

CLEARINGSPORT CONCEPT NOTE: TOWARDS AN ENTITY COUNTERING CRIME, CORRUPTION AND OTHER INTEGRITY BREACHES IN SPORT

A detailed explanation of the proposal from the ClearingSport project

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Play the Game

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Sport: A public good under threat

Sport in all its shapes – from the local grassroots level to the highest global elite – has an unrivalled potential to transmit human values such as equality, teamwork, social cohesion, respect for values, rules and laws, community spirit, and solidarity, as well as fun and enjoyment.

Worldwide, sport is recognised as a public good, and as such it should belong to those who enjoy it as practitioners or audiences. The structure of most sports organisations should ensure that sport is run by its members and embedded in a democratic culture.

However, these qualities have long been threatened. Sport's explosive commercial growth has created an unregulated industry that attracts and allows crime and corruption to flourish. Alongside other pressing issues, match manipulation, systemic doping, financial fraud, and corruption among sports officials have become widespread. Moreover, the many forms of athlete abuse are revealed with increasing frequency across all sports disciplines.

National public authorities have difficulties countering international transgressions, and many governments hesitate to confront a sector as popular as sport. Some governments even add to the integrity challenges by putting national prestige achieved through elite sports performance over the integrity of sport.

These developments not only destroy trust in sport's governing bodies; they undermine the positive impact of sports activity and challenge the rule of law. These damages have profound consequences, with immeasurable costs to individuals and society and significant economic costs for sport and public authorities.

It is time to reverse these developments and push back the forces that jeopardise sport as a public good.

Since the start of the century, numerous measures and considerable investments have intended to protect athletes, officials, and communities from the harmful effects of crime, corruption, and other breaches of integrity. To name a few, sports organisations have created ethical committees and codes of conduct. State authorities have tightened laws that affect sport. Transnational organisations have produced innumerable resolutions and recommendations. Despite good intentions, these efforts too often fail because rules and regulations are not enforced.

That is why we are introducing a new proposal for an independent, overarching entity dedicated to combating crime, corruption, and other breaches of integrity in sport. This initiative is grounded in the findings of the *ClearingSport* project.

What is ClearingSport

Over the past 25 years, different actors have suggested a stronger coordination of efforts to address integrity issues in sport. In 2022, [experts called on Play the Game](#) to revitalise the idea of an international entity able to counter all kinds of crime and corruption in sport and protect athletes and those who interact with sport.

This led Play the Game to start the ClearingSport project.

The voices shaping ClearingSport

ClearingSport has attempted to capture the opinions of over 200 experts across a broad range of stakeholders:

- Academics
- Athletes
- Journalists and media organisations
- Judiciary bodies, including their members and representatives
- Law enforcement agencies and investigators
- Specialised anti-corruption agencies
- Sports integrity bodies, including their members and representatives
- Relevant activists and NGOs

These groups represented a wide range of expertise, including:

- Anti-corruption and integrity frameworks
- Criminal, tax, and financial laws and their enforcement
- Ethics and compliance
- Human rights and athlete welfare
- International initiatives and collaborations
- Legal and judicial processes
- Media and investigative journalism in sport
- Sport-specific crimes, including match-fixing and doping
- Sports governance and regulations

With a few exceptions, representatives of governments and sports governing bodies have not yet been consulted. Their involvement will be essential for the success of our proposal, but we decided to let experts shape it and then open a broad public debate with governments and sports organisations as key stakeholders at the time of its launch.

The experts were consulted and engaged through various means, including:

- Surveys on global integrity in sport
- Discussions on global integrity in sports, involving multiple stakeholders in public and private settings
- A dedicated multi-stakeholder advisory group of twenty members

[A full timeline on the foundations of ClearingSport can be found here](#)

What we have done

In collaboration with this extensive group of experts, the ClearingSport project has conducted various types of research and analysis, including:

- Systemic reviews and contextual analyses
 - Systematic literature reviews of sports governance and integrity to synthesise existing research and key debates
 - Event history analysis to construct a timeline of major developments over the last 25 years, including noteworthy scandals and criminal cases, key reforms in sports governance, and best practice examples in sports integrity
- Legal and policy analyses
 - Comparative legal and regulatory analysis to map existing legislative and regulatory frameworks affecting the field of sports integrity
 - Stakeholder and network mapping to assess partnerships, initiatives, and mechanisms both in and outside of sport established to deal with the increasing risks
- Assessments of
 - Economic impact, to evaluate the costs associated with criminal and corrupt activity in sport
 - Policy effectiveness, to test the efficacy of existing efforts to tackle crime and corruption in sports and identify the remaining gaps for improvement

About this concept note

This concept note presents our findings of the current gaps and failures in the sports system that tolerate the continued exploitation of sport and its participants for private gain, with the aim to:

- Raise awareness about the issues sport is facing and what they cost sport and society.
- Create a sense of urgency about the need to take action, given that corruption and integrity problems grow as technology evolves.
- Offer insights into how an international entity could strengthen and facilitate such action.

For an executive summary, we suggest you read [the booklet](#) that presents our main findings. This concept note explains our findings in greater depth, details our analyses, and builds upon and references the relevant ongoing debates in the field. It is structured as follows:

- An overview of the problem, including:
 - Risks and threats of breaches of integrity and their corresponding costs
 - Analysis of the existing mechanisms and frameworks
- A proposal for an entity, including:
 - Capacities it should have to solve the identified problems
 - Principles for further design
 - Next steps towards a final solution

What ClearingSport proposes

ClearingSport aims to prepare the ground for an independent international entity to counter corruption, crime, and other integrity breaches in sports and protect athletes and other participants at all levels of world sport.

The body must operate on the basis of a regulatory framework defined by experts in the field and relevant stakeholders from public authorities, sports governing bodies, athlete groups, academia, media, fans, and the sports industry. Furthermore, it needs to have a multi-disciplinary approach, engaging with statutory agencies/bodies¹ responsible for public health, child and adult protection etc.

Taking a person-centred approach and reflecting that remedy starts at the point of recognition and referral, its legal mandate should include an oversight and compliance mechanism with an accompanying culture to ensure implementation and enforcement of the regulatory framework. It must have sufficient resources and competencies to carry out investigation and intelligence sharing. It should also be able to offer support in dispute resolution and case/incident management as well as other solutions such as mediation and education.

International sports organisations were established more than 100 years ago to ensure that every athlete on the planet played by the same rules. This centralised power gives sport a unique condition for also bringing its officials and other stakeholders under a common playbook.

But sport cannot solve its problems alone and has proven unable to regulate itself. We need many other stakeholders to engage in creating solutions, including parliaments and

¹ A statutory authority or body is a government agency that has been given specific powers in order to carry out a particular task.

governments, multilateral institutions, sponsors, rights holders, the media, athlete's associations and fan groups.

With this concept note, ClearingSport intends to revitalise and inspire the ongoing debate about how to push back crime, corruption and abuse in sport.

Work to be continued

This concept note includes proposals embracing several problems and outlines how they could be best addressed. This enables you – the reader – to approach the content with a selective eye, not as an all-or-nothing exercise.

Although we believe that an all-encompassing entity will be the most effective solution, we will also appreciate if any part of this proposal is translated into noticeable progress in reducing breaches of integrity in sports.

You may embrace certain elements and reject others, and we encourage readers to refine and adapt our proposals as we continue to work together to shape efficient solutions in sports. However, we recognise that the meaning and effectiveness of these proposals depend on the context in which they are applied. While we encourage a flexible approach, we also emphasise the importance of considering the broader framework to avoid potential misinterpretation.

Disclaimer

This document is not a scientific study. The information presented here is based on open-source materials, with links and resources provided for reference. It is not intended to be comprehensive but rather serves to offer an overview of the context within which the issues that ClearingSport is addressing should be understood. Readers are encouraged to consult the attached resources for more detailed information.



The 1998 revelation of bribery of IOC members when selecting Salt Lake City as host of the Winter Olympics triggered governance reform at the IOC but was also an eye-opener drawing public attention to a series of sports corruption scandals over the next 25 years.

Photo: Smiley N. Pool/Houston Chronicle/Getty Images

Part I: The problem: crime, corruption, and other breaches of integrity in sport

Crime, corruption, and other breaches of integrity are indicative of the misuse of sport for private gain rather than public benefit. In this section we explore how these issues undermine and erode the integrity of sport.

The challenges

We have identified and explored the following challenges throughout this research:

- Bribery
- Competition manipulation/ match-fixing
- Doping use and doping-related drug trafficking
- Human rights abuses
- Illegal sports betting
- Interpersonal violence
- Money laundering
- Tax fraud and evasion

We can see evidence of these challenges, as outlined below.

1. Through events

Following diverse scandals within sports since the turn of the century, the application of laws and regulations on national corruption, bribery, fraud and other provisions to sports actors has led to the sanctioning of various individuals.

[Our compiled timeline](#) outlines major institutional and regulatory frameworks that have been established, often in reaction to a scandal or breakdown in the capacity and ability of sports to address threats to its integrity.

Our analysis of this timeline, among other evidence, illustrates the growing realisation that only a global, independent entity is the most effective approach to regulating and enforcing efforts to prevent and address breaches of integrity across sports. This proposal continues the call for international action that has followed early scandals, such as the Salt Lake City Olympics, to more recent crises.

2. Through costs

When sport is exploited for illicit purposes and private gain, there are human and economic costs. Crime and corruption not only weaken trust in sports competitions and those who

govern and participate in them; they damage society. Throughout the next section, we include examples, where relevant, of the costs of these challenges.

Defining the challenges

This report investigates crime, corruption, and other breaches of integrity in sports that exploit sport for ‘private gain’.² For the purposes of this research, we have understood ‘private gain’ to refer to the interests of individuals, organisations, and other entities that contradict public interests. ‘Public interests’ refer to the common positive interests of society. The terms crime, corruption, and breaches of integrity are used to recognise that not all activities that misuse sport can be considered as crimes.

For example, several of these practices are considered ‘crimes,’ in the sense of being unlawful acts punishable by a state or other authority. However, many of the criminal practices we explored are not limited to or specific to the realm of sport, like bribery, drug trafficking, human rights abuses, illegal betting, money laundering, and tax evasion and fraud. However, they nonetheless manifest in sports contexts. Other sports-specific crimes, like match-fixing and doping, may or may not be criminalised and – if they are – are difficult to enforce.

Corruption can manifest as punishable acts. For example, Engineers Against Poverty, which promotes infrastructure policy and practice with sustainable social, economic and environmental impacts, has found corrupt practices in every stage of the project cycle of mega-sport event (MSE) infrastructure projects, including bribery or nepotism during the contract award, bid-rigging to manipulate public tenders, overbilling and artificial claims to inflate construction costs, and fraud to mask bad design, under-performance and poor quality.³

Corruption can also indicate a deviation from collectively held moral or ethical standards. Considering sports organisations proclaim that some of the educational value of sport derives from respect of rules, the misuse of sport undermines this central value.

Sports ‘integrity’ has been used to broadly refer to these “ethical principles”⁴ that uphold the values that make sports a positive and inspiring part of society. To capture the practices that may not fall under traditional definitions of crime and corruption, we utilise the term

² Our research aligns with the understanding of private gain that extends beyond the idea of ‘private’ as referring to the ‘private’ sector, but rather ‘private’ as the interests of individuals, organisations, and other entities that contradict public interests. This was developed in referencing Transparency International’s definition of corruption as “the abuse of entrusted power for private gain.” Transparency International, “What Is Corruption?,” Transparency.org, accessed December 3, 2024, <https://www.transparency.org/en/what-is-corruption>.

³ Maria da Graça Pardo, “Changing the Game: A Critical Analysis of Large-Scale Corruption in Mega Sport Event Infrastructure Projects” (Engineers Against Poverty (EAP), 2021), https://engineersagainstpoverity.org/wp-content/uploads/2021/01/EAP-Insight_Corruption.pdf.

⁴ International Olympic Committee, “Integrity in Sport: IOC Approach” (International Olympic Committee, May 2023), <https://stillmed.olympics.com/media/Documents/Beyond-the-Games/Integrity/IOC-Paper-on-Integrity-in-Sport.pdf>.

“breaches of integrity,”⁵ which can be defined as actions, behaviours, omissions, or practices that undermine these ethical principles of individuals, organisations, or competitions in sport.⁶ The following challenges are listed in alphabetical order.

Bribery

Bribery is most easily understood as “the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.).”⁷

The United Nations Convention against Corruption (UNCAC) specifically defines bribery in the context of public officials: “The promise, offering, giving, solicitation or acceptance by or of a national public official, foreign public official or an official of a public international organisation, directly or indirectly, of an undue advantage for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties, or to obtain or retain business or other undue advantage in relation to the conduct of international business.”⁸

Statistics concerning the costs of this challenge include the following:

- Sports governing bodies received estimated bribes worth 1.1 billion US dollars during the 2010s.⁹
- FIFA executives received 150 million US dollars in bribes in exchange for marketing and TV rights to FIFA tournaments.¹⁰

⁵ This definition of “breaches of integrity” borrows from the conceptualisation of “race and racism” found in Bangstad and Fuentes (2023), which asserts that while the term “race” is not scientific and “does not reflect a biological reality”, the concept of “race” has “real social and material consequences” that appear in the form of “racism”. In the same sense, “integrity” is a nebulous concept based on individual ethics; however, “breaches of integrity” represent tangible consequences in the world of sport. For this reason, this proposal utilises the term “breaches of integrity” but does not linger on the debates of defining the concept of “integrity” in itself. Sindre Bangstad and Agustin Fuentes, “Race and Racism,” ed. Rachel Cantave, *Open Encyclopedia of Anthropology*, November 30, 2023, <https://doi.org/10.29164/23raceandracism>.

⁶ These three types of integrity were determined in referencing Alfred Archer, “On Sporting Integrity,” *Sport, Ethics and Philosophy* 10, no. 2 (2016): 117–31; Lea Cleret, Mike McNamee, and Stuart Page, “‘Sports Integrity’ Needs Sports Ethics (and Sports Philosophers and Sports Ethicists Too),” *Sport, Ethics and Philosophy* 9, no. 1 (2015): 1–5; Simon Gardiner, Jim Parry, and Simon Robinson, “Integrity and the Corruption Debate in Sport: Where Is the Integrity?,” *European Sport Management Quarterly* 17, no. 1 (2017): 6–23.

⁷ Transparency International, “5. What Is Bribery?,” Anti-Bribery Guidance, accessed March 27, 2025, <https://www.antibriberyguidance.org/guidance/5-what-bribery/guidance/>.

⁸ United Nations, “United Nations Convention against Corruption (UNCAC),” Resolution (Merida, Mexico: United Nations, December 9, 2003), art. 15, <https://www.unodc.org/unodc/en/corruption/uncac.html>.

⁹ Wladimir Andreff, *An Economic Roadmap to the Dark Side of Sport*, vol. 2 (Springer, 2019).

¹⁰ Michael E. Miller and Fred Barbash, “U.S. Indicts World Soccer Officials in Alleged \$150 Million FIFA Bribery Scandal,” *Washington Post*, May 28, 2015, <https://www.washingtonpost.com/news/morning-mix/wp/2015/05/27/top-fifa-officials-arrested-in-international-soccer-corruption-investigation-according-to-reports/>.

- Former IAAF (now World Athletics) president Lamine Diack was convicted in 2020 for accepting millions in bribes to cover up Russian doping cases. A Paris court found that Diack and other senior officials allowed at least 23 athletes to escape sanctions in exchange for payments and that Diack and his son diverted funds through corrupt marketing deals. World Athletics was awarded 16 million euro in damages for embezzlement and reputational harm.¹¹

Competition manipulation/match-fixing

Competition manipulation - or match-fixing - is defined as “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.”¹²

Compared to positive doping tests, which are almost always investigated, only a fraction of the suspicious matches¹³ reported each year by sports data companies — such as Sportradar, Starlizard, ULIS and IBIA — are examined.

The low investigation and enforcement rate of suspicious matches reported annually results in a significantly lower conversion rate from alerts to sanctions. This suggests a lack of competence, capacity, or willingness to address breaches of integrity related to sports betting, like match-fixing.

Statistics concerning this challenge include:

- Betting-related match-fixing in European football amounts to between 500 million and 1 billion euro.¹⁴
- Betting-related match-fixing contributes an estimated 120 million euro annually to global criminal proceeds.¹⁵

¹¹ Sean Ingle, “Lamine Diack Found Guilty of Corruption and Sentenced to Two Years in Prison,” *The Guardian*, September 16, 2020, sec. Sport, <https://www.theguardian.com/sport/2020/sep/16/lamine-diack-former-world-athletics-president-found-guilty-of-corruption-and-sentenced-to-two-years-in-prison>.

¹² Council of Europe, “Council of Europe Convention on the Manipulation of Sports Competitions,” Council of Europe Treaty Series (Magglingen/Macolin, Switzerland: Council of Europe, September 18, 2014), art. 3, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016801cdd7e>.

¹³ A suspicious match does not imply a fixed match, it is merely an anomalous finding that warrants investigation to confirm wrongdoing or clear it.

¹⁴ Andreff, *An Economic Roadmap to the Dark Side of Sport*, 2:18.

¹⁵ Europol, “European Union Serious and Organised Crime Threat Assessment (SOCTA) 2021” (Luxembourg: Europol, December 7, 2021), <https://www.europol.europa.eu/publication-events/main-reports/european-union-serious-and-organised-crime-threat-assessment-socta-2021>.

Doping use and doping-related drug trafficking

According to the World Anti-Doping Code, doping in sports can be understood as the use of prohibited substances or methods to enhance athletic performance.¹⁶ This includes using, possessing and trafficking banned drugs, substances, or techniques that are not allowed under the World Anti-Doping Code as well as missing or avoiding doping tests. These acts are seen to provide an unfair advantage and compromise the integrity of sport. It not only covers athletes but also athlete support personnel.

