



EVIDENCE-BASED PREVENTION OF SPORTING-RELATED MATCH-FIXING

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NATIONAL ACTION PLAN: TENNIS VLAANDEREN



Centrum Ethisiek
in de Sport





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1 INTRODUCTION

Tennis Vlaanderen is the sports federation that manages and promotes tennis and padel in Flanders. Partly as a result of the rise of padel, Tennis Vlaanderen has a rapidly growing membership. It is the umbrella federation of more than 450 clubs (tennis, padel and mixed doubles) with over 150,000 members. Tennis Vlaanderen is a federation which has been and still is very alert to the phenomenon of match-fixing. The federation is a pioneer in the Flemish sports landscape.

Match-fixing, according to an international, widely accepted definition, is seen as (Council of Europe, 2014, art. 3.4):

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.

Match-fixing generally takes on two forms: betting-related and sporting-related. On the one hand, there is betting-related match-fixing, where a sum of money is placed on a match or on specific events during a match and the match or its outcome is then manipulated in such a way as to generate a betting profit. On the other hand, there is match-fixing for sporting reasons, this is the form where a match or competition is manipulated purely to change the sporting result or outcome. For example, with the aim of avoiding relegation, securing promotion or winning a tournament or championship.

This document is an action plan which is tailor-made for Tennis Vlaanderen in order to support the federation with a 5-point action plan and to stimulate the optimisation of the approach towards sporting-related match-fixing.

The action plan was made by the Centre for Ethics in Sport (ICES) and falls within the scope of the Erasmus+ project "Evidence-based Prevention of Sporting-related Match-Fixing", or EPOSM in short. This project aims to increase knowledge and awareness about sporting-related match-fixing. The EPOSM project covers seven European countries: Austria, Belgium, Croatia, the Netherlands, France, the United Kingdom and Switzerland.

Several sports are covered in the project. For Belgium, next to tennis, football and basketball are also covered.

After a brief introduction within the framework of the EPOSM project, this action plan will outline the problems and cases that have come to light in Flemish tennis in recent years. It will then give a state of affairs with regard to the actions that have already been undertaken in the field of (sporting-related) match-fixing. Finally, a 5-point plan is formulated, indicating the next appropriate steps to take.



2 ERASMUS+ PROJECT EPOSM

2.1 Project Overview

The EPOSM project is co-funded by the Erasmus+ programme of the European Union. In the period from January 2020 until December 2021, European academic institutions cooperated with experts on sporting-related match-fixing in different sports disciplines. The cooperation has multiple objectives:

- Create awareness about the prevention of sporting-related match-fixing,
- Encourage moral judgement against sporting-related match-fixing, as sporting-related match-fixing threatens the credibility and attractiveness of sport,
- Sharing knowledge on the subject across the partner organisations in connection with training procedures.

A wide and diverse range of partners are involved in the project. The coordination of the project is done by the sport management team of Ghent University. The other partners are the Croatian Olympic Committee, the Universities of Utrecht, Loughborough and Lausanne, Panathlon International, CSCF - the Foundation for Sports Integrity, IRIS - Institut de Relations Internationales et Stratégiques and the Play Fair Code. The Council of Europe is an associated partner.

In the first phase of the Erasmus+ project, the partners conducted an online questionnaire on match-fixing in general, and sporting-related match-fixing in particular, in the 7 involved countries. Various stakeholders within the three sports ¹(different for each country) were reached, being: current and former athletes, coaches, board members, etc. The results of the survey in Belgium are discussed in the next section.

Following the survey and the initial results, criteria were formulated for the elaboration of the national action plans and the workshops. These criteria were determined by Panathlon International in consultation with the various project partners. The project partners are responsible for the training component in the project. On the basis of these criteria, an action plan is made for each sports federation involved, and subsequently workshops will be organised. In Belgium, these tasks will be elaborated by the Centre for Ethics in Sport (ICES).

2.2 Results of the EPOSM study in Belgium

As already mentioned, the first phase of the EPOSM project consisted of an online survey on (sporting-related) match-fixing. The results are summarized and discussed below.

