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Assessing public and sports policies to tackle match-fixing

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Introduction

Even though match-fixing has been present throughout the history of sports, with some cases even reported in the games of ancient Greece (Huggins 2018), the phenomenon has undergone a profound reconfiguration in the last few years. The emergence of online sports betting and the creation of new types of bets (e.g., *live bets*, *side bets*, *trading*) opened a Pandora's box that amplified pre-existing ills in sport (Moriconi and Almeida 2019). Attracted by the deregulation of online gambling markets (Moriconi and Almeida 2021), by the absence of adequate legal provisions to combat this threat in several countries (KEA 2012), by the inability of sports organisations to deal with the criminal nature of this phenomenon (Villeneuve & Aquilina 2016), or by these organisations' reluctance to admit and address the governance failures that have always existed (Andreff 2019), organised crime saw betting-related match-fixing as an enhanced opportunity to launder money and multiply capital from illicit activities (INTERPOL 2013; IOC and UNODC 2013).

Therefore, the expression *threat to the integrity of sports competitions* has gained a new meaning (Anderson 2011). Due to the strong connection with organised crime, betting-related match-fixing is no longer merely a sports ethics problem, but a problem for the

overall sustainability of the sports industry (Carpenter 2012; Bozkurt 2012; Interpol 2013; Council of Europe 2014).

To face the gravity of the scenario and the inadequacy of existing public and sports policies in combatting this phenomenon, intergovernmental sports and political organisations have coordinated efforts to reform legislative and disciplinary frameworks. In the case of UEFA, European football's governing body, the adopted solution was the implementation of a *zero-tolerance policy* (ZTP), underpinned by cognitive and normative measures (i.e., educational programmes); preventive measures (i.e., betting monitoring); generative measures (i.e., protected whistleblowing mechanisms); and punitive measures (i.e., reform of criminal and disciplinary frameworks) (European Leagues 2013).

The zero tolerance policies implemented by sports governing bodies have been highlighted in the scientific literature. Some authors interpret the governance reform as a window-dressing strategy, in which sports organizations convey a merely symbolic anti-match-fixing speech. This decreases the pressure from external stakeholders after a set of sports corruption scandals (Verschuuren, 2021), but the organizations do not invest what is needed to achieve the goals inherent to these measures (Tak et. al, 2018a). They also convey a confusing message in the discretionary way that they apply their disciplinary framework (Manoli et. al, 2021). Consequently, these measures appear more as an attempt at institutional unaccountability (Tak, 2018), rather than as a sincere motivation to protect sports actors and the integrity of sports competitions (Verschuuren, 2021).

However, there is still no solid evidence that helps to assess the effectiveness of zero tolerance policies in inducing compliance in athletes. In this chapter we contribute to the match-fixing literature by discussing - for the first time - the effectiveness of UEFA's ZTP in inducing compliance in football players.

The chapter is composed of five sections. We start by framing UEFA's ZTP within a broader policy context. We then justify the categorisation of Portuguese football as a strategic research site (SRS) to critically analyse the ZTP. We proceed with the analysis of the effectiveness of UEFA's ZTP in changing football players' behaviour in Portugal on three different levels: i.e., a) betting practices; b) reporting practices; c) match-fixing practices. In light of Mitchell, Crosset, and Barr's (1999) taxonomic model, we discuss the (in)effectiveness of this policy while suggesting alternative answers. Finally, we will

present the conclusions of our findings as well as some avenues for future research in this area of study.

UEFA approach to tackle match-fixing

The ZTP began to take shape in 2007, when UEFA introduced article 50.3 in its Statutes. The rule foresees the possibility of refusing admission to a UEFA competition for a member association or club directly or indirectly involved in match-fixing.

Aware of the criminal dimension of the phenomenon and the imminent dangers to sporting integrity, UEFA created in 2011 a network of Integrity Officers (IOs) involving all member associations. An IO is a correspondent on questions related to match-fixing denouncements and scandals among the member federations, the national law enforcement agencies (LEAs), and UEFA. IOs also play an important pedagogical role, organising and promoting educational sessions targeted at players, referees, and coaches¹.

These preliminary steps led to the launch of the ZTP during the XXXVIII Ordinary UEFA Congress, organized in Astana (Kazakhstan) in 2014. The member associations unanimously adopted the resolution 'European football united for the integrity of the game', which provides an action plan to protect sporting integrity. Among other issues, the member associations committed themselves to:

- a) implement educational programmes to raise awareness among sports stakeholders about the dangers of match-fixing and to induce compliance;
- b) implement protected reporting mechanisms to report cases of match-fixing;
- c) harmonise disciplinary regulations to severely sanction attempts or cases of match-fixing, to forbid sports actors from betting on the competitions in which they are involved, and to oblige sports actors to report attempts or cases of match-fixing.

Aware that match-fixing implies the collusion of sports actors, and that players are one of those who have direct capacity to influence the game (Boniface et.al, 2012), UEFA implemented a code of conduct which provides a set of obligations and prohibitions for these actors. Initially, the code of conduct was based on 5 principles:

¹ There are specific sessions for players and for referees. They are the only actors obliged to attend the trainings. Generally, the coaches accompany their players. Sports officials may also participate, but they rarely do it.

