

Finnish Cricket Association
Anti-Competition Manipulation Programme
Adopted by the FCA Board on 20.12.2022

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1. Objectives

The possibility of competition manipulation has long been recognised in cricket as a threat to the integrity of the second largest sport in the world. The sport has experienced reputational losses due to widely publicized manipulation cases revealed each year. The relative size of the sport domestically does not protect it from attempts of competition manipulation if live streams and live scores are available from the matches.

The international nature of the sport and the large international viewership have made Finnish cricket a source of international betting fixtures and fantasy sports for years. The FCA has followed the activities of international sports betting operators and fantasy platforms, trying to engage in information exchange beneficial for anti-competition manipulation activities.

Intelligence activities have produced numerous reports of advances in contravention of the FCA Anti-Corruption Code and rarer more advanced attempts to engage in competition manipulation. The more serious attempts have been handled in cooperation with the FCA's actor network and they have produced results that have been positive for the integrity of the sport. Suspect events have been dealt with in an internal evaluation process. No cases of performed competition manipulation have been observed.

Competition manipulation decreases the value of the sport in the eyes of partners, prospective partners, the general public, and the participants. In addition to the reputational risk, the partnerships of the FCA would be jeopardised by a case of competition manipulation.

Threat of competition manipulation was assessed as Medium for cricket in a 2020 threat analysis. The threat is heightened due to the links between international cricket betting and organised crime, the lacking or non-existent regulation of sports betting, and the ability of the beneficiaries of competition manipulation to adjust to new technologies. The threat was lowered by the limited number of participants in Finland, the acute threat awareness of the FCA, and the financial underdevelopment of the sport. The threat assessment has informed the drafting of this programme.

This programme uses “competition manipulation” as a common term for all modes of competition manipulation and match-fixing. The FCA Anti-Corruption Code has a broad definition for competition manipulation, including failures to report. Due to this, activities considered as “competition manipulation” are processed very differently depending on the gravity and other factors particular to the case.

2. Legislation and third-party rules binding on the FCA

Competition manipulation is criminally punishable as fraud or bribery.

As a sports organisation eligible for state subsidies, the FCA is committed to ethical principles of sports and through them to the principles of the Council of Europe Convention on the Manipulation of Sports Competitions (aka the Macolin Convention, not ratified by Finland).

The Anti-Corruption Code of the International Cricket Council (the ICC) applies to international ranking matches played in Finland and competitions organised by the International Cricket Council (the ICC) in Finland. The ICC has jurisdiction over disciplinary procedures and penalties when the ICC Anti-Corruption Code is applied. The ICC has specified compulsory anti-competition manipulation measures for international ranking matches organised by its members. Pathway events organised by the ICC include similar measures adapted to a tournament-format event.

The ICC mandates similar anti-competition manipulation measures (anti-corruption code) to be adopted for domestic competitions.

Anti-competition manipulation activities are hindered particularly by data protection laws, which are in some cases a significant obstacle to efficient intelligence sharing in the FCA’s actor network. The international nature and varying data protection conventions cause significant challenges to relaying information containing personal data.

3. Prohibited activities

Article 3 of the FCA Anti-Corruption Code forbids competition manipulation, betting on any domestic fixtures either self or through a second party, and using insider knowledge or conveying insider knowledge to be used for betting purposes. Bribery and failure to report gifts, failure to report contact attempts, failure to cooperate in investigations, and hindering investigations are also punishable when they are done in connection with the proscribed activities.

4. Participant engagement

Participation to domestic competitions with national titles is restricted to member clubs of the FCA. Through their membership in the FCA, the members are bound to follow sub-constitutional regulations. To participate in competitions organised by the FCA, the members are additionally required to possess a valid General League License. Multiple stipulations in the licenses conditions are aimed at protecting clubs from outside influence by requiring a certain level of administrative and financial competence. Member clubs are required to divulge to the FCA their financially significant partners who can, based on the financial value of the partnership, cause alarm for the partner's influence in the club's decision-making. Clubs participating in the Finnish Premier League are required to possess a valid Finnish Premier League License, which includes further safe operating procedures to enable e.g. the confidential sharing of certain insider information in advance.

Players and team officials are directly engaged in anti-competition manipulation activities through their participant license conditions.

Officials are similarly bound by their license conditions. The lack of disciplinary rules for officials is currently the most serious recognised lacuna in the codification of anti-competition manipulation activities.

Persons participating in the administration of the FCA, FCA paid staff, and other persons deemed to influence decision-making of the FCA are bound by the FCA Ethics Policy, which includes anti-competition manipulation measures.

5. Competition manipulation prevention actor network

The FCA engages in operative cooperation in competition manipulation prevention only with partners who are committed to knowledge sharing that benefits the federation's anti-competition manipulation activities. The federation does not communicate or market to its participants reporting channels that do not provide information to the federation on reports made through them.

Close cooperation will be maintained with the ICC Anti-Corruption Unit (ICC ACU). As contacts seeking to manipulate matches come almost exclusively from outside Finland, the intelligence activities of the ICC ACU and their direct connections with foreign authorities have proven to be effective tools in thwarting the attempts of nefarious actors.

The close cooperation with the Finnish Center for Integrity in Sports FINCIS will be developed further. The FCA participates in relevant events organised by FINCIS and assists in updating the national situation picture on the manipulation of sports competitions.

The FCA supports the establishment of the national actor network by actively participating in it.

