



# **Competition Manipulation and Gambling:**

# **Threats to Canadian Sport and the Gaming Industry**

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

**Toronto, Ontario  
May 30-31, 2023**

**Published: March 13, 2024**

McLaren Global Sport Solutions (MGSS)

Canadian Centre for Ethics in Sport (CCES)



Single-game sport betting, including prop bets within a game, was legalized in Canada in 2021 with the passing of Bill C-218. Perhaps the most serious negative impact Canadian sport is facing is an increased risk of competition manipulation, or match fixing, that comes with an increase in betting on sport, especially prop betting. According to Sportradar Integrity Services' second annual report, 2022 saw a 34 percent increase in suspicious matches from 2021.

It's not hyperbole to suggest that competition manipulation currently represents the greatest threat to the integrity of Canadian sport. To address this growing threat, the Canadian Centre for Ethics in Sport (CCES) and McLaren Global Sport Solutions (MGSS) held a symposium focused on building a national response to competition manipulation in Canada. This White Paper explores the issue of competition manipulation including public policy options and regulatory frameworks to protect Canadian sport.

Competition manipulation is the tsunami heading toward Canadian sport, threatening not only the integrity of sporting events, but the health and safety of athletes and coaches. Without a national policy or regulatory framework in place to detect or deter manipulation, and no harmonized education for athletes, coaches and sport administrators about the risks and consequences associated with competition manipulation, Canada is ill-equipped and unprepared to respond to this threat.

The symposium generated consensus around several principles believed to be essential in building a national approach going forward. We need to get ahead of this emerging threat and demonstrate to athletes and coaches that their safety is paramount. Canadians require that the integrity of sport will not be left to chance.



Richard H. McLaren, O.C.  
CEO,  
McLaren Global Sport Solutions Inc.



Jeremy Luke  
President and CEO,  
Canadian Centre for Ethics in Sport

# Contents

<b>Purpose</b>	<b>2</b>
<b>2023 Symposium Overview</b>	<b>3</b>
<b>Canadian Context and the Impacts of Bill C-218</b>	<b>4</b>
<b>Understanding Competition Manipulation</b>	<b>6</b>
<b>The Athletes' Perspective</b>	<b>8</b>
AthletesCAN	8
Jacqueline Simoneau: Preventing Competition Manipulation	9
Jordan Spencer: How Betting Almost Ended My Basketball Career	9
<b>International Approaches</b>	<b>10</b>
IOC Code	10
Macolin Convention	10
National Platform Model	11
<b>Sport Best Practices</b>	<b>12</b>
IOC Code on the Prevention of the Manipulation of Competitions	12
CFL Match Manipulation Policy	12
International Federation Response	13
<b>Education and Harm Reduction</b>	<b>14</b>
<b>Changing Landscape</b>	<b>16</b>
National Policy and Comprehensive Education	16
Changes to Advertising Standards	17
<b>Key Recommendations</b>	<b>18</b>
<b>2023 Symposium on Competition Manipulation and Gambling in Sport: Delegate List</b>	<b>20</b>

## Purpose

This White Paper builds on expert perspectives and experiences shared during two international symposiums hosted in Toronto, Canada and is intended to educate stakeholders about the threats posed by competition manipulation and to recommend risk-mitigation strategies. This White Paper serves as a follow up to the [2019 White Paper](#) that was issued following the 2019 Symposium on Match Manipulation and Gambling in Sport.

Competition manipulation (also known as “match fixing” or “match manipulation”) is a global phenomenon impacting sport. There is growing knowledge and experience around how to develop a comprehensive Canadian response to address competition manipulation, where protecting the

integrity of sporting events and athlete safety has become a high priority. The current situation demands an urgent response following Canada’s legalization of single-event sport betting and the subsequent meteoric rise in regulated betting markets that generate billions of dollars annually in legal wagers.

Preserving the uncertainty of athletic outcomes is fundamental to ensuring the benefits of sport for all, as is protecting athletes, coaches, and other support personnel from the harms of competition manipulation. Two critical elements of the solution will be the implementation of a national policy that includes a comprehensive education strategy for all participants and working with a well-regulated sports betting industry.



## 2023 Symposium Overview

The Canadian Centre for Ethics in Sport (CCES) partnered with McLaren Global Sport Solutions Inc. (MGSS) to host the first Symposium on Competition Manipulation and Gambling in Sport in 2019. Four years later, after significant changes in the Canadian sport-betting landscape, the CCES and MGSS partnered again to host the 2023 Symposium on Competition Manipulation and Gambling in Sport. The event took place in Toronto, Ontario, on May 30-31, the event was moderated by Michael Copeland, CEO of Woodbine Entertainment, and brought together 150 delegates from four continents, including representatives from the following stakeholder groups:

- athletes,
- international, national, and multi-sport organizations,
- national and provincial governments,
- sport gambling operators and regulators,
- professional sport leagues,
- sport integrity units, and,
- law enforcement agencies.