- a) Be Clean - Never fix an event;
- b) Be Open - Tell someone if you are approached;
- c) Be Careful - Never share sensitive information;
- d) Be Smart - Know the rules;
- e) Be Safe - Never bet on your sport.

This approach would eventually be simplified into what would be called the 3R's campaign: *Recognise, Resist and Report*.

The Astana Congress also represented an important milestone in promoting cooperation and information sharing between sports organisations, public authorities, betting operators, and LEAs. It also marked a step forward in recognising match-fixing as a specific criminal offence within national legal systems. Since the political recognition of the phenomenon in 2007 (European Commission, 2007), several political initiatives have been made in this direction (PACE, 2008, 2012; European Parliament 2009, 2013). This step would come to fruition with the "Council of Europe Convention on the Manipulation of Sport Competitions" (also called the Macolin Convention), established in September 2014. The Macolin Convention represents the first example of shared jurisdiction between sports organisations and states in terms of tackling match-fixing (Serby, 2018).

Portuguese football: An SRS to study the UEFA ZTP

Portugal was the first EU Member State to ratify the Macolin Convention in 2015. Prior to ratification, Portugal was already one of the EU Member States possessing a specific legal regime for the criminal sanctioning of sports corruption offences². However, the Macolin Convention was the necessary impetus to expand the judicial framework for the crimes of "passive corruption", "active corruption", "influence peddling", and "criminal association". It also provided the opportunity for updating the provisions which punish complicity, the sanctions for the "undue offer or receipt of advantage" and the practice of betting between sports actors³, and for introducing the obligation for sports federations to implement prevention and education programmes on match-fixing, under penalty of being deprived of funding⁴.

² Law 50/2007 of August 31, amended by Law 30/2015 of April 22.

³ Law 13/2017 of May 2, second amendment to Law 50/2007 of August 31

⁴ Law 101/2017 of August 28.

The Portuguese Football Federation (FPF for its acronym in Portuguese) played a crucial part in changing the legal framework governing sports corruption. Law 13/2017 of May 2 came about following the presentation of a bill to the parliamentary groups by Fernando Gomes, president of the Portuguese sports governing body.

In fact, the FPF has been an “exemplary student” in the implementation of the UEFA ZTP. In partnership with the Professional Football Players' Union (SJPF, for its acronym is Portuguese⁵), the FPF has implemented education and awareness programmes in all clubs of the 1st, 2nd and 3rd national divisions, the Under-23 League, and National Teams. To increase their detection capacity, the FPF and the SJPF developed the "Integrity Platform", a digital channel that allows for anonymous reporting of match-fixing attempts or cases⁶. In parallel, the FPF signed an exclusive contract with Sportradar to monitor betting patterns in the 1st, 2nd and 3rd Division, Portuguese Cup, and Under-23 League. On the disciplinary front, the FPF and the Portuguese Football League (Liga Portugal) included new prohibitions and tougher sanctions in their disciplinary regulations⁷ to dissuade sports players from manipulating results, betting on the competitions in which they are involved, disclosing or using inside information, and failing to comply with the duty to report.

Given the political and sporting conjuncture, we can consider the Portuguese case as an SRS⁸ to assess the effectiveness of UEFA's ZTP in inducing compliance in football players. We found that these actors have received training on the dangers of match-fixing. Moreover, they are aware of the new legal and disciplinary framework and have platforms from which they can anonymously report. But to what extent have these measures generated positive behavioural changes in football players in Portugal?

The effectiveness of the ZTP on behavioural change in football players

Evaluation is an important step in the policy formulation process (Howlett 2009). It allows for comparisons to be made between the expected and achieved outcomes of a given policy. As such, it is a fundamental condition for policy makers to support

⁵ Sindicato de Jogadores Profissionais de Futebol.

⁶ Available in <https://integridade.fpf.pt/>

⁷ Liga Portugal and the FPF have their own disciplinary regulations, which apply to the competitions under its aegis. The first ones apply to the 1st and 2nd Division and to the League Cup. The FPF regulations apply to Portugal Cup, 3rd Division and U23 League.

⁸ According to Merton (1987:1) there are "strategic research sites, objects, or events" which, by reflecting or enabling advantageous study of concrete phenomena, enable significant advances in the investigation of existing problems, as well as the discovery of new problems for further investigation.

decisions, whether they are continuation or readjustment decisions (Howlett 2009; Hendricks 2012).

To assess whether UEFA's ZTP has partially or fully "solved" the match-fixing phenomenon in Portuguese football, we draw inspiration from Vedung's (2012) *Relevance Model*. In this model, the merit criterion used to assess the effectiveness of policies is their ability to solve the underlying problem.

At the root of the ZTP is the consensus that match-fixing implies the players' connivance in the manipulation and that the resolution of the problem depends on their behavioural change. Players should be able to "*Recognize*" the phenomenon; "*Resist*" the temptation to bet, to disclose inside information or to manipulate results; and "*Report*" any attempts or case of match-fixing.

