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# **REPORT ON *PROTECT INTEGRITY PLUS*: ROLL-OUT OF THE RED BUTTON APP TO NEW SPORTS AND NEW COUNTRIES**

by

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## 1. Background

Over several years, EU Athletes has undertaken a number of projects aimed at educating sports players about and protecting them from match fixing. The *PROtect Integrity Plus* Erasmus+ project, carried out during 2018 and 2019, built on these earlier initiatives. There were a number of strands to the project, such as a social media campaign, but the central goal was to make the Red Button App, a mechanism for athletes to make reports on potential manipulation of competitions, available in new settings, representing five sports in seven countries. This was to be implemented by player associations in English, French and Irish rugby, Italian basketball, Danish handball, Greek volleyball and Spanish futsal (both male and female player unions). Introducing the Red Button App to these new settings would strengthen the protective measures in each of these sports but also serve as an experiment to inform future decisions concerning the provision of reporting mechanisms in sport generally. Seeing the player associations attempting to combat match fixing may even galvanise the wider sports movement, and government actors as well, to initiate broader action.

The idea for a *players' app* to be used for reporting information related to match fixing originated with Jalkapallon Pelaajayhdistys (JPY), the player association for Finnish football, in the wake of a serious scandal there in 2011. It was launched in 2013 and subsequently promoted by FIFPro<sup>1</sup> for use in other football jurisdictions (it has been adopted as far afield as New Zealand). Its rationale was that players who have information to pass on, and for whom reporting is typically an obligation under both the rules of the sport and their contract terms, may struggle to know how they can safely do so without compromising their own situation and career prospects. Many players might overcome their reservations if a means of reporting were provided by their union. Indeed, in a survey of more than 1,500 players carried out across several sports as part of an earlier EU Athletes project, 83% included their union in the parties to whom they would trust to make a report; and 35% would trust *only* the union (from a list including their club, their league and the sport governing body).<sup>2</sup> A system for reporting validated

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<sup>1</sup> FIFPro is the international federation for player unions in football.

<sup>2</sup> <https://www.protect-integrity.com/wp-content/uploads/2018/02/2017-EU-Athletes-Evaluation-of-the-effectiveness-of-the-PROtect-Integrity-player-education-programme.pdf>

by the player association therefore has the potential to increase the flow of information to agencies charged with combatting manipulation (and, it might be hoped, also protect players who might receive sanctions for non-reporting but who are not confident that other possible recipients of their report are to be trusted).

The Red Button App works as follows. On one of its visits to a club, the union dedicates all or part of the session with the players to match fixing issues. Following discussion on the topic, each athlete takes a card with an individual code which enables him or her to install the App on his or her smart phone. The App, which also features general educational material about match fixing, will then be available for use should the need arise. A player employing the App can choose to remain anonymous and, in this case, the recipient of the report, while knowing that it must come from a player (adding to its credibility), cannot know the identity of that player since individual codes are allocated randomly. The technology developed ensures that no trace of having used the App is left on the player's smart phone. In the first setting in which the system was used, the JPY determined that the recipient of the information would be a security company, accessible 24 hours a day, which would be responsible for calling in the police if it judged that such a step was appropriate. Player associations which were partners in the present project chose the National Platform (established in line with the structures agreed in the Macolin Convention) as the recipient of information in those cases where there was already an established and functioning National Platform.

'Whistleblowing' is a term that has come into broad usage in the last decade, having had its origins in sport itself: it derives from the role of the official on the field, who observes foul play, blows the whistle, and therefore prevents the foul play from continuing. The notion that actors in any organisation or setting could blow the whistle on corruption or malpractice and thereby help punish or deter offenders has spread to the point where many jurisdictions have adopted legislation to encourage the practice and to protect whistleblowers from reprisals. Indeed during 2019, the European Parliament approved measures to extend this protection to all member states as a matter of EU Law. The Directive requires large employers to have internal means of reporting and also requires governments to provide external mechanisms to receive reports of

breaches of EU law in specified areas.<sup>3</sup> More widely, the term is employed by the media also to refer to exposure of malpractice to the press, though whistleblowers who go directly to the press are commonly not protected by legislation.<sup>4</sup>

The Red Button App is clearly a whistleblowing facility in the sense that it provides a means by which players may report corrupt and illegal activities by their employers or fellow professionals. On the other hand, it is also intended to be used to raise alerts where players have been approached by parties external to the sport and, further, may be used to report cases where the malpractice is not in breach of national law (for example, a coach betting on matches, which would violate sports rules almost everywhere but is not illegal in many jurisdictions). The scope of the Red Button App is therefore different from and wider than implied in most statutory or dictionary definitions of ‘whistleblowing’. Thus, in this Report, we will usually employ the generic term ‘reporting mechanisms’.

Since 2000, when the International Cricket Council introduced its ‘international hotline’ in the face of evidence of fixing even at the highest level of the sport, reporting mechanisms, whether dedicated to particular categories of malpractice such as fixing or doping or more general, have been introduced very widely across sport. One review<sup>5</sup> found that 26/35 international federations and 24/141 national antidoping agencies had one or more reporting platforms in place to collect information on doping in their sport; some of these included provision for reporting other concerns, such as match fixing. Certainly most major sports now offer specific reporting platforms as part of their response to the threat of match fixing and these sometimes include smart phone apps.<sup>6</sup> And private enterprise has not been slow to offer platforms ready to be used by sports federations and leagues which might not have the resources to develop their own.<sup>7</sup>

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<sup>3</sup> <https://www.12kbw.co.uk/eu-whistleblowing-directive/>

<sup>4</sup> This is the case under the EU Directive, for example.

<sup>5</sup> [https://www.wada-ama.org/sites/default/files/resources/files/leeds\\_beckett\\_wada\\_report\\_on\\_whistleblowing\\_platforms\\_july\\_2018.pdf](https://www.wada-ama.org/sites/default/files/resources/files/leeds_beckett_wada_report_on_whistleblowing_platforms_july_2018.pdf)

<sup>6</sup> for example, see [https://www.tennisintegrityunit.com/storage/app/media/TIU\\_Annual\\_Review\\_2018.pdf](https://www.tennisintegrityunit.com/storage/app/media/TIU_Annual_Review_2018.pdf)

<sup>7</sup> One example is the Sportradar mobile app (<https://integrity.sportradar.com/anti-match-fixing/education-and-prevention/>)

Government agencies (e.g. The Gambling Commission in Great Britain) and not-for-profit institutions (e.g. the International Centre for Sports Security) have also been active in setting up various mechanisms open to sports players with concerns about manipulation who wish to make reports outside the institutional framework of their own sport. In short, a good deal of experience has been and is being accumulated in the sports sector. Nevertheless, relatively little is known about how successful these various provisions have been in contributing to the cause of sport integrity. Formal evaluation is in fact inherently difficult. For example, if an agency finds that the frequency of reports from players is increasing, does this signal a greater incidence of offences or a greater willingness of athletes to alert relevant parties to offences of which they have become aware? Further, integrity units prosecuting offenders will be understandably reluctant to reveal the intelligence route by which they have identified cases, so even basic information such as frequency of use of a reporting mechanism is typically unavailable to researchers.<sup>8</sup>

Given the paucity of evidence from sport itself, it is relevant to ask whether provision of reporting mechanisms has been successful in other sectors.

Perhaps the most comprehensive review of whether facilitating reports from employees has positive effects on the firm or industry was conducted by Stubben and Welch<sup>9</sup>, informed by access to 1.2m employee reports made to a reporting mechanism supplier to US companies. They examined the relationship between the volume of reports and a number of significant indicators of subsequent corporate performance. More use of reporting was associated with lower subsequent incidence of lawsuits against the company and reduced liability to monetary fines by courts and regulators. Their interpretation was that the existence of reporting mechanisms deterred offenders within

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<sup>8</sup> Verschuuren notes that the paucity of published figures on use of reporting mechanisms in sport may in fact reflect that use is typically low. P. Verschuuren, 'Whistleblowing determinants and the effectiveness of reporting channels in the international sports sector', *Sport Management Review*, in press, pre-published online, August 2019, <https://doi.org/10.1016/j.smr.2019.07.002>

<sup>9</sup> S.R. Stubben and K.T. Welch, 'Evidence on the use and efficacy of internal whistleblowing systems', September, 2019. Available at SSRN: <https://ssrn.com/abstract=3273589> or <http://dx.doi.org/10.2139/ssrn.3273589>, summarised in *Harvard Business Review*, <https://hbr.org/2018/11/research-whistleblowers-are-a-sign-of-healthy-companies>

the company and allowed managers to identify issues before they became too damaging. Similarly, for the particular case of accounting fraud, Berger and Lee<sup>10</sup> exploited the natural experiment that different states in the US introduced mandatory reporting mechanisms (for companies invested in by state pension funds) at widely different dates. They estimated that application of a new requirement to facilitate reporting led to a 5-9% reduction in the incidence of fraud and to a reduction in audit fees in the state (consistent with the presence of reporting systems implying less need for detailed audit investigations). In another study, Wilde<sup>11</sup> compared the incidence of financial misreporting in firms where allegations had been made through regulator reporting facilities with a matched sample of firms which had not been the source of complaints. He found that ‘whistleblower’ activity was associated with a lower subsequent level of financial irregularities.