Statistics concerning this challenge include

- Research has previously estimated that 14-39% of elite athletes use doping, which is much higher than the 1-2% that test positive for doping usage each year.¹⁷ This figure is supported by a 2012 statement from then-WADA director David Howman who expects doping usage among elite athletes to be in “the double digits” numbers.¹⁸
- Estimates of the doping market in Italy in 2013 (based on seizures from 1999-2011) indicated that about 425 million euro are spent each year in Italy on doping products, excluding cannabis and cocaine.¹⁹

You may also consider the following statistics from Europol’s Operation Viribus in 2019 which targeted organised crime groups and the trafficking of counterfeit medicines and doping materials:²⁰

- 3.8 million illicit doping substances and counterfeit medicines seized (seizures included doping substances, dietary supplements, medicines, and sport and food supplements)
- 17 organised groups dismantled
- 9 underground labs disrupted
- 234 suspects arrested
- 839 judicial cases opened
- Almost 1,000 individuals reported for the production, commerce or use of doping substances

¹⁶ World Anti Doping Agency (WADA), “The World Anti-Doping Code,” World Anti Doping Agency (WADA), January 1, 2021, <https://www.wada-ama.org/en/resources/world-anti-doping-code-and-international-standards/world-anti-doping-code>.

¹⁷ Olivier de Hon, Harm Kuipers, and Maarten van Bottenburg, “Prevalence of Doping Use in Elite Sports: A Review of Numbers and Methods,” *Sports Medicine (Auckland, N.Z.)* 45, no. 1 (January 2015): 67, <https://doi.org/10.1007/s40279-014-0247-x>.

¹⁸ Associated Press, “WADA: 1 in 10 May Be Doping,” *ESPN*, February 7, 2012, sec. Olympics, <https://www.espn.com/watch/syndicatedplayer>.

¹⁹ Letizia Paoli and Alessandro Donati, *The Sports Doping Market: Understanding Supply and Demand, and the Challenges of Their Control* (Springer, 2014), 141.

²⁰ “Keeping Sport Safe and Fair: 3.8 Million Doping Substances and Fake Medicines Seized Worldwide,” Europol, July 8, 2019, <https://www.europol.europa.eu/media-press/newsroom/news/keeping-sport-safe-and-fair-38-million-doping-substances-and-fake-medicines-seized-worldwide>.

Consider also statistics from the criminal investigations conducted through Europol's Shield operation in 2024 targeting doping-related drug trafficking:²¹

- Seizures worth above 64 million euro
- 1,284 individuals charged (296 arrests and 988 under prosecution)
- More than 12 million units of medicines and doping substances seized
- 52 organised crime groups investigated
- Four underground labs dismantled

Human rights abuses

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, the freedom of association, and many more. Everyone is entitled to these rights without discrimination, and this also applies to athletes and those who work around sport.

Another human right is the right to freely form associations, which organised sport typically has an ambiguous position towards. On the one hand, sports governing bodies wish to have this right respected on their own behalf and often stress the concept of sports autonomy. On the other hand, they have difficulties accepting this right being extended to key stakeholders. Sports governing bodies lead political and legal fights to protect their monopoly in organising sports events and competitions, such as shown by the International Skating Union (ISU)²² and European Super League²³ cases.

Also, they have historically resisted accepting that athletes have a right to form their own associations and are generally reluctant to negotiate with athlete unions.²⁴

Other activities in and around sports that are exploitative in nature and/or enable human rights violations in/through sports occur when events are awarded to countries that do not uphold human rights when building venues for the event or during the actual hosting of these events. The same can be said if these same governments (ab)use sport for geopolitical purposes.

²¹ "Fake Medicines Worth EUR 64 Million off EU Markets," Europol, February 13, 2024, <https://www.europol.europa.eu/media-press/newsroom/news/fake-medicines-worth-eur-64-million-eu-markets>.

²² European Union, Judgment of the Court | International Skating Union v European Commission, ECLI:EU:C:2023:1008 (Court of Justice of the European Union (CJEU) 2023).

²³ "Judgment of the Court in Case C-333.21 | European Superleague Company" (Luxembourg: Court of Justice of the European Union, December 21, 2023).

²⁴ Play the Game et al., "Strengthening Athlete Power in Sport" (Aarhus: Play the Game, September 2023), <https://www.playthegame.org/media/zd3hly0p/sapis-final-report.pdf>; Yetsa A Tuakli-Wosornu et al., "The Journey to Reporting Child Protection Violations in Sport: Stakeholder Perspectives," *Frontiers in Psychology* 13 (2023): 907247.

Any new international entity must be based on general concepts of human rights and also monitor and sanction infringements of these rights in sports. The UN's Universal Declaration of Human Rights²⁵ and the European Convention of Human Rights²⁶ both cover a wide range of basic material and immaterial rights that apply to any human being in sport.

Illegal sports betting

Illegal sports betting is defined as "any sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located," where 'sports betting' refers to "any wagering of a stake of monetary value in the expectation of a prize of monetary value, subject to a future and uncertain occurrence related to a sports competition."²⁷

Statistics concerning this challenge include:

- Approximately 82% of the betting market is illegal²⁸
- Approximately 61% of online sports betting is not licensed or regulated²⁹
- Between 340 billion and 1.7 trillion US dollars are wagered on illicit betting markets each year³⁰
- Asia accounts for 65% of the global betting market (both legal and illegal), with the Asian illegal market estimated to be ten times larger than its legal market.³¹

For example, consider the following statistics from the criminal investigations conducted by Interpol's nine soccer gambling operations (SOGA) operations targeting illegal soccer gambling:³²

- Seizures of 64 million US dollars in cash
- 20,300 arrests
- Closure of 4,000 illegal gambling dens which handled more than 7.3 billion US dollars worth of bets

²⁵ United Nations General Assembly, *Universal Declaration of Human Rights* (Paris, France: United Nations, 1948), <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

²⁶ Council of Europe, *European Convention on Human Rights* (Rome, Italy: Council of Europe, 1950), https://www.echr.coe.int/Documents/Convention_ENG.pdf.

²⁷ Council of Europe, "Macolin Convention," art. 3.

²⁸ The French Institute for International and Strategic Affairs (IRIS), "Preventing Criminal Risks Linked to the Sports Betting Market," 2017, 40, https://www.iris-france.org/wp-content/uploads/2017/06/PRECRIMBET_2017_FINAL.pdf.

²⁹ Asian Racing Federation, "The State of Illegal Betting Report" (Asian Racing Federation, 2021), 5, https://cdn.prod.website-files.com/5f8e2bde2b2ef4841cd6639c/62844a249c7d1e17ec718f02_State-of-Illegal-Betting-2022_v11-RGB-opt.pdf.

³⁰ United Nations Office on Drugs and Crime, *Global Report on Corruption in Sport*, 2021, 259, <https://www.unodc.org/unodc/en/safeguardingsport/grcs/index.html>.

³¹ United Nations Office on Drugs and Crime, 259.

³² "Corruption in Sport," Interpol, accessed March 17, 2025, <https://www.interpol.int/Crimes/Corruption/Corruption-in-sport>.

- Administrative sanctions for illegal gambling activities so far amounting to 4.5 million euro

Interpersonal violence

In sports, one manifestation of human rights abuses is interpersonal violence and its concealment. “Interpersonal violence” is defined as “the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation. Interpersonal violence involves the intentional use of physical force or power against other persons by an individual or small group of individuals. It can occur online, be perpetrated by different actors and take different forms.”³³ Interpersonal violence may be physical, sexual, or psychological in nature.³⁴

In line with this definition, “concealment” of violence refers to the improper handling of or negligence of acts of violence, including but not limited to misconduct, complicity, obfuscation, and dereliction of duty.

Even though interpersonal violence against sports participants is pervasive, incidents are largely unreported. When they are reported, organisations and their representatives are disincentivised from following up on allegations for fear of reputational damage and the costs of reparations, among other factors.

Statistics concerning this challenge include:

- A 2023 study found that up to 80% of sports participants reported experiencing psychological, physical, or sexual violence in sport.³⁵
- Up to one in five sports participants reported they had experienced a contact sexual offence before the age of 18.³⁶
- Reparation payments can be valued at up to approximately 2 million US dollars per case, as seen in the Larry Nasser abuse cases.³⁷

³³ Yetsa A Tuakli-Wosornu et al., “IOC Consensus Statement: Interpersonal Violence and Safeguarding in Sport,” *British Journal of Sports Medicine* 58, no. 22 (November 1, 2024): 1322, <https://doi.org/10.1136/bjsports-2024-108766>.

³⁴ James A. Mercy et al., “Interpersonal Violence: Global Impact and Paths to Prevention,” in *Injury Prevention and Environmental Health*, ed. Charles N. Mock et al., 3rd ed. (Washington (DC): The International Bank for Reconstruction and Development / The World Bank, 2017), <http://www.ncbi.nlm.nih.gov/books/NBK525208/>.

³⁵ Mike Hartill et al., “Prevalence of Interpersonal Violence against Children in Sport in Six European Countries,” *Child Abuse & Neglect* 146 (December 1, 2023): 106513, <https://doi.org/10.1016/j.chiabu.2023.106513>.

³⁶ Hartill et al.

³⁷ Evaluation reached by calculating the total costs of settlements against Michigan State University, USA Gymnastics, US Olympic and Paralympic Committees, and the US Justice Department (USD 1,018.7 M) divided by the number of survivors (500 claims). Office of Public Affairs, “Justice Department Reaches Civil

Interpersonal violence and human rights abuses is connected to the concept of ‘safeguarding’. This means “all proactive measures to both prevent and appropriately respond to concerns related to harassment and abuse in sport as well as the promotion of holistic approaches to athlete welfare”³⁸ is implemented to combat the abuse of sports participants. It is focused on creating safe, inclusive, enjoyable experiences and protecting children and adults from harmful experiences in sports whereas other integrity topics focus on protecting the sport itself.

There are also overlaps with other integrity breaches such as the use of doping or match-fixing due to the (emotional and physical) impact this can have on those affected. As an example, forced doping of a minor by a coach does not only constitute an anti-doping rule violation; it is also a safeguarding violation.

Money laundering

Money laundering is most easily understood as “an illegal activity that makes large amounts of money generated by criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source.”³⁹

The United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances specifically defines money laundering as including the knowledge of concealment or disguising the illicit origins of the money or property: “the conversion or transfer of property, knowing that such property is derived from any offence(s), for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in such offence(s) to evade the legal consequences of his actions.”⁴⁰

Statistics concerning the costs of this challenge include:

- A 2017 study (based on expert interviews) estimated betting winnings related to match-fixing constitute approximately 1% of total betting winnings annually, equalling around 4.5 billion US dollars.⁴¹
- A 2021 UNODC report found that approximately 140 billion US dollars are laundered each year through sports betting.⁴²

Settlement with Victims Abused by Lawrence Nassar,” United States Department of Justice Archives, April 23, 2024, <https://www.justice.gov/archives/opa/pr/justice-department-reaches-civil-settlement-victims-abused-lawrence-nassar>.

³⁸ Tuakli-Wosornu et al., “IOC Consensus Statement: Interpersonal Violence and Safeguarding in Sport.”

³⁹ “What Is Money Laundering?,” Investopedia, accessed March 27, 2025, <https://www.investopedia.com/terms/m/moneylaundering.asp>.

⁴⁰ United Nations, “United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances” (Vienna, Austria: United Nations, December 20, 1998), art. 3.1, https://www.incb.org/documents/PRECURSORS/1988_CONVENTION/1988Convention_E.pdf.

⁴¹ The French Institute for International and Strategic Affairs (IRIS), “Preventing Criminal Risks Linked to the Sports Betting Market,” 40.

⁴² United Nations Office on Drugs and Crime, *Global Report on Corruption in Sport*, 259.

Tax fraud and evasion

Tax fraud is a term that encompasses various illegal activities, including tax evasion. Tax fraud involves intentionally falsifying information on a tax return to avoid paying the correct amount of taxes owed. This can include claiming false deductions or credits, not reporting income, or using a false Social Security number.

Tax evasion is the illegal act of deliberately avoiding paying taxes. It usually involves underreporting income, inflating deductions, hiding money in offshore accounts, or not filing tax returns at all. Tax evasion is a criminal offence in most jurisdictions and can result in significant penalties, fines, and even imprisonment.

Statistics concerning the costs of this challenge include:⁴³

- Footballer Lionel Messi and his father have been convicted of defrauding Spain of 4.5 million US dollars (4.7 million euro) between 2007 and 2009.⁴⁴ They were sentenced to 21 months in prison (later changed to a fine) and ordered to pay substantial fines.
- Footballer Cristiano Ronaldo was accused of tax evasion worth 16.5 million US dollars (14.7 million euro).⁴⁵ In 2018, he reached a deal with Spanish authorities and agreed to pay 21.3 million US dollars (18.8 million euro) in fines and back taxes.⁴⁶
- Tennis player Boris Becker was convicted of hiding 2.5 million GBP worth of assets to avoid paying debts, evading taxes of 3.1 million US dollars. He was sentenced to two and a half years in prison in 2022.⁴⁷
- Boxer Floyd Mayweather was accused of owing the Inland Revenue Service 22.2 million US dollars in taxes from his 2015 fight against Manny Pacquiao. He eventually settled the debt.⁴⁸
- Former Bayern München Football Club President Uli Hoeness admitted tax fraud of 25.6 million US dollars (18.5 million euro), but the fraud was not linked to his role in football.⁴⁹

⁴³ Please note all conversions of the original amount and currency have been estimated based on the conversion rate on the date of the relevant citation.

⁴⁴ BBC, "Lionel Messi Tax Fraud Prison Sentence Reduced to Fine," *BBC*, July 7, 2017, <https://www.bbc.com/news/world-europe-40534761>.

⁴⁵ Associated Press, "Ronaldo Accused of €14.7m Tax Evasion," *ESPN.Com*, June 13, 2017, sec. Soccer, https://www.espn.com/soccer/story/_/id/37524554/real-madrid-cristiano-ronaldo-accused-14-million-euro-tax-evasion.

⁴⁶ BBC, "Ronaldo Fined €18.8m over Tax Evasion," *BBC*, January 22, 2019, <https://www.bbc.com/news/world-europe-46957605>.

⁴⁷ BBC, "Boris Becker Jailed: Tennis Champion Sentenced over Bankruptcy," *BBC*, April 29, 2022, <https://www.bbc.com/news/uk-61276378>.

⁴⁸ Ray Martin, "Owe Back Taxes? Don't Do What Floyd Mayweather Did - CBS News," July 17, 2017, <https://www.cbsnews.com/news/owe-back-taxes-dont-do-what-floyd-mayweather-did/>.

⁴⁹ AFP, "Bayern Munich President Uli Hoeness Admits €18.5m Tax Fraud in Court," *The Guardian*, March 10, 2014, sec. Football, <https://www.theguardian.com/football/2014/mar/10/bayern-munich-uli-hoeness-admits-tax-fraud>.

ClearingSport's assessment

Sport is increasingly a target for crime and corruption, both internally and through exploitation by organised criminal networks. But how did sports become a hotbed for crime, corruption, and other breaches of integrity? Several key factors contribute to this vulnerability:

- The rapid commercialisation of sport has created vast financial opportunities, attracting not only legitimate stakeholders but also investors and merchants who prioritise profit over sporting values.
- Insufficient regulatory frameworks make sport an attractive sector for illicit activities, particularly in comparison to other industries.
- Weak governance structures make sports organisations vulnerable to inadequate oversight, conflicts of interest, and a lack of independent regulation.
- The transnational nature of sport and its governance structures hinders the effectiveness of national regulatory, investigative, and judicial frameworks in preventing and combating corruption.
- Technological developments such as the expansion of the internet, the evolution of smartphones, and artificial intelligence constantly facilitate new criminal methods that authorities struggle to adapt to.

The obstacles

A series of obstacles make it difficult to address crime, corruption and other breaches of integrity in sports. These systemic failures impede progress, making many of the existing laws, rules, regulations and mechanisms fall short of the goals they set out to achieve. These obstacles include but are not limited to what we describe in the following.

The challenges in addressing crime and corruption in sports stem from a complex mix of structural, legal, and jurisdictional issues:

- Sport lacks the tools and authority to tackle (trans)national criminal issues
- Existing international and national laws and sports regulations are not harmonised, leading to a patchwork of different rules and jurisdictions across the full range of integrity topics
- The entities and initiatives addressing breaches of integrity in sports largely operate independently and focus on a single type of violation, such as corruption, financial crime, competition manipulation, doping, or human rights abuses

For years, sport has largely been allowed to regulate itself. This approach has failed to prevent and counter crime and corruption for several reasons:

- Sport's self-regulation involves an inherent conflict of interest, as each sports governing body must nurture its commercial interests while simultaneously protecting the integrity of sport.
- The governance structures in sports generally lack separation of powers between the commercial, political, investigative, and judicial powers.
- The blurred and permeable boundaries between sport and society complicate jurisdiction over sports-related issues, making it difficult to determine which authority is responsible for and able to enforce regulations.
- Although the public and governments have been calling for better governance in international sports federations for two decades, and despite promises from the Olympic movement to heed these calls, the results are unconvincing.⁵⁰ The sports governance evaluation system set up for the Olympic movement relies mostly on self-assessment and lacks transparency.⁵¹

The self-regulation of sport has also led to challenges related to sport policing itself.

- As evidenced by several cases of crime and corruption in sport, sport has a proven lack of will and ability to investigate itself and ensure investigations are rigorously pursued.
- Too often, whistleblowers are inadequately protected and face serious repercussions, including but not limited to reputational damage and threats to their personal security.
- Existing law enforcement agencies have limited bandwidth to monitor compliance with international legal standards and to translate the overlap between those standards and national legal systems.
- Intelligence and investigations across various sports entities, law enforcement agencies, and other actors are not shared, making it difficult to understand the extent and nature of the issues.