Despite the educational and awareness programmes implemented along with the legal and disciplinary reform, we have shown in previous works (Moriconi and Cima 2020a, 2020b) that football players in Portugal continue putting bets on their sport, on their competition, and often on their own matches. They also remain reluctant to report deviant behaviours and match-fixing is a persistent problem according to their own perceptions. These conclusions arise from semi-structured interviews with players, coaches, referees, and managers, which were carried out during previous national and international projects funded by the Portuguese Foundation for Science and Technology (FCT) and the European Commission through its Erasmus + Sport Programme⁹.

Considering this observation, it is important to explain this behavioural inertia.

Betting practices

There is a considerable gap between UEFA's discourse and the players' perceptions of what sporting integrity means. This dislocation helps explaining why players have not changed their betting behaviours. According to the official discourse, punishing the players who bet on their competition is a key premise to protect sport integrity. Those players who place bets on their game may be tempted to deliberately underperform with the objective of winning those bets or they can be aware of a case of match-fixing and place a bet because of this inside information.

⁹ "A theory of corruption in a complex system: the case of match-fixing" (funded by FCT) and T-PREG and AMATT (funded by the EC).

However, the interviewed players' perceptions go in another direction. Gambling is understood as a cultural activity that works as an interaction ritual. In general, betting behaviours are recreational. More than winning money, players have as an ultimate goal of winning internal rivalries about who "knows more about sport" in order to increase their status in the group (Moriconi and Cima 2020a: 167).

Similar opinions can be found in other countries. After being suspended by the Football Association (FA), former British footballer Joey Barton claimed that betting is "culturally engrained" and that "if they found out everyone who has been betting and cracked down on it, you'd have half the league out"¹⁰. According to the former player, "match-fixing is wrong", but "culturally, betting is acceptable". Players of Portuguese championships also make a distinction between gambling for manipulating and gambling as a recreational practice that, according to their perceptions, does not affect sport integrity. Some players also criticize the prohibition to bet in their own victory and, as Moriconi and Cima (2020a) have shown, there are cases in which this practice is used as a motivational way. The authors describe the case of a team that felt that they were devaluated by bookmakers, due to the low odds they put on its victory. While the odds for victory were unfavourable, the possible monetary gain were favourable. The players trusted in themselves and, in consequence, started to place bets on their success. It was a motivation for performing at their best and, finally, they played a great championship. On the contrary, all the players interviewed by the authors considered that betting on an own defeat is non-acceptable, even as a recreational practice.

Nevertheless, gambling as a cultural practice can trigger pathological problems. Stillman et al. (2016) warned that players are more prone to gambling addiction than the rest of the population. Too much free time, high financial resources, the taste for sport, and the need for adrenaline are some of the explanatory variables (Lim et al. 2017). Michael Chopra, Matthew Etherington and Andros Townsend are examples of players who lost control and developed gambling problems.

According to Etherington, betting operators cannot be dissociated from the gambling addictions. The former player considers that players are ideal targets because they are *vulnerable youngsters* with "a lot of money". In certain instances, some operators "come

¹⁰ BBC Sport (2018). Joey Barton claims 50% of professional footballers bet on matches. [online]. Available at: <https://www.bbc.com/sport/football/42783527> [Accessed 10 mar. 2021].

into the club and say 'you can bet with us'¹¹. On the other hand, Joey Barton has had a Betfair account in his name since 2004, registered to his address and validated with his passport, but it was only after placing 1,260 bets that he was discovered¹². Barton admitted to “doing *things* for betting companies” and that they were paying him “in betting account money—they weren't informing the FA.”

In Portugal, the situation is quite similar. Several players were surprised when, as part of the prevention campaigns, they were informed that they could not bet on their sport. Some feared disciplinary and legal sanctions because they were betting with their tax data on the regulated market. However, due to the lack of audit and control capacity, it is unlikely that those practices were punished (Moriconi and Cima 2020a).

This evidence highlights that awareness programmes are – despite their importance – somewhat ineffective in achieving their own objectives. Awareness of the new prohibitions seems to have mainly served to make players aware that they are committing a disciplinary or legal infraction and forces them to develop camouflage strategies. Betting on the unregulated market or betting through an intermediary on the regulated market are some of the options. There are also those who admit that they bet with their tax data in the regulated market because if “the winnings are small”, or “as long as they lose money”, nobody will bother them (Moriconi and Cima 2020a).

Although cooperation among stakeholders is one of the pillars of the Macolin Convention, betting operators protect themselves with the data protection regime and only provide information on their bettors if they are requested to do so by the police, as part of an investigation. On the other hand, national regulators face a real cat-and-mouse game in the surveillance process of unregulated operators who, in the absence of scrutiny, seize on opportunities arising from several sports-related faults—such as late salary payments—to open the door for greedy players, or those in desperate need, to engage in fraudulent betting (Moriconi and Cima 2020a).

Reporting practices

¹¹ BBC Sport (2017), Gambling companies prey on 'vulnerable'. [online]. Available at: <https://www.bbc.com/sport/football/39726468> [Accessed 10 mar. 2021].

