Integrity In Sport

Mapping the UK Landscape

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Integrity Report
Foreword

While the power of sport to inspire people has not diminished, unfortunately it has become too common to hear stories of scandals, accusations and damning testimonies, where the integrity of sport is called into question. At UK Anti-Doping (UKAD) our remit is clearly focused on threats to sport caused by the use of performance enhancing drugs. However, if we failed to take account of other integrity issues in the sporting landscape, we could miss out on making the necessary links to understand the wider corruption in sport.

The integrity threats that face sport today are multifaceted and reach all areas, from on field rule breaches to manipulations of governance structures, from individual indiscretions to entire systems of corruption. Recognising that integrity issues take many forms, we must combat these threats by being robust and agile in our response. The first step in tackling these threats is to understand the context in which they operate, which is why UKAD commissioned Swansea University to undertake this study into the current integrity issues within the UK, focusing particularly on the issues that are consistent across a range of sports.

The motivation to undertake this project was born out of a meeting UKAD held in 2018 with a group of high-level stakeholders from across sport to discuss the nature, range and severity of threats to sport integrity and the reputation of UK-based sports. From this meeting one thing became clear; we can only adequately deal with sport integrity issues when we are united. No single organisation has the powers, capabilities or jurisdiction to meet the demands presented by these ever-changing integrity threats, so it is imperative that

organisations collaborate and share knowledge and best practice if we wish to protect purity of sport.

This meeting also revealed the multiple and potentially competing demands that integrity units working in sport make of national governing bodies (NGBs). It serves all our interests if we in those institutions can work together to make those asks of sports as joined up as possible.

This academic report is not intended to usurp organisations' current systems of tracking integrity, but rather to serve as the foundation of knowledge and recommendations from which future efforts may be built. It clearly demonstrates the nature and extent of the consultation undertaken and contains an honest and comprehensive collection of views and opinions collated by themes.

Within the sector we believe partners can unite to develop cohesive and efficient arrangements for agreeing definitions, sharing information, and developing integrated education programmes. **Whilst the report authors put forward suggestions on structures and strategies this is not necessarily the opinion of UKAD.** Our focus is instead on the practical steps we can take with partners to protect sport from corruption.

Trevor Pearce CBE QPM
UKAD Chair

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Executive Summary

Integrity in Sport: Mapping the UK Landscape

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1. Good governance is now well-established as a vital part of running successful sports organisations. So too are policies and practices for selected ethical issues, such as anti-doping, equality and diversity, and safeguarding. Nevertheless, there is a lack of coherence and comprehensiveness concerning the approach to the broad range of threats to what is called "sport integrity".

2. In November 2018, UK Anti-Doping (UKAD) convened a group of high-level sport stakeholders across the UK to discuss the nature, range and severity of threats to sport integrity and the reputation of UK-based sports.

3. Following the meeting UKAD commissioned a research project looking at integrity in sport, particularly the threats to integrity in sport and potential overlapping integrity issues and actors across providers. The aim of the current research is to map the landscape and to make recommendations as to the future, integrated, development of sport integrity in alignment with the good governance of sport within the UK.

4. The aim of the research is to survey the landscape of sport integrity in the UK. Its objectives are to describe and evaluate existing models and structures, to identify barriers and enablers and form recommendations for the development of sport integrity policy and practice in the UK.

5. The study comprised a multi-method approach to map the landscape of sport integrity in the UK. A questionnaire was sent, with agreement from UKAD, to 81 sport stakeholders in the UK. It secured a 63% response rate. In addition, focus groups were conducted (n=2), in London and Manchester, to explore the potential key issues, barriers and opportunities for the development of the sport integrity agenda. Finally, the views of a range of high-level operatives from organisations that are key stakeholders (n=10) in sporting integrity in the UK were sought in order to probe in greater detail key issues arising in the previous stages of the research. Key findings from the questionnaire were:

5.1. Stakeholders operated with multiple definitions of sport integrity; 26 different elements were identified;

5.2. 75% of the sample reported that their organisation had an integrity function, of which 79% reported to the Board or CEO;

5.3. In terms of budget available to organisations, over half had a budget of less than £10,000, with others over £2m, per year;

5.4. Significant diversity was found in the roles (via job title) of those responsible for the integrity function. Nine distinct job titles were reported;

