



Competition Manipulation and Gambling:

Threats to Canadian Sport and the Gaming Industry

Executive Summary

**White Paper in Response to the
2023 Symposium on Competition
Manipulation and Gambling in Sport**

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McLaren Global Sport Solutions (MGSS)

Canadian Centre for Ethics in Sport (CCES)



Executive Summary

With the surging popularity of sport betting and the rapid legalization of single-event sport betting in jurisdictions across North America, the risk of competition manipulation has increased dramatically.

In April 2019, the Canadian Centre for Ethics in Sport (CCES) and McLaren Global Sport Solutions Inc. (MGSS) hosted the first international Symposium on Match Manipulation and Gambling in Sport to raise awareness among key stakeholders of this growing threat to the integrity of sport.

Building on the key recommendations that came out of the 2019 symposium and following the legalization of single-event sport betting in Canada in 2021, the CCES and MGSS joined forces again to host a second international event – the 2023 Symposium on Competition Manipulation and Gambling in Sport. Hosted in May 2023, the symposium brought together stakeholders from the Canadian sport gambling ecosystem, international experts, best practices from international sport, and countries that are leading the way to address the problem. The purpose of the symposium was to deepen stakeholders' understanding of the threat that competition manipulation poses to athlete safety and sport integrity, and to make specific recommendations that will protect Canadian sport.

This white paper brings together the combined learnings from both symposia to inform a path forward for Canadian sport.

Match fixing is an international phenomenon and is often linked to gambling, with criminal networks exploiting unregulated gambling markets. This presents a major threat to the integrity of sporting events, with sportspeople subject to considerable financial temptations and pressure to influence sporting objectives and outcomes.

- European Commission

The Canadian Context

Sport betting in Canada has changed drastically since Bill C-218 (Safe and Regulated Sports Betting Act) came into effect on August 27, 2021. Through the bill, the federal government decriminalized single-event sport betting with the intention of reducing the harms associated with grey- and black-market gambling, including competition manipulation, and to ensure that Canada would benefit economically from this growing industry.

Grey and black markets that offer online betting, including single-event sport betting, were well established in Canada before it was legalized and now regulated sport-betting platforms must compete with them for customers. In comparison to unregulated betting markets in which bookmakers often operate with limited or no oversight, regulated markets provide better opportunities to monitor and address issues related to competition manipulation.

Regulated operators are building a reputation as the platforms of choice for the betting public, relying heavily on marketing and high-profile sport organization sponsorships to attract customers. However, unbeknownst to most people, betting operators must be compliant with regulatory requirements that include safeguards to protect the integrity of the bet from manipulation and to educate the betting public on the importance of responsible gambling behaviour. This is in stark contrast to unregulated betting markets in which bookmakers operate with limited oversight.

The dramatic increase in sports betting advertising and sponsorships has created a new level of public awareness around the availability of sport gambling in Canada. Advertising and sponsorships of sport organizations have led to an increase in sports gambling which could, in turn, lead to an increase in potential harms related to gambling, including competition manipulation.

In Canada, the implementation of single-event sport betting falls under provincial and territorial jurisdiction. Provinces are seeing the benefits of additional revenue through taxation thanks to these massive new revenue streams; however, it remains largely unknown if or how any of the money, either through the operators or the provincial governments, is flowing back into sport or being used to support initiatives designed to prevent competition manipulation or other threats to sport.

To take advantage of this new revenue stream, there are Canadian sport organizations that currently have sponsorship agreements with regulated betting operators. While beneficial to the sport organization, it can lead to an increase in betting on their sport and consequently carries a greater risk of competition manipulation, so organizations are turning their attention to protecting their athletes, coaches, officials, and other support personnel from the associated risks.

Sport organizations have adopted a multitude of approaches to combat competition manipulation and manage the underlying threats to the integrity of sport and athlete safety. Governance reforms, sophisticated analytics, and investigations have all become a priority for many professional and international sport federations.

The risk of competition manipulation is greater for leagues and events where athletes earn lower wages, which leaves them more vulnerable to bribes. According to a 2012 World Soccer article, “match-fixers are most successful when the chances arise to gamble on one of the world’s fringe leagues away from the spotlight.” Susceptible young athletes or lower-earning professionals are targeted and groomed by criminal “fixers” who study their habits and vulnerabilities, then attempt to develop relationships, then exploit them.