The implication for sport of this body of research is that provision of reporting mechanisms and promoting their use by athletes is likely to lead to better outcomes compared to the once common (and still sometimes prevalent) preference of clubs and federations not to know. The apparent efficacy of those systems introduced and operated by regulators in other spheres suggests that it may be appropriate for external agencies (federations, player associations, government agencies) to promote reporting mechanisms where there is a lack of action at the level of the individual firm (club) or where there is reason to doubt the integrity of those employers.

While research has demonstrated that reporting mechanisms may well do good, another strand in the academic literature shows that prospective gains are, however, limited by obstacles which prevent many of those observing malpractice from using them. Much of this research has been conducted in the accounting and health care sectors.<sup>12</sup> Of

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<sup>10</sup> P.G. Berger and H. Lee, Do Corporate Whistleblower Laws Deter Accounting Fraud? (March, 2019). Available at SSRN: <https://ssrn.com/abstract=3059231> or <http://dx.doi.org/10.2139/ssrn.3059231>

<sup>11</sup> J.H. Wilde, ‘The deterrent effect of employee whistleblowing on firms’ financial misreporting and tax aggressiveness’, *The Accounting Review*, 2017, 92(5), 247-280.

<sup>12</sup> For an extensive review of the research in accounting, see L. Gao and A.G. Brink, ‘Whistleblowing studies in accounting research: A review of experimental studies on the determinants of whistleblowing’, *Journal of Accounting Literature*, 2017, 38, 1-13. For an overview of barriers to reporting instances of poor behaviour in health and social care, see R. Mannion and H.T.O Davies, ‘Cultures of silence and cultures of voice: The role of whistleblowing in healthcare organisations’, *International Journal of Health Policy and Management*, 2015, 4(8), 503-505.

course an individual first has to recognise malpractice and accept the moral case that it is his or her responsibility to consider action to prevent the malpractice from continuing. But even when the employee reaches that point, he or she may weigh the benefits and costs of reporting and decide against. Among the principal deterrents to employee-reporting noted in the literature on the accounting and health care sectors are: (i) a lack of confidence that any action will result that will stop the wrongdoing, i.e. a perception that reporting will be futile; and (ii) fear of consequences for the reporting party in terms of social ostracism (particularly where employees work in close teams, as in many medical settings) and harm to career prospects. Such fears may of course be all too valid. The *Financial Times* generalised that “regardless of how legitimate their case, whistleblowers who go public rarely get to work again in the industry they expose”.<sup>13</sup>

These general findings with respect to the (un)willingness of workers to reveal malpractice appear particularly salient in the sports context. Verschuuren<sup>14</sup> notes that players operate in an environment where loyalty to the team is central to the culture, leading to a code of silence (omerta) and likely ostracism of informers.<sup>15</sup> Further, sports players have careers of unusually short duration with less time for their career to recover should they suffer reprisals. Reprisal is also easier given typically very short-term contracts and the subjective nature of the coach’s decision to renew or not renew (such that legal challenge is unlikely to succeed). Verschuuren documents several cases of apparent reprisals against sports players. We note also the global nature of the player market. Legal protection of ‘whistle blowers’ in the jurisdiction where the offence is reported may have little relevance where players have to move between clubs and countries on a regular basis and where employers in other countries may be unwilling to sign a known disruptor.

These considerations from the wider literature, amplified by factors reflecting the specificity of sport, suggest that the effectiveness of reporting mechanisms may depend

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<sup>13</sup> <https://www.ft.com/content/9e7b9f5e-fd34-11e1-a4f2-00144feabdc0#axzz28WmjWJTK>

<sup>14</sup> For reference, see footnote 8 above.

<sup>15</sup> For an example, see a 2019 report from Associated Press about the experience of the Argentine tennis player, Marco Trungelliti. His whistleblowing to the Tennis Integrity Unit led to the exclusion of three corrupted players from the sport but afterwards he was rejected by other players, leading to stress and effects on his health and performance: <https://apnews.com/553335ae88d14fc89218885587a4305e>

heavily on confidence among players that their report would be acted upon and that their identity would not become known within the sport. These criteria therefore need to be taken seriously in the design of reporting mechanisms. In particular, it is important that the reporter should be able to choose to remain anonymous and that any reports should be filtered through a party independent of the sport. Given the ease with which sport insiders might be able to ‘guess’ the identity of the player concerned from the content of the report, or because the informer has talked to someone in the sport before, the role of an intermediary will include using the report in a way which minimises the probability that the player’s identity or likely identity will become generally known.<sup>16</sup>

In assessing the *PROtect Integrity Plus* project, it was not possible to test *directly* for whether it has achieved its immediate objective of increasing the number of players willing to report malpractice, still less its main ultimate objective, improving detection of manipulation and thereby deterring it. This could not be ascertained easily even if a sport had had many years of experience with a reporting mechanism as, while it is possible to count the number of reports, it cannot be known how many reports would have been made anyway, through alternative routes, or how many instances there had been where players ‘should have’ made a report. In any case, even if a count of reports were informative to some extent (e.g a high frequency might be suggestive of good player awareness of the system), the present project has only recently rolled out the Red App (the last players to be included received the App only in December, 2019) and it would therefore not be surprising if no reports had been generated so far. In short, it is (far) too soon to attempt a direct test of the effectiveness of the Red Button App. in the sports and countries covered in this Report.

Nevertheless, it is possible to approach an evaluation of the project from a number of other directions. In *Section 2*, we consider whether the Red Button App meets criteria which one would reasonably expect it to meet if it were fit for its stated purposes. *Section 3*, based on player survey data, focuses on the roll-out of the App during 2018-

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<sup>16</sup> In some contexts, directing reports through an intermediary has the additional merit of creating a source of external pressure on the sport to act on the information where it might otherwise choose to ‘cover up’ allegations which might be disruptive and commercially damaging if revealed.



2019: it addresses questions such as how well explained use of the App was from the perspective of the players and whether players would (for example) trust it enough to use it. *Section 4* reports on findings from a focus group of Finnish footballers. It was in Finnish football that the Red Button App first appeared in 2013. Since it should now be well embedded in the sport in that country, we judged it more realistic to evaluate the impact of the Red Button on players who had had lengthy exposure to it rather than explore the issues only with those just recently introduced to it. In *Section 5*, we focus on the questions of who receives any reports made by players and whether the players can be confident that any report would lead to effective action to stop the abuse of the sport. Here, we draw on what we learned from four lengthy interviews with recipients of alerts from the Red Button App. Throughout, we will make recommendations, valid for player associations and other agencies which may have committed to the Red Button, as to how the resource should be maintained and, if possible, improved in the future. These recommendations and general conclusions will be summarised at the end of the Report, in *Section 6*.

## **2. Strengths and weaknesses of the Red Button App**

We did not carry out any physical/engineering tests on the Red Button App but found no reason to doubt that the technology worked, for example that use of the Red Button App indeed left no trace of having been used on the player's smart phone. Our review here considers the strengths and weaknesses of the App given what we regard as a safe assumption, that the technology is reliable and delivers the features claimed for it.<sup>17</sup>

We also note in preamble that the Red Button App has been included before in an evaluation of reporting mechanisms in sport. In a substantial Report<sup>18</sup> commissioned by Française des Jeux, Christian Kalb Consulting examined twenty systems used in the world of sport in a great diversity of settings, for example by UEFA, the Tennis Integrity

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<sup>17</sup> The system has been tested by INTERPOL.

<sup>18</sup> The Report, *Quel système de remontées d'alertes pour la plateforme française contre la manipulation des compétitions sportives?*, dated November, 2018, is not in the public domain. We are grateful to FDJ and Christian Kalb Consulting for allowing us access to the Report and quoting its findings here.

Unit, Anti-Doping Denmark, the Italian Sports Ministry and sundry American universities. Some had other offences than match fixing in scope, for example doping or abuse. Each system was allocated marks under headings reflecting fifteen named criteria for a well-designed reporting mechanism, for example the organisers should have the capacity to promote the system to athletes in an effective way, the technology should allow players to choose to remain anonymous, and there should be appropriate formal procedures on how information received will be processed and acted upon. Although there has to be an element of subjectivity in assessing how well each system satisfies each criterion, and although the weighting given to each criterion in assigning a final score is necessarily arbitrary to some extent, and although some weaknesses were identified in the Red Button, it is nevertheless highly encouraging that the Red Button App was awarded the highest overall score of any of the twenty systems examined in the Report.<sup>19</sup>

Direct comparison between the Red Button App and other reporting mechanisms is outside the scope of our Report. In some of the sports we examined, alternative means of reporting are available to the athletes to whom the Red Button App was made available. For example, Anti-Doping Denmark provides a ‘Stop Matchfixing Hotline’ accessible by telephone, by an online reporting form or by an App downloadable from its website.<sup>20</sup> However, while the greatest marginal gain from provision of the Red Button App will likely be where alternatives are lacking altogether or lacking in trust from the athletes, we do not regard it as redundant to introduce a player association-led facility in any setting. The Handbook produced by the UNODC and IOC<sup>21</sup> notes that individuals considering reporting may differ considerably as regards the channels where they would feel comfortable. Since the goal is to maximise the flow of information,

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<sup>19</sup> Of course, the Report did not cover all reporting mechanisms currently in use. Further, choice of mechanism will depend on the needs of the commissioning organisation. For example, the Red Button App is intended to be a tool only for athletes whereas another design may be needed if information is being invited from a wider range of sources.