5.5. It is acknowledged that sport integrity operations spread across a variety of topics, issues, and departments that reflect different approaches and structures for integrity work. The following roles were reported:
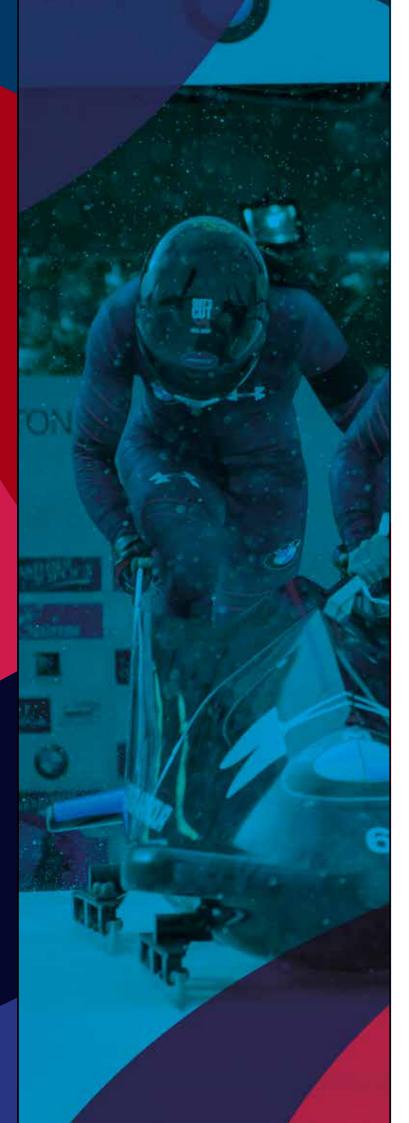
Safeguarding/Welfare Officer; Compliance Manager; Integrity Manager; Anti-doping Manager; Well-being Officer; Discipline Manager; Integrity Investigations Manager; Integrity Analyst; Head of Business Operations; Customer Complaints; Clean Athletes Coordinator;

5.6. Respondents clearly identified the lack of resource, especially in small organisations, to operate integrity functions;

5.7. Respondents identified a large range of stakeholders that they worked with in the integrity landscape. These ranged well beyond sport organisations. Examples included Interpol, NSPCC, Social Services, UK Gambling Commission, and Universities. A third of the respondents were members of the Sport Betting Integrity Forum;

5.8. In terms of misconduct reporting, 85% of the sample provided either a whistleblowing or welfare support service.

6. Key themes were developed from the questionnaire, which informed the latter qualitative phases of data collection. Focus groups and interviews provided a forum for more extensive discussion concerning:

6.1. Sport Integrity Definition and Concept;

6.2. Drivers and Threats to Sport Integrity;

6.3. Current Approaches to Sport Integrity;

6.4. Organisational Structures and Partnerships for Sport Integrity;

6.5. Models of Delivery and Compliance of Sport Integrity; and

6.6. Future Developments in Sport Integrity.

7. Highlights from these themes are as follows:

7.1. Definition/conceptual clarity: despite the existence of a plethora of definitions, there was unanimous support for a three-dimensional model of sport integrity. Although each dimension could overlap, a model comprising personal integrity, competition integrity, and organisational integrity was thought to capture the full range of issues falling under the label of integrity.

7.2. Drivers and threats: the fear of reputational damage and its consequences were uppermost in respondents' perceptions of the drivers for sport integrity. A lack of resource, uncertainty around due processes and procedures were identified as key threats to the success of integrity functions.

7.3. Current approaches: striking a balance between bottom-up education, and top-down compliance was characteristic of current approaches; financial resources played a critical role as did the size and commercial orientation of the stakeholder. Better resourced organisations were associated with a legalistic compliance model of integrity. This was informed by employment law as an unavoidable framework. Equally, other integrity issues (safeguarding) were linked to legal processes, while other cultural factors were not. In addition, acknowledging that much of sport is supported by work that is volunteer-based, other models, including codes and ethics committees, alternative dispute resolution methods were discussed as more appropriate alternatives according to the issues at hand.