---

*Results from the post-symposium survey were very positive with over 80% of respondents recognizing that competition manipulation is a threat to sport in Canada.*

The symposium began with a brief introduction to competition manipulation, then explored how the sport betting landscape has changed, and the impact this has had on Canadian sport and how the issue of competition manipulation is being addressed internationally.

The focus then turned to the Canadian response, hearing athletes' perspectives on the impact and risks of competition manipulation, followed by a closer look at the policy template developed by the Canadian Olympic Committee (COC) and the CCES and a discussion with the sport organizations that participated in the policy template pilot project. In addition, the Canadian Football League (CFL), and other amateur and professional sport organizations, gave an overview of how they're addressing competition manipulation.

From an international perspective, sport federations spoke about how they are combating competition manipulation, including the use of artificial intelligence. INTERPOL and the FBI also shared their respective roles in the coordination and investigation of issues related to competition manipulation on a global scale.

The symposium wrapped up with a panel discussion on the next steps for a Canadian approach to address competition manipulation. Stakeholders in attendance agreed that Canada would benefit from a comprehensive, harmonized national policy that is athlete centred and developed in consultation with experts and stakeholders.

Results from the post-symposium survey were very positive with over 80% of respondents recognizing that competition manipulation is a threat to sport in Canada. The vast majority also expressed support for a Canadian competition manipulation policy administered by an independent organization.

## Canadian Context and the Impacts of Bill C-218

Sport betting in Canada has changed dramatically since Bill C-218 (Safe and Regulated Sports Betting Act) came into effect on August 27, 2021. Through the bill, the federal government decriminalized single-event sport betting, which was already happening in the grey and black markets, with the intention of reducing the harms associated with grey- and black-market gambling and to ensure that Canada would reap the economic benefits of this growing industry. Bill C-218 paved the way for provinces and territories to offer single-event sport betting to residents in a safe and legal environment; however, few people anticipated the exponential growth of sport gambling that has been seen.

Ontario's online gambling industry, for example, is projecting total wagers in 2023 to exceed \$50 billion. An important issue raised at the symposium was the question of revenue distribution from the proceeds of sport gambling. In the current sport-betting system, sponsorship and, indirectly, advertising, appear to be the main vehicles for revenue sharing with sport organizations, but it's not clear if and/or how sport organizations derive revenue from bets placed on their own events.

The barrage of sportsbook advertising and sponsorships have created a new level of public awareness around the availability of sport gambling. Betting has become such an integral part of sport fans' viewing experiences that odds and in-game betting options appear in real time during sport broadcasts. It's acknowledged that an increase in sports gambling could lead to an increase in potential harms that relate to gambling, however, this paper deals only with competition manipulation.

The potential impacts of this new legalized market raise important questions, in particular, how will this explosive growth impact the risk of competition manipulation and athlete safety?

In Canada, the implementation of single-event sport betting falls under provincial and territorial jurisdiction. The provinces of Ontario and Alberta

moved quickly to establish regulated betting platforms that allow single-event sport betting in their provinces. Today, all provinces offer online single-event sport betting, however Ontario opted to regulate private-sector operators, of which there are now over 75, while all others allow only the use of government-operated platforms. Provinces are seeing the benefits of additional revenue through taxation thanks to these massive new revenue streams, however; it remains largely unknown if or how any of the money, either through the operators or the provincial governments, is flowing back into sport or being used to support initiatives designed to prevent competition manipulation.

Grey and black markets that offer online betting were well established in Canada before legalization and now the new regulated sport betting platforms must compete with them for customers. Regulated sportsbooks are building a reputation as the platforms of choice for the betting public, relying heavily on marketing and sponsorship to attract the betting public to their platforms. In addition to compliance with regulatory requirements, betting operators must implement safeguards to protect the integrity of the bet from manipulation and educate the betting public on the importance of responsible gambling behaviour, which should encourage prospective bettors to use the regulated market.

The social influence and negative impact of marketing and sponsorship on underage, and problem gamblers are currently under review and shouldn't be taken lightly. Provincial regulators are consulting with sport betting stakeholders hoping to learn from other countries with longer histories of sport betting (e.g., the U.K. and Australia). Provincially, the Alcohol and Gaming Commission of Ontario (AGCO) recently updated the regulations to ban the use of active athletes in advertisements for online gambling and strengthened standards to restrict the use of celebrities and social media influencers who may appeal to minors. There are people, however, who believe that the updated regulations don't go

far enough and are pushing for a blanket ban on advertising. [Bill S-269](#), currently in the Senate of Canada, proposes a framework to provide stricter advertising and sponsorship regulations for sports betting nationally.