<sup>20</sup> <https://www.antidoping.dk/hotline>

<sup>21</sup> United Nations Office on Drugs and Crime (UNODC) and International Olympic Committee (IOC), Reporting Mechanisms in Sport: A Practical Guide for Development and Implementation, 2019, [https://www.unodc.org/documents/corruption/Publications/2019/19-09580\\_Reporting\\_Mechanisms\\_in\\_Sport\\_ebook.pdf](https://www.unodc.org/documents/corruption/Publications/2019/19-09580_Reporting_Mechanisms_in_Sport_ebook.pdf)

there is therefore still something to be gained by providing a mechanism validated by a player association even where current mechanisms appear to meet the criteria for a satisfactory reporting infrastructure. In some cases, the Red Button App has become part of the infrastructure. For example, in Denmark and Great Britain, handball and rugby players respectively may use the App but the information flows into the same institution as reports using ‘official’ hotlines.<sup>22</sup>

We consider now how well the system made available in the present project satisfies what we regard as the most important criteria to be met by a useful reporting mechanism. Choice of criteria reflects findings from the general literature (outside sport) and is consistent with criteria suggested in the Report by Christian Kalb Consulting and in the UNODC/ IOC Handbook.

*(i) Athletes should have high awareness of the reporting mechanism and how to use it*

Player associations have direct contact with players. In the present project, membership among players is high and in any case, non-members may attend dressing-room meetings. The unions are therefore well-placed to distribute the App and do so in the context of their delivering ongoing education about the risks to sports players from match fixing. Players surveyed in this project (Section 3 below) were generally satisfied with how well it was explained to them. On the other hand, the App will serve its purpose only if awareness of current and future new players is maintained over time. For example, its effectiveness depends on players continuing to keep the App on their smart phones and we report in Section 4 below that they may ‘lose’ the App, for example when they change phone. Our conclusion that the Red Button App comfortably satisfies this criterion is therefore qualified by a recommendation that there must be a continuing programme to reinforce awareness among players. Consideration needs to be given to how resources will be allocated to this programme once initial funding is no longer available. And it is not only money which may be a constraint. A particular issue

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<sup>22</sup> In one of our interviews with representatives of National Platforms (Section 4 below), the view was expressed that “*combining systems gives maximum opportunity for overcoming obstacles to reporting*”.

raised with us by the player associations was the limited time allowed by clubs for dressing room meetings. Federations committed to the fight against match fixing should consider advocating or mandating that clubs should facilitate longer and more regular meetings.

*(ii) The reporting mechanism should be easy to use*

Clearly a reporting mechanism should be designed to have low barriers to use. It should therefore always be accessible and it should be easy to use. Here, the Red Button App rates highly. It may be employed 24 hours a day. The player associations allow a choice of languages as appropriate, bearing in mind that the players may include non-nationals.<sup>23</sup> And, once an athlete has taken the decision to make a report, it is straightforward to communicate it through the App. On opening the App, the athlete is presented with a screen where he or she may immediately make a report without the need for further clicks. First, a tick-box is selected to indicate the reason for the report, chosen from: “I was contacted”, “my colleague was contacted”, “I heard a rumour” and “other”. A free text box is positioned below this list for the actual report to be completed, this expanding as the reporter types.<sup>24</sup>

*(iii) The reporting mechanism should carry the trust of players that they can safely choose to be anonymous*

As noted above, a significant barrier to using reporting mechanisms in any sector is that it will lead to negative consequences for the reporting party, such as reprisals, social ostracism and harm to career. These factors are highly salient in the context of sport. In our focus group of Finnish footballers (Section 4 below), participants expressed the

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<sup>23</sup> For example, in the case of Greek volleyball, the user may choose to make a report in Greek, Danish, English, French, Italian or Spanish. Further the user’s language preference is retained for it to be offered as default if any further use is made of the App.

<sup>24</sup> The page also includes an information icon ⓘ at the top. This allows the user to access any information about the App (or other educational material concerning sports integrity) which the player association has elected to include.

strong perception that they would suffer career damage if it became known that they had reported activities related to manipulation. In a survey of nearly 2,000 players in eight European countries, research for the *Don't Fix It* project found that one-third would never report confidentially an approach or suspicions of match fixing. Asked why not, a high proportion endorsed 'career concerns' and 'lack of trust in confidentiality' as the reasons.<sup>25</sup> This underlines the importance of both including the option to remain anonymous and convincing players that an assurance of anonymity can be trusted.

Here, the Red Button App is strong. First, the App is distributed through the player association. Since trust in the player association is typically at least as strong as in other parties (see Section 1 above), its validation of the mechanism is likely to increase confidence among the athletes. Second, that the technology assures anonymity is readily demonstrable, for example the players select their own reporting code number at the team meeting; if they wish, they can then destroy the card showing the code once they have installed the App on their smart phone and can therefore see for themselves that a report could not be traced back to them (since no one else has seen their code).

*(iv) The reporting mechanism should be designed to elicit good quality information*

In one of our discussions with National Platforms (Section 5 below), we heard the view that “*the closer the information is to the players concerned, the more trustworthy it is*”. To this extent, alerts received through the Red Button should deserve to be taken seriously since, in contrast to most systems, they are guaranteed to come from players.<sup>26</sup>

On the other hand, the view from one of the National Platforms was that all reporting mechanisms face the problem that players may be unsure what should be reported. This issue was in fact raised in our focus group for Finnish footballers, who exhibited lack of clarity about when they should report. For example, players who received

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<sup>25</sup> *Don't Fix It: Protect Our Game*, Birkbeck, University of London, <http://www.sportbusinesscentre.com/wp-content/uploads/2013/12/Dont-Fix-It-Protect-Our-Game-A-Good-Practice-Guide-for-Professional-Football-Players-Associations-to-tackle-match-fixing-in-football.pdf>

<sup>26</sup> Many anonymous systems are accessible by anyone and thus susceptible to mendacious or malicious reports from the (perhaps disgruntled) public.

‘approaches’ via Facebook appeared to dismiss them as frivolous and not worthy of an alert through the Red Button or any other avenue. We recommend that player associations should be explicit in providing examples of when something should be reported and endorse what several union representatives told members: everything should be reported as corruption may be identified by putting together several different pieces of (small) information.

Players may also have little feel for how detailed information should be. National Platform representatives identified the principal weakness of the Red Button App as its lack of opportunity for follow-up dialogue with the informant, where the recipient requires additional detail in order to investigate further; some other channels allow the player to opt for subsequent interaction using technology which permits anonymity to be preserved.

Player associations should also be sensitive to the importance of anonymity when selecting the recipient for any alerts which its members may communicate through the Red Button App. In as closed a world as sport, it may be possible for an insider to guess the likely identity of an informant from the context, potentially compromising his or her anonymity. We caution against a framework where any reports go directly to a governing body. The first-best way to proceed is that reports should be channelled through an independent intermediary which should use its experience to prevent ready identification of the player. Section 7 of the UNODC/IOC Handbook presents case study examples of good and bad practice, stressing that agencies should do everything possible to mask the identity of the player from whom the initial report came when investigating potential offences. Of the eight player associations in this project, only one had nominated a body within the sport as recipient of Red Button Alerts.

*(v) The reporting mechanism should carry the trust of players that their reports will be acted upon*

Together with fears for themselves, the most common obstacle to reporting noted in the general literature is that employees perceive the act of reporting as ‘futile’: they think that ‘nothing will be done’. The role of player associations here is that the trust members

place in them potentially allows them to assure players that their information will in fact be used to prevent manipulation. But of course, this requires that player associations establish that procedures put in place as part of the Red Button framework for processing and acting on alerts are indeed effective. Where a well-functioning National Platform is already active, this will be the natural destination to which reports are directed. All four player associations in the present project where there was a National platform opted to use it. These National Platforms typically have clearly set out procedures for assessment of incoming information (including from the Red Button App) and rules on how to proceed (for example, referrals to police or sports governing bodies).

*(vi) Use of the reporting mechanism should satisfy sports rules which require an athlete to report any approaches or any other information about corruption which he or she observes*

Every year scores of players at all levels of sport are sanctioned for failure to report and such sanctions may be severely disruptive to careers and sometimes career-ending. Even as prominent an athlete as Shakib Al Hasan, recently ranked as the best bowler in the World in official cricket player ratings, is currently serving a two-year global ban from the sport for failure to report sufficiently promptly three suspicious approaches (which were likely related to provision of inside information rather than active match fixing). There was no suggestion that he had manipulated any matches.<sup>27</sup> A young Maltese footballer, Samir Arab, was banned from all football for two years for failing to report an approach in a timely fashion notwithstanding that, shortly afterwards, he was the key police witness in securing conviction of the criminal who had been the source of the conspiracy to fix a Malta youth international match. This sanction was confirmed by the Court of Arbitration for Sport.<sup>28</sup>

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<sup>27</sup> The official reasoned decision is available through a link at <https://www.icc-cricket.com/media-releases/1473892>

<sup>28</sup> <https://www.independent.com.mt/articles/2018-08-22/football/Court-of-Arbitration-for-Sport-upholds-two-year-ban-for-Maltese-football-player-Samir-Arab-6736195223>

These high-profile cases are illustrative of the career-risk faced by athletes when they are exposed to a corrupt environment. In contrast to some other sectors, sports typically go beyond encouraging reporting of corruption by actually making it an offence not to ‘whistleblow’ and frequently sanction players for not doing so in a timely fashion and through official channels. Player associations in Europe are very active in seeking to protect their members from this risk by emphasising the importance of reporting any approaches to manipulate matches. Player associations which are members of EU Athletes actively promote its Code of Conduct for Athletes: six simple rules for athletes to follow, one of which is “*you must report any suspicious approaches*”.<sup>29</sup>

But, as noted, there are serious obstacles to reporting including fear of personal consequences for informers. Rules, supported by sanctions, which require athletes to report are presumably intended to provide a countervailing pressure to tip the balance of those wavering in their decision in favour of reporting. However, this countervailing pressure may not be sufficient if the personal cost of using official channels within the sport is perceived as high. In this context, the sports player may instead be willing to use an independent reporting mechanism, such as the Red Button App; but the incentive to do so is lessened if a report through this channel would fail to remove the risk of sanctions for not reporting.