7.4. Structures and partnerships: several models were described. Often elements which comprised integrity (e.g. anti-doping; event manipulation) were carried out by a designated department or person, while other issues such as anti-discrimination agendas (e.g. equality and diversity) were dispersed throughout the organisation. Exploiting existing partnerships between sports that had evolved in the successful roll out of mandated policies (e.g. anti-doping; safeguarding) could be utilised more broadly. While knowledge sharing was thought to be critical it is not clear that anything so definitive as "best practice" could be identified, though elements of "good practice" would be a more reasonable starting point.

7.5. Delivery and compliance: both the nature of the sport stakeholder and its relation to financial resourcing influenced models of delivery and compliance. Home Country Sport Councils and UK Sport did not formally see themselves as regulators of integrity issues, yet their capacity to distribute financial resources, or withhold them, from "non-compliant" member bodies could not be ignored. Processes for enacting this power were not developed and could appear to be ad hoc. Considerable support for the development of a prioritisation framework was offered, highlighting the need to identify those elements of the integrity model that were the subject of legal and financial considerations. This might produce a prioritisation strategy that acknowledges: issues subject to legal obligations; ethical priorities so important they could be mandated from those that would be merely aspirational.

7.6. Future developments: there was universal support for the development of a UK-wide Sport Integrity Forum. It was acknowledged that the model of the Sports Betting Integrity Forum could be a good example but that its brief was restricted to the betting dimension of event manipulation, its antecedents and solutions. Other suggestions included online support, portals for confidential information sharing and the establishment of criminal laws for event manipulation. The inclusion of independent elements to the development of a forum was universally supported to counter perceptions of conflicts of interest. Moreover, while leadership of such a forum was discussed, there was a lack of majority on any one organisation. Of those mentioned, the Department for Digital, Culture, Media and Sport was the most widely cited.

8. 24 recommendations are listed in the report. Key among them are:

8.1. The formation of a UK-wide Sport Integrity Forum to develop and share good practice and to lead development of a national Sport Integrity Plan;

8.2. The establishment of a UK-wide agreement on the operational definition of Sport Integrity;

8.3. The development of a UK-wide Sport Integrity Education Strategy;

8.4. The development of practice-sharing criteria and partnerships according to the resource levels and shared integrity threats.

Introduction

UKAD, the organisation responsible for promoting clean sport in the United Kingdom hosted in November 2018 a multi stakeholder meeting to discuss the potential overlapping integrity issues and actors across sport sectors. One outcome was the commissioning of this independent research, the aim of which was to map the sport integrity terrain and to make recommendations as to the future integrated development of sport integrity as a key element within the scope of good governance in the UK sporting landscape. The study examined the views of key stakeholder groups through online questionnaires (n=51), face-to-face focus groups (n=2), and individual interviews (n=10) to gain a deeper understanding around approaches to sport integrity across the UK, the reasons for the development of integrity functions and barriers to, and enablers of, future development.

The central focus of the research, sport integrity, is something of a moving target. It has only recently become a widespread term in sports nomenclature. Unsurprisingly, then, there are many competing definitions of sport integrity. It is a contested concept. For the purposes of this report we assert a definition that we believe is both inclusive and concise. Sport integrity refers to the ethical value of sporting conduct and character, commitment to the authenticity of sporting contests, and their coherence with ethical codes of sport organisations, for those engaged in sport in all roles and at all levels. This caters for the three overlapping dimensions of sport integrity, widely acknowledged in the academic literature, that were investigated in and

through this research; personal, competition, and organisational. The dimensions are important to distinguish analytically, even though they often overlap in real world contexts, since they locate responsibilities in policy and practice that must be addressed for a holistic approach to the phenomenon. It also recognises the different constituencies of sport, from administrator to athlete, coach to officials, whose words and actions must cohere if sport integrity is to be protected and promoted.

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Sport Integrity: A Very Brief Review of Literature

The term "sport integrity" has gained global currency in recent years but there is still considerable confusion over what, in particular, it refers (Gardner et al, 2017; Harvey and McNamee, 2019). Certainly there is a case for saying that many sport industry personnel reserve the term for discussions of "event manipulation" (UNODC, 2016) while betting related manipulation has given rise to the term "sport betting integrity" and related policy development (see SBIF), while others have distinguished "narrow" and "broad" conceptions of sport integrity (McNamee, 2013) to capture the distinction. While "narrow" refers to sports betting manipulation, "broad" sport integrity refers to those ethical practices that form our understanding of fair sport competition and conduct, which in turn form the focus of this research.