The current system of arbitration in sports also presents several issues that affect the legal security due process of especially athletes, but also other actors:

- Review of sports bodies' decisions and dispute settlement are administered within each sport, providing little to no separation of powers.
- The Court of Arbitration for Sport (CAS) is the overwhelmingly dominant body in sports arbitration. However, this body lacks sufficient independence and transparency,

⁵⁰ A large majority of the 35 Olympic international sport federations fail to meet acceptable minimum standards of transparency, internal accountability, and democracy (Geeraert, 2014). Updated studies in 2018-19 point in the same direction (Alm, 2019). Jens Alm, "Sports Governance Observer 2019: An Assessment of Good Governance in Six International Sports Federations" (Play the Game: Aarhus, October 2019), <https://www.playthegame.org/media/oodhlakx/sports-governance-observer-2019.pdf>; Arnout Geeraert, Jens Alm, and Michael Groll, "Good Governance in International Sport Organizations: An Analysis of the 35 Olympic Sport Governing Bodies," *International Journal of Sport Policy and Politics* 6, no. 3 (September 2, 2014): 281-306.

⁵¹ <https://www.asoif.com/governance>.

including in its procedural rules, the selection of arbitrators, and the reasoning and publication of the awards.

- The costs of accessing justice are prohibitive for individual complainants, including athletes, particularly in areas where highly technical expertise is needed in combination with strict liability.

Existing mechanisms leave significant gaps

Over the past 25 years, hundreds of initiatives have been taken to eradicate dubious practices from sports. In some areas, laws and regulations have been introduced or tightened, both at the national and international levels, and we have countless guidelines for sports integrity. Still, other areas remain un(der) regulated.

In principle, sports organisations, event organisers, athletes and officials are bound by these laws and regulations. But, as the scandals shown in the timeline indicate, too often, existing laws and mechanisms fall short of the goals they set out to achieve for several reasons. Our analysis identifies the following challenges and issues across existing efforts to counter crime and corruption in sports. These include a lack of

- An overall framework for addressing sports integrity issues, spanning from prevention to detection to sanctioning.
- Resources for and willingness to investigate wrongdoing, including the formal mandate for enforcement and/or powers for individual initiatives to take action.
- Clarity on responsibilities, including the role of authorities within or outside of sport, the delegation of investigations from umbrella organisations to members, and the prioritisation of awareness raising and setting guidelines over investigations.
- Harmonisation of violations under sports rules.
- Leadership that is 1) without conflicts of interest and 2) wants to apply the rules.
- Formal and informal networks for exchange that meet rules for data protection and possible law enforcement requirements for classified information to enable intelligence/data sharing across jurisdictions.
- Oversight and consequences for failure to establish and enforce rules/laws.
- Research on specific issues, including health costs associated with doping use and longitudinal studies on (economic) effects of safeguarding breaches.

We explore the gaps in greater detail in the following sections, where we map and analyse existing efforts to identify solutions.

The identified solutions

We have identified four solutions to strengthen and address gaps across existing efforts to counter crime and corruption in sports.

Our research considered where existing efforts are incomplete or are not executed as originally intended, alongside remaining gaps. Our analysis yielded several solutions:

1. Create a collaborative framework to harmonise existing policies into universal minimum standards of integrity in sport.
2. Establish a global regulator to monitor and enforce the defined minimum standards through compliance and sanction mechanisms.
3. Support relevant authorities in investigations to protect athletes and those who interact with sports.
4. Introduce alternatives for dispute management in sport, particularly in the areas of arbitration and mediation, to ensure real independence and fair access to justice.

There are many ways these four solutions could be implemented. The next section explores how an international entity with a clear separation of powers could bring them together as institutional capacities, unifying efforts to counter crime and corruption in sports.



20 years has passed since the German referee Robert Hoyzer was convicted in 2005 in a case that revealed how illegal gambling and match-fixing is organised at an international scale across many countries. Although an international convention against sports manipulation is in place and the public concern is widespread, the global cooperation between police authorities, sports organisations and private integrity agencies is still suffering from legal restrictions and lack of resources.

Photo: Christof Koepsel/Bongarts/Getty Images

Part II: Our proposal: Towards an entity

This proposal advocates for an all-encompassing international entity with a clear separation of powers across the capacities below to more effectively address the issue of crime, corruption, and other integrity breaches in sports.

1. To harmonise existing policies into universal minimum standards of integrity in sports, an international entity could coordinate existing networks to define and administer a collaborative framework.
2. To monitor and apply the defined minimum standards outlined by the collaborative framework, an international entity could implement compliance and sanctions mechanisms as a global regulator.
3. To strengthen the protection of athletes and those who interact with sport, an international entity could bolster investigations, intelligence gathering, and other necessary steps by managing a reporting mechanism that offers full protection to whistleblowers and others involved in the investigative process.
4. To ensure fair access to justice, an international entity should offer specialist services related to signposting, arbitration and mediation as dispute management alternatives.

By centralising these capacities, they can strengthen one another and complement existing efforts.

The following sections explore each of these capacities in more depth, outlining what they look like, how they address the defined challenges and their proposed implementation in an international, all-encompassing entity.

1) Collaborative framework

This section details the analysis that led to the identified solution to create a collaborative framework to harmonise existing policies into universal, minimum standards of integrity in sport.

It concludes with a proposal to implement this solution through the creation of an international entity which could coordinate existing networks to define and administer a collaborative framework.

ClearingSport's assessment

Crime, corruption, and other breaches of integrity in sport continue in part because actors are not united by universal minimum standards that comprehensively address them.

Several efforts offer good practice examples of addressing these challenges, and the intergovernmental initiatives and collaborative forums that exist are good starting points. But

individually, they are unlikely to succeed in enforcing the existing international laws, national laws, and sports regulations they have produced, let alone unify these efforts towards a set of universal minimum standards.

Limited coordination exists across specialist entities that perform important work on issues like financial crime, competition manipulation, doping, and human rights abuses, making it difficult to address the common underlying causes of integrity breaches.

So far, no entity is leading the charge to unify this patchwork of standards and initiatives by creating comprehensive minimum standards in collaboration with key stakeholders. A collaborative framework could also enable information sharing, which is paramount to achieving the desired goals.

Mapping existing efforts

To better understand the current landscape, we performed a mapping exercise including a quantitative and qualitative review of existing laws, regulations, mechanisms, and initiatives designed to protect sporting integrity.

i) Existing frameworks

Several mechanisms exist that can be seen as frameworks acting on the international, national, and sports levels. The scope, functions, and effectiveness of these frameworks vary significantly.

At the international level

International law includes conventions, resolutions, guidelines, and frameworks which are relevant and applicable to upholding integrity in sport, like:

- The Council of Europe's open Convention on the Manipulation of Sports Competitions (Macolin Convention)
- EU Corporate Sustainability Reporting Directive (CSRD)
- UNESCO International Convention against Doping in Sport
- Council of Europe Anti-Doping Convention
- UN Convention Against Corruption (UNCAC)
- Universal Declaration of Human Rights, 1948
- UN Guiding Principles of Human Rights (UNGPs)
- UN Convention on the Rights of the Child, 1989
- UN Convention on the Rights of Persons with Disabilities, 2006
- UN Convention Against Transnational Organised Crime (UNTOC)

To have effect, international conventions and treaties need to be adopted, signed, ratified, and, in most cases, implemented in national law.

At the national level

Besides implementing international law, national law can incorporate international standards and autonomous legal provisions within criminal, civil, or customary law, making breaches of integrity like corruption, doping, bribery, interpersonal violence, and competition manipulation illegal or punishable by law.

Within sport

Based on the autonomy of sport to regulate itself, a parallel system of regulations guides the conduct and functioning of global sport. These rules include:

- Competition rules, which maintain fair play and integrity within the sport
- International regulatory frameworks, which affect the governance, eligibility, and ethical standards in sports, such as within anti-doping and competition manipulation

These rules and policies are meant to affect sports stakeholders and competitions, ranging from international sports federations to local clubs and from international sports events to small local events.

Analysis of existing frameworks

Based on the literature review, analysis and research conducted to date, it appears that whilst sports regulatory frameworks are becoming increasingly detailed and comprehensive, enforcement is an area that remains underdeveloped.

The following sections explore several facets of this lack of enforcement through several findings related to jurisdiction, the concept of autonomy of sport, and examples of meaningful collaboration.

Complications related to jurisdiction

For any rule, regulation, or law to be effective, it must be enforceable against the person or institution that breaches it. The mechanism that determines this enforceability is called jurisdiction.

The jurisdictions of laws and sports regulations differ. In (inter)national law, jurisdiction refers to the legal authority of states and/or regions to establish and enforce laws concerning acts and individuals, regardless of whether those acts take place within their territory.

In contrast, sports regulations primarily derive their jurisdiction through association, meaning individuals and sports organisations are bound by these rules through membership, employment, or licensing.

This distinction is significant because it has resulted in gaps in enforcement. Sport lacks jurisdiction over individuals and organisations that are not associated with sport, even if they breach sports regulations. This reflects the reality that although sports bodies play a crucial

role in governance, they often lack the capacity to address certain issues without collaboration and partnerships with governmental and regulatory authorities.

Nonetheless, when (inter)national law has jurisdiction, these breaches of sports regulations are not always classified as criminal offences, and state authorities have no legal basis to intervene. In other cases, the legal frameworks within sports and the application of national laws to sports simply have not been fully harnessed, resulting in a lacklustre application of general corruption, bribery, fraud, anti-money laundering etc. mechanisms to the sporting context.

This leads to the broader challenge concerning the often blurred boundaries between the responsibilities of sports organisations and those of the state. This becomes particularly salient in areas like human rights or when external investments compromise the ‘autonomy of sport.’

The impact of the concept of the autonomy of sport

The traditional concept of the ‘autonomy of sport’ was established to ensure sports determines its own rules free of interference from outside entities. The autonomy of sport refers to the right of sporting organisations to govern themselves independently without undue interference from third parties. This principle is recognised and promoted by organisations like the International Olympic Committee as an essential mechanism for protecting sporting integrity.

At the same time, another concept known as the ‘specificity of sport’ recognises that sport has unique characteristics that may justify special treatment under general law. Both principles seek to establish sport as a legitimate, credible, and autonomous industry.

Sport must adhere to regulatory best practices to justify its legitimacy, autonomy and credibility. Article 5 of the Olympic Charter states that sports organisations ‘have the rights and obligations of autonomy, which include [...] the responsibility for ensuring that principles of good governance be applied,’⁵² meaning sports organisations have a responsibility to uphold principles of good governance.

It is important to continue the efforts to develop and enforce effective legal frameworks to maintain a balance between measured governmental oversight, limit state involvement in sports governance, and prevent the unethical exploitation of sports for political purposes. Nonetheless, maintaining a balance between autonomy and oversight is increasingly complex. A key challenge to sports autonomy today is the increasing investment of private equity and state actors in the industry. To mitigate the risks posed by growing commercialisation and ensure sport remains independent from undue external influence, an international regulatory framework that aligns with (inter)national legislation is needed.

⁵² International Olympic Committee, “Olympic Charter” (Lausanne, Switzerland: International Olympic Committee, January 30, 2025), <https://stillmed.olympics.com/media/Documents/International-Olympic-Committee/IOC-Publications/EN-Olympic-Charter.pdf>.

Examples of collaboration

The international community, sports organisations, and public authorities have established the World Anti-Doping Agency (WADA) to address doping in sport, recognising that doping extends beyond a purely sporting issue. It involves multiple intersecting stakeholders, including sports participants like athletes, coaches, and doctors; the doping and drug market; medical and scientific professionals; and regulatory and legal bodies.

Similarly, addressing corruption and other breaches of integrity in sports requires a collaborative approach. These challenges also involve sports participants (such as officials, athletes, and players), financial markets, and regulatory and legal mechanisms to control, investigate, and sanction wrongdoing.

The existing mechanisms from anti-doping efforts in sports can be leveraged as lessons. The World Anti-Doping Code (WADC) has provided a comprehensive legislative foundation for the global anti-doping effort, demonstrating how a structured, cooperative approach can effectively govern integrity issues within sport.

A collaborative framework could also clarify definitions, functions, roles, and responsibilities among public authorities, sports organisations, law enforcement, and other relevant entities.

ii) Existing initiatives

Several platforms and networks facilitate collaboration in the sporting sector. While they differ significantly in mandate, scope, and approach, none of them possess the authority to regulate and/or enforce rules. More importantly, these platforms vary greatly in independence and transparency, which impacts their effectiveness and credibility.

Despite these challenges, the following existing platforms and networks serve as starting points for broader collaboration to create what has not yet been developed: a set of minimum universal standards for sports integrity.

Intergovernmental initiatives

- Council of Europe, Enlarged Partial Agreement on Sport (EPAS)⁵³
 - Thematic focus: to make sport more ethical, more inclusive and safer
 - Members: governmental representatives
- European Union⁵⁴
 - Thematic focus: community cohesion and social inclusion. Fund integrity in sports-related projects
 - Members: EU member states

⁵³ <https://www.coe.int/en/web/sport>

⁵⁴ <https://sport.ec.europa.eu/>

- UNODC Safeguarding Sport from Corruption and Economic Crime⁵⁵
 - Thematic focus: aims to support governments, sports organisations, and relevant stakeholders to tackle corruption and economic crime in sports
- G20
 - Thematic focus: Corruption in sport has been acknowledged as an emerging risk area in the 2019-2021 G20 AntiCorruption Working Group (ACWG) Action Plan⁵⁶

Collaborative forums

- The Global Network of Sport Integrity Agencies: a multi-stakeholder alliance across several integrity units on all integrity matters.⁵⁷
 - Thematic focus: all (sport) integrity matters
 - Members: National sport integrity bodies led by Sport Integrity Australia
- International Partnership Against Corruption in Sport (IPACS): a multi-stakeholder initiative established by the Council of Europe, IOC, UK Sport, OECD, and the UNODC to fight corruption.⁵⁸
 - Thematic focus: corruption in sport
 - Founding members: Council of Europe, IOC, UK Sport, OECD, UNODC
 - Steering committee: governmental representatives from any country interested in joining the partnership, intergovernmental organisations, and sports organisations
- Specifically in the safeguarding space, there are several initiatives bringing together stakeholders:
 - International Safeguards for Children in Sport initiative⁵⁹
 - Sport & Rights Alliance (SRA)⁶⁰
 - Centre for Sports and Human Rights⁶¹ and Safe Sport International⁶² Advisory Councils

⁵⁵ <https://www.unodc.org/unodc/safeguardingsport/>

⁵⁶ Organisation for Economic Co-operation and Development, “G20 Anti-Corruption Working Group Action Plan 2019-2021 and Extract from G20 Leaders Communiqué” (Argentina: Organisation for Economic Co-operation and Development, December 11, 2018), [https://one.oecd.org/document/DAF/WGB/RD\(2018\)10/en/pdf](https://one.oecd.org/document/DAF/WGB/RD(2018)10/en/pdf).

⁵⁷ “Global Network of National Sport Integrity Agencies Launch,” Sport Integrity Australia, August 13, 2024, <https://www.sportintegrity.gov.au/news/media-statements/2024-08/global-network-of-national-sport-integrity-agencies-launches>.

⁵⁸ <https://www.ipacs.sport/>

⁵⁹ <https://safeinsport.org/>

⁶⁰ <https://sportandrightsalliance.org/>

⁶¹ <https://www.sporhumanrights.org/about-us/advisory-council>

⁶² <https://www.safesportinternational.com/people/advisory-council/>

Also active in the field are the Sport Integrity Global Alliance (SIGA), an alliance of public and private entities promoting standards of fair play in sport,⁶³ and the International Centre for Sport Security (ICSS), a service-oriented non-profit that advises on safety and security, sport integrity, and youth matters.⁶⁴ However, both organisations have been the subject of critical scrutiny for lack of transparency and alleged close ties to the Qatari government.⁶⁵

National integrity bodies (NIBs)

In a small, but growing number of countries, the national government, National Olympic Committee (NOC), or a multi-stakeholder group has established a national sports integrity unit or body to address diverse integrity issues.

These countries include:

- Australia: Sport Integrity Australia (SIA)⁶⁶
 - Scope: use of prohibited substances and methods in sport; abuse of children and other persons in a sporting environment; manipulation of sporting competitions; failure to protect members of sporting organisations and other persons in a sporting environment from bullying, intimidation, discrimination or harassment
- Canada: Canadian Centre for Ethics in Sport (CCES)⁶⁷
 - Scope: unethical behaviour
- Estonia: Estonian Center for Integrity in Sports (ESTCIS)⁶⁸
 - Scope: non-discriminatory, ethical and honest sports
- Finland: Finnish Center for Integrity in Sports (FINCIS)⁶⁹
 - Scope: anti-doping, manipulation, current ethics issues (sexual and gender based harassment, abuse of power and corruption, inappropriate treatment)
- Japan: Sport Integrity Unit⁷⁰
 - Scope: anti-doping, governance and compliance, violence and harassment

⁶³ <https://siga-sport.com/>

⁶⁴ <https://theicss.org/>

⁶⁵ See, for instance, the following: Paula Dupraz-Dobias, “Promoting Integrity without Transparency,” *SWI Swissinfo.Ch* (blog), November 10, 2022, <https://www.swissinfo.ch/eng/business/3-3-promoting-integrity-without-transparency/48032334>.

