistleblowers who may suffer retaliation.

According to Transparency International, the Directive provides strong common minimum standards for the protection of whistleblowers in Europe¹¹, namely because it places an obligation upon a wide range of public and private entities to establish internal whistleblowing mechanisms, in granting protection, it does not in any way take into account the whistleblowers’ motive for reporting nor their identity (it protects the identity of whistleblowers in most circumstances and grants protection to whistleblowers who have reported or disclosed information anonymously and who have subsequently been identified), and it also allows whistleblowers to report breaches

”

*After I reported the scandal,
many things changed for me.*

*All the friends I had just
disappeared (but the good
ones stayed). I was expecting
moral support from my club,
but it never came*



After reporting an attempt to fix a match and, in consequence, uncovering the *CalcioScommesse* scandal in 2011, Simone Farina had to abandon professional football because no football club wanted to sign him.

Source: Farina in [Youtube](#).

Photo by Pixabay @Pexels / CCO

¹⁰ Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law. Accessible at: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32019L1937>

¹¹ Building on the EU Directive for Whistleblower Protection: analysis and recommendations. Accessible at: <https://www.transparency.org/en/publications/whistleblower-protection-in-the-eu-analysis-of-and-recommendations>

of law internally or directly to the competent authorities and prohibits “any form of retaliation”, including threats of retaliation and attempts at retaliation, and provides a long, diverse and non-exhaustive list of examples, providing penalties to be enforced to persons who hinder or attempt to hinder reporting, retaliate against reporting persons (including by bringing vexatious proceedings) and breach the duty of maintaining the confidentiality of whistleblowers’ identity.

In addition, the new Directive allows for stronger national whistleblower protection, in the sense that Member States can introduce stricter provisions than those set out in the Directive and are prohibited from reducing the level of protection already afforded to whistleblowers.

Nevertheless, the Directive only applies to report on breaches of EU law, which means that it fails to address the protection of all whistleblowers, and therefore it is important to advocate for a broader material scope covering all breaches of the law (whether national or EU law) and threats or harm to the public interest, including the ones related to the Sports world.

On the other hand, as highlighted by many analysts, although the Directive requires organisations to appoint a person or persons responsible for managing reports independently and professionally, and to implement secure whistleblowing mechanisms, as well as a process that includes a prompt response, diligent follow-up and timely feedback, truth is, at national level, what whistleblowers can report on and be protected is still to be determined. For example, at the EU level, the new directive does not protect people reporting harassment, discrimination, or bullying.

And even regarding anonymous sources, there are some limitations, since EU countries will have to decide whether private or public entities and competent authorities need to accept and follow up on reports from unknown and anonymous sources. Some countries, for example, Spain and Portugal, have traditionally taken a restrictive stance on anonymous whistleblowing.

Finally, concerning penalties for failure to comply, it’s important to mull and take into account that many countries miss to properly sanctioning non-compliance with whistleblower protection legislation. The new Directive requires that penalties should be imposed against those who attempt to hinder reporting, retaliate against whistleblowers, attempt to bring proceedings or reveal the identity of the whistleblower, but without strict enforcement and setting of minimum penalties, the risk of an hostile environment to blow the whistle soars.

That is why most civil society organisations advocating for better whistleblowing protection systems have been urging for 1) extending protection measures to persons who are believed or suspected to be whistleblowers (even mistakenly), to persons who intended to make a whistleblowing report and to civil society organisations assisting whistleblowers, 2) strengthen the protection of whistleblowers in legal proceedings and the reversal of the burden of proof, meaning that the person who has taken a detrimental measure against a whistle-blower should prove that it was not linked in any way to the reporting or the public disclosure, and would, therefore, have happened anyway, and 3) providing

for the full reparation of damages suffered by whistle-blowers, through financial compensation and non-financial remedies.

To make it possible, is key:

- 1) to require private or public entities and competent authorities to accept and follow up on anonymous reports of breaches and that all public-sector entities without exception, and not-for-profit entities with 50 or more workers, to establish internal reporting mechanisms,
- 2) to stipulate that internal reporting mechanisms should include procedures to protect whistle-blowers and foresee penalties for natural or legal persons who fail to fulfil their obligations under the Directive, and
- 3) to require that the explicit consent of a reporting person be obtained, where possible before their report is transmitted to another authority.