It follows that any reporting mechanism will be stronger if it is recognised as an adequate means of complying with the requirement that a player report any information required to be reported according to the rules of his or her sport. The Red Button App does not leave any record of who has made a report (unless the informant chooses to leave a name). However, the receipt of the report will be time stamped and a player could therefore ‘claim’ a report later if accused of a non-reporting offence. There is therefore a potential for the Red Button App to be accepted as means for players to comply with their obligation to report. Such acceptance would make the Red Button App more effective in increasing the flow of information about corruption. On the other hand, sports may frame rules which explicitly recognise compliance with the rules only

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<sup>29</sup> <https://euathletes.org/wp-content/uploads/2018/08/2018-Code-of-Conduct-Leaflet-GB.pdf>



if they are made through specific ‘official’ channels. For example, Article 2.5.3 of the England and Wales Cricket Board Code defines as an offence: “Failing to disclose to the Designated Anti-Corruption Official (without unnecessary delay) full details of any approaches or invitations received by the Participant to engage in Corrupt Conduct”. It goes on to state explicitly that “It is not sufficient for such disclosure to be made instead to any other third party” though this blunt statement is softened by the stipulation that “The obligation on the Participant under this Article will be deemed to have been discharged if he/she elects to transmit the information via an intermediary provided that full disclosure of all details, including the identity of the Participant, is made to the Designated Anti-Corruption Official by the intermediary on behalf of the Participant without any unnecessary delay”.<sup>30</sup> Although passing information through an independent party is therefore seen as potentially legitimate, the phrase ‘including the identity of the Participant’ would appear to make reporting anonymously insufficient to satisfy the Code.

These extracts from the Code of one federation in one sport illustrate potential ambiguities relevant for all sports regarding whether use of the Red Button App can be regarded as offering players protection against disciplinary charges for failure to report. None of the footballers in our Finnish focus group (Section 4 below) knew whether use of the App would make them compliant with the rules of their sport and with obligations included in their club contracts. In some cases, this in itself might provide a reason not to use the App.

Whether the Red Button App satisfies criterion (vi) has no general answer. It depends on what local arrangements are in place. A player association is recommended to prioritise discussions with the governing body over the extent to which it recognises the Red Button App as a means of satisfying its rules. Further, in setting the framework for how the designated recipient should process Red Button alerts, it should take account of sports rules defining the ‘failure to report’ offence. In general, where there is a credible independent agent handling alerts, such as will be the case in countries with a

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<sup>30</sup> <https://platform-static-files.s3.amazonaws.com/ecb/document/2019/03/11/8e0e3084-d464-4e35-a36f-321fbabeb619/2019-A-C-Code-PMOA-Final.pdf>

well-functioning National Platform, there should be no reason for committed sports governing bodies not to embrace the Red Button App. It should also be attractive to federations which are committed to anti-match fixing but which recognise that some member clubs present corrupted environments where players need a union-validated mechanism to overcome their real fears of adverse consequences if they ‘blow the whistle’.

### **3. The roll-out and the player survey**

The roll-out of the Red Button App in the five sports was implemented by the eight player associations predominantly during 2019. Usually it took place during team meetings; Irish rugby also covered ‘rookie camps’ during workshops on integrity. By late November, the team meetings had reached 4,697 athletes, with the programme still ongoing, the timetable being constrained by the frequency of meetings with players and the seasons for each sport.

Of the 4,697 players, 2,698 (57.4%) had downloaded the App. We discussed with player associations whether the conversion-rate could have been higher. While the goal was to have the download completed at the meeting where the App was introduced, practical obstacles often stood in the way. From Italian basketball, the player association reported that downloading was not as straightforward to an Android device as to an iPhone and the time allotted to team meetings was too short. The union for Greek volleyball players achieved a high conversion-rate from small group meetings (usually before training sessions) and, where downloads had not taken place, this was attributed to lack of wi-fi at the venues. A high conversion-rate was also reported from Irish rugby, with some of the failures due to the simple problem of players coming to the meeting without their phone. The lower conversion-rate in English rugby was linked to meetings being too big in numbers (up to sixty in a room) and too short in duration (as short as ten minutes in some cases).

Clearly the uptake of the App by players will be less where the player leaves the meeting without yet having completed the download. To minimise the number who do so, we recommend, on the basis of our discussions with player associations, that (i) the Red

Button App is introduced after a discussion of the reporting rules of the sport, (ii) meetings should be longer than is typically presently allowed for by clubs, (iii) meetings should be for small numbers, dividing up squads for successive meetings where the club will agree, (iv) players should be asked in advance to bring their phones to the meeting and (v) meetings should be in venues where wi-fi is available. These recommendations may sound obvious; but care will be needed in future roll-outs to pay close attention to practical matters as the reach of the App will be compromised if reliance has to be placed on individual athletes downloading after they have gone their separate ways. Some of the recommendations require greater cooperation from clubs than is often reported to be presently the case.

We asked players about their experience of team meetings and their view of the App through a questionnaire (consisting of questions framed with a 5-point Likert scale), distributed by player associations in the local language. They were asked to focus on one or two clubs and to administer the survey some time after the relevant player visits to those clubs, rather than immediately or almost immediately. The gap varied between associations, for example 2 months in Spanish women's futsal, 8-10 weeks in Danish handball and 2-6 months in Greek volleyball. Channels for players' responses also varied, for example online in Spanish women's futsal, WhatsApp links in Spanish men's futsal and paper questionnaires in English rugby.<sup>31</sup>

Although there may be a tendency for players to wish to give a favourable review of their own union officials (who had conducted the sessions), it is nevertheless encouraging that players expressed strong satisfaction with the roll-out meetings (Figure 1).<sup>32</sup> The overwhelming majority rated the roll-out and the explanations of the App as either 'excellent' or 'very good'. Out of 144 responses only six answered 'poor' or 'very poor' and five of these were from English rugby, where the player association had had to hold unsatisfactorily large meetings.

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<sup>31</sup> No questionnaires were distributed in the case of French rugby. Here, rollout was concentrated towards the end of the project, leaving insufficient time for a gap to be left before distributing questionnaires.

<sup>32</sup> In this and subsequent figures, responses for men's and women's futsal in Spain have been combined.

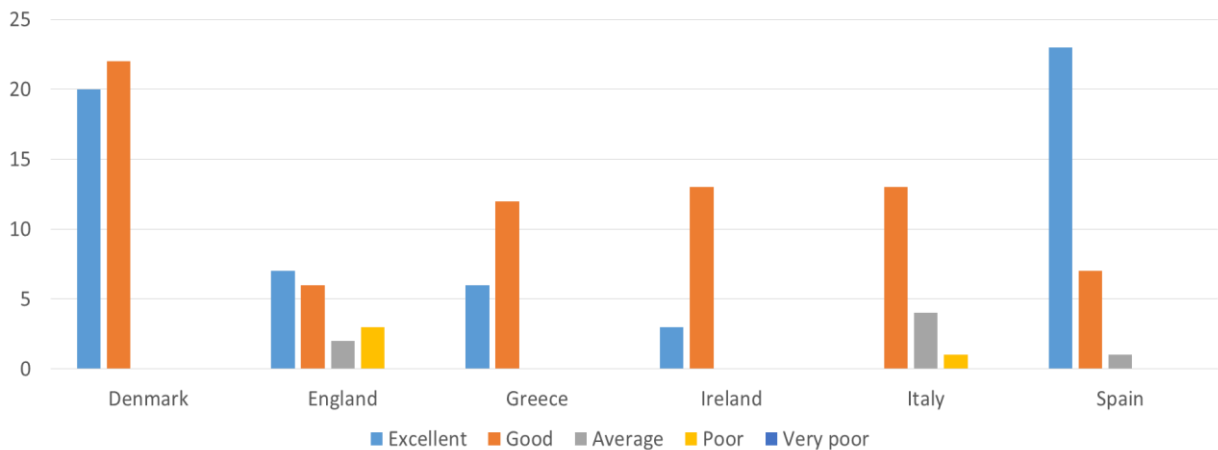


Figure 1. *How would you rate the way the Red Button was rolled out and explained to you?*

We next sought player views on the App itself. We identified above that principal obstacles to overcome for any reporting mechanism are likely to include concerns about risk to the informant and feelings that reporting would be futile anyway.