Many amateur Canadian athletes don’t earn a living wage, leaving them vulnerable not only as targets for fixers, but also to the temptation of betting on their own competitions. The lack of organizational policies and mandatory education leaves athletes, and the whole Canadian sport community, exposed.

2023 Symposium Overview

The speakers at the symposium represented all corners of the sports betting and competition manipulation landscape, including representatives from INTERPOL, the FBI, the Responsible Gambling Council of Canada, the Alcohol and Gaming Commission of Ontario, the Canadian Gaming Association, the NBA, the Dutch National Platform, Curling Canada, and athletes, including Jacqueline Simoneau, Canadian artistic swimmer and IOC Athlete Ambassador.

The information provided by speakers helped inform how best Canada should prepare itself to address competition manipulation. A summary of each symposium session is captured below.

Competition Manipulation Policy Pilot Project

The CCES, the Canadian Olympic Committee (COC), and six national sport organizations recently reached the end of a pilot project to test the feasibility and effectiveness of a national competition manipulation policy. Modelled on the Canadian Anti-Doping Program, the project included the customization and implementation of the policy template, mandatory education for athletes and support personnel, confidential reporting and investigations, case management with the assertion of violations and proposed sanctions, independent hearings, and public disclosure for confirmed sanctions. The feedback gathered from this 18-month project has assisted in the development of a harmonized, national competition manipulation policy that is explored below where the post symposium activities are explored.

The Athletes' Perspective

Athletes are often scapegoats for their roles in the manipulation of sporting events, and at the 2023 symposium several athlete speakers discussed the need to shift the focus and to address the problem using an athlete-centered approach. A change of thinking should include examining solutions to the reasons why athletes are vulnerable and should be supported by comprehensive education.

Whether an athlete alters their performance or provides insider information to sources who use it to their advantage, competition manipulation can take various forms. Athletes are particularly vulnerable to being victims of competition manipulation and many don't understand what it means to participate in it or the resulting consequences. This underlines the need for comprehensive education and policy support systems for athletes — a key theme throughout the 2023 symposium.

International Approaches

While single-event sport betting is new to Canada, there is a long-standing history of regulated gambling in many countries. As a result, international sport governing bodies, international governments, and integrity bodies have significant experience addressing competition manipulation. Canada is in a good position to learn from and adopt the best practices that have emerged from international cooperation and sport integrity initiatives.

Olympic Movement Code on the Prevention of the Manipulation of Competitions

The Olympic Movement Code on the Prevention of the Manipulation of Competitions (IOC Code) harmonizes regulations to protect competitions from manipulation and is an integral part of the Olympic Charter and the IOC Code of Ethics. The CCES, in partnership with the COC, developed a competition manipulation policy template that is aligned with the IOC Code and is available for sport organization to implement.

Macolin Convention

The Macolin Convention is the only rule of international law on competition manipulation. It provides countries with a roadmap for addressing the issue domestically and includes common definitions and the structure for a national platform. The Macolin Convention is largely a European tool, and it has been signed by 32 states, but it also welcomes other countries who have adopted this unified approach to competition manipulation, such as Australia and Morocco.

National Platform Model

National platforms are responsible for coordinating the fight against the manipulation of sport competitions and must cooperate with all organizations and relevant authorities. They receive, centralize, and analyze information on irregular and suspicious betting or non-betting activities related to sport competitions in their countries. The 2023 symposium, there was an explanation about the Dutch national platform and as well as the role of the Group of Copenhagen, which is the advisory group for the Macolin Convention's Follow-up Committee to enhance the establishment, operation, and development of national platforms.

International Federation Responses

Independent integrity units are the independent bodies responsible for ensuring the integrity of a sport in specific areas of operation. These units are often involved in a wide range of integrity-related issues including safe sport, anti-doping, competition manipulation, and governance, and typically use one procedural structure for all disciplinary matters. The International Tennis Integrity Agency (ITIA) and Athletics Integrity Unit (AIU) are widely regarded as two of the best models of anti-corruption and governance models in sport.

FIBA, the international basketball federation, recently adopted a slightly different model. Rather than creating a separate unit, which can be costly and resource intensive, FIBA appointed a single person to act as an Independent Integrity Officer using an “on-demand” model.