2.2.1 International Results

First, it can be seen that across all the international participants in the survey, almost 20% of respondents said they had come into contact with (in)direct offers of match-fixing. More specifically, 17.5% of all participants personally knew at least one person who had been approached for match-

¹ For Belgium : basketball, tennis and football



fixing. In addition, 8.4% said they had been approached for a match-fixing proposal themselves. The total international sample consisted of 5014 respondents who are or were active in many different sports such as football, basketball, tennis, handball, hockey and cricket.

2.2.2 Results for Belgium

When we look at the results of the survey for Belgium, we see that the overall results for Belgium are slightly higher than the international results. However, these figures should be put into perspective due to the large heterogeneity of the international and Belgian sample. Specifically for this action plan, it can also be stated that the Belgian tennis sample ($n = 70$) is rather small.

Of the 960 respondents in Belgium, 323 (33.6%) indicated that they **personally knew one or more people who had been approached for match-fixing**.

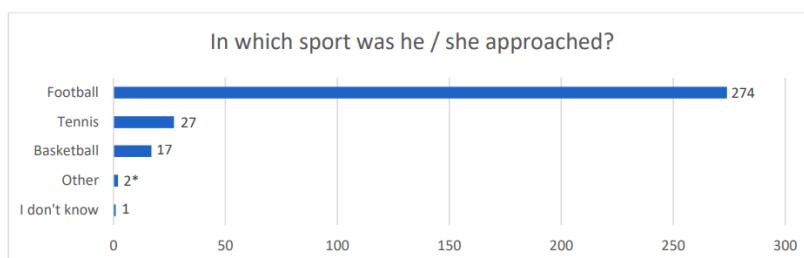
Table 7: Respondents who personally knew someone who had been approached for match-fixing (n = 960)

"Do you personally know anyone who has been approached to fix a game / match?"	
Yes, I know one person	152
Yes, I know two persons	42
Yes, I know three or more persons	129
No	637

} 323

In 27 of the 323 cases the person approached (whom one knew) had been active in the tennis world.

Figure 2: Sport discipline of the approached person they knew best (n = 321)



In addition, 8 of the 69 respondents active in the tennis world indicated that they had **once been approached with a match-fixing proposal**. In relative terms, this is 11.6% of respondents from the tennis world. In most cases, this approach concerned sporting-related match-fixing.

Table 8: Cases of having been approached themselves in the Belgian sample (n = 958)

"Have you yourself ever been approached to fix a game / match?"		
Sport discipline	No	Yes
Football (n = 792)	648	144 (18,2%)
Tennis (n = 69)	61	8 (11,6%)
Basketball (n = 75)	68	7 (9,3%)
Other (n = 22)	18	4 (18,2%)



Table 10: Motive of the match-fixing cases (n = 159)

	Total (n = 159)	Football (n = 140)	Tennis (n = 8)	Basketball (n = 7)	Other (n = 4)
What was the motive of the people who approached you?					
Only betting-related match-fixing	3	2	0	1	0
Both betting- and non-betting-related match-fixing	1	1	0	0	0
Only non-betting-related match-fixing	121	110	4	6	1
Both non-betting-related and "other motive"*	4	3	1	0	0
Other motive*	27	22	2	0	3
I don't know	3	2	1	0	0

*The exact "other motive" could not be identified due to a software bug.

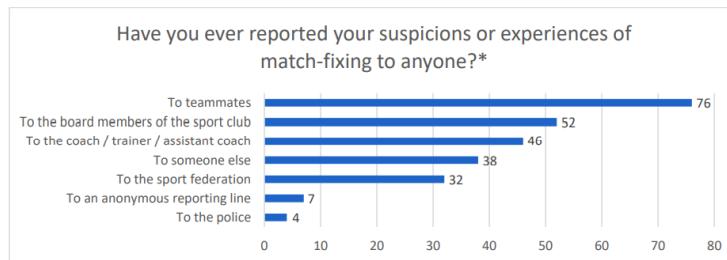
Finally, there are some striking figures when it comes to **reporting** suspicions and/or experiences of match-fixing. For example, 177 or 51.0% of the 347 respondents who had been approached personally and/or who knew someone) had never reported their suspicions or experiences anywhere. On the other hand, 166 respondents or 47.8% did report their suspicions or experiences of match-fixing to someone.

347 respondents reported (proposed) match-fixing incidents

Of the 347 respondents who indicated (proposed) match-fixing incidents, 177 respondents (51.0%) had never reported their suspicions or experiences of match-fixing to anyone.