Several Canadian sport organizations have sponsorship agreements with regulated betting operators, this is typically followed by an increase in betting on their sport and subsequently carries a greater risk of competition manipulation. As a result, sport organizations have turned their attention to protecting their athletes, coaches, officials, and other support personnel from the associated risks. This situation highlights the need to provide sport organizations with access to a universal competition manipulation policy that includes mandatory education and is administered by an independent body.

The CCES, the COC, and six national sport organizations<sup>1</sup> are nearing completion of a pilot project to test the feasibility and effectiveness of a

<sup>1</sup> Badminton Canada, Canada Basketball, Canada Soccer, Curling Canada, Racquetball Canada, and Squash Canada

national competition manipulation in sport policy. Modelled on the Canadian Anti-Doping Program, the project includes the implementation of a policy template, mandatory education for athletes and support personnel, confidential reporting and investigations, case management with the assertion of violations and proposed sanctions, independent hearings, and public disclosure for confirmed sanctions. The feedback gathered from this 18-month project will inform how to protect the Canadian sport community from risks and harms associated with competition manipulation.

In the last few years, Canada has experienced significant change in the realm of sport betting, which should help to prepare us to manage events on the horizon. As Canada looks ahead to the 2024 Paris Olympic and Paralympic Games and as one of the host nations for the 2026 FIFA World Cup, the need for a comprehensive response to the increased risk of competition manipulation takes on a new sense of urgency.



CCES CEO Jeremy Luke addressing the plenary

*Ontario's online gambling industry is projecting total wagers in 2023 to exceed \$50 billion.*

## Understanding Competition Manipulation

According to the European Commission, “Match fixing is an international phenomenon and is often linked to gambling, with criminal networks exploiting unregulated gambling markets. This presents a major threat to the integrity of sporting events, with sportspeople subject to considerable financial temptations and pressure to influence sporting objectives and outcomes.”<sup>1</sup> Regulated gambling markets, however, can also be subject to betting-related fraud, as has been demonstrated by leading sport integrity companies that use advanced technology to identify irregular or suspect betting patterns. In the case of a manipulated competition or match, compromised individuals will wager unusually large sums on a specific outcome of the event or within the event in question due to prior knowledge of corrupt actions taken to ensure that outcome. In comparison to unregulated betting markets in which bookmakers often operate with limited oversight, regulated markets provide better opportunities to monitor and address issues related to competition manipulation.

<sup>1</sup> “Fighting Match-Fixing,” The European Commission, <https://sport.ec.europa.eu/policies/sport-and-integrity/fighting-match-fixing>

Manipulation of a sporting event or game removes the most important characteristic of sport – unpredictability. If the public loses trust in a sport’s integrity, they may stop following it entirely. With the surging popularity of sport betting and rapid legalization of single-sport betting in jurisdictions across North America, the financial implications of rigged events are profound. In 2018, The Economist estimated the total annual global sports betting turnover at two trillion dollars, of which 85% is currently done through illegal betting. Beyond illegal betting, from which total volume can be estimated, regulated markets are also experiencing a boom in activity. Looking at the province of Ontario’s relatively young regulated market, bettors’ actions are speaking volumes, with \$35.5 billion wagered from April 1, 2022 to March 31, 2023 according to [iGaming Ontario](#). Together these elements seem to put sport in a perilous position.



*According to a 2012 World Soccer article, “match-fixers are most successful when the chances arise to gamble on one of the world’s fringe leagues away from the spotlight.”*

*International Betting Integrity Association booth helmed by CEO Khalid Ali*



## Examples of Competition Manipulation

### Betting

- Betting on your own matches
- Betting on any match in the sport
- Having someone place bets for you
- Betting on any competition in an event you're participating in, even in a different sport

### Failure to report

- If you become aware of a manipulated competition, it must be reported

### Sharing insider information

- Sharing information about the team or individual players that isn't publicly available
- Giving or offering a benefit (e.g., money, gifts, favours) for information that you wouldn't normally have access to

### Not doing your best

- Doing less than your best
- Asking anyone else to do less than their best
- Trying to create a specific outcome (e.g., losing on purpose to gain a favourable seed)

Because of the underlying threats to the integrity of sport and athlete safety, efforts to combat competition manipulation through governance reforms, sophisticated analytics, and investigations have become a priority for many professional and international sport federations.

The risk of competition manipulation is greater for leagues and events where athletes earn less money, as they are more vulnerable to bribes. According to a [2012 World Soccer article](#), "match-fixers are most successful when the chances arise to gamble on one of the world's fringe leagues away from the spotlight." Promising young athletes or lower-earning professionals are targeted and groomed by criminal "fixers" who study their habits and vulnerabilities, then attempt to develop relationships in order to exploit these vulnerabilities. This nefarious example is but one example that could constitute a corruption offence.