The International Ice Hockey Federation (IIHF) has one of the most comprehensive integrity programs in international sport using a six-pillar approach to combating the threat of competition manipulation in ice hockey.

Education and Harm Reduction

Competition manipulation poses an immense risk to sport, especially to athletes at the beginning of their career who often know little to nothing about its dangers and the various forms manipulation can take.

As single-event sport betting grows in popularity, athletes, coaches, officials, and support personnel are increasingly exposed to efforts to manipulate sporting competitions, and for the most part they are not adequately educated about match fixing and are unaware of their vulnerability. Education and harm reduction must be integral components of initiatives designed to protect participants and the integrity of sport.

Key Recommendations

The following recommendations are informed by the material shared at the 2023 symposium and are based on our growing understanding of the best practices to address the threat of competition manipulation in sport.

- 1.** Develop a national policy for Canadian sport to address competition manipulation that is inclusive of all stakeholders, developed in consultation with athletes, adopted by all national and multi-sport organizations, and administered by an independent body.
- 2.** Develop comprehensive educational programming that is targeted at athletes, coaches, and other participants to protect them from the harms caused by competition manipulation and to inform them of their responsibilities under the national competition manipulation policy.
- 3.** Create a national working group to advise on the administration of a national policy, share regulation and policy best practices, harmonize the administration of the national policy across Canada, and provide direct lines of communication among all stakeholders, including national and multi-sport organizations, all provincial sport gambling regulators, law enforcement, legal, government, and betting operators.
- 4.** Develop a revenue sharing system from the proceeds of sport gambling that ensures an appropriate percentage of revenue is allotted to sport, with an emphasis on community sport development and harm reduction.
- 5.** Encourage the Government of Canada to sign and ratify the Macolin Convention to prevent, detect, and punish match fixing.



Post Symposium

Since the symposium in May 2023, there have been significant changes and updates to the betting and competition manipulation landscape in Canada.

The development of a national policy (Recommendation 1 above) is supported by the recently announced [Future of Sport in Canada Commission](#).

The learnings from the Competition Manipulation Policy Pilot Project have contributed to the ongoing development of a national harmonized policy against competition manipulation in sport that will be administered by an independent organization (national policy currently under development). This approach will relieve national sport organizations of the administrative burden of administering the policy for their sport and will remove real and perceived conflicts of interest.

Recently, the CCES, in collaboration with the COC, has updated the “Understanding Competition Manipulation” online education course to include the latest updates from the IOC Code. Further, the CCES and the COC are working to ensure that all participants of the 2024 Youth Olympic Games and the 2024 Paris Olympics are well educated on competition manipulation and the rules that apply to them.

Canadians could not have anticipated the onslaught of advertising from betting operators that would follow when Bill C-218 was passed. The concern for sport is that increased advertising leads to increased gambling and a greater risk of competition manipulation.

In April 2023, the AGCO held consultations with mental and public health organizations, responsible gaming experts, gaming operators, broadcast and marketing groups, as well as the public, and determined that amendments to the AGCO standards prohibiting the use of athletes and restricting celebrity endorsements in advertising and marketing materials were required to safeguard children and youth who may be particularly susceptible to this content. Amendments to the AGCO standards are scheduled to take effect February 28, 2024.

Looking beyond Ontario, Senator Marty Deacon has brought forward Bill S-269 to the Senate in response to concerns regarding the volume of advertising and lack of regulations. Bill S-269 calls for the development of a national framework to regulate advertising for sports betting in Canada.



About McLaren Global Sport Solutions (MGSS)

MGSS was founded in 2014 as a specialized professional services firm focused on sport integrity to help clients solve complex governance challenges. We serve a range of sport organizations including national and international sport federations, domestic leagues, universities, and professional sport organizations.

Mission: To help sports organizations protect and enhance their brand, navigate difficult organizational issues related to ethics, governance and integrity, and inform strategic business decisions.

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About the Canadian Centre Ethics in Sport (CCES)

The CCES is an independent, national, not-for-profit, multi-sport organization with a vision of fair, safe, accessible, and inclusive sport for everyone. We believe the fundamental purpose of sport can and should be to make a positive contribution to Canadian society and that ethical sport is the best way to achieve that.

Mission: To work collaboratively to address unethical behaviours and promote a values-based approach to sport to ensure positive sport experiences for all.

Vision: Sport is fair, safe, accessible, and inclusive.

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