On the other hand, 166 respondents (47.8%) had reported their suspicions or experiences of match-fixing to someone (see Figure 21).

Figure 21: Reporting suspicions or experiences of match-fixing to anyone (n = 166)



Finally, the most striking findings are listed.

- Of the total of 960 respondents in Belgium, 323 said they knew one or more people who had been approached for match-fixing.
- Eight of the 69 interviewees who are or were active in the tennis world reported that they had been approached with a match-fixing proposal.
- Less than 50.0% of the 347 respondents who said they knew one or more people who had been approached for match-fixing and/or indicated that they had been approached themselves for match-fixing, had shared their suspicions and/or experiences with someone.



3 THE CURRENT SITUATION REGARDING (SPORTING-RELATED) MATCH-FIXING

In this section, the situation with regard to (sporting-related) match-fixing with regard to Tennis Vlaanderen will be discussed. Thus, the Belgian situation as well as the specific state of affairs within the federation will be discussed.

3.1 Status of the European Convention on the manipulation of sporting competitions

The European Convention on the Manipulation of Sports Competitions (Macolin Convention) is the only international legally-binding instrument on match-fixing. It requires public institutions to cooperate with sporting organisations, betting operators and organisers of sporting competitions to prevent, detect and sanction match-fixing. It also establishes a framework for efficient international cooperation on the subject.

The treaty entered into force on 1 September 2019. Belgium has already signed the Convention in 2016 but has not yet ratified it. Thus, it is not yet applicable in Belgium.

Despite the fact that the Convention is not yet applicable in Belgium, the National Platform - a 'key-element' of the Convention (Article 13 Macolin Convention) - is already present in Belgium. At the end of 2016, the National Platform to Combat the Manipulation of Sports Matches was already established in Belgium. The National Platform is a consultative body with a wide diversity of stakeholders, notably the federal government, the communities, the federal police, the gaming commission, the national lottery and representatives of the sports sector.

The aim is to create a forum where ideas about prevention can be exchanged, problem behaviour can be detected and repressive action can be debated, either disciplinary within the federation or criminal law. The aim is to learn from each other's initiatives, share good practices and contribute to the development of a relationship of trust between the stakeholders with respect to the broader issue of sporting fraud.

The General Council meets twice a year, the Steering Committee meets more often.

3.2 Legal framework of match-fixing

In Belgium, there is no specific legislative framework regarding general match-fixing. As in some other European countries, match-fixing is punishable on the basis of general criminal legislation, more specifically anti-corruption legislation. These are Articles 496 and 504bis of the Criminal Code, concerning private bribery and fraud.

In addition, match-fixing often goes hand in hand with activities such as money laundering, forgery and forming a criminal organisation, which are covered by other articles of the Criminal Code.

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Besides this criminal law part, there is also a disciplinary framework on match-fixing, established by Tennis Vlaanderen.

3.3 Regulatory framework of Tennis Vlaanderen on match-fixing

Tennis Vlaanderen has 2 instruments which constitute the regulatory framework for match-fixing. On the one hand, there is the Tennis Vlaanderen Code of Conduct and, on the other, the disciplinary regulations of Tennis Vlaanderen.

3.3.1 The Code of Conduct

The code of conduct which applies to the members of Tennis Vlaanderen is divided into a general code of conduct and specific additional provisions, different for players, trainers/coaches, officials and club staff.

In the basic code, a first match-fixing related article is mentioned, namely **Article 1.1.4.16** of the Code of Conduct Tennis Vlaanderen, which obliges to abstain from any kind of fraud, conflict of interest or corruption, including bribing, being bribed or facilitating bribes. Moreover, **Article 1.1.5.24** of the Code of Conduct stipulates that one should report any breach of the Code of Conduct (e.g. match-fixing) and encourage others to do so. This obligation is important in practice for the various parties involved.

For tennis and padel players, **article 1.2.2.5** of the Code of Conduct Tennis Vlaanderen is added. This prohibits match-fixing, match and/or competition cheating, gambling on own matches and also implies an obligation to report cases of match-fixing when one is aware of them.

A similar provision applies to coaches, trainers and team captains, namely **article 1.3.6.29** of the Code of Conduct. The same applies to officials in Article **1.4.3.18**. In Article **1.4.3.19** of the Code of Conduct, officials are explicitly prohibited from committing acts aimed at unlawfully influencing the results of competitions.