Responses to our question on trust, are charted in Figure 2. The question asked was how much the respondent would trust the confidentiality of the system and its safety for the player. Given that only one respondent from 144 chose either the answer ‘not at all’ or the answer ‘slightly’, it may safely be concluded that the players across the board had at least some faith in the Red Button App. Everywhere, the majority of players indicated that they trusted the App either ‘completely’ or ‘a lot’. However, while one should not draw too strong a conclusion from a relatively small sample, the group of Italian basketball players was more sceptical than others. No one here expressed ‘complete’ trust in the App and only marginally more of the athletes trusted it ‘a lot’ than chose the lukewarm answer ‘moderately’. The player association might pay attention in future team visits to justify again its validation of the App as ensuring confidentiality and the safety of players. Players who have been exposed to an environment where they feel vulnerable are likely to require repeat reassurance about the possibility of adverse personal consequences to themselves from taking active steps to supply information about integrity issues.

If the App is to serve its purpose of increasing the flow of information about manipulation, athletes must also be persuaded that reporting via the App will make a difference. We asked athletes whether they were confident that any reports made through the Red Button would be acted upon. Across the whole group of 144 respondents, 30 were ‘completely’ and 74 ‘moderately’ confident. This still left a significant minority who were more sceptical; Italian basketball players were the least willing to endorse the Red Button App by expressing at least moderate confidence that reporting would be followed by action.

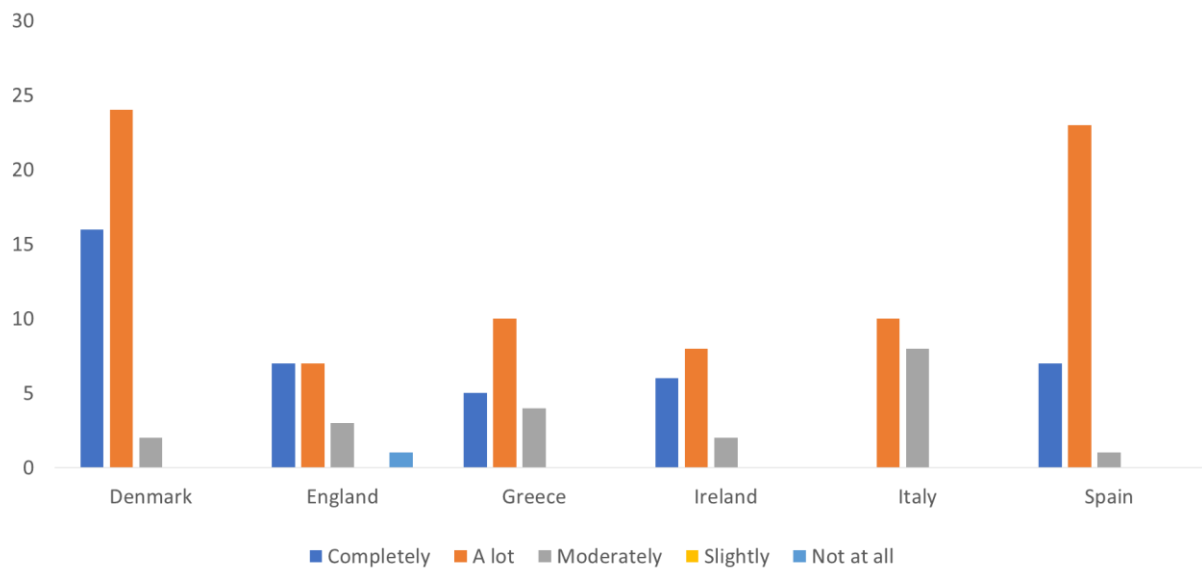


Figure 2. *How much do you trust the Red Button App as a confidential way of reporting approaches safely?*

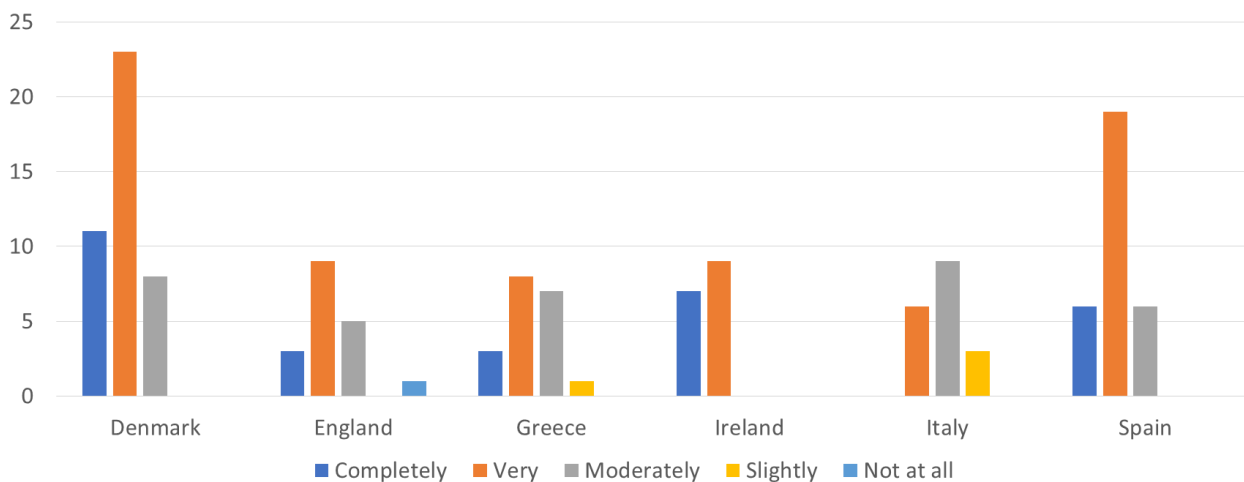


Figure 3. *How confident are you that reports through the Red Button will be acted on?*

Finally, respondents to the questionnaire were asked to compare the Red Button App with alternative reporting mechanisms (Figure 4). Here a ‘don’t know’ option was offered and indeed 46/144 players chose not to express a view. Of the remaining 98, 64 rated the Red Button ‘much better’, and 23 ‘better’ than alternatives. This very positive overall view of the Red Button is consistent with survey evidence that a significant proportion of sports players would trust their union more than other parties if they were to make a report. The Red Button App may be preferred because it is validated by the union and the mode of distribution allows demonstration of the provision for anonymity which might have to be taken on trust for alternative external-to-the-club reporting mechanisms.

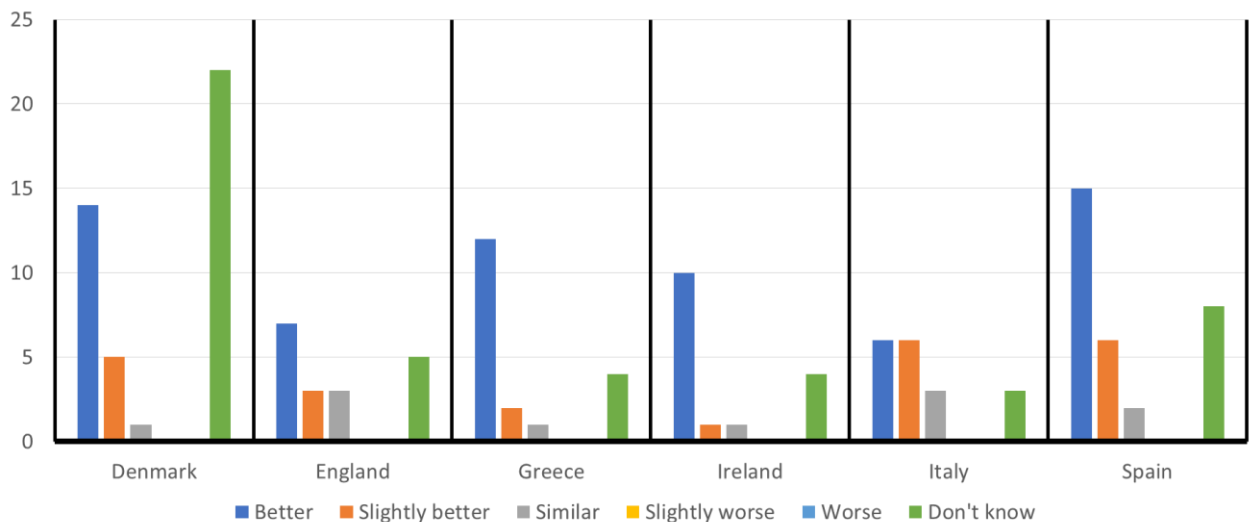


Figure 4. *How does the Red Button App compare to other ways of reporting approaches?*

#### 4. Finnish footballers

Though the results from surveying players reached through the *PROtect Integrity Plus* project were encouraging, they come with the caveat that the athletes in question had only recently been introduced to the Red Button. It cannot be known how far any enthusiasm might be maintained and how players may come to regard the Red Button as their career unfolds. For a longer view, we turned to the setting where the Red Button

App was first introduced. As noted earlier, the App was an initiative of the player association in Finnish football, in the wake of a major exposure of fixing in the Finnish League in 2011.<sup>33</sup>

We decided to elicit views from Finland through a focus group. A focus group is a set of individuals brought together to discuss a topic of interest to them. Guided by a skilled moderator, interaction between participants should draw out information which might not be generated by a survey, for example because the researcher could not readily foresee what the key issues relevant to the group might be. The focus group is increasingly popular in social science research.<sup>34</sup>

Our focus group was organised for us by the player association, the JPY, and moderated by Panu Autio, an official of the union and a well-known professional futsal player.<sup>35</sup> It was conducted in Finnish in Helsinki in August, 2019, following a loose written-down structure that we agreed with the moderator. The session was recorded and subsequently professionally transcribed and translated into English. There were seven participants<sup>36</sup> (in addition to the moderator), all male players currently active in the Finnish League. They were drawn from three different clubs and ages ranged from 19 to 31. Four of the players had had experience of playing in foreign leagues, in Eastern or Southern Europe.<sup>37</sup> No foreign players were included as it was judged that discussion might be more free if it was in players' native language; but the group was asked about what they thought to be attitudes of foreign players. Throughout the account which follows, italicised text shows a direct quote (in English translation) from a player in the group.