⁶⁶ <https://www.sportintegrity.gov.au/about-us/who-we-are>

⁶⁷ <https://cces.ca/home>

⁶⁸ <https://eadse.ee/en/>

⁶⁹ <https://suek.fi/en/fincis/>

⁷⁰ <https://www.jpnsport.go.jp/corp/english/activities/tabid/549/Default.aspx>

- Malta: Authority for Integrity in Maltese Sport (AIMS)⁷¹
 - Scope: illegal performance-enhancing drugs, match-fixing, manipulation of competitions, anti-money laundering, and all forms of harassment and abuse
- New Zealand: Sport Integrity Commission⁷²
 - Scope: anti-doping, competition manipulation, participant protection, safeguarding and protecting children and young people
- Switzerland: Swiss Sport Integrity (SSI)⁷³
 - Scope: doping, ethics (maltreatment, abuse of position, unsporting behaviour, aiding and abetting)

A number of countries are still in the exploration phase of establishing a national integrity entity, including:

- Czech Republic
- Lithuania
- Luxembourg
- France
- Germany
- the Netherlands
- Portugal
- United States of America

A number of countries have established specific entities addressing harassment and abuse in sports, including:

- Canada: Canadian Safe Sport Program⁷⁴
- United States of America: U.S. Center for SafeSport⁷⁵
- United Kingdom: NSPCC Child Protection in Sport Unit (CPSU)⁷⁶

Good governance within sport

Good governance plays a key role in preventing and reacting to crime, corruption and integrity breaches in sport.

⁷¹ <https://www.aims.org.mt/>

⁷² <https://sportintegrity.nz/>

⁷³ <https://www.sportintegrity.ch/en>

⁷⁴ <https://cces.ca/safe-sport-program>

⁷⁵ <https://uscenterforsafesport.org/>

⁷⁶ <https://thecpsu.org.uk/>

Officially, sport has recognised this. In 2008, the Olympic international sports federations approved the Basic Universal Principles of Good Governance of the Olympic and Sports Movement (PGG), introduced by the IOC.⁷⁷

The IOC has also introduced its own self-made and self-regulated system of benchmarking in the form of annual good governance surveys conducted amongst Olympic sports. Other good governance standards and improved regulations, particularly amongst international federations, have occurred in line with recommendations made by the International Partnership Against Corruption in Sport (IPACS).

Nonetheless, those good governance standards are often not carried out in practice and are weakly enforced, if they are enforced at all.⁷⁸ The many scandals that have occurred in Olympic federations further illustrate that the formal adoption of a good governance code alone does not necessarily lead to the actual implementation of its standards.⁷⁹

One explanation is that compliance with good governance standards is voluntary. For example, following high-profile corruption scandals in FIFA and the IAAF (now World Athletics), the Association of Summer Olympic International Federations (ASOIF) introduced 50 broad principles of good governance in 2016, with ten more added in 2023.⁸⁰

On the one hand, this initiative represents a more significant step toward establishing a common governance standard. ASOIF seeks to persuade federations to adopt these principles and supports those willing to implement them through consultancy and the sharing of best practices.⁸¹ On the other hand, the ASOIF initiative is entirely voluntary, as international federations aim to maintain their autonomy. Consequently, ASOIF is unable to influence the incentives of federations that choose not to implement certain standards. Furthermore, the reporting on the implementation of these standards is done by means of so-called “assisted self-assessment”, raising concerns about the objectivity, transparency and validity of the process.

⁷⁷ See point 41. International Olympic Committee, “The Olympic Movement in Society” (Copenhagen: International Olympic Committee, October 5, 2009), <https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/IOC/Congresses/XIII-Olympic-Congress-Copenhagen-2009/Overview/EN-XIII-Olympic-Congress-Recommendations.pdf>.

⁷⁸ Arnout Geeraert, “Sports Governance Observer 2018: An Assessment of Good Governance in Five International Sports Federations” (Aarhus: Play the Game, November 2018), <https://www.playthegame.org/media/ygyf4r51/sports-governance-observer-2018-international.pdf>; Alm, “Sports Governance Observer 2019.”

⁷⁹ Arnout Geeraert, “The Limits and Opportunities of Self-Regulation: Achieving International Sport Federations’ Compliance with Good Governance Standards,” *European Sport Management Quarterly* 19, no. 4 (2019): 520–38.

⁸⁰ ASOIF Governance Task Force, “ASOIF Governance Task Force (GTF) Report” (ASOIF, November 2016), https://www.asoif.com/sites/default/files/download/asoif_governance_task_force_report.pdf.

⁸¹ Geeraert, “The Limits and Opportunities of Self-Regulation: Achieving International Sport Federations’ Compliance with Good Governance Standards.”

Even so, ASOIF's most recent implementation report highlights that overall progress remains limited in areas of good governance that constrain decision-makers. For instance, the level of detail in financial reports varies significantly across federations, and twelve federations either lack an audit committee or have one composed of non-independent members. Even though having these bodies in place does not say anything about their functioning, they are, however, considered basic elements of good governance.

The identified solution

Looking at the landscape, we see that while certain areas have generally accepted standards, others lack them entirely. Even where standards do exist, their implementation is often not mandatory. Currently, no entity is fully and convincingly taking the lead in establishing or implementing minimum universal standards for integrity in sports.

The identified solution to these challenges is to create a collaborative framework to harmonise existing policies into universal, minimum standards of integrity in sport.

The framework builds on a set of rules and regulations that should make clear

- Who is governed by it
- Which issues need to be addressed
- What the minimum standards are for the respective issues, to harmonise policies, rules and regulations
- Respective responsibilities for the participants in the framework
- How participants in the framework should collaborate

By defining and including these considerations, the framework established by the new entity drives the creation and enforcement of universal, minimum standards of integrity in sport. In this way, a collaborative framework could:

- Unite stakeholders in harmonising (existing) minimum universal standards across existing frameworks, initiatives, and mechanisms through an umbrella organisation and/or through other mechanisms such as an international convention.
- Establish and support existing capacity building via the transfer of knowledge and resources, particularly for those with fewer resources, including sports integrity factfinders, investigators, prosecutors, and government officials.
- Disseminate good practice and thought leadership in establishing internal procedures, practices, and bodies, including the topics of:
 - Ethics and audit committees
 - Conflicts of interest
 - Responsible autonomy
 - Relations with betting operators

Options in formalising a collaborative framework

A collaborative framework could be formalised through a charter or a convention adopted and/or ratified by public authorities.

Charter

A charter could be adopted outside of sports or within sports to regulate integrity matters through non-binding principles. A charter could be led by an entity within the United Nations system, and it could be incorporated directly into the Olympic Charter.

Convention

A convention could be ratified to implement binding agreements with public signatories. A convention would effectively create a legislative foundation, echoing recent proposals for the European Union to serve as a regulator,⁸² with mechanisms for regulation being enshrined through legislation like a suggested “European Sport Act.”⁸³ Conventions that already exist and could be built upon include

- the UN Convention Against Corruption
- the UN Convention Against Transnational Organised Crime (UNTOC)
- the Macolin Convention
- the UN Convention on Rights of a Child (UNCRC)⁸⁴
- the Lanzarote Convention
- the Brighton Declaration (ECHR)
- the World Anti-Doping Code (WADC), which builds upon from the UNESCO International Convention against Doping in Sport⁸⁵ and the Council of Europe Anti-Doping Convention.⁸⁶ The Council of Europe convention is legally binding for member states, while the UNESCO Convention lacks this status for those who have ratified.

⁸² Jan Exner and Stephen Weatherill, “A MODEST PROPOSAL FOR AN EU REGULATION ON FOOTBALL GOVERNANCE,” *EU Law Live Weekend Edition*, no. 209 (November 30, 2024).

⁸³ Jan Zgliniski and FairSquare, “Policy Brief: Laws for The Games: How the EU Can Reform Sports Governance” (FairSquare, October 2024), https://fairsq.org/wp-content/uploads/2024/10/Laws-for-the-Games-Report_Pages_v3.pdf.

⁸⁴ United Nations, “UN General Assembly, Convention on the Rights of the Child,” November 20, 1989, <https://www.ohchr.org/sites/default/files/Documents/ProfessionalInterest/crc.pdf>.

⁸⁵ “International Convention against Doping in Sport,” Convention (Paris, France: UNESCO, October 19, 2005), <https://www.unesco.org/en/legal-affairs/international-convention-against-doping-sport>.

⁸⁶ “Anti-Doping Convention,” Convention (Strasbourg: Council of Europe, November 16, 1989), <https://rm.coe.int/168007b0e0>.

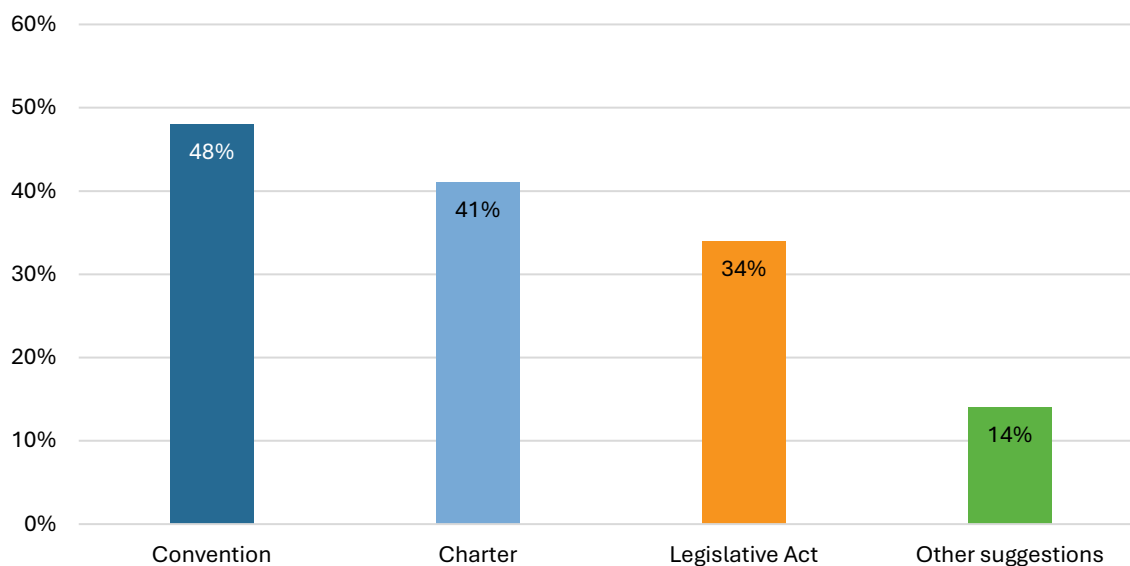
Survey says...

In June 2023, Play the Game surveyed almost 200 experts to scope the establishment of an international anti-corruption agency in sport.⁸⁷

One of the questions concerned the “path to establishing the agency” and asked respondents: “Which way do you think would be feasible? (mark one or more).” They answered:

- Convention: 48%
- Charter: 41%
- Legislative act: 34%
- Other suggestions: 14%

Figure 1: Path to establishing an agency



The proposal: Towards an entity

To harmonise existing policies into universal minimum standards of integrity in sports, an international entity could coordinate existing networks to define and administer a collaborative framework.

Today, the existing networks and initiatives in diverse sports integrity fields reflect the willingness and necessity for stakeholders both within and outside sports to work together and address threats to sports' integrity. However, great diversity exists in the will and capacity to enforce the application of criminal legislation or sports regulatory frameworks to sports across different integrity issues.

⁸⁷ Grit Hartmann, “ClearingSport - Towards an Agency Countering Crime and Protecting Integrity in World Sport” (Aarhus: Play the Game, June 2023), <https://www.playthegame.org/media/rt3mkfyk/clearingsport.pdf>.

A fundamental task for the new proposed entity will be to establish a collaborative framework for sports integrity through a wide consultation process among all relevant stakeholders. Given the multi-jurisdictional nature of the challenges and the movement of sports stakeholders across state boundaries, an international approach is required.

This proposal builds upon the increasing number of cross-cutting national sports integrity bodies being established, alongside the evidence from anti-doping efforts about creating such a framework.

To ensure effective coordination and oversight, the entity is proposed to be an umbrella organisation connecting the following initiatives, among others:

- National integrity bodies (NIBs), which are established by national governments, National Olympic Committees (NOC), or multi-stakeholder groups to address integrity issues.
- International sports integrity units across Olympic and non-Olympic international sports federations that 1) address multiple integrity issues, and 2) have operational independence from the governing body and thus exhibit separation of powers and oversight.

The mandate of the umbrella entity can be defined by a charter or a convention led by public authorities. This overarching charter or convention would be able to tie together existing frameworks, initiatives and mechanisms, make them fit for purpose in the context of sports and underpin them with good governance standards to ensure their effectiveness.

Survey says...

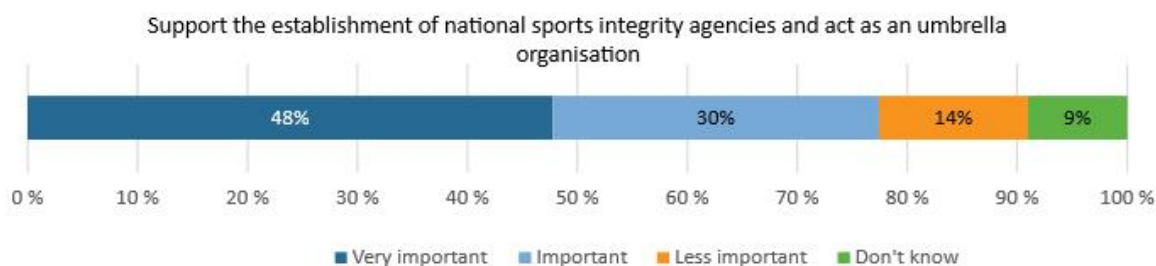
In Play the Game's June 2023 survey scoping the establishment of an international anti-corruption agency in sport,⁸⁸ one of the questions concerned the "important capabilities / responsibilities" of the entity, and asked respondents to consider various aspects and then judge that aspect on a scale of "Very important," "Important," "Less important," and "Don't know."

When respondents were asked about the importance of "Support[ing] the establishment of national sports integrity agencies and act as an umbrella organisation," their answers were:

- Very important: 48%
- Important: 30%
- Less important: 14%
- Don't know: 9%

⁸⁸ Hartmann.

Figure 2: Support the establishment of national sports integrity agencies and act as an umbrella organisation



2) Global regulator

This section details the analysis that led to the identified solution of establishing a global regulator to monitor and enforce the defined minimum standards through compliance mechanisms. It concludes with a proposal to implement this solution through the creation of an international entity that could implement compliance mechanisms as a global regulator.

ClearingSport's assessment

There is significant variation in both the willingness and ability to enforce criminal laws and sports regulations when it comes to addressing integrity issues in sport.

The Olympic movement has long recognised that the right to autonomy must be earned through good governance. However, sport's self-regulation and the accompanying inherent conflicts of interest have led to insufficient and ineffective enforcement. Despite a [recent push for the application of good governance standards across sports](#), we observe that – in reality – those standards are not consistently enforced.

Sport's claim for unlimited autonomy has furthermore deterred actors from outside sports from intervening in sports. Public authorities often avoid challenging sports autonomy for several reasons, including concerns about repercussions from sports, public backlash from sports fans, or those who benefit from sports' commercial success. These are some of the reasons why public authorities neither pass sports-specific laws nor dedicate the necessary resources to oversight, resulting in minimal enforcement of globally accepted standards in the sports industry.

ClearingSport does not aim to remove the autonomy of sport. On the contrary, we aim to protect it from abuses that undermine the legitimacy of sports governing bodies and their fundamental right to freedom of association.

Mapping existing efforts

Crime, corruption, and other breaches of integrity in sports have largely been addressed and regulated independently. For the purposes of this mapping research, wrongdoing has been broadly divided into offences related to

1. Financial crime
2. Doping
3. Competition manipulation
4. Human rights abuses and interpersonal violence

The existing networks and initiatives in diverse sports integrity fields reflect the willingness and necessity of stakeholders both within and outside sports to work together and address threats to the integrity of sport. However, there is significant variation in that willingness and ability to enforce criminal laws or sports regulatory frameworks in addressing different integrity issues in sports.

1. Financial crimes

Numerous conventions exist at the international level to address financial crime in society in general such as the UN Convention Against Corruption (UNCAC), UN Convention Against Transnational Organised Crime (UNTOC) and the Convention on Laundering, Search, Seizure, and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (Warsaw Convention). These conventions are supplemented by multinational and bilateral agreements on specific aspects of financial crime, such as the Foreign Account Tax Compliance Act (FATCA), as well as powerful national laws with extraterritorial reach, such as the UK Bribery Act. Unfortunately, this collection is more of an incomplete patchwork than a properly nested and deconflicted system of legal oversight.

Several multinational organisations also assist in the education and implementation of standards related to anti-money laundering and other illicit financial flows, to ensure the sharing of information and cooperation among nations. These include the Egmont Group of Financial Intelligence Units (FIUs), the Basel Committee, the Financial Action Task Force (FATF), the Wolfsberg Group, and the Organization of Economic Cooperation and Development (OECD).

This combination of an incomplete legal framework and multiple multinational organisations with limited authority results in effectively zero enforcement of globally accepted financial standards within the sports industry.

Shifting priorities at the national, regional and multinational level have complicated efforts at reform. Most prosecutorial authorities and financial regulators underestimate the size and scope of financial crime in the sports industry. It is also an obstacle that sports is organised

differently from any other sector, and the complexity and opaqueness of the sports industry make it difficult to see and understand the issues.

When governments do investigate the matter, the focus of their efforts remains on larger criminal organisations rather than individual criminals – whether they be government officials, sports association executives, team owners, coaches, athletes or trainers. Pursuing the latter involves investigating and prosecuting public figures with substantial popular support and financial resources. At the current time, there is insufficient punishment for noncompliance, even when it has led to systemic failures over extended periods.