3.3.2 Disciplinary Rules (Anti-Corruption Code)

As mentioned before, there is, besides a code of conduct, also a Disciplinary Regulation Tennis Vlaanderen. In the Disciplinary Rules, **article 14** is dedicated to match-fixing. The article 14 is called the 'anti-corruption code'.

The anti-corruption code comprehensively prohibits any form of match-fixing. It prohibits, inter alia :

- direct or indirect betting of money on the outcome or any other aspect of all official matches and competitions in which one's own or one's club participates;
- directly or indirectly falsify or attempt to falsify the result or any other aspect of official competitions;
- Directly or indirectly address or facilitate a player to not give his or her best in his or her official matches;
- directly or indirectly accept, receive, solicit, give, offer or promise money, a benefit of any kind or consideration for facilitating violations of this Anti-Corruption Code;
- directly or indirectly accept, receive, solicit, give, offer or promise money, a benefit of any kind or consideration for the provision of inside information, including, but not limited to, inside information regarding participation, performance, playing conditions or any other knowledge regarding official matches that is not publicly known;



- directly or indirectly give, offer or promise money, a benefit of any kind or any quid pro quo to any tournament employee, including but not limited to tournament management, official, staff, volunteer, contractors, tournament owner or accredited, in exchange for information or any benefit related to official games;
- directly or indirectly accept, receive or demand money, a benefit of any kind or any consideration, for the purpose of arranging accreditation at official competitions for the purpose of committing or facilitating the commission of breaches of this Anti-Corruption Code.

Furthermore, each member of Tennis Vlaanderen is obliged to report any knowledge or suspicion of manipulation to Tennis Vlaanderen. Failure to do so constitutes an infringement of the disciplinary regulations.

Infringements of the Disciplinary Regulations may be prosecuted after an investigation by the Federation's Prosecutor's Office and disciplinary proceedings by the Disciplinary Committee.

Finally, professional tennis is also subject to the Tennis Anti-Corruption Program (TACP) of the ITIA (International Tennis Integrity Agency), formerly TIU (Tennis Integrity Unit). The jurisdiction of ITIA takes precedence over that of Tennis Vlaanderen. A disciplinary decision taken by ITIA will therefore automatically apply to the jurisdiction of Tennis Vlaanderen, its Federation Prosecutor's Office and its Disciplinary Commission.

3.4 Sporting-related match-fixing in Belgian tennis

In Flemish tennis, there are, on the one hand, two general situations known to be susceptible to sporting-related match-fixing. In addition, there are a few specific cases known of sporting-related match-fixing.

First, there is the phenomenon of so-called end-of-season matches. These are matches where for one player or team the only interest in the match is to win for honour, while for the opponent(s) much bigger interests are at stake. Because of the difference in importance, there is a risk that both parties will (unwittingly) manipulate such matches by trying to make a deal or by deliberately not giving their full effort. For example, one party may have a greater interest in being promoted to a higher category or not being relegated to a lower one. Since relegation and promotion normally occur at the end of the season, this phenomenon is called an end-of-season match.

Second, there are the withdrawal that often occur in tournaments in Flemish Tennis.

On the one hand, there is the WO, i.e. the legitimate walkover, which means that a player is absent for a game but has a legitimate reason (e.g. illness, injury, force majeure, ...). If a player is absent without a legitimate reason, it is an unjustified walkover and therefore a withdrawal.

The cause of this problem is that players register in two tournaments which run at the same time, which means that players who perform well in both tournaments and thus go further in the rounds end up with a double occupation. The only possible option is to withdraw. As there is no legitimate reason, this would be an FF, an unjustified withdrawal. However, in practice, these withdrawal are all too often accepted as legitimate walkovers (WO) by the tournament managers. By giving an unjustified withdrawal a player manipulates the uncertain outcome of a match.

The specific cases of sporting-related match-fixing are the following:

The first incident occurred in 2017 at the professional level to Belgian tennis star Alison Van Uytvanck.



Van Uytvanck had agreed with Chinese Shuai Peng to form a doubles team for the 2017 Wimbledon grand slam tournament. However, shortly before the start of the tournament, Peng wanted to trade Van Uytvanck for another doubles partner, Sania Mirza.