Becoming engaged in corruption isn't always as simple as betting on your own team; it often starts small and escalates. Manipulation may also come from close contacts — a family member asking questions about a teammate's injury to find out if they're participating in the upcoming game can lead to the sharing of inside information, which an uneducated athlete may not realize constitutes competition manipulation.

Many amateur Canadian athletes don't earn a living wage, leaving them vulnerable not only as targets for fixers, but also to the temptation of betting on their own competitions. The combination of a difficult financial situation and a lack of education about competition manipulation elevates the risk of harm to athletes. The lack of institutional protections and mandatory education leaves the Canadian sport community exposed.

With the newly regulated market in Canada, national sport organizations (NSOs) and professional leagues are turning their attention to strengthening their policy frameworks to mitigate the risks of competition manipulation. For example, the CFL recently launched a comprehensive competition manipulation policy and education program in partnership with MGSS and the CCES.

---

*Manipulation of a sporting event or game removes the most important characteristic of sport – unpredictability. If the public loses trust in a sport's integrity, they may stop following it entirely.*

## The Athletes' Perspective

Competition manipulation occurs both directly and indirectly. Whether an athlete alters their performance or provides insider information to outside sources who use it to their advantage, competition manipulation can take various forms. Athletes are particularly vulnerable to being victims of competition manipulation and many don't understand what it means to participate in competition manipulation or the consequences that can result from it. Athletes can easily become victims of corruptors, which emphasizes the need for better education and support systems for athletes — a key theme throughout the 2023 symposium. Many attendees highlighted that prevention, rather than compliance, was the best way to stop competition manipulation.

To date, several organizations have implemented athlete-centred education programs to raise awareness about competition manipulation, including the International Olympic Committee (IOC), the International Ice Hockey Federation (IIHF), the International Tennis Federation (ITA), and the CFL. The IIHF lists competition manipulation as one of their integrity pillars and has a robust program to address competition manipulation, including a heavy emphasis on education.

The CFL has made a competition manipulation education course available to all players and support personnel specific to their policy. Both the CFL and the IIHF have provided all those subject to the policy with an independent, anonymous reporting mechanism to report instances of competition manipulation.

Athletes are the most heavily impacted by manipulated competitions and their input and feedback should be considered when developing competition manipulation policies, programs, and education. The 2023 symposium provided athletes with an opportunity to share their experiences and their insight about options for the best path forward.

### AthletesCAN

AthletesCAN is an independent association of current and retired Canadian national team athletes that work to develop athlete leaders to influence sport policy, act as role models and inspire a strong sport culture.

They are engaging on the topic of competition manipulation to support the work they do to ensure an athlete centered sport system.

Athletes are often seen as scapegoats for their role in the manipulation of sporting events, however at the symposium, speakers discussed the need to shift the focus and to address the problem using an athlete-centered approach. This could include examining solutions to the root causes that put athletes in a vulnerable position and to educate Canadian athletes about the associated risks.

Presenter Chris De Sousa Costa, retired karate national team athlete and AthletesCAN treasurer, advocated for a national approach to address competition manipulation. He also emphasized the need for athlete education that covers the repercussions of competition manipulation to ensure athletes understand the significant consequences of participating in these illicit acts and encourages athletes to actively engage with education on the subject.

AthletesCAN also indicated that NSOs need to proactively support the development of a national framework, including athlete involvement throughout the development process.

---

*Regardless of whether athletes participate in competition manipulation, many will be discouraged from playing and even decide to quit their sport due to their beliefs in fair play being tarnished.*

## Jacqueline Simoneau: Preventing Competition Manipulation

Jacqueline Simoneau, two-time Olympian and [IOC Believe in Sport Ambassador](#), spoke at the symposium about how to prevent competition manipulation at the athlete level. Regardless of whether athletes participate in competition manipulation, many will be discouraged from playing and even decide to quit their sport due to their beliefs in fair play being tarnished. As sport looks to tackle this problem, Jacqueline highlighted that a policy preventing competition manipulation may not be enough for athletes because not every athlete reads through their contract thoroughly before signing. For Jacqueline, the solution to this problem was to become a champion of the subject, and to educate athletes on the potential harms of competition manipulation and what to do if they suspect the practice is happening. All athletes should be aware of four key rules:

1. Don't fix the competition and do your best.
2. Don't bet on your sport or any event at the Olympic Games.
3. Don't share information about health issues and sport tactics.
4. Speak up! If you witness or suspect competition manipulation, you must report it.