It is clear that understanding developments in sport integrity requires an appreciation for the broader policy landscape out of which it emerges. Increasing research attention has been given to particular, ethically salient issues over the last two decades including, principally: anti-doping (WADA, 2019); safeguarding (Brackenridge, 2002); equality and diversity (Bray et al, 2013; Hayhurst, 2011; Spracklen et al, 2006); event manipulation and anti-corruption (Forrest and Simmonds, 2003; Serby, 2015; UNODC); and the increasing adoption of models of good governance (Chappelet, 2013).

While journalists and some scholars have unhelpfully tended to lump together the vast portfolio of problematic practices in sport under the label "sport integrity", sport ethicists have used the concept of "integrity" as a lens to analyse negative practices in sport competition and practitioners. Unethical practices like those listed above are thought to damage or corrupt the integrity of sport by negatively affecting the interests of the sporting activities (Butcher

and Schneider, 1998) and sports organisational structures, as well as the individuals involved. Much of the literature on sports ethics has tended to adopt an issues-based focus, whether concerning anti-doping, abuse, harassment, sexual exploitation, simulation, and so on. Sports journalists have, in addition, often focused on the failures of personal integrity of sports leaders, and, along with social and political scientists, investigated inept or corrupt structures.

Each of these approaches has merit. To understand when sporting competitions are corrupted we must have a relatively clear idea of what the "intrinsic goods and excellences" (Simon, 1991; Devine, 2011) of sports are in order to understand when practices undermine them (Lopez Frias and McNamee, 2018). The well-known example of Rosie Ruiz, who took a shortcut to cross the finish line before any other competitor in the 1980 Boston Marathon, is a classic case in point. She failed to run the complete 26mile/42 km course (using the subway mid-event!) and thereby failed to achieve the athletic excellences of the endurance foot race. In essence her actions were no different to a cyclist riding with the benefit of a concealed motor, who denies their opponents the fair opportunity to contest the athletic goal.

In the last few decades, using the well publicised scandals in sport institutions such as those at the International Olympic Committee (IOC), the Fédération Internationale de Football Association (FIFA), and the National Collegiate Athletics Association (NCAA), sport philosophers have examined the concept of "integrity" not in relation to personal moral character or sport competition but to sport governing bodies and institutions (McNamee, 2013). Thus, the discussion on integrity has regained relevance in sport ethics and sport politics as the result of the

interest in good governance in sport communities (Gardiner, Parry, and Robinson, 2017; Auweele, Vanden and Parry, 2015; Geeraert, Alm and Groll, 2014; McNamee and Fleming, 2007).

What these simple remarks reveal is made more difficult by a plethora of definitions that have arisen in the sports ethics and governance literature. Often a lack of clarity and precision has fostered conceptual inflation, to the extent that sport integrity becomes a label for any and every ethical issue in sport. This is not helpful for policy makers nor researchers attempting to chart the field. There are simply too many maps and models. For the sake of simplicity it may be easier to identify there are three dimensions of integrity-related issues in sport, namely: organisational integrity, personal integrity, and competition integrity (Archer, 2016; Cleret, McNamee and Page, 2015; Gardiner, Parry and Robinson, 2017; Lopez Frias and McNamee, 2018). The interrelated dimensions allow us to articulate the kind of integrity goal and failures that are the objective of any particular subject, whether it be event manipulation, doping, or corruption.

What is clear is that the current landscape is dominated by organisational aspects and has been pursued under the aspect of sport governance.

There has been a rise of strategy documents and resultant working groups that have emerged in this landscape. These include: Sport Betting Integrity Forum (SBIF); International Partnership Against Corruption in Sport (IPACS); High Performance Strategic Advisory Group (HPSAG)/ UK Governance Group; International Olympic Committee (IOC); Council of Europe (COE); Wood Report – Review of Australia's Sports Integrity Arrangements; Duty of Care in Sport Report –

Baroness Grey-Thompson; Department for Digital, Culture, Media and Sport (DCMS) Sport Strategy; Code for Sports Governance – UK Sport/Sport England; Tailored Review of UK Anti-Doping (UKAD) – DCMS.