As the registration date had already passed Peng asked Van Uytvanck to withdraw with an injury. Van Uytvanck refused whereupon Peng put both Van Uytvanck and her coach Alain De Vos under (financial) pressure. It was the latter who reported the incident to the Tennis Integrity Unit (TIU).

Peng was handed a 6-month suspension, half of which was conditional, as well as a 10,000 US dollars fine, half of which was also conditional. Peng's French coach, Bertrand Perret, was also suspended for three months because of his involvement in the case.

Secondly, there is a case that took place at amateur level, in which an official was guilty of match-fixing. The facts are as follows:

In the semi-finals and finals of a doubles tournament, one of the players, who was initially registered in class X and had played in that class in the first round, was replaced by another player. This happened with the knowledge and permission of the tournament director. In the electronic administration platform the originally entered pair remained. After the matches, the name of the player who had only played in the first round was replaced by the name of a Tennis Vlaanderen member who had not actually played any match in the X series.

4 THE CURRENT FIGHT AGAINST SPORTING-RELATED MATCH-FIXING

In this section, we look at which actions have already been undertaken by Tennis Vlaanderen in the fight against sporting-related match-fixing.

The description of the instruments already adopted and actions taken will be based on the Integrity Management Framework (IMF).

4.1 The Integrity Management Framework

The Integrity Management Framework was originally developed for the OECD¹ by Jeroen Maesschalck and Janos Bertok.² The model or framework can be used to map out an organisation's integrity policy (or part of it, such as match-fixing) and to see where reinforcement may be needed.

The central premise of the Integrity Management Framework is that a good integrity policy (in this case, the match-fixing policy) must be based on three pillars.

- 1) The instruments of match-fixing policy.
- 2) The processes: necessary to bring the instruments to life and keep them working.

¹ Organisation for Economic Co-operation and Development

² May 2009, Towards a Sound Integrity Framework: Instruments, Processes, Structures and Conditions for Implementation.



- 3) Structures: In order to have an impact, the match-fixing policy must be incorporated into the organisation's chart. There also needs to be explicit accountability for the organisation's match-fixing policy.

Going deeper into the instruments (the first pillar of the IMF) we can divide them into 4 groups, according to the specific function each of them has in the integrity policy, here match-fixing policy. The table below lists the different groups, their function and examples of the instruments.

Group of instruments	Function instruments	Which instruments?
Determining and defining match-fixing	<ul style="list-style-type: none"> - These instruments are suitable for determining and then describing the behaviour expected from those involved in match-fixing. - Which values are important and which rules must be followed? 	<ul style="list-style-type: none"> - A risk analysis - Analysis of ethical dilemmas in the sport in question - Code of Conduct - Code of Ethics - Disciplinary code
Guidance on match-fixing	<ul style="list-style-type: none"> - The aim of these instruments is to provide guidance to those involved, so that they know what is expected of them with regard to match-fixing. - And encourage them to stick to it. 	<ul style="list-style-type: none"> - Ethical leadership of the executives and within the organization - Training and education (including dilemma training) - Coaching and counselling
Monitoring of match-fixing	<ul style="list-style-type: none"> - These instruments can be used to determine the extent to which the match-fixing policy is followed/complied with. - Passive monitoring: reporting violations - Active monitoring: detection of violations 	<ul style="list-style-type: none"> - Complaints system - Match-fixing hotline - Whistleblower policy - Investigating the reports - Analyse the messages - Mapping violations by means of surveys
Enforcing and strengthening match-fixing policies	<ul style="list-style-type: none"> - Action must be taken when the rules are broken (proportionate, uniform and fair) - Within the organisation(s), certain persons must be appointed to deal specifically with match-fixing. 	<ul style="list-style-type: none"> - Informal sanctions - Formal sanction procedures - Procedures for crisis communication - Appointing a SPOC (Single Point of Contact), an API (contact person for integrity), clearly defining his powers



		and facilitating his activities
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4.2 Current instruments of the federation in the fight against match-fixing

In the table below, the current instruments will be placed within the model. **Tennis Vlaanderen is abbreviated to TV.**