Jacqueline Simoneau

In addition to the rules, providing accessible and anonymous reporting mechanisms for athletes and other stakeholders is key to protecting the integrity of sport. The IOC created a secure and confidential hotline where anyone can report suspicious activity related to competition manipulation, which can be found at [ioc.integrityline.org](http://ioc.integrityline.org).

## Jordan Spencer: How Betting Almost Ended My Basketball Career



Jennifer Bishop (Aird & Berlis LLP) and Jordan Spencer

Jordan Spencer, a British professional basketball player and athlete advocate, spoke about his personal experience with gambling as a means to earn extra money and supplement his salary. Jordan bet on his own games, thinking it was a safe option because he had control over the outcome. However, during his first season with the London Lions in 2019, Jordan was informed that he was being investigated by FIBA for misconduct. "I'd heard stories about what can happen in terms of bans from sport and I feared the worst," Jordan said. As a result of the investigation, he was temporarily suspended from representing Great Britain, conditionally suspended from league games and was fined. This experience inspired Jordan to advocate for athlete education on the potential harms of betting. Read his full story at [olympics.com/athlete365/integrity/how-betting-almost-ended-my-basketball-career](http://olympics.com/athlete365/integrity/how-betting-almost-ended-my-basketball-career).

## International Approaches

While single-event sport betting is new to Canada, it's well established in many countries. As a result, international sport governing bodies have experience mitigating the risks and harms associated with competition manipulation.

Alarm bells about competition manipulation have been ringing for some time and the threat is still growing. In fact, Jacques Rogge, former President of the International Olympic Committee (IOC) made the following statement in July 2011: “[...] now there is a new danger coming up that almost all countries have been affected by and that is corruption, match-fixing and illegal gambling. This is the new fight we have to confront.”

Canada has an opportunity to consider the lessons learned and potentially adopt the best practices that have emerged from international cooperation and sport integrity initiatives, such as Australia’s National Integrity Framework.

---

*“Now there is a new danger coming up that almost all countries have been affected by and that is corruption, match-fixing and illegal gambling. This is the new fight we have to confront.”*

*Jacques Rogge, former President of the International Olympic Committee (IOC), July 2011*

### IOC Code

The Olympic Movement Code on the Prevention of the Manipulation of Competitions harmonizes regulations to protect competitions from manipulation and is an integral part of the Olympic Charter and the IOC Code of Ethics. Approved by the IOC in December 2015, all international sport organizations<sup>1</sup> that fall under the IOC umbrella must implement this Code by referencing it or by implementing the regulation outlined within.

---

<sup>1</sup> National Olympic committees, international sport federations, and their respective members at the continental, regional, and national levels, as well as IOC-recognized organizations bound by the Olympic Charter.

### Macolin Convention

The Macolin Convention is the only rule of international law on match fixing in sport. It provides countries with a roadmap for addressing the issue domestically and includes common definitions and the structure for a national platform.

The Macolin Convention also connects countries and all stakeholders including government, sport, regulators, betting operators, law enforcement, and the judiciary, in an effort to combat match fixing on a global scale.

Even though the Macolin Convention is a European instrument, the Council of Europe is extremely mindful of the global nature of competition manipulation and encourages non-European countries to become Parties to the Convention. In fact, Australia has signed the Macolin Convention, and they regulate gambling in a similar manner to Canada. While supporting Bill C-218 with statements to the House of Commons’ and the Senate’s respective standing committees, the CCES and the COC emphasized the need for Canada to become a signatory to the Macolin Convention. The Senate committee’s third report for Bill C-218 included an observation that encourages the federal government to sign the Macolin Convention.



*Michael Copeland (Woodbine Entertainment), Dominic Mueser (Sportradar), Shelley White (Responsible Gambling Council), Geoff Zochodne (Covers)*

## National Platform Model

National platforms are responsible for coordinating the fight against the manipulation of sport competitions and must cooperate with all organizations and relevant authorities. They receive, centralize, and analyze information on irregular and suspicious betting or non-betting activities related to sport competitions in their countries. When appropriate, the national platform issues alerts and communicates relevant information in connection with possible breaches of legislation or sport regulations. National platforms create practical opportunities to gather stakeholders, including the relevant public authority regulators, sport organizations, competition/event organizers, and betting operators to coordinate their policies and actions.

National platforms work with all actors involved in sport betting domestically, however competition manipulation is a global threat that requires a global response. International criminal police organization INTERPOL provides national platforms with support in addressing competition manipulation cases globally, and also assists with addressing counterterrorism, cybercrime, financial crime, anti-corruption, and organized and emerging crime.

The CCES was invited to be an observer to the Group of Copenhagen, which is composed of representatives from national platforms that have been officially established by national public authorities and perform the role of national platform as described in Article 13 of the Macolin Convention. The Group of Copenhagen exists primarily as a network for the exchange of information, experience, and expertise in support of the implementation of the standards contained in the Macolin Convention, in particular in the context of:

- The elaboration of studies and compilations of good practices,
- The practical support provided to existing national platforms to consolidate and further improve their systems,
- The assistance to countries for the creation of new national platforms, and
- The institutional and professional capacity building of national and international actors.