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<sup>33</sup> For an overview of the scandal, see A. Koivula, 'Reality of football match fixing: Case Finland', *Law in Sport*, 2013, <https://www.lawinsport.com/topics/anti-corruption/item/realities-of-football-match-fixing-case-finland>

<sup>34</sup> For a review, see I. Acocella, 'The focus groups in social research: Advantages and disadvantages', *Quality and Quantity*, 2012, 46(4), 1125-1136.

<sup>35</sup> We are grateful to Mr. Autio for his role in the project and in particular for his highly skilled moderation of the meeting.

<sup>36</sup> It is commonly recommended that focus groups should have 6-10 participants since the discussion may dry up with fewer than six or become hard to control with more than ten. D.L. Morgan, 'Focus groups as qualitative research: Planning and research design for focus groups', *Sage Research Methods*, 2013, <https://pdfs.semanticscholar.org/6895/650998233a7bb52efcdaa39b0e42d2102f3c.pdf>

<sup>37</sup> We do not name the countries in case it should allow identification of the players, who were asked to speak about sensitive topics.

The session began with a discussion of players' personal experience of match fixing and their perception of its scale in Finland and elsewhere. Those who had played abroad had all been exposed to environments where it seemed to be endemic: *"I felt it is quite extensive as it was not only the employees of the sports club but also the players, and at times it felt like a large part of the team was in on it"*. Another player commented that it was the same where he had played (and a close acquaintance of his had had the same experience in yet another country): *"there the sports clubs make agreements with each other, or whatever they are, the bigger groups influencing players directly....the clubs make agreements with each other or some people benefit from fixing the match"*.

These experiences underline the corrupt environment in some countries in Europe where clubs themselves are implicated in manipulation that is perceived as normal. Clearly it would be a very intimidating context for any players who considered 'blowing the whistle'.

But these problems were not perceived as existing at all in Finland. *"I cannot even imagine a sports club paying another or making agreements to fix the result"*.

Players were aware that match fixing can take other forms, for example *"agreements between players, three guys in the same group so that they agree to play badly"*. However, no one had personally encountered such a scenario: *"I have never during the time that I've played heard of players making agreements with each other at a large scale"*.

One player had been on the field in one of the Finnish matches in 2010-2011 which was later revealed to have been fixed. He appeared to have had only vague unease at the time but understood later how the match had been fixed, once it had been denounced in the press: *"there was something. Because you couldn't really notice it, and later maybe when I was going through it I realised it was quite clear"*. He went on to describe the manoeuvre by which a player had engineered a goal for the opposing team. A second member of the focus group had had suspicions in one relatively recent match where he had played, referring to a player who had *"got a couple of stupid yellow cards"*: *"It got me thinking about pressing the Red Button"*. But he hadn't: *"It would have been difficult*



*to prove*". Concern was also expressed about cases which might be investigated, damaging a player's reputation even when no case was found for taking it further.

Other players had the impression that there had not been manipulation of matches in Finland in recent years. But one was sure that there were frequent active attempts to recruit players to fix: *"I can say that many people are contacted, but it doesn't lead to anything"*. Another participant supported this and explained the frequency of approaches by noting that *"there are many easy targets"* (players with money troubles) in Finland.

Turning explicitly to the topic of the Red Button, players were asked when they had first been introduced to the App. All except one (who had had a lengthy spell abroad) recollected the team meeting where the App had been explained though they tended to be vague about when that had been. (*"I think some years, two or three"*). On the other hand, most had good recollection of the case made by the union for the App: *"It was described as an easy, anonymous way to inform someone about suspicions regarding match fixing"*; *"precisely- an easy and minimal effort way, doesn't require much effort if you are suspicious"*; *"yeah, and the anonymity, you don't have to put your own name on it"*. The consensus view was certainly that the Red Button would be simple to use though only two players had *"played around"* with the interface after the initial download to ascertain this for themselves.

The importance to players of the anonymity feature of the App was emphasised in the discussion. One player was concerned about threats: *"somebody can threaten you because you've told someone. They can say that something is going to happen to your family"*. On the other hand, this was perceived to be less likely in Finland than *"the more south you go"*. One particular point raised concerned career prospects if a player was on the transfer market. Despite the perceived safety of Finland, an informant would have several possible destinations ruled out if his identity became known. *"If you get caught having revealed something like that, it might be difficult to find a job in Serie C in Italy....If you get a reputation of having destroyed a team's fixing matches, then a lot of other clubs that take part in these activities will think again when considering taking you.... It's about your salary and it can influence your career if you don't have*

*anonymity*". Hearing these concerns about a specific way in which reporting can damage a career reinforces the general proposition that career concerns are a major factor in deterring reporting of malpractice and of the value added by reporting mechanisms which can guarantee anonymity.

All players reported that they had no knowledge of who received the information passed on through the App and what happened to it once it had been received.<sup>38</sup> This did not seem to stop them trusting the system (all those who spoke to the issue said they did) but nevertheless it was perceived as a reason for reporting to the football club rather than through the App: *"I don't know anyway how it works, and then you're not sure who it goes to and how, and if you tell someone in your club then you know for sure it will go forward and you know who has been told. He can take it further"*; *"I would first call someone....and not just put it in the App and trust that it's taken care of"*; *"you might have the idea that you haven't done enough to make it go further"*. A common view was that more detailed information should be provide in the App itself and at future team meetings. In later discussion, it was not admitted by any participant that they knew of any alternative reporting mechanism other than speaking to the Club or using the Red Button App.<sup>39</sup>

We were struck by the willingness expressed by all of the players to go to their club officials in the event that they had something to report<sup>40</sup>, a testimony to high standards of integrity in present day Finnish football. They tended also to express the view that most of their teammates would do the same. At the same time, those who had worked abroad recognised that there was a high probability in some football cultures that the club itself will have been corrupted: *"In Finland, I don't think it's a problem, but somewhere out there it can be- in [Country name redacted] and these kind of countries"*. Two of the four who had had international experience were explicit that they could not

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<sup>38</sup> There was also incomplete knowledge of other features of the App, for example not all knew that it could be downloaded only by players and not by the general public.

<sup>39</sup> Official reporting mechanisms for information on manipulation are provided by SUEK, part of Anti-Doping Finland.

<sup>40</sup> Focus group participants thought that, generally, foreign players in Finland also trusted club management. However, they were aware of some cases of very poor treatment of foreign players and the views of those particular players will likely have been coloured by their experience, creating distrust of management in all spheres.

have gone to club management if they had had information to reveal (though the two others thought they probably could have in their particular clubs even though the country's football as a whole was corrupt).

One speaker with international experience commented on what may be represented as a paradox. Match fixing is not a serious problem in Finland and it therefore has less need for the Red Button. In other countries, corruption is widespread and the Red Button could have a role- but it is unlikely ever to be permitted to be used. *“what is their interest and motivation to change? Do they want such a system there the current power structure that arranges the matches?”*.

While Finnish players appeared very ready to report concerns related to match fixing, there was uncertainty in the group about just what should be reported, whether through the Red Button or otherwise. Players referred to approaches through Facebook when playing abroad but also in Finland. They seemed not to regard these as serious and credible offers and some were hesitant to trouble to report this sort of incident: *“Probably if I received a message on Facebook, I maybe wouldn't [press the Red Button] just because it basically doesn't matter”*; *“It can be a joke. What do they mean by it?”*; *“Although you should report it, I feel it depends a lot on the situation and the offer”*. Later in the discussion, when the players were asked what might stop them reporting, they again raised the issue of whether it was worthwhile to report every incident, implicitly applying a higher threshold for reporting depending on how important they judged it to be. One participant would think about whether the information was likely to be relevant: *“I would question the significance. I am aware that even small pieces of information might be significant, but you think okay, that was just one situation, and if I go and report and press a button, it's not useful”*.

Whether these particular players would or would not use the Red Button App proved, however, to be a somewhat academic question for some of them. When asked directly whether the App was still on their phone, one expressed himself sure that it was, another did not know whether it was, four others did not have the App any more.<sup>41</sup> Asked by

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<sup>41</sup>We received information from the moderator, following the focus group, that he had physically examined each participant's smart phone and, in fact, three of the seven had the App on it.

the moderator how this was, two players had deleted it after running out of space on their phone and two had ‘lost’ the App when changing phone. No one knew what to do if they wanted to download the App on to a new phone: “*I have no idea*”.