On the side of public policymaking, it is also important to appoint an independent whistleblowing authority responsible for the oversight and enforcement of whistleblowing legislation and to assure that data on the functioning of the law is collected and published for monitoring and evaluation purposes.

Tennis player Marco Trungelliti followed his duty and blew the whistle about match-fixing attempts. He has emphasized that most of the players who receive offers to rig a match do not report due to fear of retaliation.

Trungelliti himself has suffered personal consequences after his report that led him to testify in the trial against three of his Argentine colleagues. He has been in torment and several of his colleagues consider him a “snitch” thereafter.



”

*My head is a
bonfire.*

I am burned out.

*I practically do
not sleep. (...) I*

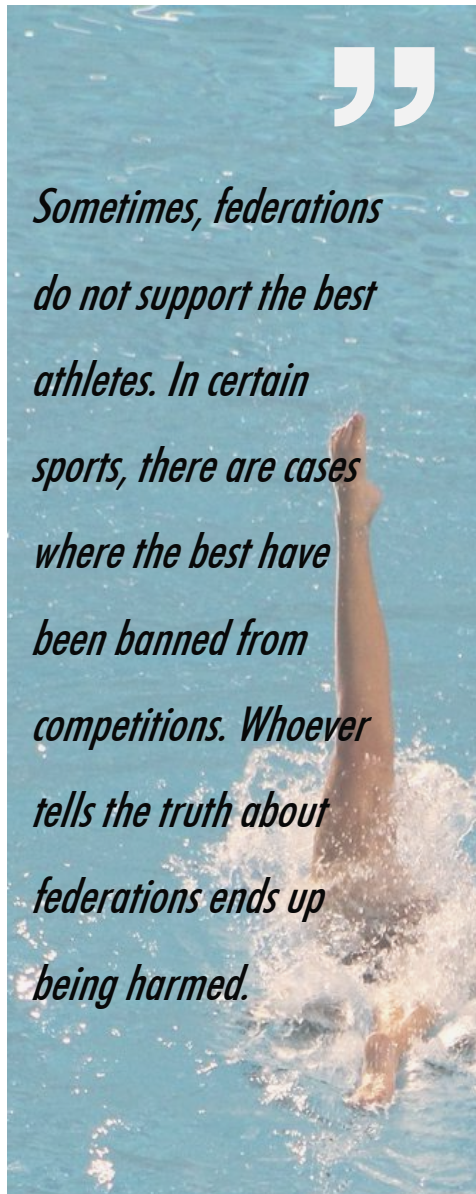
*feel a constant
defamation.*

PROTECTING REPORTING SYSTEMS IN SPORT

Preliminary Considerations

There are two preliminary considerations in assessing the effectiveness of whistleblowing protection systems.

First, there need to be a thorough understanding and clear and vocal commitment of the leadership to establish and implement whistleblowers protection systems.



Sometimes, federations do not support the best athletes. In certain sports, there are cases where the best have been banned from competitions. Whoever tells the truth about federations ends up being harmed.

Thus, it means to create a positive organisational culture. Sports actors are aware of the widespread corruption of sports and are afraid to speak out. In order to reverse this scenario, the first step is to recognise the problem and to implement an environment in which it is not only technically possible to report (e.g. type of system, system support or system interface) but it is culturally and ethically encouraged from leadership and top management. But for the first condition to come true, it is key a specific training and capacity building for Top Decision Makers: just after being made aware of existence of the problem of match-fixing as a whole, of its extirpation (also) with the creation of protected reporting systems, the role of the “Top Decision Makers” is to raise the awareness of the remaining sports actors (athletes, coaches, referees, managers, etc.).

As a second consideration, such a system needs to be supported with adequate resources, both financial and human.

As already suggested by the United Nations Office on Drugs and Crime (UNODC)¹², the creation of a network of organisations that offer support functions (advice and information, stress and life coaching, and legal support) could be a solution to the lack of economic funding or to less/more experience in the sector.

Source: T-PREG data collection. Interview with Olympic athletes. [Photo](#) by lawrav @Pixabay / CCO

¹² UNODC. REPORTING MECHANISMS IN SPORT. A Practical Guide for Development and Implementation. Accesible at: https://www.unodc.org/documents/corruption/Publications/2019/19-09580_Reporting_Mechanisms_in_Sport_ebook.pdf

Clear Procedures

Ideas of good practices on accurate procedures vary and depend on factors such as national legislation and context, size and complexity of organisations and sector, etc.