## Sport Best Practices

Several international sport federations and professional sport leagues are actively addressing competition manipulation. While their policies and programs are a good step in the right direction and crucial to protecting the integrity of sport, they should ideally be administered by independent and impartial organizations to protect against real and perceived conflicts of interest.

### IOC Code on the Prevention of the Manipulation of Competitions

In 2017, the Olympic Movement Unit on the Prevention of Manipulation of Competitions (the Unit) was formed and was instrumental in the creation and implementation of the Olympic Movement Code on the Prevention of the Manipulation of Competitions (the Code). The Code sets the framework for a harmonized set of rules and regulations related to competition manipulation across sports, and establishes disciplinary procedures and a range of permissible sanctions. It also lays out rules about athlete betting, manipulation of competition, sharing insider information, failure to report instances of suspicious behaviour, and requirements to cooperate with investigations. The Code is now an integral part of the Olympic Charter and in protecting the integrity of Olympic competitions but applies only to Olympic Movement signatories.

---

*A single CFL game can generate over \$6 million CAD in wagers from around the world.*

### CFL Match Manipulation Policy

A single CFL game can generate over \$6 million CAD in wagers from around the world, which indicates that the league is susceptible to the risk of match-fixing and for players and non-players to be targeted by match fixers.

In 2023, in partnership with MGSS, the CFL updated its competition manipulation policies to align with current best practices and implemented the CFL Match Manipulation Policy (“the CFL Policy”), which applies to two categories of individuals: CFL personnel and non-CFL personnel. The first category encompasses league staff, club owners, administrators, coaches, players, managers, trainers, player agents, and other team employees. Non-CFL personnel are CFL contractors who must comply with the policy, such as media partners. This policy is unique because it allows the CFL to discipline a broad range of individuals and protect the integrity of the league. It reaches beyond the players competing on the field and enables the CFL to target individuals who might otherwise use non-public information to influence matches or benefit from engagement in sports betting activities. The CFL Policy is the first of its kind for a professional league in Canada.

Having a comprehensive policy is only one aspect of fighting competition manipulation. Players, coaches, officials, and other individuals closely associated with the league must also be educated on what constitutes a corruption offence, the consequences of those offences, their duties to report and cooperate, and more broadly, the potential dangers of betting on sporting events. In 2023, the CFL launched an e-learning course that was developed and delivered by the CCES to educate individuals about the new policy.

The CFL Policy also includes an Authorized Gaming Operator (AGO) model. This framework provides opportunities for the league to engage with the domestic licensed sports betting market by offering value to operators, including the use of the CFL’s assets, such as logos, to optimize betting on the platform. In addition to annual fees paid to the CFL and increased fan engagement, partnering with AGO sportsbooks allows the CFL to monitor illegal betting activity more closely through data-sharing agreements.

## International Federation Response

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

FIBA, the international basketball federation, has recently adopted a slightly different model. Rather than creating a separate unit which can be costly and resource intensive, FIBA appointed a single person to act as an Independent Integrity Officer (IIO) adhering to an “on-demand” model. Richard McLaren, CEO of MGSS, is the appointed IIO for FIBA and is supported by Harod Associates, a global investigation company based in the U.K.



*Olivia Roffe, Senior Investigator and Head of Sport Intelligence for Harod Associates, speaks to delegates about investigative techniques used in match fixing cases.*



The International Ice Hockey Federation (IIHF) has one of the most comprehensive integrity programs in international sport. At the 2023 symposium, Ashley Ehlert, IIHF Deputy General Secretary, outlined the organization’s six-pillar approach to combating the threat of competition manipulation in ice hockey.

The IIHF’s comprehensive approach includes robust event monitoring, comprehensive education, and an Integrity Officers program that was recently launched with their national federations. The Integrity Officers will facilitate reporting and investigations for integrity violations and will promote education within their own federations.

## Education and Harm Reduction

The risk that competition manipulation poses to sport is immense. Those involved in sport, especially at the beginning of their athletic careers, often know little or nothing about the dangers of competition manipulation and the various forms this manipulation can take. Sport betting is being normalized, which is increasing the possibility of people taking advantage of uninformed participants. For example, a young athlete who doesn't know they are subject to a competition manipulation policy, let alone what actions are considered offences, may place a bet on their own sport, putting their sporting career at risk.

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

In 2022, the CCES launched an e-learning course to educate athletes, coaches, and other support personnel about competition manipulation. Participants in the CCES's pilot project were provided with a follow-up course in 2023 for that explored the competition manipulation policy in more in depth; including awareness of competition manipulation, how it can happen, and a summary of corruption offenses.