¹² The Iris Time (2017), Joey Barton suspended from football for 18 months. [online]. Available at: <https://www.irishtimes.com/sport/soccer/english-soccer/joey-barton-suspended-from-football-for-18-months-1.3062001> [Accessed 10 mar. 2021].

One of the biggest obstacles in the fight against (sports) corruption is the so-called "code of silence" (Numerato 2016). The "code of silence" is an informal rule that discourages the reporting of wrongdoing among a group. Members of a team are expected to turn a blind eye to unethical practices for the perceived good of the collective (Skolnick 2002; Westmarland 2005; Albisu 2018).

Considering that this practice lowers the chances of gathering proofs for investigating, the obligation to report any approach or attempt at wrongdoing has become a priority in UEFA's integrity measures. However, the level of reporting is still very low and, in several countries such as Portugal, reporting is still considered as a dangerous action that can destroy a career (Moriconi and Cima, 2020b).

The problem of silence has been treated as a phenomenon of individual responsibility. By making players aware of the importance of reporting and by making complicity criminally and disciplinarily responsible, a "morality of principle" is sought to be introduced at the expense of a "morality of loyalty" (Uys, & Senekal 2008: 39).

However, this strategy is limited because it neglects a set of structural issues that underlie the silence. In Portuguese football, the culture of silence is not so much due to a code of loyalty, or an "omertà", but rather to a set of "public secrets that deliberately acknowledge the existence of informal institutions who create and materialise these dangers" (Moriconi and Cima 2020b: 55).

In other words, what explains the low number of denunciations is not the fear of psychological reprisals for exposing elements of the group or of physical reprisals for denouncing elements of organised crime, but the awareness that those who denounce may suffer professional reprisals from their own clubs or from sports organisations (Moriconi and Cima 2020b).

The situation finds its correlation in international examples. In 2011, Simone Farina rejected an offer of €200,000 from Alessandro Zamperini, a former A.S. Roma teammate, to fix an Italian cup match between his team, Gubbio, and Cesena. Farina's report helped to reveal the CalcioScommesse scandal and led to the arrest of several people. However, after exposing the dark side of Italian football, Farina ended up retiring at the age of 32 because he could not find any club willing to sign him. Farina was even appointed by FIFA as an ambassador for fair play. But how many players are willing to give up their careers to be a global example of integrity?

Farina's example can be contrasted with the case of coach Antonio Conte. Conte was suspended for 10 months by the Italian Football Federation (FIGC) (his sentence was reduced to 4 months on appeal) for failing to report an alleged case of match-fixing involving Siena, the club he coached in the 2010-11 season. After serving his sentence, Conte continued to coach at the highest level of Italian and European football and was not known to have been professionally marginalised in any way.

Football players' perceptions regarding the dangers and advantages of whistleblowing are shaped and framed by real cases such as the ones mentioned above. In Portugal, the "hypocrisy and cynicism" of the official discourses on whistleblowing are admitted by the National Director of the Criminal Police himself. At the "International Conference on Sports Integrity", Luis Neves referred that those who cooperate with justice are, in many cases, "the only ones condemned".

Despite this reality being officially recognised, UEFA does not include these problems in its narrative. This deprives the narrative of symbolic value and legitimacy, decreases the acceptability of the formal norms that create the duty to report, and decreases the players' trust in sports governing organisations. Consequently, this increases the reluctance of these actors to report on anonymous platforms run by these entities - such as the Integrity Platform. The result is an incoherent policy which, to an extent, may even generate the reverse effect and invalidate the whole awareness-raising process (Moriconi and Cima 2020b: 63).

Match-fixing practices

In Portugal, the "Jogo Duplo" (Double Game) case is the only betting-related match-fixing case that has come to trial. This case embodies the official ZTP discourse and much of the scientific literature on the subject since it involves a transnational criminal network (Bozkurt 2012; Carpenter 2012). This network used national intermediaries with high social capital in football (Hill 2010; Costa 2018), to recruit players from secondary divisions (2nd Division) in precarious situations and playing for clubs without sporting objectives (Anderson, 2011; Gorse and Chadwick, 2011).

The "Jogo Duplo" case concerns the 2014-2015 and 2015-2016 seasons, namely a time when the FPF, Liga Portugal and the SJPF were seeking to adjust to UEFA's recommendations promoted within the Astana Congress.

More than half a decade later, match-fixing is still a ubiquitous phenomenon in the social imaginary of players. In fact, risk factors that are at the genesis of the "Jogo Duplo" process, such as late salary payments, remain present in Portuguese football.

As part of the application process for the 2020-21 sports season, Liga Portugal prohibited Vitória Futebol Clube – SAD¹³ and Clube Desportivo das Aves - Futebol SAD from competing in professional competitions (i.e., the 1st and 2nd division) for failing to meet several criteria, such as the non-existence of debts to players, coaches, and staff. During the 2019-20 season, Aves' situation was particularly serious. On April 29 2020, an audio was published in which, allegedly, the Executive Director of Aves' SAD, Estrela Costa, argues with Wei Zhao, president of the structure, accusing him of "swindles" and uttering alarming phrases such as "Three games you sold", "Three games you bet", and "Three games you made my team lose" ¹⁴. During that season, several players from Aves' Under-23 and senior squads were owed several months of wages. Some even feared being evicted from their homes for having rent arrears¹⁵.