Group of instruments	Which instruments?
Determining and defining match-fixing	<p>4.2.1.1 A risk analysis</p> <p>TV keeps statistics of the number of match-fixing cases that are reported and/or otherwise uncovered and incoming complaints are also analysed. This allows TV to make estimates of the risk of match-fixing in tennis. TV also recently reviewed its entire disciplinary process involving match-fixing.</p> <p>There are some risk factors. In addition to the individual character of the sport, there are for example the end-of-season matches (see above), the competition formats with rises and falls between categories, the earnings model with lower-ranked professional players, and so on.</p> <p>On enquiry with the ITIA it appears that they have carried out specific risk assessments. They regularly carry out strategic and tactical risk assessments on match-fixing at all levels of professional tennis. These analyses are confidential and not available for public inspection.¹</p> <p>4.2.1.2 Code of Conduct</p> <p>TV has established a code of conduct, partially tailored to each stakeholder. See 3.III.a. for a more extensive discussion.</p> <p>.</p> <p>4.2.1.3 Disciplinary code</p> <p>TV has also drawn up a disciplinary code. Based in part on the ITIA's Disciplinary Code. See 3.III.b. for a detailed discussion.</p>

¹ Source : Jose De Freitas



Guidance on match-fixing	<p>4.2.1.4 Training, education, coaching and consulting (including dilemma training)</p> <p>Those involved in tennis at various levels are systematically trained and informed about match-fixing.</p> <p>Every year, all international players have to go through an e-learning in which match-fixing is discussed.</p> <p>All youth players at European level go through a similar e-learning.</p> <p>Every year, the youngsters attending the top sports school are trained in match-fixing.</p> <p>A match-fixing module will also be included in the training(s) for trainers.</p> <p>Officials are informed about match-fixing at least twice a year.</p>
Monitoring of match-fixing	<p>4.2.1.5 Complaints system</p> <p>Any person or body, whether or not they are a member of TV, can denounce or report disciplinary facts to TV or directly to the TV Prosecutor's Office. Even if anonymity is desired, a report can be filed with the match-fixing hotline.</p> <p>The further course of the complaints system is described under the topic 'Enforcing and strengthening the match-fixing policy - Formal sanctioning procedure'.</p> <p>4.2.1.6 Match-fixing hotline</p> <p>TV has a contact point where suspicions of, approaches to and/or knowledge of match-fixing can and must (for members) be reported.</p> <p>The Helpline is easily accessible as every TV member has a clear button on his/her personal webpage that refers to the Helpline for dealing with match-fixing. The hotline is called 'hotline cross-border behaviour'.</p> <p>4.2.1.7 Whistleblower policy</p> <p>TV does not have a whistleblowing policy but is open to looking at options around that.</p> <p>4.2.1.8 Investigating the reports</p> <p>The reports are investigated in several steps. Without passing judgement on the facts themselves, reports are received and subjected to a first analysis by the two TV federation SPOCs, consultation is possible with the ethics commission. If the report contains sufficient concrete elements, it will be passed on to the TV Prosecutor's Office (composed of 3 independent lawyers).</p>



	<p>The further course of the complaints and reporting system is described under "Enforcing and Reinforcing the Match-fixing Policy - Formal Sanctions Procedure".</p> <p>4.2.1.9 Analyse the reportation</p> <p>TV attaches importance to keeping statistics on the reports they receive, specifically on match-fixing and in a broader sense on integrity. They examine which type of reports are most frequently reported, etc.</p> <p>4.2.1.10 Mapping violations by means of surveys</p> <p>In this context, the first phase of the EPOSM Project can be mentioned, namely the survey and its results on match-fixing among tennis players in the Flemish landscape. This survey serves as an instrument under this topic of match-fixing policy and provides some interesting insights.</p>
Enforcing and strengthening match-fixing policies	<p>4.2.1.11 Formal sanction procedure</p> <p>When members of TV flout the Federation's regulatory framework they are committing a disciplinary offence for which they may be prosecuted and punished.</p> <p>The TV Provincial Prosecutor's Office establishes the file and decides on the prosecution of the disciplinary facts of which one is aware, either through a report, a complaint or on its own initiative.</p> <p>After the investigation by the Federation's Public Prosecutor's Office, it either dismisses the case, proposes an amicable settlement or hands the case over to the disciplinary committee.</p> <p>If the case goes before the Disciplinary Commission (composed of lawyers), it will make a disciplinary decision. On appeal, the ruling can still be contested before the Appeals Committee and before the Belgian Court of Arbitration for Sport (BAS).</p> <p>4.2.1.12 Procedures for crisis communication</p> <p>TV drew up procedures for crisis communication 2 years ago, including match-fixing cases.</p> <p>4.2.1.13 Appointing a SPOC (Single Point of Contact), an API (contact person for integrity), clearly defining his powers and facilitating his activities</p> <p>At TV, two federation SPOCs have been appointed to watch over integrity cases. These SPOCs are the contact points and reporting points for integrity in general and specifically for match-fixing. They are independent in their functions and activities, and also have a direct contact line with the Federal Police.</p>