It has typically been the case that these developments have frequently been presented under the aspect of governance initiatives. The phrase "good governance" has achieved global recognition in the world of sport largely, though not exclusively, because of the large-scale public scandals of the Federation Internationale de Football Association (FIFA), the International Olympic Committee (IOC), the Russian state-sponsored doping saga, and more recently the high profile prosecution of Dr Larry Nassau for his sexual abuse of hundreds of female gymnasts in the USA. As a consequence most sports federations, national and international, appreciate the importance and relevance of good governance (Brown and Caylor, 2009; Geeraert, Scheerder and Bruyninck, 2012). This awareness has not, of course, resulted in all International Federations (IFs) or National Governing Bodies (NGBs) exhibiting good governance. Many researchers attribute this, in part, to the lack of clarity in articulating the precise boundaries of "good governance," creating a lacuna between expectations and reality (Van Kersbergen and Van Waarden, 2004).

Recent research by Moore Stephens (2018) stated that "sport governance" had many of the usual features of governance elsewhere, but that there were additional features to consider such as match-fixing, anti-doping, safeguarding of vulnerable persons, and dealing with volunteer directors. Sports governance therefore not only includes regulatory procedures but also ethical ones, meaning that there are systems

and procedures that must be followed but also an element of individual and collective moral reasoning for actions and behaviours in delivering and implementing good governance, many of which are not very precisely circumscribed. In relation to sports governance, McNamee and Fleming (2007, p.428) take it "simply to mean the structuring of an organisation so as to achieve its aims or mission in ways that are ethically defensible". Similarly, Chaker (2004, p.5) writes of the "creation of effective sport-related state agencies, sports non-governmental organisations and processes, that operate jointly and independently under specific legislations, policies and private regulations to promote ethical, democratic, efficient and accountable sport activities". The relationship between ethical standards and governance is an intimate one, although ethical elements are often not explicitly delineated.

There have been many definitions of governance offered as stated above, and also some, but not an extensive, level of research has gone into developing practical indicators of good governance for sport (Geeraert, 2015) (Chappelet and Mrkonjic, 2013) (Chappelet, 2011). Geeraert (2015a) developed the Sports Governance Observer (SGO) as a practical benchmarking tool for IFs to enable them to monitor their governance against the four key elements of: Transparency; Democratic Process; Checks and Balances; and Solidarity.

There have been relatively few attempts to develop tools to monitor general ethical issues within sports, perhaps due to sport largely being a rule-based activity. Possibly the only example is a report commissioned by Sport Scotland (McNamee and Fleming, 2005; 2009) of an ethics audit of an entire sport organisation. It is perhaps surprising that so few organisations have conducted such an audit, or at least have done so
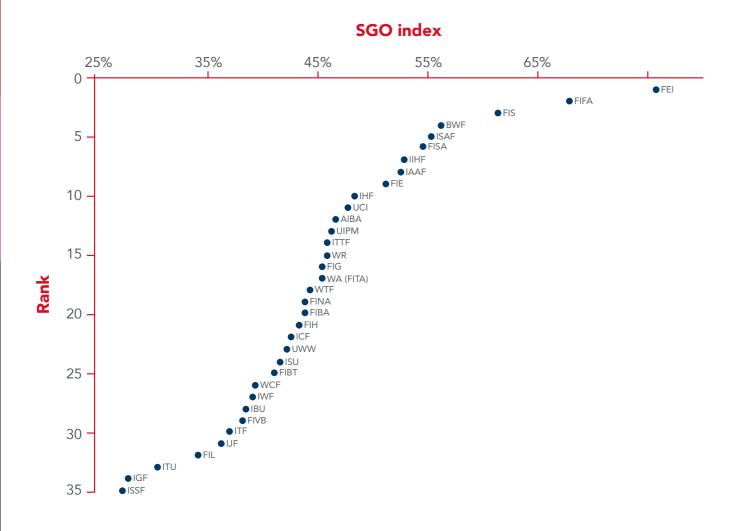
and reported their findings publicly. One recent example of this is the Wood Report (2018) which was a full review into Australia's Sports Integrity Arrangements, which was heightened following the ball tampering scandal which hit Australian Cricket in the Spring of 2018.