During the Covid-19 pandemic period, this was the norm in the second divisions. The SJPF president revealed the existence of "human dramas" such as "deprivation of financial resources" to meet the "most basic needs, such as food"¹⁶.

There is no evidence that any player from Aves or any other club has rigged a game. The point is that the situation they were put in increased their vulnerability to do so. Former players like Mario Čižmek went through a similar situation with an unfortunate outcome. The former Croatian player went unpaid for 14 months while playing for NK Sesvete, a club fighting to stay in the 1st division. Faced with lengthy legal procedures to terminate

¹³ SAD for its acronym in Portuguese (Sociedade Anónima Desportiva) means Public limited sports company.

¹⁴ "Desportivo Aves - escuta telefónica Estrela Costa Wei Zhao - corrupção futebol português" (2020) (Desportivo Aves - wiretapping Estrela Costa Wei Zhao - corruption Portuguese football). Youtube [Video]. Available at <https://www.youtube.com/watch?v=uRP3kJ2bEhA> (1'.09''-1'.22'').

¹⁵ Record (2020). "Atletas do Aves sem rendas pagas temem ser despejados" (Aves athletes without paid rents fear eviction). [online]. Available at: https://www.record.pt/futebol/futebol-nacional/campeonato-de-portugal/aves/detalhe/atletas-do-aves-sem-rendas-pagas-temem-ser-despejados?ref=Aves_DestaquesPrincipais [Accessed 10 mar. 2021].

¹⁶ Record (2020). Sindicato alerta para "dramas humanos" devido a salários em atraso a jogadores (Union warns of "human dramas" due to players' overdue salaries). [online]. Available at: <https://www.record.pt/futebol/futebol-nacional/detalhe/sindicato-alerta-para-dramas-humanos-devido-a-salarios-em-atraso-a-jogadores> [Accessed 10 mar. 2021].

his contract and collect the money owed, Čižmek became involved in a match-fixing case¹⁷.

Another risk factor highlighted in the "Jogo Duplo" affair is the lack of competitiveness and interest in the matches that were manipulated. In one of the telephone conversations transcribed in the indictment of the case, it is stated that club X was going to manipulate a game but finally took a step back because it still needed one more point in this game to avoid relegation¹⁸.

Since "Jogo Duplo", the level of distrust in Portuguese football has increased significantly. Players admit to having experienced "strangely easy" game and to being aware of clubs from lower divisions "making a season's worth of money" in the first qualifying rounds of the Portuguese Cup. In these cases, the involvement of organised crime is not acknowledged. It is the players themselves on their own initiative, or encouraged by managers, who agree to the manipulation. However, the high subjectivity of the game and the difficulty to build the burden of proof are obstacles to the investigation of these cases (T-PREG, 2020).

In this scenario of windows of opportunity, the slowness of the sports and criminal justice systems work in favour of the manipulators. It should be noted that it was only in October 2019 that the Disciplinary Board of the FPF applied sports sanctions to 4 defendants of the "Jogo Duplo" case. Furthermore, the judgment of the trial that convicted, in first instance, 26 of the 27 defendants in this case, was only read in February 2020¹⁹. However, it is still waiting for the decision to become final, since the defendants appealed the sentence.

Strategies to generate compliance

According to the collected evidence, the UEFA ZTP failed to induce compliance in football players in Portugal. Could flaws be identified in the definition and implementation of these measures? If so, what kind of readjustments will be necessary?

¹⁷ Čižmek, M. (2013). Mario Čižmek: Why I became a match-fixer. Play the Game. [online]. Available at: <https://www.playthegame.org/news/articles/2013/mario-%C4%8Di%C5%BEmek-why-i-became-a-match-fixer/> [Accessed 10 mar. 2021].

¹⁸ Jogo Duplo (2017). Proc. n° 819/16.0JFLSB: 106 (Lisbon Judicial Court); 1.

¹⁹ Pina, P. (2020). "Jogo Duplo" "Jogo Duplo". Cinco arguidos condenados a penas de prisão efetiva. (Five defendants sentenced to effective prison sentences.) RTP. [online]. Available at: https://www.rtp.pt/noticias/mundo/jogo-duplo-cinco-arguidos-condenados-a-penas-de-prisao-efetiva_n1208331 [Accessed 10 mar. 2021].

To answer these questions, we turned to a standard model for analysing compliance strategies. Like Roberts and Bolton (2018), we opted for the taxonomic model of Mitchell et.al (1999). These authors drew inspiration from international relations to solve the absence of a pattern of compliance strategies in the sports management literature.

Mitchell et.al (1999) developed a taxonomic model consisting of three pairs of strategy categories: i.e., punitive and remunerative; generative and preventive; cognitive and normative.