5 STRENGTHENING THE INTEGRITY MANAGEMENT FRAMEWORK

Tennis Vlaanderen has already built a good regulation framework. There are still some things which could be upgraded. The 5-point action plan is therefore aimed at practical adjustments with a limited workload.

In the white row below the action point, there is always a tip or a point for attention. A tip means a recommendation on how the action point could be carried out. A point of attention is a point that one should pay extra attention to when executing the action point.

5.1 More focus on sporting-related match-fixing

5.1.1 Context

Match-fixing is a theme which has been seen as a high priority by Tennis Vlaanderen for some time now. Also internationally, through the ITIA, the International Tennis Integrity Agency, match-fixing is tackled in a very professional way. Consequently, there is a lot of attention for match-fixing and the expertise is excellent.

However, the focus is almost entirely on one type of match-fixing, namely betting-related match-fixing. The first step of the Action Plan is therefore to create more attention for sporting-related match-fixing. The need is particularly strong in the problems of unjustified withdrawals and end-of-season matches. Sporting-related match-fixing is equally a threat to the integrity of the athlete and a threat to the sport.

5.1.2 Checklist

Action point	Check?
Give more attention to sporting-related match-fixing in addition to the focus on gambling-related match-fixing.	
Tips <ul style="list-style-type: none">▪ Paying more attention to sporting-related match-fixing in the Code of Conduct.▪ For example, in the articles 1.2.2.5, 1.3.6.29 and 1.4.3.18 of the Code of Conduct, clarify that sporting-related match-fixing is also a form of match-fixing.	
Communicate to all stakeholders about sporting-related match-fixing as a next step in raising awareness.	
Tips <ul style="list-style-type: none">▪ Using an infographic, inform stakeholders about sporting-related match-fixing, the forms it takes, the dangers and how to report such cases. As well as highlighting the similarities and differences with gambling-related match-fixing.	
Better align the Code(s) of Conduct and Disciplinary Regulations on sporting-related match-fixing.	



Tip	<ul style="list-style-type: none">▪ Trying to eliminate the differences in wording between the Code of Conduct and the Disciplinary Rules regarding sporting-related match-fixing.
Mapping the phenomenon of unjustified withdrawals. Then raise awareness of the phenomenon of unlawful withdrawals and take action where necessary.	
Tip	<ul style="list-style-type: none">▪ Raise awareness among members who play in competition.▪ Action against unjustified withdrawal would be possible on the basis of Article 1.2.3.11 of the Code of Conduct and Article 11, §1 and §5 of the Disciplinary Regulation.
Analyse league formats to curb end-of-season matches.	
Tip	<ul style="list-style-type: none">▪ For less competitive participants, competition formats are devised without risers and relegators.
Raise awareness around end-of-season matches.	
Tip	<ul style="list-style-type: none">▪ For example by means of an infographic.

5.2 Disciplinary sanctions

5.2.1 Checklist

Action point	Check?
Analyse whether the penalties for breaches of the Disciplinary Regulation are sufficient to act as a deterrent. If not, include minimum penalty levels in the Disciplinary Regulations if the current system of indicative tables proves unsuccessful.	
Points of attention <ul style="list-style-type: none">▪ The penalty levels may be too low since the person concerned in the second case of 3.IV was punished in such a way that it did not act as a deterrent to the members of the federation.▪ Attention for increased punishment for recidivism.▪ Increases the uniformity of disciplinary proceedings.	
Try to link disciplinary sanctions to attending a training course or workshop related to the subject of the violation.	



Tip

- For example, link the period of suspension to the condition of attending such a workshop.