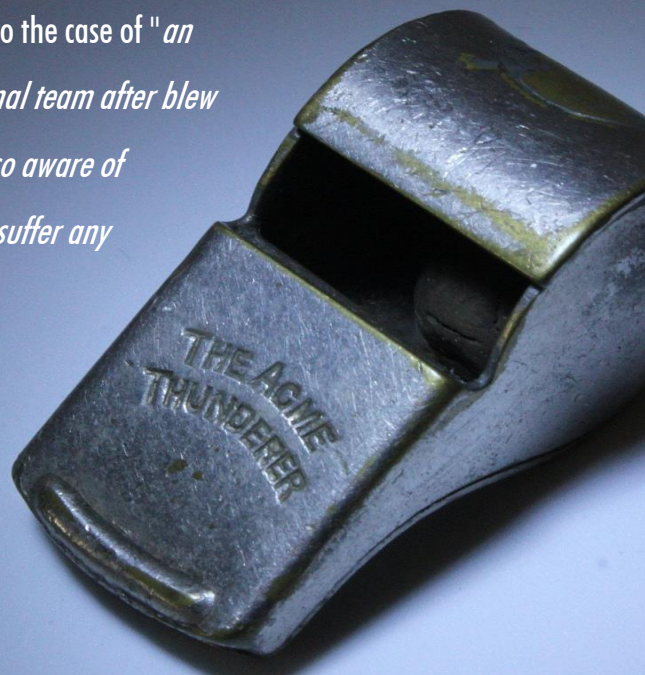
However, there are some pillars that must be respected for the protected reporting system to be a valid tool.

First, it is important to establish who can use the whistleblowing channel and who can (and under which circumstances) benefit from protection in the case of reporting.

Sometimes, sports actors keep certain types of doubts related to the reporting process. The creation of an “Integrity Office” in all sport federations, associations, unions and clubs would be a way to tackle this potential problem. This Office should remain objective, impartial and above all, to be independent from the management structure. In practice, it should not have direct responsibilities with the organisation or with the assessed department/office. An often-overlooked feature is the strong communicative ability, of human resources management centered on assertiveness, as well as the ability to persuade thanks sharing rather than mere and bureaucratic reference to prescriptions and regulations.

The head of a Sport Governing Body integrity programme confirmed that *"there are athletes who are being harmed because they have reported"* and referred to the case of *"an athlete who has been left out of the national team after blew the whistle while team mates who were also aware of suspicious issues, but remain silent, didn't suffer any consequence"*.

There are also referees seeing their career threaten because they have publicly criticised their federations.



Source: T-PREG data collection. Interview with Sport Governance Body Integrity Officer. [Photo](#) by bluebudgie @Pixabay / CCO

Second, it is important to be establish what types of complaints can be raised by those who decide to report.

Third, a very clear procedure must be in place regarding how the complaint needs to be raised (written form, verbally, web platform, in which language, what are essential elements of the complaint, etc.), to whom the complaint needs to be raised (eg.: hotline, ethics officer, etc.). Alternative reporting lines, either to management or to outside body, should be provided as well.

Promotion, Communication and Training

One of the key shortcomings of whistleblowing protection systems, which give rise to low level of reports, is lack of awareness of the possibility to report wrongdoings and different ways that potential whistleblowers will be protected. Hence, it is essential to ensure that staff are regularly informed on reporting procedures via different channels.

At the same time, the effectiveness of the report depends heavily on human skills. At this level, the key competence is based on social psychology and other social sciences, since the construction and management of the relationship with the whistleblower is crucial in order to ensure the efficiency of the complaint. Ineffective complaint treatment can contribute to a culture of fear, mistrust and prevailing a code of silence.

Addressing a Complaint

Established procedures should aim at providing that reports are being acknowledged and processed in timely manner. Protection features should be extended to those reporting in good faith, while disclosing that protection is not extended to those knowingly making a false complaint.

Ensuring the fair treatment of complaints is strengthened by the unrestricted ability to address higher levels in the reporting chain (eg.: management).

