



# **FIAS EDUCATION GUIDE FOR SAMBISTS**

**DEVELOPED BY CSCF SPORT INTEGRITY GROUP**



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## 1. Introduction

There is sports manipulation happening in every sport, including SAMBO. There, we said it out loud and the only way from here is to get it right.

As per a survey conducted of more than 380 participants, which included athletes, coaches, staff, referees, judges and other officials, there is a strong opinion which says that match manipulation exists in some or other form in SAMBO, whether in form of favouritism by referees, tanking/loosing matches to avoid unwanted matches or to let the favourite athlete win and even rigging in the drawing process. Interestingly enough, more than 85% respondents admitted of not receiving any education or awareness raising about sport manipulation at all.

This document therefore attempts to address this exact need. It compiles the learnings from the **survey** conducted amongst the members of SAMBO community across the world and uses the same in combination with the existing knowledge and best practices, to **inform and educate** the readers about the various forms of match manipulation possible, (not just in SAMBO but also in sports in general). The reader will also understand the ill-effects or harms of match manipulation and the ways to address the problem, including some possible scenarios which can happen and how to handle such situations.

Before we start on the discussion, it will be easy if we get on same page with regard to the different terms and terminologies that shall be used in this guide. Based on the official definition by the Council of Europe in *The Convention on the Manipulation of Sports Competitions (the Macolin Convention)*, some of the key terms, are explained below:

- *Fixed*: Refers to a match or event in which match-fixing/competition manipulation occurred.
- *Omertá*: A code of silence, particularly when questioned by authorities or outsiders. Involves ignoring illegal activities of others.
- *Sporting goal*: The type of manipulation where the primary aim is to manipulate an event to obtain a sporting benefit or advantage (e.g. to win the competition unfairly, to avoid relegation, to achieve a certain rank, to qualify for other tournaments etc.). In these types of manipulation, the main interest of the manipulator is to obtain illicitly something for the benefit of the club, the team or the athletes. In these types of manipulation, while financial benefit or gain is

not visible or observable directly, but it can always be an associated or subsequent benefit. Based on facts and circumstances, it can either be part of a long-term plan or merely a hidden agenda under the garb of sporting goal or benefit or advantage, but there is always a possibility consequential or secondary financial gain.

- *Sports Competition Manipulation aka Match-Fixing*: Refers to the intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition, in order to remove all or part of the unpredictable nature of the aforementioned sports competition, with a view to obtaining an undue advantage for oneself or others.

It can refer to events manipulated for either direct financial gains, or simply for sporting goals, which may or may not immediately result into financial gains. In addition, the manipulation can refer to the entire contest, or merely elements or moments in the contest.

- *Whistleblowing*: Person who reveals information about activity within an organization that is deemed illegal, immoral, unsafe, or fraudulent. In the case of match-fixing, a whistleblower is any person who reports information about competition manipulation to relevant authorities.

## 2. Sports Manipulation: An Overview

Match-fixing or fraud in sport is as old as sport itself. There are many cases of sports manipulations throughout history. Competition manipulation, or match-fixing, has been famously labelled by former International Olympic Committee president Jacques Rogge as the greatest modern threat to sport integrity given its global, complex, and persistent nature. Below is the official definition of sport competition manipulation as set out in the Macolin Convention (see below)

“Manipulation of sports competitions” means an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the aforementioned sports competition with a view to obtaining an undue advantage for oneself or for others.

In simple terms, match manipulation refers to any act that impacts the natural course of an event. In general, the term ‘match fixing’ is used to describe or define any kind of event manipulation, whether for a sporting goal or for any financial

gain. While it is usually assumed to be linked to betting corruption, organised crime and fighting to lose, but at the same time, any kind of act which leads to a pre-determined outcome can be referred to as match fixing.

Sport is defined by fair play (the main pillar of sport is fair play); sports manipulations does not fit into the morals of sport and therefore it should be in the interest of all to fight against the problem.

***Sports manipulations has become a problem for many other sports such as football and tennis but also for many other sports because criminals think they can be more successful without television or other media attention.***

Also, it is not necessary that the results are manipulated due to external factors. Many a times, it can be internal actors who can influence the natural results of a competition. The internal actors can include coaches, team managers, federation members or even team captains. It has to be remembered that

**However small is the act of manipulation or however insignificant it looks (for e.g., making an intentional foul), the course of the match has changed, and the integrity of SAMBO has been affected.**



### **Some possible actors who can lead to Sport Manipulation in SAMBO**

It is a collective responsibility of all Sambists and the members of SAMBO family to prevent any type of sports manipulation and preserve the integrity of SAMBO in the best possible manner. However, with so many people involved at various stages of the sport, it is possible for anyone to take advantage of the insufficient protection or control to their favour, in order to obtain either a sporting goal or a direct financial gain.