Punitive and remunerative strategies

Punitive and remunerative strategies act on a consequential logic, respectively punishing the adoption of deviant behaviour or rewarding desirable behaviour. Because they focus on behavioural changes, these measures are particularly effective in solving problems arising from individual ethical failures (Mitchell et.al, 1999).

The UEFA ZTP has a strong punitive component. This excessive weight on the criminal and disciplinary side can be interpreted as a strategy of power hierarchisation, which shifts the onus of responsibility on sports actors and de-emphasises the institutional failures of the sports betting and sports governance model (Tak et al., 2018a).

As Ceva and Ferretti (2019) point out, an anti-corruption strategy cannot be reduced to the creation of new legal and disciplinary provisions. Punitive strategies increase the costs of the violation for potential offenders, but do not prevent deviance if the actors have no alternative options for achieving the underlying objectives of the violation (Mitchell, et.al, 1999). Mario Čížmek exemplifies a match-fixing case in which the existence of severe sanctions did not prevent deviance, due to the lack of legal alternatives to achieve the underlying objectives of the violation (i.e., getting back the money from salary arrears).

In another dimension, punitive strategies lose effectiveness by punishing complicity while not providing any sanctions for those who inflict physical, psychological, or professional reprisals on whistle-blowers. In conjunction with the creation of legal and disciplinary obligations, it is fundamental to guarantee the protection of whistle-blowers. Portugal does not have a whistle-blower protection law, but rather a directive "on the protection of people who report on violations of Union law".

Punitive measures are useful in restraining deviant behaviour but are less effective in encouraging high standards of sporting integrity (Mitchel et.al, 1999). For this reason, the

introduction of remunerative strategies may be important in creating a culture of whistle-blowing. These strategies encourage actors to provide information (Mitchell, et.al, 1999). The introduction of a "repentant statute"—"rewarded whistle-blowing" on the legal level or the creation of "fair play" rewards on the sporting level—is a possible option.

Furthermore, punitive strategies imply a capacity for detection and, naturally, sanctioning. Although Portugal has an adequate legal framework to prevent and combat match-fixing, it lacks the technological, financial, and human means to put it into practice (Moriconi and Almeida, 2021). This is especially visible at the level of betting practices. Sanctioning players who bet only serves to categorise a cultural practice as criminal. In practice, those who want to place fraudulent bets can continue to do so in the illegal market where enforcement is non-existent. At the level of sanctioning, the difficulty of constructing the burden of proof and the slowness of the justice system reinforce the feeling of impunity (Cima and Moriconi, 2019; T-PREG 2020).

Generative and preventive strategies

Generative and preventive strategies focus on opportunity structures, opening possibilities for desirable behaviour and reducing the gaps that can lead to deviant behaviour (Mitchell et.al, 1999). This category of strategies is suitable for systemic problem solving and its effectiveness lies in its ability to avoid problems (Mitchel et.al, 1999).

Monitoring is both a way of preventing and fighting match-fixing. The fact that the illegal betting market, where there is no monitoring, is the main source of the problem illustrates the preventive nature of monitoring (McLaren, 2011; Carpenter, 2014). It is also an important tool to detect wrongdoing and support the application of disciplinary and criminal sanctions. The "Jogo Duplo" is an example of a case that was triggered by a Sportradar report sent by UEFA to FPF, and which culminated in sporting-related and criminal sanctions. However, the effectiveness of monitoring for preventing and combating match-fixing may be questioned. These systems are ineffective in relation to the manipulators' new strategies, such as betting parcelling (Tak, Sam and Jackson, 2018a), and they have no evidential value on their own (Feltes, 2013).

At the generative level, the ZTP has invested in the implementation of protected whistleblowing systems. The idea is to generate opportunities for desirable behaviour, namely to report irregularities or illegalities. In several European countries, this measure did not have the desired effect (T-PREG, 2020). In Portugal, the Integrity platform is managed by the FPF, but due to the lack of trust in sports organisations, its effectiveness has been reduced. A solution for increasing the trust of whistle-blowers would be to introduce an automatic forwarding of the complaint to other entities such as the criminal police (Cima and Moriconi, 2019).

The emphasis on individual morality at the expense of structural failures helps explain the ineffectiveness of the UEFA ZTP at the preventive and generative level. Rather than sanctioning individuals for deviant behaviour, it is crucial to restructure the entire system which creates the vulnerabilities that lead to such behaviour (Tak, 2018). This implies acknowledging the dangers of the "institutionalised relationship" between betting and sports as soon as possible (Tak et al., 2018b: 81).

Sports betting is just one point of the big picture that is responsible for gambling. Gambling is a practice that causes addiction in the population, especially in sport actors such as football players (Brownrigg et al., 2018). This addiction, usually, results in financial problems that could be exploited by fixers to manipulate matches²⁰. In this sense, it is crucial to rethink the limits of betting sponsorships at sporting events and in the media to prevent gambling addiction in the population in general, and in football players in particular.

The illegal market is another aspect that it is important to fight. One possible option is forbidding banking institutions to transfer money to certain unlicensed betting operators. Unfortunately, these mechanisms could be not very effective, either because of the data protection issue, or because of the need to legislate for the purpose. The latter could violate principles of market freedom or of regulation of the banking sector.