Recent changes within the financial sector, however, do provide a model for a more effective means of combatting corruption and promoting integrity through a combination of strengthening governance, investigations and advocacy efforts.

Increased public sector-private sector engagement initiatives in the financial sector have raised awareness of the extent of various forms of financial crime, how to identify and report it to appropriate authorities, and the opportunity to interdict and/or seize large quantities of illicit funds.

Both the public sector and private sector have leveraged recent technological advances as well as an increase in skilled professionals (including but not limited to auditors, forensic accountants and financial investigators) to make substantial advances in fighting financial crime across multiple industries.

2. Doping

The World Anti-Doping Code (WADC) and its supporting documents provide the framework for anti-doping policies, rules, and regulations within sports organisations and among public authorities. It is designed to harmonise anti-doping policies and ensure the standards are the same for all athletes. The WADC is crucial in demarcating what is in and out of scope in the fight against doping. It is kept up to date by a five-year review cycle.

The UNESCO International Convention against Doping in Sport⁸⁹ and the Council of Europe Anti-Doping Convention⁹⁰ are complementary frameworks that are legally binding international treaties. They give formal recognition to the WADC and work together to combat doping in sports globally. The conventions serve as the mechanism through which governments formally commit to implementing the WADC's principles within their legal systems, while the WADC itself provides the detailed technical and operational framework for anti-doping programmes.

⁸⁹ “International Convention against Doping in Sport.”

⁹⁰ “Anti-Doping Convention.”

Enforcement

All Olympic international sports federations and those officially recognised by the IOC have dedicated anti-doping officers or an anti-doping unit. Some also now delegate the education, testing, investigation and sanctioning authority to entities such as the International Testing Agency (ITA), while WADA has an overarching role as code regulator and enforcer. There is a comparatively harmonised approach to addressing instances of doping in sports due to several factors:

- The WADC establishes a clear regulatory framework to address doping in sports.
- National anti-doping organisations (NADOs) establish national-level structures.
- The UNESCO and Council of Europe Conventions enable governments, as well as international organisations, to engage with the WADA and the ITA.

The allocation of substantial resources to the issue demonstrates that the fight against doping has been comparatively high on the priority agenda of both sports organisations and governments. Lastly, anti-doping (policy) work was recognised earlier and is, therefore, relatively mature compared to policy and efforts addressing other breaches of integrity, like competition manipulation and interpersonal violence.

An increasing number of countries are criminalising doping-related offences, ranging from the use of doping to the possession and/or distribution of performance enhancing drugs. With the Rodchenkov Anti-Doping Act,⁹¹ prosecutors in the United States of America are able to bring criminal charges against coaches, agents, nutritionists, therapists, or other individuals worldwide who are involved in doping practices connected to a major international sports event, including those that occur outside the United States.

Challenges

However, several challenges have also been identified, including:

- Ineffective governance and enforcement
- Strict liability for athletes
- Access to justice for athletes
- A general overemphasis on fighting the symptoms with a one-size-fits-all approach, rather than differentiating countermeasures based on causes and different motivations to dope
- An overemphasis on sanctioning athletes rather than systems behind the athletes or facilitators
- Large discrepancy between positive tests and prevalence numbers

⁹¹ Congress.gov, “Rodchenkov Anti-Doping Act of 2019,” Pub. L. No. 116-206, § United States Congress, 835 H.R. (2020), <https://www.congress.gov/bill/116th-congress/house-bill/835>.

The question of whether it is time to reform WADA is not within the scope of the ClearingSport project.

Other entities of note

- FairSport⁹²
- Global Athlete⁹³
- Institute of National Anti-Doping Agencies (iNADO)⁹⁴
 - Thematic focus: anti-doping
 - Members: national anti-doping organisations (NADOs)
- Partnership for Clean Competition (PCC)⁹⁵

3. Competition manipulation

The Council of Europe Convention on the Manipulation of Sports Competitions⁹⁶ (the Macolin Convention) provides key definitions and specifically calls for cooperation and information sharing both at the national and international levels between stakeholders. It also calls for the criminalisation of competition manipulation under national law, building upon other more general corruption conventions to fill gaps and tailor them to be applied to sport.

The primary mechanism for implementing the measures of the Macolin Convention are the national platforms in participating countries. However, this concept of collaboration between relevant stakeholders from government, law enforcement, and sports is also understood by different names. For example, the IOC refers to the construction as a national cooperation framework.

Challenges

The Macolin Convention is the only legally binding tool on the topic of competition manipulation. However, it is only binding for countries that have ratified it. As of April 2025, 14 countries have ratified the Macolin Convention.

The Macolin Convention could become mandatory if member states were to reach a common accord on its implementation. Until then, its non-mandatory nature, as well the lack of a strong structure behind the Convention to apply it in practice, reflects that the fight against competition manipulation remains a relatively low priority for both states and sports organisations.

⁹² <https://www.fairsport.org/>

⁹³ <https://www.globalathlete.org/>

⁹⁴ <https://www.inado.org/>

⁹⁵ <https://cleancompetition.org/>

⁹⁶ Council of Europe, “Macolin Convention.”

At the national level, more and more countries have implemented specific legislation to criminalise competition manipulation. For example, in 2023, approximately 50 countries had specific laws in place.

Criminalising and enforcing related legislation is not helped by the opaque nature of the issue, which makes it not only hard to detect but also more difficult to prove in a court of law or disciplinary proceeding. To address this, the UN Office on Drugs and Crime (UNODC) and the IOC have provided model criminal law provisions and a Resource Guide⁹⁷ on legal approaches to tackling manipulation and how to investigate. However, while these tools are useful to enhance harmonisation, their use has limitations due to their application on a voluntary basis.

Most of the international sports federations have specific rules in place around the manipulation of their sport in compliance with the Olympic Movement Code on the Prevention of the Manipulation of Competitions. However, these rules are limited in their application and enforcement to associated members of the sports organisations, and jurisdiction does not apply to unaffiliated stakeholders like betting operators. Furthermore, it is often challenging to determine where normal gameplay ends and manipulation begins, as certain manipulative ‘customs’ have often grown to be integral parts of a sport over many years.

Another related matter of particular concern involves betting operators. First, the use of sports data for betting purposes and associated commercial interests may directly conflict with the efforts of betting operators to combat manipulation. These (potential) conflicts of interest are reflected in challenges in data sharing between sports, betting operators and law enforcement. In addition, many elite clubs, athletes and even federations within the official sports system seem unaware – or do not understand the consequences – of having their image used by illegal betting companies through sponsorships. This ultimately lends credibility to an industry that has an extremely problematic track record, including but not limited to

- Arranging fake competitions
- Using cryptocurrencies as payment methods to make tracing impossible
- Hiding their activities behind very complex transnational business structures and movement of funds
- Creating slavery-like workforces in closed compounds in Asia, as pictured below

In 2023, a group of investigative journalists named "The Devil in the Data Team" identified one of the compounds in Cambodia where migrant workers are forced to produce illegal sports

⁹⁷ United Nations Office on Drugs and Crime and International Olympic Committee, “Legal Approaches to Tackling the Manipulation of Sports Competitions: A Resource Guide” (Vienna: United Nations, 2021), https://www.unodc.org/documents/corruption/Publications/2021/Legal_Approaches_to_Tackling_the_Manipulation_of_Sports_Competitions_EN.pdf.

betting sites and other scams. Hundreds of thousands of workers are believed to live under such conditions across Southeast Asia.



Credit: Jack Kerr/Devil in the Data Team

Other initiatives of note

- European football anti-match-fixing working group
 - Thematic focus: match-fixing
 - Members: UEFA, Council of Europe, Group of Copenhagen, Europol, Interpol (permanent members)
- Network of National Platforms⁹⁸

4. Human rights abuses and interpersonal violence

Athletes are humans first and, like all humans, have inherent rights. These human (or fundamental) rights are recognised and described in a spectrum of declarations, covenants, bills, and conventions mainly driven by the UN and the EU. The upholding of these rights implies a responsibility for the organisations governing sport.

Interpersonal violence in sports, or violations of human rights in the broader sense within sports, is an extensive topic, ranging from protecting children and vulnerable groups, the way athletes are trained by coaching staff, how referees are treated on the field, worker's rights, sexual misconduct, online discrimination and other unethical, improper and transgressive

⁹⁸ <https://www.coe.int/en/web/sport/network-of-national-platforms-group-of-copenhagen->

behaviours. Human rights also extend to the right to form unions, something that has been blocked by many sports organisations.

These rights (can) must also be considered together with breaches of integrity, as instances of doping, competition manipulation and other types of crime may reflect abuse, coercion or corruption. Breaches of integrity must also be considered alongside the fundamental power imbalances between actors in sports.

National laws and sports regulatory standards are continually evolving to remain effective in fulfilling their purpose of protecting stakeholders from wrongdoing and ensuring the integrity of sports.

There have been attempts at harmonising within the safeguarding space with varying degrees of success. For example, stakeholders have created the International Safeguards for Children in Sport⁹⁹ and the International Safeguards for Adults in Sport¹⁰⁰ to codify key elements. Even though this has led to the creation of standards, they are not applied and/or enforced as mandatory.

This differs from doping and competition manipulation, where the Olympic Charter obliges the Olympic Movement (NOCs, IFs) to implement rules in accordance with the prescribed frameworks (WADC and the Olympic Movement Code on the Prevention of the Manipulation of Competitions).

Recognising that criminal law typically only covers the most severe cases of interpersonal violence, a clear legal framework for sport is required to safeguard sports participants, addressing issues such as vetting procedures, safe hiring practices, intelligence exchange, trauma-informed investigations and mutual recognition of sanctions.

There is a need to clearly define what constitutes breaches of integrity in sport to

- Avoid the risk of harm to others
- Clarify the obligations of sports organisations to ensure rights are upheld
- Clarify the rules as children transition to adulthood (adolescents)
- Enforce rules to protect sport from poor conduct

⁹⁹ <https://www.safesportinternational.com/international-standards/international-safeguards-for-adults-in-sport/>

¹⁰⁰ <https://www.safesportinternational.com/international-standards/#ISCIS>

Other entities of note

- The Army of Survivors¹⁰¹
- Centre for Sport and Human Rights¹⁰²
- National entities specifically established to address harassment and abuse, including the Office of the Sport Integrity Commissioner (Canada) and the U.S. Center for SafeSport
- Sport & Rights Alliance¹⁰³
- Safe Sport International¹⁰⁴

Mapping existing initiatives

Both Olympic and non-Olympic international sports federations have established a growing number of dedicated integrity units. The mandate of these units traditionally has been anti-doping but has expanded with time to cover areas like sports competition manipulation, safeguarding, corruption and general ethics.

In all cases, the mandate is specific to the respective sport, but who within the sport is covered (athletes, coaches, administrators, etc.) varies. Only a minority of these units have (operational) independence from the governing body they are set to control.

Below is a list of international sports federations with a dedicated integrity officer/unit that goes beyond a pure doping mandate:

- Athletics – Athletics Integrity Unit¹⁰⁵
- Badminton – Badminton Integrity Unit¹⁰⁶
- Biathlon – Biathlon Integrity Unit¹⁰⁷
- Boxing – Boxing Independent Integrity Unit¹⁰⁸
- Cricket – ICC Anti-Corruption Unit¹⁰⁹
- Cycling – Cycling Integrity¹¹⁰
- Darts – Darts Regulatory Authority¹¹¹
- Equestrian – Equestrian Community Integrity Unit¹¹²

¹⁰¹ <https://www.nsvrc.org/organizations/army-survivors#:~:text=Our%20goal%20is%20to%20end,for%20change%20to%20protect%20survivors.>

¹⁰² <https://www.sporhumanrights.org/>

¹⁰³ <https://sportandrightsalliance.org/>

¹⁰⁴ <https://www.safesportinternational.com/>

¹⁰⁵ <https://www.athleticsintegrity.org/>

¹⁰⁶ <https://corporate.bwfbadminton.com/integrity/integrity-unit/>

¹⁰⁷ <https://biathlonintegrity.com/>

¹⁰⁸ <https://www.iba.sport/about-iba/governance-and-integrity/boxing-independent-integrity-unit/>

¹⁰⁹ <https://www.icc-cricket.com/about/integrity/anti-corruption/contact-us>

¹¹⁰ <https://www.uci.org/integrity/6Y6J8XUZygpPv4ndZZUnKp>

¹¹¹ <https://www.thedra.co.uk/>

¹¹² <https://inside.fei.org/fei/about-fei/publications/fei-annual-report/2021/governancehighlights/equestrian-community-integrity-unit/>

- eSports – eSports Integrity Commission¹¹³
- Gymnastics – Gymnastics Ethics Foundation¹¹⁴
- Hockey – FIH Integrity Unit¹¹⁵
- Luge – FIL Sport Integrity¹¹⁶
- Rugby – World Rugby Integrity Unit¹¹⁷
- Snooker – WPBSA Integrity Unit¹¹⁸
- Swimming – Aquatics Integrity Unit¹¹⁹
- Table Tennis – ITTF Integrity Unit¹²⁰
- Taekwondo – World Taekwondo Global Integrity Unit¹²¹
- Tennis – International Tennis Integrity Agency¹²²

There is also a growing number of service providers international federations can and do outsource (part of) their integrity work to. One example is the International Testing Agency (ITA), which can do all the work required by an international federation, from education to detection, on behalf of the federation.

Some sports governing bodies have created networks of single points of contact (SPOCs).¹²³ This means that at least one person is the point of contact in communication when it comes to integrity issues. For instance, the IOC has such a network among the NOCs, and some federations like FIFA have a network among member associations.

In most cases, the SPOCs are supported by capacity building, sharing of knowledge and networks, and other forms of support – for example, to conduct investigations. UEFA takes an extra step by funding (part of) the role of SPOCs with HatTrick funds.

Analysis

At the international level, most of the integrity units established to date by international federations are based in Europe but nonetheless have a global reach. There is great variance across integrity units, most notably with regard to:

¹¹³ <https://esic.gg/>

¹¹⁴ <https://www.gymnasticsethicsfoundation.org/>

¹¹⁵ <https://www.fih.hockey/about-fih/committee-panel/integrity-unit>

¹¹⁶ <https://www.fil-luge.org/en/sport-integrity>

¹¹⁷ <https://www.world.rugby/organisation/governance/anti-corruption>

¹¹⁸ <https://wpbsa.com/governance/integrity-unit/>

¹¹⁹ <https://aquaticshintegrity.com/>

¹²⁰ <https://www.ittf.com/integrity/>

¹²¹

https://www.worldtaekwondo.org/integrity/integrity_about.htmlhttps://www.worldtaekwondo.org/integrity/integrity_about.html

¹²² <https://www.itia.tennis/>

¹²³ For more information on SPOCs, please see European Olympic Committees EU Office, “Guidelines for the Setting-Up of Single Points of Contact for Integrity Within Sport Organisations” (POINTS Project / EOC EU Office, January 2019), <https://www.euoffice.eurolympic.org/wp-content/uploads/2024/04/Guidelines-for-SPOCS-v2-2020.pdf>.

- The level and nature of independence
- The mandate/scope of integrity topics covered, including but not limited to doping, competition manipulation, corruption, and harassment and abuse
- Level of resources
- Investigative powers
- The nature of their mandate and/or power to make sanctions/prosecute
- Collaborative partnerships, e.g., with law enforcement entities, other federations or national bodies, networks and statutory authorities

Example 1: The International Tennis Integrity Agency (ITIA) is one of the largest integrity units with a very high level of independence and autonomy, a broad mandate, strong investigative powers, and a budget of 17.3 million US dollars (2023) and around 30 full time equivalent staff.¹²⁴

Example 2: The Athletics Integrity Unit (AIU) has a clear mandate and operational independence from the organisation it oversees (World Athletics).¹²⁵

Example 3: The International Table Tennis Federation (ITTF) Integrity has limited independence from the federation it oversees, one staff member, and depends on cooperation for investigations rather than formal powers.¹²⁶

These existing initiatives and their functions have informed ClearingSport's identification of a solution: a global regulator.

The identified solution

The failure of sports self-regulation has led to little enforcement of existing standards, as seen in a [series of scandals](#) across international sports.

To address this gap, we recommend a global regulator to ensure the implementation of good governance in sports globally against clear minimum criteria for assessment established by universal standards.

Regulation could be supported by enforcement mechanisms, including rewards for compliance (through verification, audits, assurance of adherence, etc.) and sanctions for non-compliance.

The proposal: Towards an entity

We see the following practical options for implementing these solutions through an international entity:

¹²⁴ <https://www.itia.tennis/>

¹²⁵ <https://www.athleticsintegrity.org/>

¹²⁶ <https://www.ittf.com/integrity/>

1. Code

Building upon the aforementioned creation of a collaborative framework, a code would be based on international good practice in legal frameworks of standards, against which signatory members would be upheld. Similar examples include the Olympic Movement Code on the Prevention of the Manipulation of Competition and the World Anti-Doping Code (WADC). A code among signatory members effectively establishes a private law that the entity can uphold, facilitating a basis for rewarding compliance and prosecuting non-compliance among members within the entity's 'jurisdiction.'

An important consideration is creating a code that includes the leveraging of and need to connect organisations in existing networks. These networks and organisations could function as the basis for the entity as they are already a part of the sports landscape and are generally trusted and function well. Despite variations in the extent of cooperation, the existing coordination between them could be enhanced to ensure the policies and actions are harmonised.

The work done by the national anti-doping agencies (NADOs) is a good example of this type of process, but the proposed entity would encompass a broader set of integrity topics.