On the other hand, the sense of impunity is one of the factors that can undermine future complaints. The in consequence of the complaint can, in fact, be avoided with information sharing and exchange, at national and international level, with law enforcement agencies, which have criminal investigation powers that sports organisations do not have.

At the same time, the whistleblowers need to be kept updated on the status of their complaints and on the outcome of the investigations.

Whistleblower Protection and Support

Protection of whistleblowers can only be achieved by a clear statement, which is backed up by real commitment, that any kind of retribution (including discrimination, lack of promotions and training, harassment, job sanctions or in extreme scenarios even physical threats) will not be tolerated. Such retaliation or threats should be treated as a disciplinary matter within the organisation.

Support the whistleblower during the reporting process is probably the most difficult moment of the complaint. It is at this stage that the whistleblower may be subject to reprisals, threats, or feel doubts about his decision. Trying to ensure that the whistleblower receives the advice (legal, psychological and criminal) and necessary information after making the complaint, is essential for the whistleblower's protection.

Sometimes, career constraints (career stagnation, dismissal, relegation to lower ranking team) prevent sports actors from reporting illegalities or irregularities. Support for the dual career's development may avoid the subordination of these actors to less positive sporting contexts.

Evaluation and Review

Reporting mechanisms should be subjected to periodic reviews and evaluation in order to help the organisation to improve its existing systems. Collection of the data and related records should be made in a way that ensures data protection is in place.

RISK FACTORS

The main risk factor that can completely affect the security and effectiveness of a protecting reporting system is the resistance to admit the existence of corruption in your club / modality, by some "Top Decision Makers" (something that happens mainly in grassroots level).

Denial or underestimate the problem can lead to the implementation of protected reporting systems, solely, to comply with legal obligations. This can result in a set of disintegrated approaches that hinder the interconnection of information and, consequently, the possibility of preventing and fighting sports corruption cases more effectively.

Sometimes, Top Decision Makers recognise these problems in their sport and strive to solve them, but often don't have the financial resources to implement an adequate protecting reporting system or are not aware of the necessary best practices.

They, normally, tend to resign themselves to the lack of financial resources and to embark separately in online reporting channels, which are not very user friendly and are completely out of context.

Naturally, unaware of the most appropriate practices, they are unable to raise awareness of other sports actors to the importance of the complaint and to the most appropriate procedures. At this level, a very common mistake consists in overlooking the use of social science and social psychology skills to handle with complaints. This can result in several problems. Failure to safeguard the whistleblower's confidentiality may increase the risk of reprisals and, consequently, decrease the interest in report again. Sports actors who are aware of this reality will also feel less motivated to report irregularities and illegalities.

It may also happen that the complaint is treated confidentially, but the complainant does not receive support after making the complaint. In cases where there is a reluctance by sports organisations to admit corruption cases, or lack of experience / competence in investigating criminal matters, it is very likely that there will be no sanctions for the offender. In this way, the inconsequence of the process may act as a further deterrence factor for future complaints.

During an International Conference on Sports Integrity, held in Portugal in June 2019, the national director of the Judiciary Police, Luis Neves, called for an end to "hypocrisy and cynicism" because those who report and collaborate with the investigation are, in many cases, "the only ones convicted and serving time" (Vitorino, 2019).

In other interviews undertaken during T-PREG, law enforcement agents from other partners' countries have confirmed the same situation.



Source Vitorino, Sergio (2019): "Polícia Judiciária exige proteção para arrependidos", in Correio da Manhã on line, June 7th, 2019. Accessible on line: <https://www.cmjornal.pt/portugal/detalhe/policia-judiciaria-exige-protecao-para-arrependidos> (Last access June 20th, 2019). Photo by Hasselqvist @Pixabay.

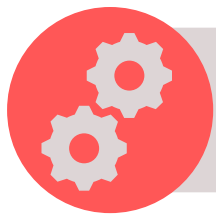
Finally, the creation of protecting reporting systems and the constitution of the obligation to report illegalities and irregularities in sport, can see its legitimacy undermined (and, consequently, all its effectiveness) organisation whenever sports leaders are recurrently associated to sports corruption scandals with their reputation at stake.