The CFL's Policy ensures that education is a cornerstone of their plan to combat competition manipulation. As referenced, the CFL partnered with the CCES to develop a comprehensive online education course that is mandatory for all players and support personnel.

Internationally, education is part of the International Betting Integrity Association's (IBIA) mandate on behalf of its members, who are betting operators. Working globally in research and education to combat corruption and competition manipulation and protect the integrity of sport and betting, the IBIA has developed educational materials for athletes in the European Union across many sports and is prepared to provide financial support for the development of education materials for Canadian athletes.

The lack of athlete education on competition manipulation, together with the social influences promoting gambling and its normalization, including the ubiquitous advertising of sport betting, leaves athletes particularly vulnerable to the harms associated with competition manipulation. Addressing the social influences promoting gambling on sport and educating athletes about the associated risks and harms are two of the most effective ways to protect athletes' health and safety.

---

*Those involved in sport, especially at the beginning of their athletic careers, often know little or nothing about the dangers of competition manipulation and the various forms this manipulation can take.*





*Athlete delegates at the symposium: Erica Weibe, Cynthia Appiah, Tony Walby, and Sandrine Mainville*

## Changing Landscape

### National Policy and Comprehensive Education

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

As highlighted throughout the paper, a key takeaway from the symposium is the need for a national competition manipulation policy that is administered by an independent organisation and includes a comprehensive education strategy. The development of a national policy was also supported by the recently announced [Future of Sport in Canada Commission](#), which included messaging about a national policy to address competition manipulation.

On this front, the COC and the CCES partnered to develop a harmonized policy for the Canadian sport community. The CCES, using the existing policy template, which is compliant with the IOC Code, is drafting a national policy with a working group comprised of leaders from NSOs, MSOs, and athletes.

The policy will be administered by an independent organization and available for adoption by sport organizations. The policy will outline the prohibited behaviours and related consequences, and will include mandatory education, comprehensive monitoring of suspicious betting activity, an independent reporting mechanism, and an independent results management and appeals mechanism. This independence removes any real and perceived conflicts of interest, removes liability from the adopting organizations, and gives credibility of potential sanctions under the policy to sport and the Canadian public.

To further reduce the administrative burden on athletes, the CCES will make the anti-doping and competition manipulation education available from one dashboard for easy access and use.

---

*A key takeaway from the symposium is the need for a national competition manipulation policy that is administered by an independent organisation and includes a comprehensive education strategy.*



*Glen Grunwald (Canada Basketball), Katherine Henderson (Curling Canada, now Hockey Canada), and Mathieu Chamberland (Canada Soccer)*

In the short term, the CCES, in collaboration with the COC, has updated the “Understanding Competition Manipulation” online education course to include the latest updates from the IOC Code. The course is currently available for all athletes and athlete support personnel and will be mandatory for all members of the Canadian delegation attending the 2024 Youth Olympic Games, in addition to True Sport Clean, which addresses anti-doping. The interactive 15-minute course will provide participants with a better understanding of the rules around competition manipulation and sports betting which include:

- not betting on your own sport or sport on the program of a multi-sport Games in which you are taking part,
- not manipulating a competition by failing to do your best or attempting to engineer a specific outcome,
- not sharing confidential information, and
- the obligation to report any attempt to manipulate a competition.

## Changes to Advertising Standards

Canadians could not have anticipated the onslaught of advertising that would follow when Bill C-218 was passed, and it has garnered much discussion and concern over the past several months.

Research shows that individuals in lower income brackets are more vulnerable to gambling problems (Rotermann & Gilmour, 2022) and, unfortunately, the vast number of Canadian amateur athletes are not paid a livable wage and fall into that group. The combination of athletes’ financial situations, which may impact their sporting ambitions and their social well-being and health, together with seductive advertising also elevates the risk of competition manipulation. The increase of sports betting advertising, and lack of institutional protection leaves the Canadian sport community in a perilous position.

---

*Addressing the social influences promoting gambling on sport and educating athletes about the associated risks and harms are two of the most effective ways to protect athletes’ health and safety.*

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

Amendments to the standards are a result of acknowledging that there is potential harm associated with gambling and applying regulations as a risk reduction strategy. Examples of the AGCO’s changes to advertising standards include the following prohibited acts in communications:

- Advertising that appeals primarily to minors.
- Use of cartoons, role models, social media influencers, celebrities or entertainers that appeal to minors.
- Use of active or retired athletes.

Amendments to the AGCO standards are scheduled to take effect February 28, 2024.