It is equally important to fight the unregulated market. Currently, gambling is regulated on a state-by-state basis²¹. This represents high costs for betting operators who must conform to different licence applications. Introducing generative measures such as

²⁰ Best, B., Delpierre, H., and Schwing, U. Jumpmedien tv (2014). *The bet – in the grip of the gambling mafia*. [video]. Available at: <https://www.youtube.com/watch?v=Rc6dJBA1LOE> [Accessed 10 Mar. 2021]

²¹ European Commission (n.a.). Online gambling in the EU. Available at: https://ec.europa.eu/growth/sectors/gambling_en [Accessed 10 mar. 2021].

harmonising activity licences at the international level can help attract betting operators to the legal market, which would be beneficial for club revenues.

Another critical factor that must be acknowledged relates to the failures in sports governance. At this level, avoiding wage arrears is imperative. The "Liga Portugal" (Portuguese League) licensing system was effective in punishing clubs with salary arrears but was unable to prevent the problem from occurring. In Portugal, financial controls are done four times a season. Making controls every month and sanctioning non-compliant clubs with loss of points could increase the effectiveness of this system. Another option could be to introduce a system of budgetary guarantees. This system consists of pledging a part of the club's initial budget, which would be activated in the event of salary defaults, to meet the immediate needs of players. However, the liquidity difficulties of clubs in Portugal are an obstacle to this system.

In parallel, the announcement of the centralisation of television rights in Portuguese football as of 2028-29, although not aimed to represent an anti-corruption measure, may also reduce this risk factor in the sense that it will allow for a better distribution of the television revenue. Equally positive is the existence of the "salary guarantee fund" in national professional and amateur competitions, which allows players with late salary payments to receive part of their salary, thus being less susceptible to manipulative approaches.

Cognitive and normative strategies

Educational programmes are one of the strategic pillars of the UEFA ZTP. Educational programmes can be analysed from both a cognitive and normative perspective.

The cognitive perspective consists in disseminating complete information about a phenomenon and the consequences of deviant behaviour, guiding the individual towards desirable behaviour (Mitchell et.al, 1999). From this perspective, educational programmes seek to dissuade players from manipulating results by warning them of the dangers of match-fixing and by highlighting the criminal and disciplinary consequences of manipulation.

The normative perspective seeks to raise collective consciousness following a moralistic logic (Mitchell et. al, 1999). Specifically, educational programmes convey the narrative

that match-fixing is an individual ethical problem, and that manipulating is morally unacceptable.

The content of educational programmes has some limitations that help explain the ineffectiveness of the ZTP.

Much of the cognitive aspect boils down to an "informational component of a punitive strategy" (Mitchell et.al, 1999: 226). In the case of betting practices, rather than informing players of the criminal and disciplinary sanctions they incur if they bet on their competition, it is important to alert players to the risks of gambling addiction to their mental health and financial stability (Feltus, 2013).

Cognitively, educational programmes are limited and lack profound content (Moriconi, 2018). The emphasis that match-fixing is an organised crime problem is reductive. Not only in Portugal, but also in countries like Greece or Turkey, the corruptors are often the actors of the sport themselves. For this reason, these programmes should also be mandatory for sports officials and presidents and should emphasise the opportunity structures for corruption that arise from failures in sports governance (Moriconi and Cima, 2020a). They should also emphasise the sometimes-promiscuous relationships between politics and sports (Manoli et al., 2019).

The normative aspect is reflected in "paternalistic discourses", defined in a "top down" perspective, which guide players to "adopt institutionally modelled attitudes and behaviours, usually determined by sports industry stakeholders" (Moriconi and Almeida, 2019: 79).

This approach fails for three main reasons. Firstly, cognitive strategies are effective with the disinclined individual, but ineffective with the recalcitrant (Mitchell et. al, 1999). Educational programmes can be useful in dissuading deviant behaviours when it results from a lack of information—for example, gamblers who place bets but do not know it is forbidden—but are ineffective in changing deviant behaviours of recalcitrant individuals (Mitchell et.al, 1999).

Secondly, changing deep-rooted beliefs is a slow process. The normative and cognitive perspectives both presume that players can obey the rules and only need to be encouraged to do so (Mitchell et.al, 1999). As evidenced in this study, this does not apply to whistleblowing practices. In Portugal, reporting illegalities or irregularities in sports is a legal

and disciplinary obligation, but there is no law that protects whistle-blowers. In the case of betting practices, normative strategies may be a good option to shape behaviour in the younger age groups but are not very effective in inducing compliance in senior players.

Thirdly, the evidences collected in Portugal show that the institutional discourse is discredited because of a series of corruption scandals that have shaken sports organisations such as UEFA and FIFA. Players pay attention to information from educational programmes, but also to the credibility and trustworthiness of the organisations that promote the official discourse. Therefore, it is very important to increase transparency and scrutiny in international sports governing organisations so that they can generate more trust in players and other sports stakeholders. Consequently, their policies will be more credible and successful (Moriconi 2020; Cima e Moriconi, 2019; Moriconi e Cima, 2020a; Moriconi e Cima, 2020b; T-PREG, 2020).