RECOMMENDATIONS



Why to promote protected reporting systems in sport organisations

1. It helps to early detect irregularities and malpractices within the sport and the relevant organisation.
2. It provides feedback on the organisational/institutional integrity performance.
3. It instills greater trust, social and reputational legitimacy to the organisation.
4. It caters for a trustworthy and integrity environment in the sports community and within the organisation staff.
5. It builds trust close to relevant stakeholders (investors, federates, partners, sponsors, citizens, etc.).



How to implement protected reporting system in sports organisations

1. To create two different channels, since a protected reporting system has to comply with certain specific guarantees and the FAQs channels do not. At the end, the important thing is to comply with these requirements even if it is only one channel, because since complaints follow a very specific process and FAQs do not need a rigorous protection procedure, nor is it relevant who receives or grants information, unlike the protected reporting system.
2. Confidential or anonymous reports can be accepted, although it is strictly necessary to ensure always that the confidentiality requirements are met in any case.
3. To provide a system highly able to guarantee the security of the information, the protection of the confidentiality of the reporting system, the respect of fundamental rights of the reporting and

concerned persons and, in case of receiving complaints from outside the system, to have a protocol to know what channels to follow in those cases, in order to guarantee the above.

4. To guarantee of accessibility, navigability and clear conditions of use of the channel.
5. To provide for the creation of an economic fund for those who report. As has been pointed out, those who report often suffer intimidation also from the point of view of their career. For this reason, financial aid can be an incentive to report.

CONCLUSIONS

Fighting corruption is among the priorities of the European political agenda.

In more recent years, match fixing has become one of the most intricate problems of modern sport.

Sporting and institutional stakeholders interviewed during T-PREG data collection pointed out that some negligence and impartiality with which sport journalism deals with reports of corruption and scandals triggered fear of imprudent public exposure:



Newspapers are authentic communication tools of clubs and political parties. Only what matters to them should be published. In the past, I have often felt internal pressure not to publish certain news. From the moment where I was already a journalist with a vast career, I had no problem in standing my ground and publishing what I wanted anyway. But younger journalists would not have the chance to do it.

Journalist might not be able to tell the story on match fixing because newsroom do not want to print it out. They know they will not be able to get any meaningful interview in sports any longer.

Source: T-PREG data collection. Interview with sport journalists in different partner countries. Photo by Gratuit @FreemagesLive.co.uk / CC BY 3.0

Consequently, the governing bodies of sport (such as the International Olympic Committee -IOC, the Fédération Internationale de Football Association -FIFA- or the International Tennis Federation -ITF-), international institutions (such as the European Commission, Council of Europe, United Nations), law enforcement agencies (such as Europol and Interpol), gambling regulators and

governments have adopted a "zero tolerance" policy towards rigged competitions and safeguarding the integrity of sport is became the most important challenge to be respected.

Despite this premise, the best practices implemented to stem the phenomenon still seem little used.

Indeed, protected reporting systems are extremely valuable tools to prevent and combat match fixing and other illegal and / or unethical behavior.

A growing number of European countries have their own laws to protect whistleblowers, but studies suggest that implementation is still poor.

In any case, whistleblower protection must be effectively implemented to reap the benefits.

First of all, the reported difficulty in building the burden of proof and the related feeling of impunity that exists in sports actors can lead to the decision not to report. This happens when there is the perception that corrupt practices are common and rooted and that, even when discovered, probably the guilty will not be punished.

It is also necessary to take into account the existing camaraderie that creates that "*culture of silence*" which requires resolving delicate or unpleasant issues within the environment in which they arose, without making them public, thus safeguarding the interest of the whole group. Obviously, silence can also be justified by the fear of negative consequences for one's professional activity or, ultimately, for one's physical integrity.

Finally, protected reporting systems should be implemented in close cooperation with judicial authorities and measures should be taken to ensure that all actors involved, regardless of level, are aware of these protected systems.

Overall, there is still much to be done to gain a full understanding of the phenomenon of the manipulation of sports competitions and of the individual and collective interests underlying the process of defining policies and the tools to combat it.

Through this guide, T-PREG project intends to offer objective data and identify, in a structured approach, recommendations for establishing more security and effectiveness in the implementation of protected reporting systems in sport organisations.

We must be clear on one point: it is necessary, first of all, to work on a cultural change in sport organisations in order to enhance the human factor.

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