Such actors who try to manipulate a match can be of two types:

1. Actors who are on/around the competition area and can execute any the sports manipulation (*Executors*)
  - These can be the **athletes, referees, or the coach.**

- These actors have the control of the match and can change the direction actively of any competition by their act or omission.
  - These actors also have direct interest in conducting sports manipulation in terms of either achieving sporting goal or any undue financial gain.
2. Actors who are on the side lines and can instigate sports manipulation from outside (*Instigators*)
- These **can be anyone** from club/association management, technical or support staff, former athletes, or even fans, friends, or friends.
  - These actors do not have any control over the match but can influence those directly involved in the match to cause sports manipulation.
  - Sometimes, they can be completely non-related persons, including but not limited to criminal syndicates or betting agents
  - In most cases, these outside actors have the sole purpose of financial gain, whether or not through betting, to manipulate the sports.

### **Some possible situations of Sport Manipulation that can happen to you in SAMBO**

#### **Scenario 1:**

*You are having lunch with your teammates between a competition. Your coach is also there and hears you all talking and your teammates, congratulating you because now you are safe and will finish at least 3<sup>rd</sup>, even with 2 bouts to go. The next bout is against a Sambist who is having difficulties because he needs to win at least 1 more bout to qualify for next round.*

*Your coach asks you, if you can do some basic fouls and help the other Sambist, win so that he is able to go to next round. What would you do?*

*Purposely trying to lose, even to obey your coach is cheating and manipulation of bout. You should always do your best on the mat. There could always be someone watching. Someone who trusts you and wants you to win. May be, a sponsor who was planning to offer you a contract if you won the particular bout. In SAMBO and in sports in general, you should never lose on purpose. Under performance is not sportsmanship and unfair to all the people who come to watch you play and support you.*

#### **Scenario 2:**

*Now imagine in the previous situation, that your coach is accompanied by a federation staff member, who also offers you money to perform badly. How would you react?*

*Losing a bout for money is even worse. It amounts to bribery on top of cheating. If you have financial troubles, you should talk to someone about*

*it, whether to your family, close friends, your team leader, your coach or even someone from the staff. Someone you trust and who you think can help your situation.*

### **Scenario 3:**

*Now imagine that you hear a federation staff member telling your coach that if you do not lose the bout to the opposite Sambist in the next bout, then he will make sure to disqualify all the athletes (including you) from your team. The staff member likes the other athlete for some reason, and he is worried that the other athlete will lose and not qualify to the next round. What can you do here?*

*In these situations where someone wants you to question your integrity and commit an act which you don't think is right, you should immediately talk to someone you trust, anyone, preferably an adult, who can help in some way. What the staff member is trying to do is manipulation through extortion and blackmail. This has to be reported immediately.*

### **Scenario 4:**

*Next, imagine that you are, unfortunately, not performing so well in a competition. You are trying your best, but some of the other sambists on the opposite sides are just too strong. You know that you are not going to reach the finals, but you still have some upcoming rounds where you can win. This would not affect your final standing, but a loss could help the other sambists to be higher in the ranking in the competition. One of your teammates proposes using this situation to make some money. He suggests that in the next round, you should purposefully lose the bouts and place bets on you losing with some third parties or simply ask the other sambist or coach of the other team to pay you some money or give you something for losing. Accordingly, you would win some money, or something else in the form of a gift, after you lose. You were, anyways, not going to the final rounds. Is this right or okay to do? What if you do not try to do anything intentionally at all but still decide to bet on your own bout anyway – to win, to lose, or to draw?*

*You are not allowed to manipulate the match and underperform. You are specially not allowed to bet on yourself or match. If you decide in advance to lose, it is a serious issue. And even if you don't decide anything, your bet on your own winning, losing or draw will always end up influencing your on-field match in some way, which will not be natural in nature.*

### **Some possible factors which could lead to Sport Manipulation in SAMBO**

Like in many other sports, one of the biggest concerns that many athletes and other members of the SAMBO community have is against the possibility of favouritism or unfair scoring by the referees.

At the same time, as per the above-mentioned survey, very few believe that the wrong decisions by the referees are motivated financially, but at the same time, a number of them think that they are clearly vulnerable for the same. Especially with no wages (as most of the referees and administrators of competitions work in SAMBO voluntarily) or the low wages and payments that the referees, staff and other administrators get, there are no reasons for not believing that these people at positions of power can manipulate the events for financial gains too. As per the survey, some of the reasons which can lead a referee to manipulate the outcome of a match can be - limited pool of referees, everybody knowing everyone, many referees being either a coach or have been a coach earlier, which also creates potential conflict of interest etc.