6. Preventative activities

The duty to report contacts without exceptions is emphasised in material produced to all persons participating in domestic competitions. Forming and maintaining a confidential

relationship with the players and officials is a standing objective of the FCA, which facilitates the use of the federation's low threshold reporting channels for any suspicion or contact attempt.

The month preceding the beginning of the summer season is the most valuable time in for disseminating materials and organising training. The participants are repeatedly reminded of the contact channels reserved for reporting during the summer seasons and additional training is organised as needed for groups and individuals.

Educational cooperation with FINCIS will be strengthened especially regarding the national teams and clubs that participate in the Finnish Premier League. Attempts to resolve problems with language barriers will be made to allow for training to be conducted in Finnish and English. Online learning modules produced by FINCIS are available in English and they will be evaluated for low threshold training aimed at all participants.

Material on anti-competition manipulation measures in international events under the jurisdiction of the ICC are passed on to relevant groups, mainly national teams, other international level operatives, and the FCA administration. These groups are encouraged to participate in education activities of the ICC, to complete independent learning modules, and to acquaint themselves with the available background information.

In bilateral and multilateral series of international ranking matches the operative work is undertaken by the host federation under the jurisdiction of the ICC. The FCA is experienced in this due to the number of bilateral series hosted in Finland. Actions taken by the FCA for the fulfilment of the requirements can be subjectively classified as good, and continuous development is undertaken to make the activities smoother. Control and guidance from the ICC is more granular and better resourced in international pathway events. The FCA aims to be a uniting factor in its actor network during pathway events to facilitate the distribution of best practices.

As the women's game and the juniors' game continue to develop into nationally noticeable operations and competition activities are starting, the federation will start anti-competition manipulation activities directed at these target groups. Due to the better international fixture opportunities for women and juniors, training international participants in anti-competition manipulation measures will be a significant new operational requirement.

Anti-competition manipulation activities of the FCA and headed by the Technical Director. The Technical Director cooperates operatively with the League Director and the League Organisation to facilitate the activities in the domestic competitions, and with the ICC ACU for international matches and competitions. Members of the League Organisation are in a central role for preventative work and information dissemination due to the large contact surface with the players and officials.

7. Intelligence-based activities

Most suspected attempts of competition manipulation are reported to the FCA either directly by the participant duty-bound to report or by an intermediary. Outside actor are encouraged to report suspicious activities with a low threshold to maintain a comprehensive situation picture.

The guiding objectives in handling reports are the need to compile a detailed view of the events and decide on the necessary actions without unnecessary delay. The federation uses information available from its actor network already when further actions are being contemplated.

8. Disciplinary procedure

In processed that have reached the disciplinary stage, the FCA applies its Code of Conduct and Spirit of Cricket (substantive disciplinary rules) and the Disciplinary Guidelines (procedural rules) in the context of the FCA Anti-Corruption Code.

Competition manipulation is classified in the most grievous category of disciplinary breaches in which indefinite suspension is available as a penalty. The substantive disciplinary rules do not include exclusion as a penalty at this time.

9. Aftercare

A person found guilty of competition manipulation is provided support in cooperation with their club or other supporting community to facilitate their return to the sport at the completion of the suspension. The suspended person is provided with clear instructions on allowed interactions with the organised sport during their suspension.

A person who has fulfilled their duty to report is always commended on reporting and their contribution to maintaining an accurate situation picture is emphasised. The commitment to confidential processing of the information they provide is also made clear.

10. Communications and information dissemination

Communication of anti-competition manipulation activities to participants groups (clubs, players, club player support, officials, the League Organisation) will take place well in advance of the beginning of each season. The communication is grounded on a well-defined duty to report and similarly well-defined reporting channels. The comprehensive duty to report is also included in training materials that are not specifically compiled for anti-competition manipulation training.

The federation provides comprehensive channels for reporting suspected manipulation attempts. Links to low threshold channels will be added to the FCA website and background material for an unlimited audience on identifying and reporting contact attempts will be posted on the website. The value of reports that originate from outside the participants is recognised in the public materials.

Material is also produced in Finnish, emphasising the exceptional international popularity of the domestic competitions and the preventative measures undertaken by the federation. The objectives and results of the federation's anti-competition manipulation are communicated openly while communication regarding operative activities is done in the constraints of confidentiality requirements.

For disciplinary procedures that have resulted in a penalty in which no actual manipulation has taken place the general communication procedure of disciplinary procedures is followed.

If actual manipulation has found to have taken place, the federation will publish a report with a discretionary level of details as soon as the case cannot be any longer appealed to an appellate body within sports. The person found to have committed competition manipulation will be published provided it is possible to do so within legal constraints.

11. Follow-up and development

Operative anti-competition manipulation work is tracked in annual reports. Information provided in the annual report will comprise at least communication and education activities that have taken place along with general descriptions of significant changes in the operating environment and intelligence activities. Educational activities are reported to FINCIS.

The timeliness of this programme will be assessed annually in January-February and the programme will be updated when necessary. The Technical Director is responsible for drafting the updates, which are then assessed by the FCA Management Group and adopted by the FCA Board.

The FCA Anti-Corruption Code is amended when the ICC updates its Anti-Corruption Code template. The federation amends the domestic Code to diverge from the ICC Code when the template is deemed impractical to apply. Approval for diverging from the ICC template is sought from the ICC. Amendments to the domestic code are adopted by the FCA Board.

12. Responsibilities

TBA

13. Contacts

Reporting e-mail address: fairplay@cricketfinland.com

Reporting mobile number (also SMS, WhatsApp, Signal, Telegram): TBA