2. Compliance and sanctioning mechanisms

Any regulation must be supported by enforcement mechanisms. Considering one of the challenges remains the lack of enforcement, a global regulator would require mechanisms to ensure compliance with defined minimum standards and the sanctioning of offenders. When breaches of integrity occur, this entity would have the remit to sanction offenders. In all aspects, compliance – and necessary complements of policy and procedures – should be coupled with efforts to shift culture to promote higher standards and better governance. In cases where sports regulations are being violated, this entity would have the remit to sanction offenders. Mechanisms could include:

- Issuing certificates of compliance to confirm positive compliance on a renewable basis (i.e. every one or two years).
- Imposing sanctions for non-compliance through measures that withhold funding or impose costs, such as financial repercussions or exclusion from other benefits.¹²⁷ If actors experience social disapproval – 'social sanctioning' – when deviating from the norm, it will induce internalisation of the norm over time. The threat or actual withholding of funding has proven to be the most effective lever to have sports government bodies adopt prescribed guidelines, policies and procedures.

¹²⁷ An area for future research concerns WADA's use of this mechanism and its efficacy to understand if better standards and/or programmes could be achieved.

In the cases where national or international laws are being violated and the entity does not have the legal mandate to adjudicate, this entity could refer the case to relevant national authorities.

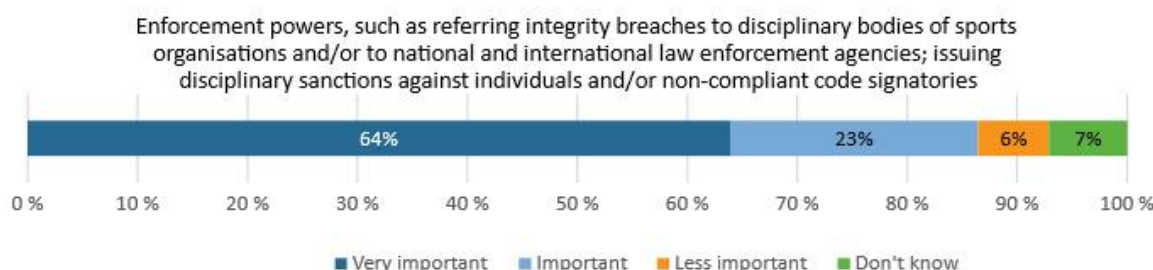
Survey says...

In Play the Game's June 2023 survey,¹²⁸ respondents were asked to consider various aspects of the important capabilities/responsibilities of an anti-corruption entity and then judge that aspect on a scale of "Very important," "Important," "Less important," and "Don't know."

When respondents were asked about the importance of "Enforcement powers, such as referring integrity breaches to disciplinary bodies of sports organisations and/or to national and international law enforcement agencies; issuing disciplinary sanctions against individuals and/or non-compliant code signatories," they answered:

- Very important: 64%
- Important: 23%
- Less important: 6%
- Don't know: 7%

Figure 3: Enforcement powers



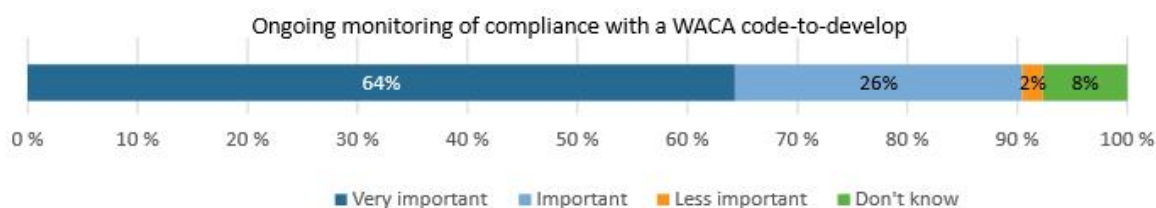
Respondents were asked about the importance of "Ongoing monitoring of compliance with a WACA code-to-develop," where "WACA" was the stand-in acronym for the international entity to combat corruption (a World Anti-Corruption Agency).¹²⁹ To this question the responses were:

- Very important: 64%
- Important: 26%
- Less important: 2%
- Don't know: 8%

¹²⁸ Hartmann, "ClearingSport."

¹²⁹ Hartmann.

Figure 4: Ongoing monitoring of compliance with a code-to-develop



3) Investigations

This section details the analysis that led to the identified solution to support relevant authorities in investigations to protect athletes and those who interact with sports. It concludes with a proposal to implement this solution through the creation of an international entity, which could bolster investigations, intelligence gathering, and other necessary steps by managing a reporting mechanism that offers full protection to whistleblowers and others involved in the investigative process.

ClearingSport's assessment

The current landscape of sports crime, corruption, and other breaches of integrity persists and is at times enabled by the fragmented approach to accountability that exists both within and outside of sports.

Within sports, there are both systemic and individual obstacles to objective investigative processes. Most sports integrity units under international sports federations are not sufficiently independent from their governing bodies, marked by conflicts of interest and lacking the ability to conduct impartial investigations. Cultural and political dynamics also create barriers to accountability. Leading sports officials who attempt to challenge the status quo or confront corrupt practices risk retribution, including the loss of voter support and/or risking their jobs. Authorities outside of sport are unable or reluctant to investigate the opaque and complex world of sport. International agencies and networks that investigate, prosecute, and share data on crime and misconduct in sports have primarily focused on specific themes rather than being united under a guiding entity with a comprehensive strategy.

Lastly, the legal status of the majority of international sports federations as 'non-profit' entities in Switzerland, where they are predominantly based, has lent them a certain degree of autonomy and made public authorities reluctant to investigate their affairs.

Mapping existing efforts

The mapping exercise of investigations considered existing efforts at the international level, national level, and within sport.

At the international level

Different agencies and networks work internationally to investigate, prosecute, and share data about crime, corruption, and sports integrity breaches.

INTERPOL (International Criminal Police Organisation)

Interpol does not have a pure investigative function – they coordinate national police forces and facilitate cooperation and the sharing of information through thematic programmes. They have limited operational capabilities but instead coordinate operations with national central bureaus (NCBs) in country.

INTERPOL has a number of thematic focuses that intersect with sport:

- i. Anti-doping and corruption-related drug trafficking in sports through Project Energia¹³⁰
- ii. Corruption in sport,¹³¹ including asset recovery¹³² and soccer gambling, through a dedicated Integrity in Sport unit and Match-Fixing Task Force
- iii. Sexual abuse and misconduct through Project Soteria (2021-2025), to prevent sexual offenders from using positions in the humanitarian sector to access and offend against children and vulnerable adults¹³³

EUROPOL (European Union Agency for Law Enforcement Cooperation)

EUROPOL has several initiatives focused on threats to the integrity of financial systems that overlap with the criminal and corrupt activity underpinning abuse practices in sports:

- i. The European Financial and Economic Crime Centre (EFECC) responds to threats to the integrity of financial systems, including money laundering, corruption, and fraud and tax fraud schemes.¹³⁴
- ii. The EUROPOL Financial Intelligence Public Private Partnership (EFIPPP) is a transnational information-sharing mechanism focused on anti-money laundering and counter-terrorist financing.¹³⁵

Network of Magistrates/Prosecutors Responsible for Sports (MARS)

The MARS network aims to strengthen international co-operation and exchange of information in the protection of the integrity of sport. It is comprised of representatives of public prosecution systems and is established and supported by, but not limited to, the Council of Europe member states' Enlarged Partial Agreement on Sport (EPAS).¹³⁶

¹³⁰ <https://www.interpol.int/en/Crimes/Corruption/Project-Energia>

¹³¹ <https://www.interpol.int/en/Crimes/Corruption/Corruption-in-sport>

¹³² <https://www.interpol.int/en/Crimes/Corruption/Anti-corruption-and-asset-recovery>

¹³³ <https://www.interpol.int/How-we-work/Capacity-building/Capacity-building-projects/Project-Soteria>

¹³⁴ <https://www.europol.europa.eu/about-europol/european-financial-and-economic-crime-centre-efecc>

¹³⁵ <https://efipp.eu/>

¹³⁶ <https://www.coe.int/en/web/sport/mars-network>

Network of National Platforms (Group of Copenhagen)

The Network of National Platforms serves as a support mechanism to the Macolin Convention by functioning as a global network of operationally engaged experts, with a view to formulating and developing proposals to strengthen the governance and operational capacity of national platforms and the broader Macolin community.¹³⁷

- Thematic focus: competition manipulation
- Members: National platforms (their elected members representing public authorities) and observers

The Misconduct Disclosure Scheme

Facilitated by the Steering Committee for Humanitarian Response (SCHR), the Misconduct Disclosure Scheme consists of commitments to systematically check with previous employers about any sexual exploitation and abuse issues relating to potential new hires and to respond systematically to such checks from others.¹³⁸ It has been implemented by 270 organisations.

At the national level

Law enforcement may enforce standards according to criminal, civil, or customary laws, depending on each country's legal system. Some national laws are extra-territorial in nature and scope.

For example, in the UK, the National Safeguarding Panel supports national sports governing bodies in the professional management of safeguarding complaints by providing two key services:¹³⁹

- Independent investigations and reviews into safeguarding complaints and concerns
- Independent arbitration in place of a national sports governing body's disciplinary or appeals panel.

The national integrity bodies in the “Collaborative Framework” section also apply to this mapping exercise on investigations.

Within sport

Within sport there are several structures in place that are relevant to investigations in the sports integrity space.

As described in the previous section, “Global regulator,” around 20 international federations have a dedicated unit that handles the investigation(s) of one or more types of breaches of integrity in sport. Operating in parallel to these integrity units, several networks of

¹³⁷ <https://www.coe.int/en/web/sport/network-of-national-platforms-group-of-copenhagen->

¹³⁸ <https://misconduct-disclosure-scheme.org/>

¹³⁹ <https://www.sportresolutions.com/services/national-safeguarding-panel>

individuals, departments, and commissions support or take on investigations. These can be permanent or more ad hoc, e.g., linked to specific events.

Two of these, in particular, are worth noting for their extended operational independence:

World Athletics (WA)

- The Athletics Integrity Unit (AIU) has a clear mandate and operational independence from World Athletics as an organisation¹⁴⁰
- Scope: all threats to integrity in athletics, including anti-doping, competition manipulation, safeguarding, and ethical breaches

Biathlon (IBU)

- The Biathlon Integrity Unit (BIU) is part of the IBU but operationally independent¹⁴¹
- Scope: all integrity-related matters in biathlon, including anti-doping, ethical breaches, and safeguarding

The following sports governing bodies have also implemented specific programmes and initiatives to address integrity-related issues.

International Olympic Committee (IOC)

- Olympic Games Joint Integrity Intelligence Units
 - Thematic focus: competition manipulation
 - Members (during Olympic Games only): national law enforcement, IOC
- Integrity single points of contact (SPOCs)
 - Thematic focus: competition manipulation
 - Members: International federations and NOCs
- IOC and National Olympic Committees (NOCs)
 - A safeguarding setup including safeguarding officers and hubs is currently being developed¹⁴²
 - Thematic focus: harassment and abuse

FIFA

- FIFA Integrity Officers Platform
 - Thematic focus: competition manipulation
 - Members: Integrity officers within member associations

¹⁴⁰ <https://www.athleticsintegrity.org/>

¹⁴¹ <https://www.biathlonworld.com/inside-ibu/governance/biu-structure-purpose>

¹⁴² <https://www.olympics.com/ioc/safe-sport/safe-sport-regional-hub-initiative>

- FIFA Guardians programme
 - Thematic focus: safeguarding
 - Members: Member association representatives who undertake the programme
- FIFA Integrity Taskforce
 - Thematic focus: competition manipulation
 - Members (during FIFA tournaments only): can include national law enforcement, betting sector, sport data companies, FIFA, and international organisations

Union of European Football Associations (UEFA)

- UEFA Integrity Officers Network¹⁴³
 - Thematic focus: competition manipulation
 - Members: Integrity officers within 55 UEFA national associations
- UEFA AMFAG (Anti-Match-Fixing Assessment Group)
 - Thematic focus: competition manipulation
 - Members (during UEFA tournaments only): can include national law enforcement, betting sector, sport data companies, UEFA and international organisations

However, the existence of integrity officers and/or participation of sports governing bodies is neither equitable nor a substitute for nor a fully functioning investigations unit. There is little to no focus on intelligence-led approaches with supporting analysis, including proactive, source recruitment and handling (HUMINT) programmes, and open-source intelligence (OSINT) and data, among others.

These approaches to breaches of integrity in sports fall short of balancing the need for cross-sectionality in some areas and specificity in others. Where there are investigative mechanisms in place, they oftentimes do not consider the cross-sectional nature of breaches of integrity in sport; and where certain breaches require specificity, there is little to no recognition of the system(s) required. Take the management of safeguarding and related concerns, for example, which requires specificities like

- A person-centred, trauma-informed approach
- Specific skill sets
- A recognition that cases may not be time limited in terms of breadth of response and remedy

¹⁴³ <https://www.uefa.com/running-competitions/integrity/anti-match-fixing/>

These specificities are stressed by both safeguarding practitioners as well as research into entities that cover safeguarding alongside other breaches of integrity.

The identified solution

At present, no one entity is responsible for policing and investigating crime and corruption in sport. This has led to a fragmented approach of monitoring. State authorities need to be supported to ensure sports and its stakeholders are compliant with international legal standards and obligations by partnering with national anti-corruption and financial crime units.

To address these gaps, the root causes of integrity breaches must be systematically investigated and properly prosecuted. The capacity of investigations would:

- Proactively drive collection of information, exchange and collaboration at different levels and across jurisdictions between law enforcement, prosecutorial networks, betting operators and regulators, data companies, etc.
- Investigate corruption and integrity complaints and concerns by providing specialist fact-finding services, supplementary to and not precluding coordination with international, regional and national authorities proceedings and sports investigations.
- Ensure investigations are based on good practice standards, particularly regarding their trauma-informed and person-centred approach.
- Establish case management and tracking.
- Ensure the cross-sectionality between topics and jurisdictions is properly reflected in the investigative approach.

Survey says...

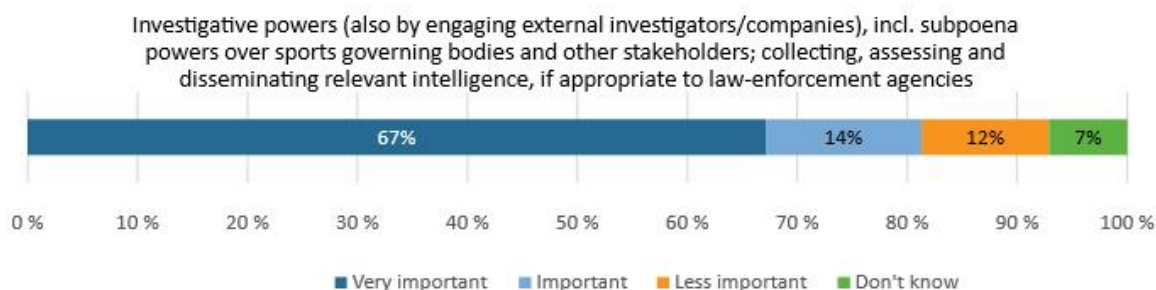
In Play the Game's June 2023 survey,¹⁴⁴ one of the questions concerned the "important capabilities / responsibilities" of the entity, and asked respondents to consider various aspects and then judge that aspect on a scale of "Very important," "Important," "Less important," and "Don't know."

When respondents were asked about the importance of "Investigative powers (also by engaging external investigators, specialised companies), including subpoena powers over sports governing bodies and other stakeholders; collecting, assessing and disseminating relevant intelligence, if appropriate to law enforcement," the answers were:

- Very important: 67%
- Important: 14%
- Less important: 12%
- Don't know: 7%

¹⁴⁴ Hartmann, "ClearingSport."

Figure 5: Investigative powers



The proposal: Towards an entity

The following mechanisms are proposed to be implemented through an international entity:

1. Reporting mechanism with whistleblower protection
2. Sports integrity commissioner/ombudsperson
3. Ensuring access to networks and avenues for remedy
4. Specialist services

The following sections explore the implementation and features of these mechanisms.

1. Reporting mechanism with whistleblower protection

A new online complaints mechanism, such as an “Integrity in sport helpline,” or support of existing helplines would require the minimum features of:

- Whistleblower protection, including implementation of ISO 37002 on whistleblowing
- Multiple access points to offer several user-friendly and secure avenues for submitting complaints to ensure inclusivity and equity
- Conducting assessments of incoming information and establishing a structured approach to rapidly identify and respond to potential incidents, along with triaging to relevant support
- Facilitating contact between the whistleblower and relevant law enforcement authorities with jurisdiction where appropriate
- Ensuring access to networks and avenues for remedy, including signposting and access to legal aid

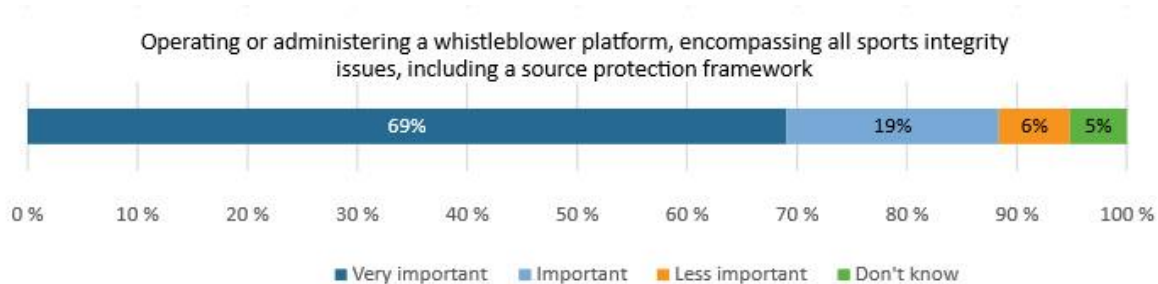
Survey says...

In the same June 2023 survey,¹⁴⁵ respondents were asked about the importance of “Operating or administering a whistleblower platform, encompassing all sports integrity issues, including a source protection framework.” Their answers were:

¹⁴⁵ Hartmann.