Any sports event can be manipulated in many different ways, for many different reasons. For example, an event can be manipulated to achieve a sporting goal, to qualify for a competition or to avoid relegation. In general, the act of doing something that will alter the natural course of a sports event or competition, or match Manipulation as it is called, as per Council of Europe, among others, can fall into one of following categories:

a. ***Direct interference in the natural progression of an event or competition***

- In SAMBO, it can happen by many ways, including but not limited to wrong calls by the referee, intentional fouls, any act of cheating, pre-planned moves, failure to appear or appearing late to the SAMBO mat, intentionally ignoring and exceeding the technical warnings, stalling or showing passivity during the bout etc.
- Basically, any act which prevents the match to be played in the natural and unpredictable way, by any of the actor who is present on the field, is considered as direct interference and is prohibited.
- This kind of interference can be either for a sporting goal or financial gain, depending on the instigator and the executor.

***This kind of direct interference can be done either by:***

- ***an instigator holding a powerful position (like coach, club management, federation etc.) or even***
- ***sponsor or such other financially strong actor. In some cases, it can also be done***
- ***an external actor who you have never met, mostly only for financial gains.***



**b. Collusion between two athletes/teams (with or without coercion/ force)**

- In SAMBO, this can include deliberate underperformance in order to let other team or athlete win. It can be either a friendly collusion or forced one, initiated by a coach, staff or even external actors, with or without involvement of any money directly.

**c. Influencing transfers in order to strengthen/weaken a team**

- In SAMBO, this can happen when a coach or team manager handles more than one team or has a particular favourite team or athlete. It can also happen when a coach or federation staff has some control or influence over who fights from each team in the competition, thereby helping the favourite athlete perform better.

**d. Taking advantage of athletes/teams/clubs in difficulty to then abuse positions of power**

This can be done in combination with one or more of other factors, by using the difficulty of the athlete or the team or any staff therein by the instigator to their advantage in the competition, for a sporting goal or even any kind of financial gain, at the cost of the executor (*Influence the draw of teams in order to be able to regulate and fix competitions (by force or collusion).*)

- *In SAMBO while the draw is supposed to be automatic or computer generated, many from those surveyed believed that even now there is some way to influence this draw of teams.*
- *Any influence on such automatic or impartial drawing of teams is wrong and has to be considered as match manipulation.*
- *This type of influence can be caused for various reasons, including to provide favouritism to a particular athlete or a team/country or simply for personal gains.*

**e. Exploiting factors such as age, identity**

- In SAMBO, this could be lying about an athlete's age, for example, so an older, more experienced athlete can compete in a junior competition and have more chance of winning by gaining undue advantage over other athletes.

- In some cases, such lying, or misrepresentation can be accompanied with payment of bribes to concerned officials by the instigator of such age manipulation to make this happen, which is another issue related to corruption.

**f. *Tampering with equipment***

- It can be either tampering of the SAMBO equipment, like the carpet, or the sambo uniforms or any other item or equipment, that is not compliant with the rules.
- In some cases, such tampering can also be accompanied with payment of bribes to persons involved in handling such equipment or it can also be done by exertion of influence or power over such person.

All the above could also be simply called as cheating. There may be an argument that underperformance could be used for tactical/sporting goals; instructing specific athletes to deliberately underperform in a competition to help others in the team with their ranking position or for rigging the tally in order to achieve a bout between particular athletes.

But this is actually asking the athlete to not be the best they can. Coaches in particular should ask themselves if it is morally and ethically right to ask the athletes to underperform. Especially as morals and ethics are influenced from a very early age.

*If kids are taught that underperformance is acceptable for sporting goals, where is the argument to stop them underperforming if someone seeking to corrupt asks them to do it for a reward, such as an offer of cash, new equipment, or sponsorship. In long term, it is these rewards, especially from external factors, which can severely affect the integrity of SAMBO as a sport.*



### 3. Different types and reasons for Sports Corruption and Manipulation

There can be various reasons which might tempt or lead someone (either an executor or an instigator) to fix or manipulate the result of a match or a competition. Some of them can be:

- To obtain a certain result in a knockout round to avoid or to meet a certain other opponent
- In the competition when the athlete's position is secure, one might try to lose or draw after agreeing with the adversary (or under force) so that they can win and finish in a certain position.
- The coach or team captain or management threatening an athlete to do what they say or else the athlete will lose his position in the club or team or contract, for example.
- Someone is blackmailing the athlete or the referee, or their loved ones
- Wanting some easy money/ financial gains

While an instigator may not be easily found or affected if a sports manipulation is detected, it is the executors, who will be directly affected if caught and are therefore directly responsible for maintaining the integrity of SAMBO as a whole. Having mentioned some of the many possible reasons which makes such executors, i.e., athletes, referees, coaches, or other stakeholders to be involved in match manipulation, it is important to recognize the underlying factor which actually can lead them into agreeing to manipulate or fix a match.