Looking beyond Ontario, Senator Marty Deacon has brought forward Bill S-269 to the Senate in response to concerns regarding the amount of advertising and lack of regulations. Bill S-269 calls for the development of a national framework to regulate advertising for sports betting in Canada and to set national standards for risk prevention for people who are negatively impacted. It also requires the Canadian Radio-television and Telecommunications Commission to review its regulations and policies to assess their adequacy and effectiveness in reducing the incidence of harms resulting from the proliferation of sports betting advertising.

## Key Recommendations

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

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



*Jeremy Luke (CCES), Chris de Sousa Costa (Athletes CAN), Doug Hood (AGCO), and Richard McLaren (MGSS)*

---

*“Canada is not immune to the global threat of competition manipulation in sport driven by the adoption of single-event sport betting and fueled by a grey market that persists despite the regulated market. Government regulators, gaming operators, and the sport community must work together to develop an integrated regulatory framework to mitigate the risks and preserve the integrity of sporting competitions.”*

*– Richard H. McLaren, O.C., CEO,  
McLaren Global Sport Solutions Inc.*

# 2023 Symposium on Competition Manipulation and Gambling in Sport: Delegate List

## Academic Institutions

- Australian Human Rights Institute, University of New South Wales
- University of Calgary
- University of Toronto
- University of Waterloo

## Anti-Doping Organizations

- Anti-Doping Denmark
- Institute of National Anti-Doping Organisations
- U.S. Anti-Doping Agency
- World Anti-Doping Agency

## Athletes

- Chris de Sousa Costa, Karate
- Jacqueline Simoneau, Artistic Swimming
- Jordan Spencer, Basketball

## Betting Operators and Regulators

- Alberta Gaming and Liquor Commission
- Alcohol and Gaming Commission of Ontario
- bet365
- Betway
- British Columbia Lottery Corporation
- FanDuel
- iGaming Ontario
- PointsBet Canada
- Régie des alcools, des courses et des jeux

## Government

- Dutch Ministry of Justice and Security
- Française des Jeux
- Japan Sport Council
- Sport Canada

## Horse Racing

- Woodbine Entertainment

## Insurance Providers

- Arthur J. Gallagher Canada Limited

## Integrity Service Providers

- Campaign to Ban Ads for Gambling
- Clearspeed
- International Betting Integrity Association
- McLaren Global Sport Solutions
- RealResponse
- Sportradar
- Starlizard Integrity Services
- United Lotteries for Integrity in Sports

## International Federations

- International Ice Hockey Federation

## Law Enforcement

- Federal Bureau of Investigation
- INTERPOL

## Legal

- Aird & Berlis LLP
- Blake, Cassels & Graydon LLP
- Borden Ladner Gervais
- Harod Associates
- Langlois
- LBB Strategies (LBB Sport)
- Minns Professional Corporation
- PhillipsADR
- Sport Dispute Resolution Centre of Canada
- Sport Law Inc.
- Tyr LLP, Toronto

## Media

- ADRENALIN Magazine
- Covers
- The Globe and Mail
- Sport Information Resource Centre
- The Athletic
- Toronto Star
- TSN

### **Multi-Sport Organizations**

- AthletesCAN
- Canadian Centre for Ethics in Sport, Board of Directors
- Canadian Centre for Ethics in Sport, staff
- Canadian Collegiate Athletic Association
- Canadian Olympic Committee
- Canadian Paralympic Committee
- National Collegiate Athletic Association
- Ontario Athletics Commission
- U SPORTS

### **National Sport Organizations**

- Alpine Canada
- Bobsleigh Canada Skeleton
- Boxing Canada
- Canada Basketball
- Canada Soccer
- Curling Canada
- Diving Canada
- Football Canada
- Hockey Canada
- Lacrosse Canada
- Squash Canada
- Swimming Canada
- Tennis Canada

### **National Trade Associations**

- Canadian Gaming Association

### **Players' Associations**

- Professional Footballers Association Canada
- National Hockey League Players' Association

### **Professional Leagues**

- Canadian Football League
- Canadian Premier League
- Maple Leaf Sports & Entertainment
- National Basketball Association
- National Football League
- National Hockey League

### **Provincial Sport Organizations**

- Ontario Curling Association

### **Research and Advocacy Groups**

- Responsible Gambling Council

*CCES Staff at the Toronto Symposium*





### **About McLaren Global Sport Solutions (MGSS)**

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

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

Reference: [www.mclarenglobalsportsolutions.com](http://www.mclarenglobalsportsolutions.com)

Contact: [copeland@mgsportsolutions.com](mailto:copeland@mgsportsolutions.com)



### **About the Canadian Centre Ethics in Sport (CCES)**

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

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

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

Reference: [www.cces.ca](http://www.cces.ca)

Contact: [info@cces.ca](mailto:info@cces.ca)

Published March 13, 2024

---