Although the sample size represented by the group is small, it should clearly be a matter for concern that, among seven active players, up to six did not have the App available for use. If replicated among all footballers in the country, it would marginalise the potential value of the Red Button as a reporting mechanism. Of course it might be argued that the relative safety of the sports environment as perceived by these players, and their unanimous willingness to report directly to club officials, will have made them relaxed about not having an alternative readily available to them. Players in more difficult circumstances would have a greater incentive to hold on to the App once it had been distributed to them. Nevertheless, the situation described has a clear message for this player association and others. The utility of the Red Button App depends on investment in ‘maintenance’ and avoidance of ‘depreciation’. After initial roll-out, it is imperative that there is a planned ongoing programme to introduce new players to the App and to refresh the knowledge of the App among old players.<sup>42</sup> We recommend also that information for players on what to do if they need to download the App again should be included in the information offered within the App itself.

Other findings from the focus group reveal a demand for knowing more about the App. It meets the strong preference of athletes for anonymity when reporting and their trust in this feature of the App is strong; but their lack of understanding of what happens to reports appears to leave them unsure as to whether their reporting might make a difference. The literature notes two severe obstacles to reporting wrongdoing: personal consequences and a feeling that to report would be futile anyway. More reassurance of players through greater information and guidance on when to use the App may be needed for the availability of the App to overcome this second obstacle.

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<sup>42</sup> The UNODC/ IOC guide to good practice (see footnote 21 above) defines commitment to a good reporting mechanism as including a “continuous evaluation and improvement of reporting mechanisms”. Here, our findings imply, ‘improvement’ should explicitly include maintaining effectiveness by continuing promotion and maintenance of the system.

## 5. Who receives Red Button Alerts?

The choice of which agency should receive information passed on through the Red Button App is crucial to its effectiveness. First, it has to be an agency which can be trusted to guard the identity of the source: if the player has elected to reveal his or her identity, the highest priority has to be given to respecting confidentiality and if the report has been made anonymously, care is still needed to use the information in such a way as those in the sport touched by the follow-up cannot easily deduce who the informant was likely to have been. Second, it has to be an agency with both the capability and the commitment properly to initiate investigation and take action as appropriate, either directly or through other agencies within a well-defined structure. Only with these two criteria satisfied will any reporting mechanism have the credibility to assure athletes that their reporting will be neither unduly risky nor futile.

Of the eight player associations which were partners in this project, those in English and French rugby and Danish handball had well-functioning National Platforms to which to turn and the Italian basketball union could access at least a nascent National Platform (a structure involving the police, the sports ministry, the betting sector and other diverse stakeholders).<sup>43</sup> Each of these player associations elected that Red Button reports would be transmitted directly to (a part of) their country's National Platform.

Of the remainder, where this option does not (yet) exist, the player association in Irish rugby nominated World Rugby as its recipient while those in Greek volleyball and men's and women's futsal in Spain chose organisations within their national police structures.

All these decisions appear to us as having been logical in the context in which each sport operates. However, we would caution other player associations adopting the Red Button against taking the decision in Irish rugby as a wise precedent. Emphatically we

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<sup>43</sup> All four countries are members of the Group of Copenhagen, a network of National Platforms operating through the Council of Europe and dedicated to transnational cooperation and sharing of expertise and information relevant to countering manipulation of sports competitions. The institutional arrangements in Italy are described at <https://rm.coe.int/convention-on-the-manipulation-of-sports-competitions-group-of-copenha/1680723839>. A particular advantage in the Italian structure is that all transactional data in licenced betting operations are fed directly to an agency within the National Platform.

can say that we have no reason to be concerned over how World Rugby would handle any alerts. However, it is against recognised good practice that reports from ‘whistleblowing’ systems should go immediately to an organisation within the sector (though the dangers are mitigated to an extent if reports go to a higher level of sports governance than the sector employing the athletes). Passing reports to an impartial external agency, such as an ‘ombudsman’ figure, offers employees greater protection. Further, pressure exerted by the involvement of an external party reduces the chance that an organisation will seek to ‘bury’ reports of corruption for fear of commercial consequences or embarrassment to leaders of the organisation.<sup>44</sup> Using a credible external agency and being transparent about where reports will go will help persuade athletes that using the reporting mechanism is neither unsafe nor futile.

We sought interviews with each nominated recipient of Red Button alerts in the sports involved in *PROtect Integrity Plus*. We were successful in securing interviews in the cases of English and French rugby, Danish handball, and Spanish futsal. The interviews were all conducted by video links and took place between August and December 2019. Each lasted in excess of one hour. All were recorded with the permission of the interviewees to allow us to review content afterwards and recordings were to be deleted at the conclusion of the project.<sup>45</sup>

The majority of interviews were with National Platforms, but we were able to interview also a representative of the Spanish police unit which would receive Red Button reports from futsal. This unit is in the National Police and is dedicated to combatting all criminal activity in the gambling sphere (not just betting). In addition to the central resource, it has dedicated officers in each of the country’s 52 provinces with the capability to act quickly on any information received. In fact, this police department has had a number of successes in identifying manipulated events in football and tennis (both cases which were betting-related and others where a fix was arranged to achieve a

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<sup>44</sup> Worse, in some cases sports organisations may themselves be perceived as corrupt and complicit in wrongdoing. In such circumstances, the UNODC/ IOC Handbook (footnote 19 above) explicitly advocates the involvement of player unions or other more trusted actors in the provision of a reporting mechanism.

<sup>45</sup> We are grateful to all interviewees (more than one at some agencies) who gave us their time and supplied supporting documentation afterwards.

sporting objective). However, these cases were detected incidental to operations investigating organised crime. In fact, the police unit had not yet received any information from existing reporting mechanisms.

Spain does not yet have a National Platform but the police unit responsible for gambling crime has a close working relationship with other stakeholders and this as yet informal structure appeared to us as likely to function effectively as the established National Platforms. It seemed a very appropriate recipient for Red Button alerts. Greek volleyball also uses the police, in its case the Financial Police, but we were unable to secure an interview in this case.

Of the agencies receiving alerts, only Anti-Doping Denmark had had any previous experience of the Red Button mechanism: it had been introduced in the country's football in May 2016 (it went live in its handball in May 2018). In neither sport had the Red Button been used since its introduction (during the period there had been two alerts in each of these sports from other sources). It was also the case for the other sports in the *PROtect Integrity Plus* project that no use had so far been made of the App. This is probably unsurprising given the recency of its introduction and the fact that, in both England and France, rugby was perceived as a very low risk sport, perhaps, it was speculated, because the game is inherently hard to fix. In France, 258 alerts had been received since the formation of the National Platform in January, 2016 and only one had related to rugby.<sup>46</sup> The data told a similar story (only ever two alerts on rugby) at the longer established Sport Betting Integrity Unit, located within the Gambling Commission (of Great Britain)<sup>47</sup>, where the majority of alerts handled across all sports came from betting operators. In all the countries, alternative reporting mechanisms were already available to athletes, in some cases via multiple platforms, but in none was there high usage and such as there was came more often from non-athletes than from athletes themselves. Information appeared more commonly to come from sports players taking

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<sup>46</sup> A large majority of the 258 alerts had been about approaches to fix rather than actual manipulation.

<sup>47</sup> Italian basketball was, however, viewed as relatively high risk, given it is the country's second-most popular team sport and one with high volume associated betting markets.

information directly to officials within the sport itself<sup>48</sup>, rather than from external reporting mechanisms. On the other hand, one interviewee suspected that not all sports pass all information to the National Platform despite their nominal commitment to relevant protocols.

We found that knowledge of the features of the Red Button App tended to be incomplete amongst the representatives of the agencies receiving reports. In one country, it was believed- incorrectly- that players had to carry the card with their code in order to use the App whereas in fact the card is needed only to download the App. In another country, it was thought that anyone could download the App, whereas in fact it is available only to professional athletes.<sup>49</sup> Nevertheless, and notwithstanding the presence of reporting mechanisms already in place, all interviewees welcomed the introduction of the Red Button App within their jurisdictions. Adding the Red Button to the suite of existing facilities to report “*gives maximum opportunity for overcoming obstacles to reporting*”.

From discussion of the merits and drawbacks of the Red Button App, some common themes emerged. It was appreciated that good quality information was likely to come from a mechanism open only to athletes, “*the closer it [the information] is to the players concerned the more trustworthy it is*”. If a report were to come via the Red Button, this in itself would be taken into account when triaging the alert for possible action. In general, there was a view that “we need more whistleblowers”; there needs to be “constant promotion” of mechanisms to report and emphasis on reasons to report rather than remain silent. The primary intention was not to prosecute athletes but to “*get to the bad guys*”.

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<sup>48</sup> For example, the first conviction in France under the Sport Manipulation Code, 2012, had been in table tennis where the information reached the National Platform through the ‘delegate’ for the sport; the National Platform has a nominated delegate for each of thirty sports federations.

<sup>49</sup> This suggests that stronger briefings are required by player associations when procedures are agreed.