Some such factors which may also be applicable to SAMBO are:

- Underpaid referees and athletes
- Financial fragility of clubs/teams
- Salary or reimbursement delays for athletes, referees, club officials
- Omertá/ Fear of reporting incidents
- Less attention on competition (less media or not many fans of the particular match)
- Normalization of gift giving and bribery
- Weak or non-existent reporting mechanisms
- Small country or team (and thus less opportunities)
- Legislative weakness
- Lack of monitoring and detection mechanisms

A manipulation can be carried out by several channels. It can be through deals and the bribery of referees, sometimes connected with the influence of the referee

committee to identify “vulnerable referees”, or through the bribery of the opposing team/athlete(s). Sometimes there is a pre-match deal of athletes to lose a match for future reward or return manipulation. Such alliances or deals can sometimes have also political dimensions, like deals in favour of mayors, politicians, political parties, heads of federation or minority affiliations. In youth competitions, the fraud can also take the form of age manipulation, and the selection of athletes that are older than the limit. In the past there were also cases of manipulation linked to the fraudulent increase of athlete value etc.

Some athletes and coaches could also manipulate matches for personal reasons. For example, when they are fighting against their friends or country mates in a match, where there is nothing to gain or lose for the athlete, but a win of the opposite side could help them qualify to next round etc., so they decide to underperform during the match and want to let them win.

#### **4. Dangers of Sports Manipulation?**

Sport competition manipulation threatens the social, educational, and cultural values of sport promoted by sport governing bodies. Not only it affects the reputation of sport due to possibility of pre-determined results, taking away the most important feature of the sport, i.e., unpredictability, but at the same time, it can also cause a fear of possible association of the sport to criminal activities like corruption and money laundering. The economic damages from sport competition manipulation (whether done for sporting goal or financial gain) includes loss of revenues to teams and federations, loss of sponsors, decreased government funding towards sport projects, harm to brand image, lack of athlete involvement, and decline in spectator demand for the product of sport.

Books, movies, and plays are scripted entertainment, where the ending exists or is knowable in advance. A sporting contest on the other hand involves unscripted entertainment between competitors attempting to display skill, moral character, and social worth on a public platform. On this platform they are evaluated by their fellow competitors and larger society. Sport competition manipulation obviates this authenticity by manufacturing an inauthentic “script” for aspects of the contest or the outcome of the contest itself. This manipulation distorts the efforts of all those involved in competition, destroys the unpredictable nature of sport, and robs contestants of the intrinsic and – to varying degrees - extrinsic values of sport. Thus, apart from the practical harms and the possible reputational damage, there are some ethical harms also, which need to be seen as a result of match manipulation.

### **Why should we protect SAMBO from Match Manipulation?**

SAMBO, like any sport, relies upon high standards of integrity, from grass root level through to international competitions. The risks from sports integrity issues in SAMBO, particularly for betting related issues, at the moment appear to be relatively low. In fact, as per our research on several a number of betting websites, SAMBO is not offered for any formal betting yet.

***Although, it is worth to mention here that with several other combat sports available easily for betting, with the growing popularity of SAMBO, it is inevitable to see SAMBO being offered by these sites in future. In such scenario, if something happens, the fall out can be huge.***

As previously mentioned, there are people that will exploit any vulnerabilities. And any indication of wrongdoing in a sport can have significant implications.

More so, if there is an incident of match manipulation, which goes undetected at first, but is found out later, it can have severe consequences for everyone in SAMBO, especially to those who were involved in such manipulation. Particularly:

- a. If there is an incident of match manipulation or fixing in SAMBO, first and foremost, the ethos, reputation and commercial viability of the sport of SAMBO will be undermined. It can also potentially tarnish the reputation of all those involved in the sport, not just those who have acted irresponsibly. The learning of what is right and what is wrong needs to start young.
- b. There are many cases of athletes have receiving potentially career ending bans from their sport for their involvement in event manipulation, with some receiving prison sentences. Such sanctions may appear harsh. But the reputational damage has to be considered if someone in SAMBO is thought to be cheating or affecting the natural course of the results.
- c. If the manipulation involved direct financial gains, which are able to be established, then there are chances that those involved, including the athletes can go to jail after being sentenced by a court of law, for criminal or fraudulent acts, depending on the law of the country.
- d. It can take just one alleged incident reported on the internet, with or without the same going viral, given the nature how the search engines work, high

chances that anyone searching about 'SAMBO' on the internet, the alleged incident will be in the top results.

## 5. What about Inside Information

In every sport and every sporting community, there will always be information that should stay within the sporting community. This applies to SAMBO also. This information could be anything, from team selection, athletes carrying injuries, contact details, athletes feeling unwell or any unrest within the team. The key point here is that it is information that is not in the public domain. This is known as inside information.