Conclusions

There are problems in the agenda setting, formulation, and implementation of the UEFA ZTP that help explain its ineffectiveness.

The arrival of match-fixing to the top of the sporting and political agenda is recent, but match-fixing is a historical problem in sports. Herein lies the first flaw. With the infiltration of organised crime in sports, UEFA has outsourced the problem of match-fixing, overlooking pre-existing governance failures in the sport which provide windows of opportunity for organised crime.

Secondly, match-fixing is not the result of a "neutral and value-free scientific assessment" (Tak et al. 2018a: 74), but rather an assessment in which certain (sports) actors are blamed for the problem. The determination of the problem and the perpetrators is a power phenomenon (Chalip, 1995), and the institutional unaccountability and transfer of responsibility to individual failures is a tendency of powerful actors (Ross and Staines, XXXX). In the case of match-fixing, this happens for two reasons. Holding sports actors accountable is easier than restructuring the entire sports system, "because they are paradoxically the last resort against match-fixing" (Tak, 2018; Tak et al., 2018b: 79).

However, "compliance initiatives alone do not establish a governance structure" (Jones, 2013: 207). It is unlikely that compliance strategies defined along these lines will promote positive behavioural changes in football players without first implementing a structural

reform which reduces opportunity structures that enable corruption (Henne, 2015). By building a narrative around individual ethical failures, the ZTP is more likely to "instrumentalize solutions, amounting to symbolic gestures rather than meaningful reforms" (Henne, 2015: 17), thereby neglecting reforms that address deeper sports governance problems.

UEFA and FIFA are two examples of how governance failures, such as over-concentration of power, lack of scrutiny, and the resulting lack of transparency, can give rise to corruption cases (Roberts and Bolton, 2018).

For this reason, compliance strategies should be part of a broader governance structure. This requires complementing these strategies with checks and balance procedures (Jones, 2013), specifically mechanisms that oversee power within football and that are independent from football's own governance structures.

In this sense, it is important to have a strong intervention in the regulation of football. The regulation should transit from a logic of mere compliance to enforcement, meaning that sports organisations are not so concerned with complying with a checklist of measures (i.e., "checking the boxes"), but rather with verifying if the objectives they set are being achieved (i.e., "walk the talk").

For example, FIFA has implemented a reform process and established an internal body to regulate its activities, the Independent Governance Committee. However, the effectiveness of the self-regulatory model has been questioned due to the lack of external scrutiny and the absence of sanctions for the prevaricating sports federations (Roberts and Bolton, 2018; Geeraert, 2019). The criticism voiced by Poiares Maduro after stepping down as chairman of FIFA's Governance Committee after eight months in office reinforces this perspective. According to Maduro, self-regulation is not possible in football because there is "a 'cartelisation' of the system, associated with a huge centralisation of power" and a lack of "scrutiny".²²

Consequently, more research is needed to develop the discussion on new models of regulation. The creation of an independent supranational entity is a possibility (Chappelet, 2018). The question that arises is who will have the negotiating capacity to impose this

²² Sapó (2019). Poiares Maduro: "Futebol internacional tem uma lógica de cartel. É impossível que consiga reformar-se a si próprio" (International football has a cartel logic. It is impossible that you can retire yourself) Available at: <https://desporto.sapo.pt/futebol/primeira-liga/artigos/futebol-internacional-tem-uma-logica-de-cartel-miguel-poiara-maduro> [Accessed 10 mar. 2021].

type of regulation model. Some work has shown that it is possible to expand the role of the EU in monitoring, sanctioning, and coordinating FIFA and UEFA (Geeraert and Drieskens, 2015). The Council of Europe has played an important role in raising public attention for the problem of match-fixing, but it depends on the willingness of the states to ratify its provisions, as well as on the willingness of the domestic institutions of those states to implement them. Furthermore, the Council of Europe keeps member states in a weak position vis-à-vis UEFA and FIFA. These bodies, for preventing state intervention, can argue their right to self-regulation, since they can exclude the state and their football teams from their competitions. As a consequence, if the independent body comes under the aegis of the EU, it might be difficult to get the support of the football governing bodies. After all, while it is easy to exercise this 'blackmail' vis-à-vis an individual state, it will not be so with the EU as a whole²³.

There is still much to learn and to do in terms of preventing sports competitions. But one thing is clear in this chapter: the creation and implementation of measures in a top-down perspective, without considering the opinion, ideas, practices, and attitudes of the in-field actors (or even defining the problem as their moral failure) is a limited strategy that, rather than generating zero tolerance, generates little effectiveness.

²³ Sapó (2019). Póiares Maduro: “Futebol internacional tem uma lógica de cartel. É impossível que consiga reformar-se a si próprio” (International football has a cartel logic. It is impossible that you can retire yourself) Available at: <https://desporto.sapo.pt/futebol/primeira-liga/artigos/futebol-internacional-tem-uma-logica-de-cartel-miguel-poiara-maduro> [Accessed 10 mar. 2021].

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