All interviewees placed great emphasis on the principle that “*whistleblowing should not have negative consequences for the whistleblower*”.<sup>50</sup> It was clear that they understood and accepted that athletes should have the facility to choose to make anonymous reports. To this extent, the anonymity that was possible in the Red Button App was perceived as one of its strengths and a very important one. But it also sets up drawbacks. Generally, experience was that reports from players tend to be reliable and of high quality. However, players do not always know how detailed their information needs to be to be useful and sometimes one extra detail might have made a difference to whether a successful follow-up could result. An example given by one interviewee was that a player might report that he had received an approach on Facebook but the agency would find this very much more useful if a screenshot had been provided such that the user name of the account from which the approach had come would be revealed. This interviewee advocated that the Red Button mechanism should have a facility for uploading a screenshot. But the more general point from interviewees was that a deficiency of the Red Button system was the lack of possibility for subsequent interaction between the agency and the athlete.<sup>51</sup> In Denmark, the official reporting mechanism allows athletes to opt in to receive a receipt and take part in a future dialogue, using encrypted means where the National Platform still doesn’t know the informant’s identity. The feasibility of adding such a facility to the Red Button system in future development of the tool should be considered. Absent such a facility, those promoting the App to players should include in their programme discussion of and guidance on what makes for a potentially valuable report, what should be reported and how much detail should be presented. This underlines that player associations need significant resources and time with their members if value from the Red Button is to be maximised.

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<sup>50</sup> One National Platform cited one case where it recognised and regretted that its own actions had inadvertently compromised a player’s identity in a case where his evidence had led to successful prosecution. It urged that lessons from this case should be drawn given the priority to protect whistleblowers.

<sup>51</sup> A related point made to us was that athletes do not receive a receipt for their information: if players cannot even know whether their report has been acknowledged by anyone, let alone acted upon, this may be a factor in discouraging use of the App.

An important issue for members of player unions is whether a reporting tool is a legitimate means of compliance with their obligation under sports rules to report any approach or any information concerning breaches of integrity. We discussed this with the Danish National Platform. Unusually, no sports player in Denmark has to date been charged with a failure to report. But the view of our interviewee was that a player would be judged compliant if he or she could show that a report had been made (demonstrable by describing the time and content of the report). In any case, a player union should always seek to confirm this formally at its National Platform.

The credibility of the Red Button depends on it being known that any information transmitted by players will be used to good effect. Malpractice drawn to the attention of recipients needs to be processed, investigated and sanctioned as appropriate. We sought from recipients information to support that their procedures were fit for purpose.

In Italy, reports are received by an individual with access to the several stakeholders within the structure of the nascent National Platform. In Denmark, France and Great Britain, recipients are teams dedicated to handling alerts from whatever source. In general these agencies act as hubs and will first assess information and then relay it to appropriate actors for further action and investigation, as appropriate, normally to police if a crime is alleged and to the relevant sports body if it is more a matter of sports discipline.<sup>52</sup> In the case of Spain, a specialist unit of the police receives reports directly but has well-established relationships with sports organisations.

The procedures described to us by the representatives of the National Platforms were similar to each other. In each case, reports fed into a system, for example by an e-mail notification, that was common whatever the reporting mechanism used by the informer. Experienced personnel triaged alerts, closely following best practice as described in Section 4.1.1 of the UNODC/ IOC Handbook<sup>53</sup> and conforming with agreed frameworks set down in the Group of Copenhagen *Handbook on Alert and Surveillance Systems*<sup>54</sup>. This commonality in how alerts are assessed and recorded facilitates sharing

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<sup>52</sup> Where there is no trusted and well-functioning National Platform, a police body is a natural recipient of alerts but this is likely to narrow the scope of the system as it will tend to act only if a specific crime is involved.

<sup>53</sup> Reference: see footnote 21 above.

<sup>54</sup> <https://rm.coe.int/group-of-copenhagen-handbook-alert-and-surveillance-system-5-12-17/168077ca97>

of information between National Platforms where appropriate. The subsequent handling of reports and the degree of rigour of any investigations are topics outside the scope of our evaluation but there is assurance to be gained from the commitment in each country to combatting the manipulation of sport.

From our interviews, we were satisfied that these recipients have the formal systems in place and the capability and resources necessary to process and act on any alert from the Red Button App. At the same time, we recognise that future roll-outs may be in contexts which present greater problems in identifying suitable recipients for alerts.

In passing, we note some interesting differences in emphases among the recipients we interviewed. In Italy, the problem of manipulation of sport appeared to be perceived principally as an aspect of the general threat posed by organised crime. In Great Britain, discussion focused heavily on integrity risks associated with sports betting markets. This is natural given that the hub for receiving and assessing alerts lies within the Gambling Commission, which is involved in conformity with its statutory obligation to ensure that betting is transparent, fair and free of criminal activity. In Denmark, the greater concern appeared to relate to manipulation carried out to further sporting objectives, for example teams playing to lose to take advantage of anomalies created by weaknesses in tournament design. In some parts of Europe beyond Denmark, sports-motivated fixes may even be regarded as endemic, as noted by our Finnish footballers who had played abroad. Their testimony is consistent with findings from an econometric study drawing on records of scores of thousands of football matches around the World. It offers a forecasting model for the sport which demonstrates that relegation-threatened clubs are more likely to win the worse the country's current ranking on the Transparency International Corruption Index.<sup>55</sup>

One novel view expressed by one interviewee was that obtaining information in an effective way is helped by personalisation. The notion was that athletes will respond better if promotion of the need to report is built around one individual or a team of

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<sup>55</sup> G. Elaad, A. Krumer, and J. Kantor, J. (2018): 'Corruption and sensitive soccer games: Cross-Country Evidence', *The Journal of Law Economics and Organization*, 2018, 34(3), 364-394.

individuals with names and faces who become both ambassadors for integrity and trusted ombudsmen to whom troubled athletes can safely turn.

## **6. Conclusions and recommendations**

In this final section, we recap principal findings and recommendations from our Report.

(i) Outside sport, reporting mechanisms have been effective in some contexts for revealing malpractice and this in itself has been demonstrated in some studies to improve the health of organisations. But everywhere effectiveness is limited by obstacles to employees taking the decision to report. Typically, they are found to be constrained by cultures demanding loyalty to team mates, by (justified) fear of personal consequences and by a lack of faith that their report will be acted upon.

(ii) In sport, the same things apply. National Platforms report that information from players is typically valuable and has led in documented cases to sanctions, likely to deter offending. However, use of official reporting mechanisms is low. Players are constrained by (justified) fear of reprisals such as social ostracism and career disruption (even exclusion from the sport) and by a feeling that what they could do would not make a difference anyway. Indeed, compared with other sectors, employees in sport may find these obstacles even more relevant to their circumstances.

(iii) There already exist a number of reporting mechanisms available to athletes at the level of their sport, their country or internationally. Nevertheless, National Platforms generally welcomed the entry of the Red Button App into this crowded space. Multiple reporting mechanisms allow for the heterogeneity of athletes in terms of where and how they report and thereby maximise the flow of information. The Red Button App may appeal to many because it is validated by their union as guaranteeing anonymity, where desired, and this safety feature can be readily demonstrated at team meetings where it is introduced. Further, the union should be able to assure its members that using the

App will not be futile because it has satisfied itself that alerts feed into an effective structure for processing and acting on information received. This assurance may be harder to give if future roll-outs occur in settings where sports have become more corrupted and where there is no obvious recipient of alerts who is able to access a trustworthy structure dedicated to combatting manipulation. EU Athletes and other federations of player unions should plan for the development of guidelines to unions wishing to give their members access to the Red Button.

(iv) The principal merits of the Red Button App are that its promotion is embedded within a player education agenda delivered by organisations shown to be trusted by most athletes, it is based around a technology which has become part of players' lives, it is straightforward to download and use, and it offers maximum protection of the identity of the reporting party. Our player focus group emphasised the issue of confidentiality and National Platform representatives recognised its importance if resistance to reporting was to be overcome.

(v) The principal technical weakness of the Red Button App is that it does not allow for dialogue with the player after the report is received. National Platforms saw the value of an App available only to players because the quality of reports from players is typically high. But there may be small items of information which would facilitate investigation and some other reporting mechanisms allow dialogue with the athlete to elicit this further information (and give athletes feedback on progress) while still preserving anonymity. Developers of the App should consider whether it can be supplemented in future iterations with provision for dialogue without losing its advantages. Meanwhile player associations should give athletes guidance on what would be likely to constitute a useful report. Although our sample of players who had recently been introduced to the App expressed a relatively high level of satisfaction with how it had been explained to them, our player focus group in Finland, comprised of players with longer experience of the App, was hungry for such information as well as for more detail about what would happen to any report they made. To get the most value

from the App, unions need to be allowed much more time for meetings dedicated to integrity issues.

(vi) A more important practical weakness of the Red Button App is that athletes might not be motivated to keep the App on their phone, for example when they change phone. It was disturbing that the majority of players in our Finnish focus group albeit a slim majority no longer had access to the App. (though this might be explained by participants having confidence that, in their particular environment, it would be safe and effective to report through club officials, not a universal state of affairs in sport). The implication is that player associations have to maintain the effectiveness of the reporting mechanism by frequent promotion and refreshment (and by providing instructions on how to move the App to another phone and what to do if a phone is lost including embedding these as information within the App itself). *PROtect Integrity Plus* made available a degree of external funding for what seems to have been a successful roll-out by eight player associations; but they now need to plan how to resource an ongoing strategy to maintain the effectiveness of the App.

(vii) There is lack of clarity over whether use of the App satisfies rules of sports and terms of individual contracts imposing on athletes a requirement to report. To maximise protection of players, each player union which introduces the App will need urgently to determine what the position is in its competition and agree an interpretation with governing bodies and clubs.

*December, 2019*