This inside information can be anything related to the competition (match, tournament, league) that an athlete or official has, which is not open to the public. Usually, it is information possessed due to someone having a special connection or position in the club or team, like injuries, match strategies and so on. This information should never be shared by anyone outside of their absolute trust circle. It should particularly not be disclosed to anyone who might be asking too many questions and especially if the athlete or the official does not know and has doubts that it can be shared to someone they should not, like opposite team or even with bettors to make illegal gains. Interestingly, as per the survey results, more than 50% of the Sambists know at least one type of possible information which can be part of inside information, but very few people knew the entire gambit of what can consist of inside information.

It is important to note that any **inside information can be very interesting and**



**valuable to some people that may not even be thought as of any value within your team, or even within SAMBO.**

People can try and find out such information, for several reasons, which would ultimately be bad for the athletes, the coaches, the wider SAMBO community, and the sport. Most importantly, there is also a risk that if the information that 'the outcome of an event is predetermined (or fixed)' is made public, even if it is not, but supported by some information that others did not



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know, it could also be used by people to place an unfair bet and make illicit money.

Some of the examples of violations of inside information can be:

- a. Disclosing Inside Information to any person and/or entity, with or without benefit, where the Participant knew or should have known that such disclosure might lead to the information being used for any form of manipulation of competitions, especially by opposite team members, coaches or such person(s) who should not have known about such information.
- b. Giving and/or receiving a benefit for the provision of Inside Information regardless of whether any Inside Information is actually provided.
- c. Using Inside Information for any form of manipulation of sports competitions, for the misuse of betting, or for any other corrupt purposes whether by the Participant or via another person and/or entity.





### Scenario 1:

*You arrive at your club and a woman that you don't know but may have seen her few times in the last few weeks, approaches you and praises you for your performance recently and talks good thing about your work and practice. She then informs you that she might not be able to watch the next match due to her travel. She then casually asks you if the match is any important for you or if you knows who will win and why. What would you do?*

*You should, in any circumstances do not share any information about strategies, injuries or any other internal information that you may be privy to. It can be used unfairly by anyone, including the opposite side to use the information to their advantage or even to outsiders, who can use it to try to gain money unfairly – by cheating, betting, or any other illegal means.*

### Scenario 2:

*Your regular team doctor is on leave, and you are having a shoulder pain which cannot avoid anymore. You don't like the substitute doctor and you are going to have an important match in 2 weeks. You have heard about a good doctor who is also the official team doctor of another team. You go to this doctor and ask for medication for your shoulder pain. Is it ok?*

*While going to another doctor might look a very simple act, but the mere fact that the doctor is also official doctor of another team is very important issue and cannot be ignored. Even assuming there is patient-doctor confidentiality, you are unknowingly passing information about your pain/injury to another team, which can be passed on by anyone to the other team. It can be someone from doctor's staff, athlete from opposite team who saw you there or even the doctor himself. You cannot trust anyone and you should not share any personal, especially medical issue with anyone outside your circle of trust.*

Some ways to prevent such leakage of inside information can be done by:

- Making sure that you and your friends know what inside information is and ensuring that you are cautious whenever you are sharing any information which you are privy to because of your status in the team.
- Getting very clear, as much as possible, about the difference between what should be kept to yourself and what it is safe to share with others, including the circle of trust.

- Make sure that you and your friends know that you are not supposed to give out any personal information, including contact details, about yourself or any of their friends to anyone outside their group or club.
- Be aware of new people you are speaking to and figure out first how do they know you or how do you know them.
- Be aware when people you know asking about your health and your teammates
- Make sure that if you have any concerns, including about accidental sharing of any inside information with someone, either by you or by your friend, then you raise it with someone in your club or association as soon as possible.

**Sharing of inside information does not necessary be triggered by or with an external person. Someone you know for long time but who is not from the closest circle of your team (a referee you know personally or even a Sambists from an opposite team) could also ask you for important information on you or your teammates. You are not necessary offered money to share such info, yet you do violate the rules about sharing inside information.**

**Be aware of the importance of privacy of information of you and your team!**

## **6. How does External Match Manipulation happen?**

In many cases, there can be an external influence to manipulate a match from inside the environment, like teammates, coaches, team captains, team managers and support staff, club management as well as organizers, sponsors. But also, there can be outside actors like former athletes or coaches, gamblers, or even friends. These actors can approach either indirectly through some known people or directly as fans, followers etc.

There can be several opportunities which make an athlete vulnerable to external contact and influence, but the most common ones can be as follows:

1. The first is to contact an **executor, i.e., athlete referee or a coach** and lie about the reasons for a meeting. They try to persuade such executors that it will be only meeting for coffee, and they will offer them a tempting opportunity, like sponsorship, media visibility etc. After having built a relationship, they will offer a fixing proposal and focus on marginalizing potential risks. This can be referred to as grooming. There are many ways to achieve this, the manipulator may also simply approach the executor, especially young athletes in their bar, or café, or club. It may even be someone known to the executor.