- Very important: 69%
- Important: 19%
- Less important: 6%
- Don't know: 5%

Figure 6: Operating or administering a whistleblower platform



2. Sports integrity commissioner/ombudsperson

A commissioner or ombudsperson would serve as an independent, impartial, confidential, and informal resource to help resolve conflict and solve problems of sports corruption and integrity issues, thus ensuring greater transparency and accountability within sports. Their findings would inform future policymaking and improve effectiveness of existing mechanisms. They may issue public reports.

3. Ensuring access to networks and avenues for remedy

From an athletes' perspective, remedy is very important. Signposting could be part of the functioning of a strong ombudsperson, and avenues for effective remedy that can be signposted include:

- Non-judicial grievance mechanisms (i.e. non-legal routes to remedy)
- Criminal complaints
- Civil claims
- Sports disciplinary procedures
- International sports federations
- National sports federations
- National integrity in sport units
- Court of Arbitration of Sport (CAS)

Signposting to remedy mechanisms is a good way to start, but unfortunately, there are often no sufficient remedy mechanisms. To ensure access to justice and remedy, a strategy could include a global network of legal experts who may provide relevant free legal aid. It may also include directing to resources for the funding of legal support in proceedings.

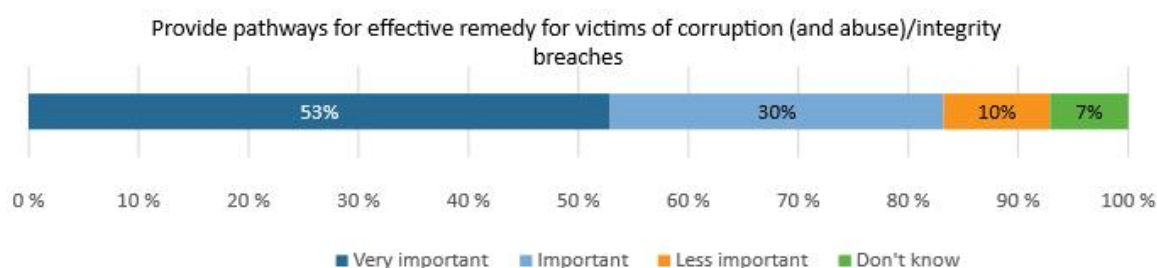
Survey says...

In Play the Game's June 2023 survey,¹⁴⁶ one of the questions concerned the "important capabilities / responsibilities" of the entity, and asked respondents to consider various aspects and then judge that aspect on a scale of "Very important," "Important," "Less important," and "Don't know."

When respondents were asked about the importance of "Provid[ing] pathways for effective remedy for victims of corruption (and abuse)/integrity breaches," the answers were:

- Very important: 53%
- Important: 30%
- Less important: 10%
- Don't know: 7%

Figure 7: Provide pathways for effective remedy



4. Specialist services

Specialist services could be offered for a fee alternatively or concurrently, depending on the nature of the investigation and the organisation requiring the service.

Background integrity checks/vetting services/fit and proper tests

Specialists could help ensure that partners in sports conduct background integrity checks through affiliation with due diligence screening initiative/s that would serve to prevent known perpetrators move across jurisdictions and across sports.

This could be supported by a database or central licensing system in which all sports officials at a certain pre-defined level agree to being registered, delivering information on business interests, convictions, and other potential conflicts of interest.

Assessments and reports

Assessments and reports provide two avenues to monitor and ensure compliance. The first option, to assess compliance with minimum standards through an independent external

¹⁴⁶ Hartmann.

assessment or auditor, proposes an external avenue to ensure sport is not tasked with both case management and sanctioning.

The second option includes the issuing of an investigation case file report to the responsible sports federation after the investigation, and the federation would then be responsible for sanctioning and enforcing the corresponding sanctions.

In both cases, consultation would need to be provided in cases where recommendations were given to improve compliance and address any gaps identified during the assessment and investigation process.

4) Dispute management alternatives

This section details the analysis that led to the identified solution to introduce alternatives for dispute management in sport, particularly in the areas of arbitration and mediation, to ensure real independence and fair access to justice. It concludes with a proposal to implement this solution through the creation of an international entity, which could offer specialist services related to signposting, arbitration and mediation as dispute management alternatives.

ClearingSport's assessment

The current system of arbitration in sport conflicts with two principles of access to fair justice:

1. The system is mandatory, rather than voluntary.
2. The system does not respect the rule of law, as demonstrated by ineffective independence and lack of adherence to due process

Alternative avenues for dispute management that would ensure that sports arbitration complies with due process and broadly the rule of law are a necessary complement of any good governance and integrity reforms.

Mapping existing efforts

The Court of Arbitration of Sport (CAS) is known as the “supreme court of world sport.”¹⁴⁷ Several analyses,¹⁴⁸ however, take issue with several facets of CAS, including the following characteristics:

¹⁴⁷ Grit Hartmann, “The Secretive Life of the Court of Arbitration for Sport,” Play the Game, November 18, 2021, <https://www.playthegame.org/news/the-secretive-life-of-the-court-of-arbitration-for-sport/>.

¹⁴⁸ Grit Hartmann, “Tipping the Scales of Justice - The Sport and Its Supreme Court” (Play the Game, November 2021), <https://www.playthegame.org/media/hfefk4em/tipping-the-scales-of-justice-the-sport-and-its-supreme-court.pdf>; Antoine Duval and Giandonato Marino, “Quantifying the Court of Arbitration for Sport,” Asser International Sports Law Blog, May 23, 2014, <https://www.asser.nl/SportsLaw/Blog/post/quantifying-the-court-of-arbitration-for-sport-by-antoine-duval-and-gianni-marino>; Antoine Duval, “Three Pillars for a Reform of Court of Arbitration for Sport,” Play the Game, December 4, 2015, <https://www.playthegame.org/news/the-rules-of-the-game-three-pillars-for-a-reform-of-the-court-of-arbitration-for-sport-independence-transparency-and-access-to-justice/>.

- Lack of independence across CAS bodies and individual arbitrators
- Arbitration under CAS is not voluntary, but enforced on any athlete wishing to compete internationally. There is no choice for other dispute resolution mechanisms.
- Lack of transparency on arbitrators, awards, and documentation
- Difficulties in establishing case law
- Inaccessibility to justice due to prohibitive costs

The arguments for reform include:

- Growing doubts among European courts about CAS legitimacy¹⁴⁹
- Athletes have lost confidence in CAS¹⁵⁰
- CAS' caseload has grown exponentially¹⁵¹
- Anticipating the increased caseload that would accompany the creation of another mechanism like the World Anti-Doping Code for integrity
- Potential incompatibility of principle res judicata of CAS decision under national law with European law

The identified solution

Introduce alternatives for dispute management in sport, particularly in the areas of arbitration and mediation, to ensure fair access to justice.

1. Arbitration

Partner organisations could outsource arbitration to a specialist service in place of a sports disciplinary or appeals panel being conducted by the sport.

2. Mediation

Mediation can be particularly useful in the provision of remedy when there are very clear means to redress the power imbalance between parties. Mediation services to be considered include:

- Selection and appointment of a specially trained neutral facilitator with a good understanding of the sport
- Organisation of the mediation in a confidential setting using a mediation procedure
- Mediation of the dispute and assistance to finalise a settlement agreement between the parties

¹⁴⁹ Tamara Čapeta, Sports arbitration: AG Čapeta proposes that awards by the Court of Arbitration for Sport must be open to full review by national courts to ensure the compatibility of FIFA rules with EU law, No. C-600/23 (European Court of Justice January 16, 2025).

¹⁵⁰ Hartmann, "The Secretive Life of the Court of Arbitration for Sport."

¹⁵¹ Duval and Marino, "Quantifying the Court of Arbitration for Sport."

The proposal: Towards an entity

Although the current system of arbitration in sport was not a primary subject of research in the ClearingSport project, an international entity could offer specialist services related to arbitration and mediation as dispute management alternatives. Separately, this could be complemented with a reform of CAS.

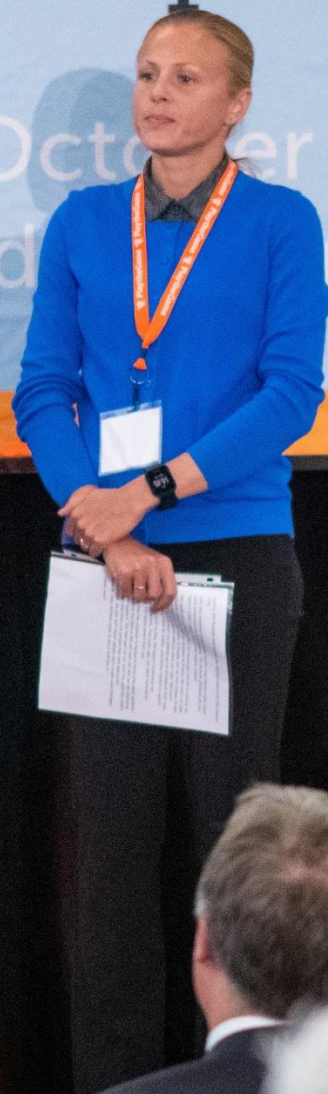
It is also acknowledged that a new triage process, which establishes the 'route' a case could or should take with corresponding mechanisms, would be necessary to ensure that alternative dispute management services can be utilised.

Play the Game

Athlete power on

16 October

Bradley, CO



Play
the Game
2019

Athlete power
rise

Without whistleblowers like Yuliya and Vitaly Stepanov and their cooperation with journalists, the public would never learn about the criminal and corrupt sides of the glamorous sports industry. Those who expose scandals, however, pay a huge personal, professional, and reputational price, and an investigation unit with full protection of whistleblowers must be a main priority for a new international entity.

Photo: Thomas Søndergaard/Play the Game

Part III: A concept for an entity

This proposal conceptualises an international entity under the working title “ClearingSport.” Establishing a credible and trusted entity that reduces risk to sport’s organisations and harm to individuals involved in sport will be a major step forward in ensuring sport is conducted free of crime and corruption and safe for all to enjoy.

The idea of such an international entity has been around for decades. However, the proposals often lack a theory-informed outline that 1) analyses the specific failures in the global sports governance the entity would address; 2) rectifies the gaps and insufficiencies in approaches to date that have hindered previous attempts to create such an entity; and 3) offers suggestions for how such an entity should be designed.

The ClearingSport proposal has sought to fill these gaps:

1. Addressing the specific failures in global sports governance

The solution to this problem seems simple: implement institutional practices and structures based on good governance standards and provide mechanisms to ensure their enforcement.

However, this type of solution faces significant obstacles as these practices and structures can disrupt power balances, constrain decision-makers, and can even lead to their dismissal.¹⁵² As a result, organisational leadership often perceives good governance as contrary to its interests. Consequently, organisations tend to resist reform and change from within faces substantial barriers.¹⁵³

Unless pressured or compelled, sports governing bodies have proven to be unlikely to implement high standards of good governance.¹⁵⁴ Even when such pressure is applied, they may implement governance principles on paper without fully adhering to them in practice (‘dualism’).¹⁵⁵

2. Rectifying the gaps and insufficiencies

Following our identification of current gaps and insufficiencies in existing systems, our proposal aims to address the holistic nature of the failures of global sports governance. Even though breaches of integrity can be addressed individually, our research and consultations have convinced us that a comprehensive approach will secure the strongest solution.

¹⁵² Mark Pieth, *The Responsibility of the Host Country* (DIKE, 2014).

¹⁵³ Paul Pierson, *Politics in Time: History, Institutions, and Social Analysis* (Princeton University Press, 2004).

¹⁵⁴ Geeraert, “The Limits and Opportunities of Self-Regulation: Achieving International Sport Federations’ Compliance with Good Governance Standards.”

¹⁵⁵ Arnout Geeraert, “The Dark Side of Governance Networks: How Private Actors Use Discursive Strategies in Global Sport Governance,” *Public Management Review*, 2025, 1–27.

ClearingSport thus advocates for the creation of an entity to drive and coordinate collaborative action at the international level across a range of capacities, stakeholders, and issue areas. As explored extensively in part II of this document, the proposed all-encompassing international entity functions with clear separation of powers across four capacities, including a collaborative framework, a global regulator, investigations, and dispute management alternatives.

3. Designing an entity

ClearingSport provides the international community with a concept for that entity and a proposed pathway to enable the establishment of that entity. The goals of the proposal include raising awareness to create fertile grounds for discussion and presenting the concept of an entity to be further finetuned with all relevant stakeholders, with this document serving as a guideline.

About the entity

This section explores the concrete details of the international entity for consideration.

Name

Options:

- Keeping Sport Clear of Crime
- Sport United: Sharing the Common Goal of Fair Play
- Sport Integrity United

Vision

To reflect the long-term aspirations of the entity, options for a vision statement include:

- To protect all participants in sport. following the guideline “Everyone, everywhere safe in sport”.
- Helping sport live up to its full potential by minimising harm and promoting safe, inclusive and positive experiences

Defining values and principles

The new entity must be transparent about the values and principles that guide its practice. Based on our research and consultations we conclude that to be fit for purpose, the entity must, at a minimum, embody the following values and principles.

Values

The following core beliefs would guide the entity’s organisational culture:

- Accountability
- Equity

- Expertise
- Responsibility
- Transparency

Accountability

To function effectively and uphold its legitimacy, the agency should be founded on key principles of good governance, ensuring that its operations remain fair, independent, and accountable. By adhering to these principles, it can strengthen its credibility, enhance its authority, and foster trust among stakeholders.

Equity

To promote fairness and integrity, the entity must actively recognise and respond to the systemic and structural imbalances that affect access, representation, and outcomes in sport governance.¹⁵⁶

This involves ensuring that all stakeholders - regardless of background, geography, or resources - are supported appropriately to participate meaningfully and benefit equally from governance reforms. Embedding equity into its operations ensures that governance standards reflect a diversity of perspectives and promote meaningful inclusion throughout the sector.

Expertise

Governance expertise should be a fundamental criterion for membership in the organisation's decision-making structures and adjudication and technical bodies.

It ensures that the governance standards are effectively designed, implemented, and enforced. This, in turn, strengthens the agency's role as a neutral, authoritative body capable of promoting good governance across the sector.

Responsibility

To maintain relevance and effectiveness, the criteria should undergo regular evaluation and refinement based on emerging best practices, stakeholder feedback, and evolving governance challenges.

This process ensures that standards remain both rigorous and adaptable, fostering continuous improvement in governance practices across the sector.

¹⁵⁶ Created in referencing the World Health Organization's definition of "health equity." World Health Organization, "Health Equity," World Health Organization, accessed March 24, 2025, <https://www.who.int/health-topics/health-equity>.

Transparency

To underpin its integration into organisational culture, detailed implementation reports should be published regularly to provide a comprehensive and objective assessment of governance compliance. These reports should outline the extent to which organisations adhere to established good governance principles, highlighting both progress and areas of concern. By making this information publicly available, transparency is enhanced, and stakeholders – including sponsors, policymakers, and the public – can hold organisations accountable for their governance practices.

Principles

The following operational guidelines would shape the entity's decision-making:

- Democracy
- Efficiency
- Geographical diversity
- Operational independence
- Separation of powers

Democracy

Governance structures should be inclusive, ensuring that key stakeholders such as athlete representatives and sports governing bodies have a meaningful voice in decision-making. This helps prevent dominance by a single stakeholder while ensuring that governance standards are broadly supported within the sector, well-informed, and effectively aligned with best practices.

Efficiency

Leveraging existing mechanisms, networks, laws, and rules where possible.

Geographical diversity

Wherever placed, the entity should be able to operate globally.

Operational independence

Given the inherent conflict of interest, decision-making within the entity should be independent of sports governing bodies and others with a commercial benefit from sport. More specifically, decision-making must not be subject to control by the sports sector, neither de facto nor de jure.

This can be achieved, first, by limiting the proportion of key officials with direct affiliations to the sports movement. At the same time, it is crucial to ensure that officials from outside the sports sector possess sufficient expertise, as this enables them to engage effectively with complex governance issues and make informed, autonomous decisions.

Separation of powers

There should be clear division of responsibilities between standard-setting, compliance monitoring, and enforcement functions. Those developing governance criteria should not be responsible for adjudicating compliance or imposing sanctions, ensuring impartiality and reducing conflicts of interest.