5.3 Reporting

5.3.1 Checklist

Action point	Check?
On the site where a report of match-fixing can be made, it is clearly indicated what will happen to the report, which procedure the report will follow.	
Point of attention <ul style="list-style-type: none">▪ The person making the report must be able to see in all transparency what will happen to his report. The person making the report needs this information to be able to assess the possible consequences of his report and to know that it will be taken seriously.	
Tips <ul style="list-style-type: none">▪ To indicate with a diagram the possible consequences of a report.▪ What are a reporter's options (formal/informal)?▪ Possible inspiration for this : https://www.unia.be/nl/over-unia/wat-gebeurt-er-met-je-melding	
On the site where a report of match-fixing can be made, it is clearly indicated that a report can be made anonymously. It is clearly indicated how anonymity will be guaranteed as much as possible through the above procedure.	
Tip <ul style="list-style-type: none">▪ Guaranteeing anonymity as far as possible increases the willingness to report.	
Facilitating reports of match-fixing by non-members of Tennis Vlaanderen.	
Tips <ul style="list-style-type: none">▪ Make the hotline easily accessible, preferably on the first web page of the federation.▪ Name the hotline with a (more) neutral name.	
Encourage people to report any cases of match-fixing they come across before a match.	
Tip <ul style="list-style-type: none">▪ This allows intelligence agencies to prepare for the case of fixing and to collect evidence more easily and more strongly.	



Analyse whether there is a possibility to increase anonymity in reporting. Analyse the possibility of a whistleblowing scheme.	
Tip <ul style="list-style-type: none">▪ A whistleblowing policy again increases the willingness to report.	

5.4 Screening of the structures

5.4.1 Checklist

Action point	Check?
The disciplinary bodies and procedure as well as the ethical bodies are regularly analysed and reviewed by an external expert.	
Points of attention <ul style="list-style-type: none">▪ The independence of disciplinary bodies.▪ Persons involved in the processing of a report should not be involved in the later disciplinary treatment of the report, in order to avoid the appearance of partiality.	
Analyse the formal independence of the Federation's Prosecutor's Office and the Ethics Commission, in addition to their actual independence.	
Point of attention <ul style="list-style-type: none">▪ Formalising independence in regulations.	

5.5 The code of conduct, training & education

5.5.1 Checklist

Action point	Check?
A person who registers with a tennis or padel club recognised by Tennis Vlaanderen will receive a shortened version of the Tennis Vlaanderen code of conduct.	



<p>Tips</p> <ul style="list-style-type: none">▪ The abridged version consists of a few concrete and important points from the Code of Conduct, including match-fixing.▪ The document provided is quite concise and concrete. It could, for example, be presented in a small brochure.▪ At the start of the season, discuss the Code of Conduct, including the rules around match-fixing.	
The 'club action plan' on transgressive behaviour is supplemented by sporting- and gambling-related match-fixing.	
<p>Tip</p> <ul style="list-style-type: none">▪ Tennis Vlaanderen drafts some standard provisions on (sporting-related) match-fixing and offers them to the sports clubs to integrate in their regulations. This will enhance uniformity.	
The ethical code is analysed: the ethical code of Tennis Vlaanderen is analysed on the basis of scientific research on the effectiveness of ethical codes.	
<p>Tip</p> <ul style="list-style-type: none">▪ The scientific studies on this are :<ul style="list-style-type: none">- Ethical Codes in Sports Organizations: An Empirical Study on Determinants of Effectiveness, Els De Waegeneer 2016- Ethical Code Effectiveness in Football Clubs: A Longitudinal Analysis, Bram Constandt 2017	
The federation maintains its systematic education and training programmes and includes (sporting-related) match-fixing in them. The federation analyses whether there are needs and possibilities to extend and/or intensify this. The trainers give attention to practical examples and cases.	
<p>Tips</p> <ul style="list-style-type: none">▪ The federation can cooperate with different partners for this purpose.▪ Regular training through online modules.▪ Members who play in competition are encouraged to attend training on a regular basis.	
Educate officials and match officials on how to report inappropriate behaviour (including match-fixing). Emphasize the importance of reporting and integrate tips and tricks on how to fill in a match form.	
<p>Tips</p> <ul style="list-style-type: none">▪ The match form is important for the federation to obtain information about inappropriate behaviour, including match-fixing. Which facilitates punishment of such behaviour.▪ Add workshops on the match form to Official's Week, Official Day etc.	
Include match-fixing in all training for trainers/coaches, regardless of level.	



6 REFERENCE LIST

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