2. The second most used tactic is to approach the executors through social media such as Facebook or Instagram or using communication apps as WhatsApp, Viber or Signal. Sometimes they also try to build a “trustworthy” relationship through the executor’s partner, friend, or entourage.
3. Corruptors, whether internal or external to SAMBO, tend to approach their targets either directly through gifts, money, sexual favours etc. or indirectly through family, friends or simply posing as fans.
4. Many tricks are then used to convince the target to agree to manipulate, typically through ‘**grooming**’ of the target or using threats e.g. by exploiting some previous or a created issue, using violence or intimidation. The ‘grooming’ of an athlete/referee/coach or even an official takes place over a period of time whereby typically the following steps are undertaken by a ‘corruptor’:
  - a. Initial Approach – The Executor (target) is approached but no suspicion is raised with regards to the integrity of the corruptor.
  - b. Become friends - An intermediary is in charge of becoming a friend of the target. This may even start when the target is still a minor.
  - c. Identify weaknesses - The corruptor determines the weaknesses and lifestyle of the target and subsequent potential to manipulate a competition.
  - d. Gift - Offer of a gift to create a feeling of obligation towards the corruptor. If the target refuses, the corruptor may become more aggressive and violent.
  - e. First manipulation - The first manipulation can be generally very small, as simple as say causing a foul
  - f. Trapped - If the target agrees to manipulate then he/she is trapped and becomes a ‘slave’ to the fixer.

In order to conduct this grooming, there can be various factors that a corruptor can consider for designing the strategy to trap the athlete/referee/official. Some of them can be:

- Whether the salary or bills/reimbursements of the athlete or coach has been paid
- Whether the salary or reimbursements of the official has been paid
- Addiction (drugs, sex, alcohol, expensive items like watch, jewellery etc.)
- Excessive gambling and gambling debts
- Bad sports results and lack of recognition and reward
- Pressure, opportunity, and rationalisation
- Living beyond personal income and high personal debt
- Desire for personal progression, greed, naivety of the target, unfulfilled ambition
- Pressure from family and friends to succeed
- Fluid moral values and a desire to challenge and/or abuse the system

## 7. How do prevent Match Fixing from happening in SAMBO?

First and foremost, if any of the above or similar situations appear to happen to you, whether you are an athlete, referee or an official, you should understand that there is definitely someone who you can trust and talk to. More so, for young athletes, it is the duty of the coaches and the federations to ensure that they are comfortable, prepared, and ready to talk to someone they trust. Depending on the circumstances, the person to talk can be someone in the team or the club, or a friend, or family, or someone in the school (in case of athlete) or work. It can also be some senior official from the club or federation, (local) athletes' union or even local welfare office. As per the survey, at least 20% participants were either approached or knew a fellow Sambists who was approached by someone (internal and external) to manipulate a match. Unfortunately, more than 40% of these participants chose not to talk about such information with anyone. The reason can be anything, from lack of trust to lack of awareness.

The most important thing therefore is to remember, that no one has to be and shall be left alone!

Furthermore, particularly to the athletes, it is important that:

- a. You are aware about the associated dangers of someone approaching you, asking for manipulation of matches, however small it may be
- b. You are aware about the possible consequences of agreeing to the requests or not reporting of such approaches
- c. You are aware of your trusted points of contact
- d. You are aware about when and how speak out or report

For the coaches, staff and officials, it is even more important that ***all their athletes know*** someone who they can speak to in confidence whenever required, especially when they have any concerns about integrity or corruption. This may be a coach or someone else, with some authority from the club or association or federation or even their parents or teachers. They have to be informed about the best person they should talk to, especially if they are approached or they know about anyone around them being



approached for any kind of match manipulation. The athletes have to be informed that if they become aware of a situation, they should tell their trusted point of contact, and ask for advice. The athletes should be encouraged to speak up, without any fear, including fear of being labelled as a 'snitch', if they suspect a teammate and/or friend has got themselves involved in a situation that is potentially risky. This becomes even more important if the person asking for manipulating is a coach, staff or such other person in position of power, in which case, the trusted point of contact also needs to have some authority and power to act upon such information and to give the athlete enough confidence to speak up.

**It has to be remembered that knowing, but not reporting can rather have worse consequences. This applies to everyone, including the athletes, coaches, staff, officials and every other member of the SAMBO community.**

Following are some people who you can contact in case you want to share any concern regarding match manipulation or anything else which can you think is wrong and can affect you or SAMBO:

[integrity@sambo-fias.com](mailto:integrity@sambo-fias.com) and  
[swissoffice@sambo-fias.com](mailto:swissoffice@sambo-fias.com)

## **Guidelines for Athletes or Referees or Officials**

### **1. Be honest - don't manipulate sports**

Compete cleanly and fairly, do not manipulate the competition event or even a small part of it. Even an act that seems harmless can permanently destroy your career and lead to criminal penalties. Always try to compete to the best of your ability and refuse suspicious offers.