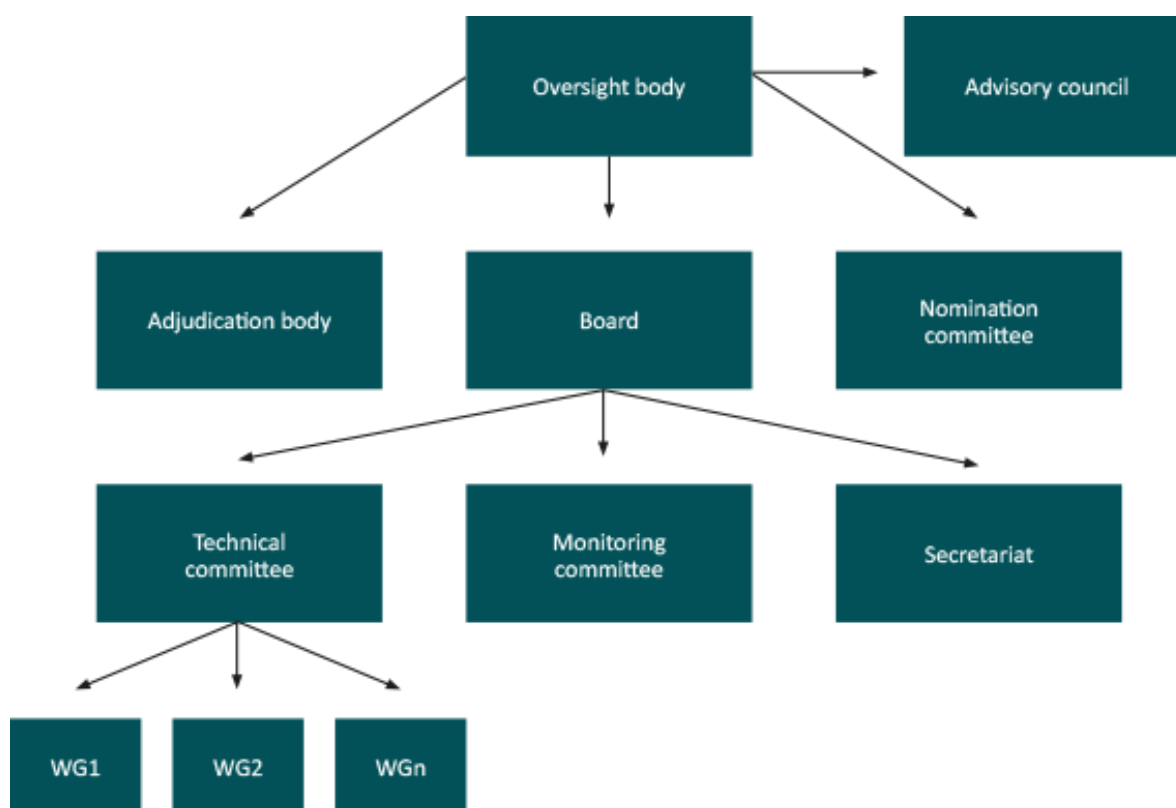
Governance

Inspiration should be drawn from the governance structures of organisations with similar functions, such as the International Organization for Standardization (ISO), the International Accounting Standards Board (IASB), and the International Labour Organization (ILO).

Governance structure

These principles inform the governance structure depicted below.

Figure 8: Governance structure of the proposed entity



The following provides an overview of the roles and responsibilities of the respective bodies.

Oversight body

- The highest authority in the entity
- Votes on governance standards. A two-thirds or qualified majority would be required to adopt standards
- Admits new members
- Approves long-term strategic plans and priorities for work on good governance
- Reviews and adopts budget and financial statements
- Elects the board and oversees its work

Board

- Strategic and executive leadership body
- Members serve a maximum of two consecutive terms
- Defines the long-term strategy of the entity
- Establishes a predefined range of possible sanctions for different levels of non-compliance (but does not apply sanctions itself)
- Liaises with relevant stakeholders, particularly through the advisory council.
- Oversees the technical committee and working groups, ensuring effective standard development
- Manages the entity's budget and administration

Advisory council

- Represents stakeholders from the sports movement, including sports governing bodies and athletes, and ensures that their views are taken into account
- Helps shape the long-term strategic plans and identifies emerging trends and challenges in good governance
- Supports the harmonisation of the good governance standards into different types of sports organisations.

Secretariat

- Acts as the administrative and operational arm of the board, ensuring the implementation of governance standards
- Supports the technical committee and working groups in developing and refining governance criteria
- Facilitates coordination between different governance bodies
- Prepares detailed implementation reports and assists in transparency efforts (e.g., publishing compliance data)
- Organises consultations, training, and capacity building to help sport federations achieve compliance
- Manages documentation and records, including implementation reports, advisory recommendations, and sanction notices

Technical committee

- Develops and updates governance standards based on research, stakeholder input, and best practices
- Works closely with the board to refine governance criteria and evaluation methods
- Helps clarify standards and ensures consistent application
- Establishes and oversees the working groups, ensuring they align with the organisation's mission
- Appoints experts to the working groups

Working groups

- Provide recommendations to the technical committee
- Tasked with specific governance areas (e.g., financial transparency, ethical compliance, stakeholder representation) and to draft technical specifications or amendments to standards.
- Conduct research and feasibility studies
- Include experts on relevant specific areas, a majority of which should be independent from the sports movement

Monitoring committee

- Monitors compliance with the different good governance standards
- Provides advice on compliance matters to the board
- Submits compliance violations to the adjudication body

Adjudication body

- Ensures fair and impartial enforcement of governance standards by reviewing compliance cases and applying sanctions when necessary
- Independently assesses compliance cases brought forward by the monitoring body or stakeholders. Provides authoritative interpretations of governance standards in disputed cases
- Operates on the basis of the principles of due process and fair hearings, ensuring fairness, proportionality, and legal certainty
- Is structured with an appeals process, ensuring that decisions are reviewed fairly
- Ensures fair interpretation and enforcement of governance standards
- Provides authoritative interpretation
- Issues recommendations on developing new governance standards where appropriate

Nomination committee

- Oversees the selection and appointment of key governance roles
- Ensures that candidates meet applicable criteria relating to, e.g., independence and expertise
- Reports to the oversight body to guarantee transparency in governance appointments

Representation of stakeholders

Crime, corruption, and other breaches of integrity in sport can only be addressed through a collaborative approach to defining and implementing regulations. Above all, the proposed entity seeks to bring stakeholders together to collaborate and build trust between each other and in sports.

The entity should be established in accordance with the key principle of independence outlined above to address the issues it needs to solve without interference. However, it should also be recognised that the entity needs to operate and act in cooperation with sports. Two broad scenarios can be envisioned regarding the representation of sport in the entity's governance.

Scenario 1

In the first scenario, representatives from the sports movement serve a purely consultative role. They are represented in the advisory council but are excluded from the entity's decision-making bodies.

The oversight body consists solely of member state delegates, appointed for their relevant expertise. While sports movement representatives may be invited to working groups, the majority of members should remain independent of the sports movement. This scenario more directly seeks to fight crime and corruption in sports by empowering public authorities and implementing enforcement mechanisms analogue to what is seen in law enforcement.

Scenario 2

In the second scenario, the sports movement would participate in key decision-making bodies alongside other sports stakeholders, such as athletes. To ensure balanced and inclusive representation, the entity's oversight body could adopt a tripartite-plus model, inspired by the International Labour Organization (ILO). The general assembly would consist of four distinct groups (see Table 1):

- Member state representatives (government group) – 50% of seats
- Sports governing body representatives (Sports movement group) – 25% of seats
- Athlete representatives (Athlete group) – 15% of seats
- Independent experts & civil society (Independent group) – 10% of seats

Table 1: Example of composition

Group	Representation %	Appointment Method
Government group	50%	Appointed by national governments
Sports movement	25%	Elected by sports governing bodies
Athletes	15%	Elected by athlete unions
Independent & civil society	10%	Selected through an independent process

A similar procedure could be adopted for the board, where member state appointments would follow a regional quota system to ensure geographical diversity.

This proposal prefers a collaborative approach between stakeholders, sports bodies, and public authorities for several reasons:

- Even considering the gaps described in previous chapters, there are [precedents of useful collaborations](#) between sport and public authorities on integrity issues.
- Cooperation between sporting and statutory bodies strengthens policy and enforcement by clarifying definitions of the respective functions, legal rights, and mutual responsibilities of sporting entities.
- Existing agreements, including the UNESCO International Charter of Physical Education¹⁵⁷ and the Council of Europe's European Sports Charter, support this approach.¹⁵⁸

However, a collaborative approach comes with a great risk of undue influence, direct or indirect, from sports governing bodies on the operations of the entity. It is therefore essential that the governance systems of the entity are set up to protect the full operational independence of the entity, in line with the aforementioned principle of 'operational independence'.

Financing

Any entity that benefits from sports has a duty to protect it. This responsibility includes investing in integrity-related efforts.

¹⁵⁷ "Public authorities and sports organizations are invited to enhance their co-operation in a spirit of mutual respect, and to minimize the risk of conflict by clearly defining their respective functions, legal rights and mutual responsibilities in physical education, physical activity and sport." UNESCO, "International Charter of Physical Education, Physical Activity and Sport" (UNESCO, 2015), art. 10.8, <https://unesdoc.unesco.org/ark:/48223/pf0000235409>.

¹⁵⁸ "The sports movement, which comprises non-governmental, non-profit sports organisations, is the main partner of public authorities for the implementation of sports policies. Its organisations are bound by the requirements and limits imposed on them by legislation in accordance with international standards." Council of Europe, "Revised European Sports Charter" (Council of Europe, 2022), art. 4.1, <https://edoc.coe.int/en/sport-for-all/11299-revised-european-sports-charter.html>.

Sport

- **Benefits:** Considering the sports industry's annual global revenue is between 480-750 billion US dollars,¹⁵⁹ sports organisations should counterbalance the competitions and industry from which they benefit financially - which simultaneously also provide opportunities for crime and corruption - with integrity-supporting efforts.
 - Estimated value of sports industry:
 - 2023-number: 480.12 billion US dollars¹⁶⁰
 - 2020: 756 billion US dollars¹⁶¹
 - Professional sport (matchday, sponsorship, TV rights, transfers): 171 billion US dollars
 - Sports retail (clothing, equipment etc.): 270 billion US dollars
 - Clubs and gyms fees: 115 billion US dollars
 - Infrastructure, food and beverages, and betting: 200 billion US dollars
- **Responsibility:** Sports governing bodies must be accountable to the principles that justify their existence, many of which depend on the protection of integrity in sport. For example, the second of the fundamental principles of the Olympic Charter makes such a commitment when it states, “The goal of Olympism is to place sport at the service of the harmonious development of humankind, with a view to promoting a peaceful society concerned with the preservation of human dignity.”¹⁶²
- **How can they fund integrity-related efforts?** Sports organisations can fund these efforts through:
 - Membership fees
 - Charging a fee for different services otherwise offered by the private sector (such as specialised education, and/or training in good governance, crime prevention, and other integrity-related topics)
 - Dedicating a portion of sponsorship, broadcasting, or athlete transfer deals, particularly those with risks related to crime and corruption.
 - Any recouped illegally/unethically acquired assets and/or fines

¹⁵⁹ United Nations Office on Drugs and Crime, *Global Report on Corruption in Sport*.

¹⁶⁰ The Business Research Company, “Sports Global Market Report 2024” (The Business Research Company, February 2024).

¹⁶¹ Amir Somoggi, “Coronavirus’s Economic Impact on the Sports Industry – Sports Value,” *Sportsvalue* (blog), March 18, 2020, <https://www.sportsvalue.com.br/en/coronaviruss-economic-impact-on-the-sports-industry/>.

¹⁶² International Olympic Committee, “Olympic Charter,” June 26, 2019, https://stillmed.olympic.org/media/Document%20Library/OlympicOrg/General/EN-Olympic-Charter.pdf#_ga=2.67361361.1773004175.1571420233-612939929.1571420233.

Government

- **How can they fund integrity-related efforts?** Government authorities can contribute public funds to these efforts. These public funds effectively serve as an investment, given the taxes that can then be collected from regulating illegal markets and preventing and rectifying tax evasion and/or fraud. Another standard practice that could be considered is the secondment of staff to international governmental and law enforcement entities.

Betting operators

- **How can they fund integrity-related efforts?** Betting operators can dedicate a portion of their revenues to ensure the legal betting industry is a responsible and proactive advocate of regulated activity.
- **Challenges:** The commercial interests of betting companies and operators are such that sports data obtained for betting purposes may conflict with the interests of the same betting companies to fight against crime and corruption. These potential conflicts of interest are reflected in challenges in data sharing between sports, betting companies, and law enforcement. The opaque nature of violations of sporting integrity, which can be hard to detect, does not help.

Other entities that would benefit from investing in integrity-related efforts include data providers servicing the betting industry and law enforcement agencies, which could reinvest seized assets as a preventive strategy against crime and corruption.

Survey says...

In Play the Game's June 2023 survey,¹⁶³ one of the questions concerned the "funding" of the agency and asked respondents, "We are eager to hear ideas that go beyond the obvious split between sports and (possibly) governments, possibly in the comment section. But for now, we would like to get an idea of who should bear the greater share. How important are the following payers with regard to WACA?" Here are the answers:

Sports organisations

- Very important: 55%
- Important: 27%
- Less important: 8%
- Don't know: 10%

Governments

- Very important: 58%
- Important: 23%

¹⁶³ Hartmann, "ClearingSport."

- Less important: 10%
- Don't know: 9%

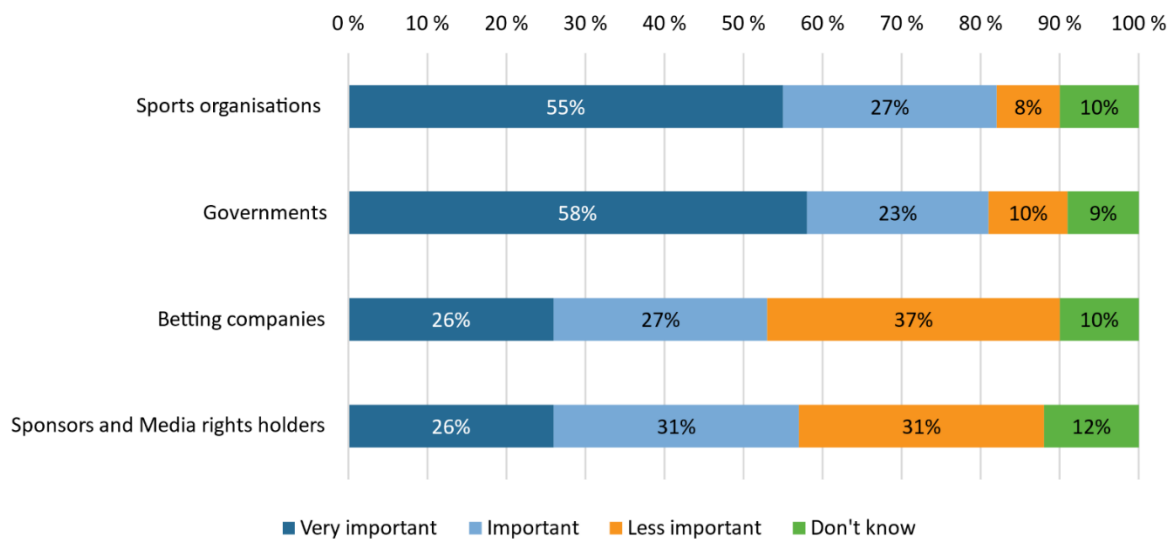
Betting companies (operators)

- Very important: 26%
- Important: 27%
- Less important: 37%
- Don't know: 10%

Sponsors and media rights holders

- Very important: 26%
- Important: 31%
- Less important: 31%
- Don't know: 12%

Figure 9: Importance of potential financiers



Epilogue: Passing the baton

International sports organisations were established more than 100 years ago to ensure that every athlete on the planet played by the same rules. This centralised power gave sport a unique basis to bring its officials and other stakeholders under a common playbook.

Since then, sport and its role in society have evolved dramatically. However, the governance of sports remains much the same, leading to an ever-growing list of scandals that sports cannot – and should not – solve on its own.

Since 2006, Play the Game has been a leader among a large and growing group of stakeholders who are passionate about sport and share the belief that more can and should be done to protect sport against crime, corruption, and breaches of integrity. This passion has also driven ClearingSport.

However, to make our proposals a reality, other stakeholders need to engage in lobbying, funding, and defining and refining the structures that can implement the identified solutions. This includes governments, the sports movement, existing networks, sponsors, rights holders, the media, athletes' associations, fan groups, and more.

Now, we pass the baton.

Credits

This concept note is a document based on consensus, and the individual advisors cannot be held accountable for each detail in the proposal.

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Glossary

Bribery: The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.).¹⁶⁴

Competition manipulation: 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.¹⁶⁵

Crime: The intentional commission of an act usually deemed socially harmful or dangerous and specifically defined, prohibited, and punishable under criminal law.

Corruption: The abuse of entrusted power for private gain.¹⁶⁶

Human rights: Rights that are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, the freedom of association, and many more.

Illegal sports betting: Any sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located. See *sports betting*.¹⁶⁷

Interpersonal violence: The intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment or deprivation. Interpersonal violence involves the intentional use of physical force or power against other persons by an individual or small group of individuals. It can occur online, be perpetrated by different actors and take different forms.¹⁶⁸

Money laundering: The conversion or transfer of property, knowing that such property is derived from any offence(s), for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in such offence(s) to evade the legal consequences of his actions.¹⁶⁹

¹⁶⁴ Transparency International, "5. What Is Bribery?"

¹⁶⁵ Council of Europe, "Macolin Convention," art. 3.

¹⁶⁶ Transparency International, "What Is Corruption?"

¹⁶⁷ Council of Europe, "Macolin Convention," art. 3.

¹⁶⁸ Tuakli-Wosornu et al., "IOC Consensus Statement: Interpersonal Violence and Safeguarding in Sport."

¹⁶⁹ United Nations, "United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances," art. 3.1.

Private gain: Interests of individuals, organisations, and other entities that contradict public interests.

Public interests: The common positive interests of society.

Safeguarding: All proactive measures to both prevent and appropriately respond to concerns related to harassment and abuse in sport as well as the promotion of holistic approaches to athlete welfare.¹⁷⁰

Sports betting: Any wagering of a stake of monetary value in the expectation of a prize of monetary value, subject to a future and uncertain occurrence related to a sports competition.¹⁷¹

Sports integrity: The manifestation of the ethics and values which promote community confidence in sports, including fair and honest performances and outcomes, unaffected by illegitimate enhancements or external interests; and positive conduct by athletes, administrators, officials, supporters and other stakeholders, on and off the sporting arena, which enhances the reputation and standing of the sporting contest and of sport overall.¹⁷²

¹⁷⁰ Tuakli-Wosornu et al., “IOC Consensus Statement: Interpersonal Violence and Safeguarding in Sport.”

¹⁷¹ Council of Europe, “Macolin Convention,” art. 3.

¹⁷² International Olympic Committee, “Integrity in Sport: IOC Approach.”

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