### **2. Be smart - know the rules**

Be aware of the competition rules for your sport, especially when it comes to sport manipulation/match fixing, other integrity issues. You may also get into trouble because of the actions of those close to you. Find out if it is forbidden in more detail by sport, for example from your own sports federation or athletes' association.

### **3. Be careful - do not share sensitive information**

Do not share information that is not available to all public sources. For example, the sharing of inside information, like injury information, or tactics could affect your matches by giving huge advantage to the opponent, not to mention that it is prohibited by competition rules of SAMBO.

### **4. Be open - report if you are approached**

If someone suggests participating in the competition manipulation or you hear about any other possibility of violations, whether by someone you know or not, please pass on your information. You will not be blamed for your information or experiences and if you wish, your identity will be protected. However, it is important that you report your information and not keep it to yourself. This is the best way to protect your sport and yourself from a competition manipulation attempt.

### **Specific Suggestions for Athletes or Referees or Officials**

If anyone is approached to manipulate any match or bout in SAMBO, irrespective of involvement of money or not, or if one hears about any other violations, the following steps must be immediately taken:

- a) Identify or detect that the discussion/talk is about an attempted competition manipulation proposal. Refuse politely but resolutely.
- b) Report the proposal or possible violation to a trusted person, or to the coach or even to the club or federation, or if possible, even directly to the police. The bottom line is that someone trusted has to be told and one cannot be and would not be left alone with the information of attempted manipulation.
- c) Retain all information received, such as text messages, call records or emails. The data can be stored data using screenshots, for example. They can be used later to investigate the case or as possible evidence.
- d) There are several ways how an approach can look like. Some of the common ways for such bribery approaches or ill-intentioned grooming situation, which can be easily identified can be:
  - When unknown people start approaching and inviting to events/dinners/clubs, or propose gifts or promises of anything that can be valuable (sponsorship deals, expensive alcohols, or anything else)
  - When the club or training school has financial difficulties and someone unknown starts approaching with funding proposals
  - When the next matches to be fought for you have no sporting interest and/or when your upcoming opponents are struggling (to avoid relegation or qualify).

#### **In Summary:**

***Always remember, when you feel that something is wrong, then something IS wrong!***

***Report it immediately!***





## 8. Receiving a Report, Investigation and Disciplinary Procedures

Till now, we discussed various possible types of sports manipulations, the ways that it can happen in SAMBO and how to prevent the same. However, unfortunately, if it still happens, then this section will be helpful for you to understand the various steps involved, from reporting to disciplinary actions.

This section gives a brief overview of the rights and responsibilities of you as a reporting person, witness or even an accused.

### **Receiving/making a report:**

In any case, there are a number of guidance, that both a reporting person and the person receiving the report can follow.

### ***First, regarding the information that can be provided through any of the reporting channels:***

- The reporting person is not obliged to provide material evidence. The person receiving the report is not an investigator and there is no need of seeking proof. The information should be taken as it is.
- Any formal or informal information is valuable but should be provided under free will.
- All the information need not be directly related to match fixing or manipulation of matches. It can also concern providing of inside information to inappropriate persons, links with external criminals, misuse of assets and other criminal behaviour.
- The report should be made in good faith.
- If an information is shared which is later found to be incorrect, should not have any wrong bearing on the person reporting it, if such person reasonably believed to be true at the time of reporting. However, if it is found that the information was provided with malicious intentions, it might have



repercussions for the same.

***Second, following are some precautions to be taken while and after reporting:***

- If the reporting person fears retaliation, he/she can consider remaining anonymous. However, anonymity is not ideal for reporting such incidents relating to match manipulation, as such information may be less easy to use or to take further steps.
- When possible and if the reporting person trusts the reporting line or person receiving the report, identity should be provided. At the same time, it is better to report anonymously than not reporting at all.
- All along the process, the reporting person should be encouraged to seek personal advice from people he/she trusts.
- Unless necessary, the person reporting should be advised not to inform his/her personal and sport entourage about the report.
- Unless necessary, once reported, the reporting person should refrain from taking any steps regarding the case (communication, proof gathering, etc.), as it could undermine the investigation and prosecution. This is also applicable to the person who received the report, if he/she is not involved in the actual investigation.
- As much as possible, the person reporting should remain patient and not take any adverse steps, even if no update is provided. Match-fixing investigation sometimes require time and all parties have to give time.

In the following paragraphs, we shall see some of the important steps of investigation and disciplinary procedures relating to match manipulation.

**Collecting Evidence for Investigation**

All athletes must understand that they are not being asked to actively collect evidence and especially not when it may put them in danger. But if they have information then they should try to pass this on to relevant persons – police, management that they trust, etc. It is very important to report any suspicious behaviour, any stranger that approaches, but also the known people, like friends or teammates or in the team staff or even a coach, who might approach the athlete to fix or manipulate the results of a match or even one part of a match.

However, it has to be borne in mind that to report an approach, one does not have to bring proof of what is being reported. Of course, if there is some material (like a screenshot of a discussion, or a phone recording) it will be easier for the

investigator. But it has to be kept in mind by the person who was approached, or the person reporting is not an investigator and should be careful before actively collecting evidence of match-fixing. It can be dangerous.

The athletes or even the staff should be made aware that if someone contacts the them by messaging on social media (like Facebook, Instagram or Twitter) and attempt to ask about something private information, for example an athlete's health and if that athlete will fight or not or if they want to know the strategy or information which is not yet made public, then the person who wishes to report I should take a screenshot and take it to the person of trust, like coach, or someone at the club or if needed and if comfortable, then even to the police.

Most importantly, it has to be made sure that if the club or police tries to investigate and talk the potential manipulations, then:

- For disciplinary proceedings, neither the reporting person nor the accused should be present alone
- For legal proceedings, the reporting person and also the accused should ideally have a lawyer
- If such reporting person or accused is under 18 years of age, it has to be made sure there is always an adult with such person

Once the investigation is completed by the designated officials, they present the final report to the relevant person(s) in the club or federation to decide upon the further course of action. Based on the evidence collected and the report of the investigating officer, the designated disciplinary committee conducts its proceedings.

### **Some broad steps how a disciplinary proceeding works**

- The Disciplinary committee should decide if they have enough evidence and if they are ready to start disciplinary proceedings
- At this stage, they also consider if there is a criminal investigation or criminal proceeding. In which case, the committee decides, usually together with the police or prosecutor, if they should wait until the end of criminal proceeding or if they should conduct their disciplinary proceedings independently and in parallel.
- After the start of disciplinary proceedings, the Committee can decide about temporary suspension of activities or participation of the accused person(s) until the completion of the proceedings. This Depends on number of sources of evidence, severity of allegation and other such circumstances.



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- The accused or even the witnesses are not obliged to have a lawyer present in the proceedings, but there is no bar to have one and depends on the situation. Also, it is always advisable that all parties cooperate in such proceedings, which helps in better handling of the case, as well as helps the committee arrive at an easier decision, which can be easily guided by the behaviour, conduct and cooperation provided by the accused.
- The committee can call in witnesses, including the reporting person(s) and other such necessary persons, whose testimonies can be helpful in determining the final decision
- Once the decision has been made, the same is generally communicated to the parties and also to the outside world as per the protocol
- The affected parties can appeal to the designated body as per the rules and if not satisfied, then also appeal to the Court of Arbitration for Sport (CAS)

### **Various factors which can be determining factor for the violation and sanction**

- Whether or not the Participant is participating in the competition or match concerned;
- Whether or not the outcome of the competition or match which was attempted to be manipulated, was actually altered or only attempted to be altered;
- Whether or not any benefit or other consideration was actually given or received;
- Whether or not the participant's effort or performance in the competition or match concerned were (or could be expected to be) affected by the acts or omission in question;
- Whether or not the result of the competition or match concerned was (or could be expected to be) affected by the acts or omission in question;
- Whether or not the manipulation included a violation of a technical rule of the respective club or competition organizer;
- In general, any form of aid, abetment or attempt by a participant that could culminate in a violation of the rules shall be treated as if a violation had been committed, whether or not such an act in fact resulted in a violation and/or whether that violation was committed deliberately or negligently.



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### **Rights of the Accused**

- *Right to counsel:* to have a lawyer present during the entire disciplinary process.
- *Right to information:* to know what charges have been made against them, to be made aware about the witness testifications made against them and to have access to the evidence collected against them.
- *Right to an impartial disciplinary process:* to ensure that there is no partiality by the disciplinary committee members against or even in favour of the accused.
- *Right to present a defence:* to present facts and evidence, in order to prove their case, either pleading innocence or to seek leniency
- *Right of appeal:* if the accused is not satisfied with the outcome, either on factual grounds or for the reasons that the applicable procedural protections were not respected.

For a detailed overview of the investigation process, and other details relating to disciplinary proceedings, including the possible sanctions, penalties etc. that exist in SAMBO, you can refer to the FIAS Rules on Betting and Anti-Corruption (2014), FIAS Disciplinary Code (2020), FIAS Ethics Code (2016) and Dispute Resolution Rules (2014).