Geeraert (2015a) collected data across 35 IFs scoring them on all 36 (under the four key elements listed above) indicators of the SGO, mainly through observing sources of information such as IF's websites, statutes and regulations. General Secretaries were also provided with an opportunity to review the data collected with a response rate of 43% (15 IFs). Despite being subject to serious allegations of corruption (Schmidt and Borden, 2015; Pieth, 2011) FIFA was allocated the second highest score of all IFs (see Figure 1: Geeraert, 2015a). This is a worrying statistic bearing in mind the general perception that FIFA was seen in many people's eyes as corrupt and exhibiting poor governance, whereas in reality, it was scoring higher than other IFs, suggesting that there were serious deficiencies in the governance across the board. It is worth noting again, that good governance is not only about being in possession of, or having developed a framework, but more importantly about how one delivers, implements and lives by said framework and set of rules.

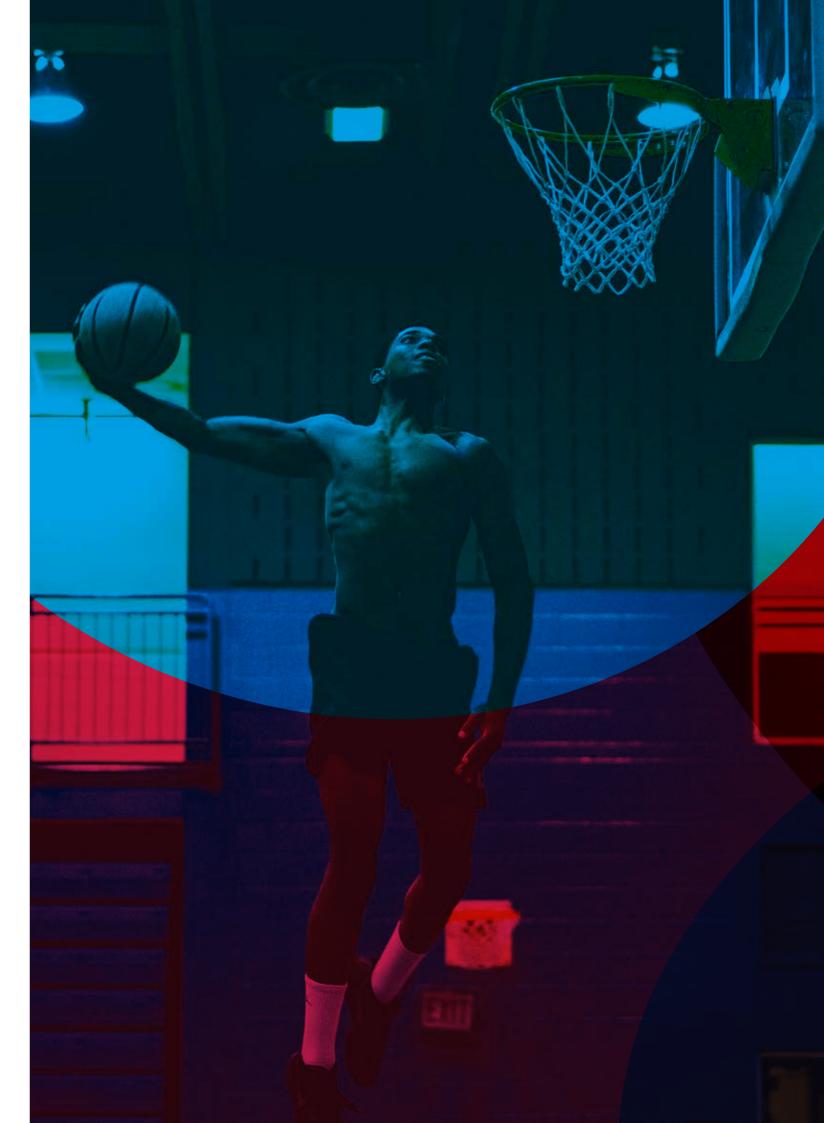One of the main findings of the study showed that most IFs had internal audit committees and codes of ethics, but were weak in relation to athlete representation and ethics committees. There were large individual variations across federations. Nevertheless, Geeraert stated that most federations scored poorly on some key governance indicators, suggesting that there is a more general governance challenge in international sport.
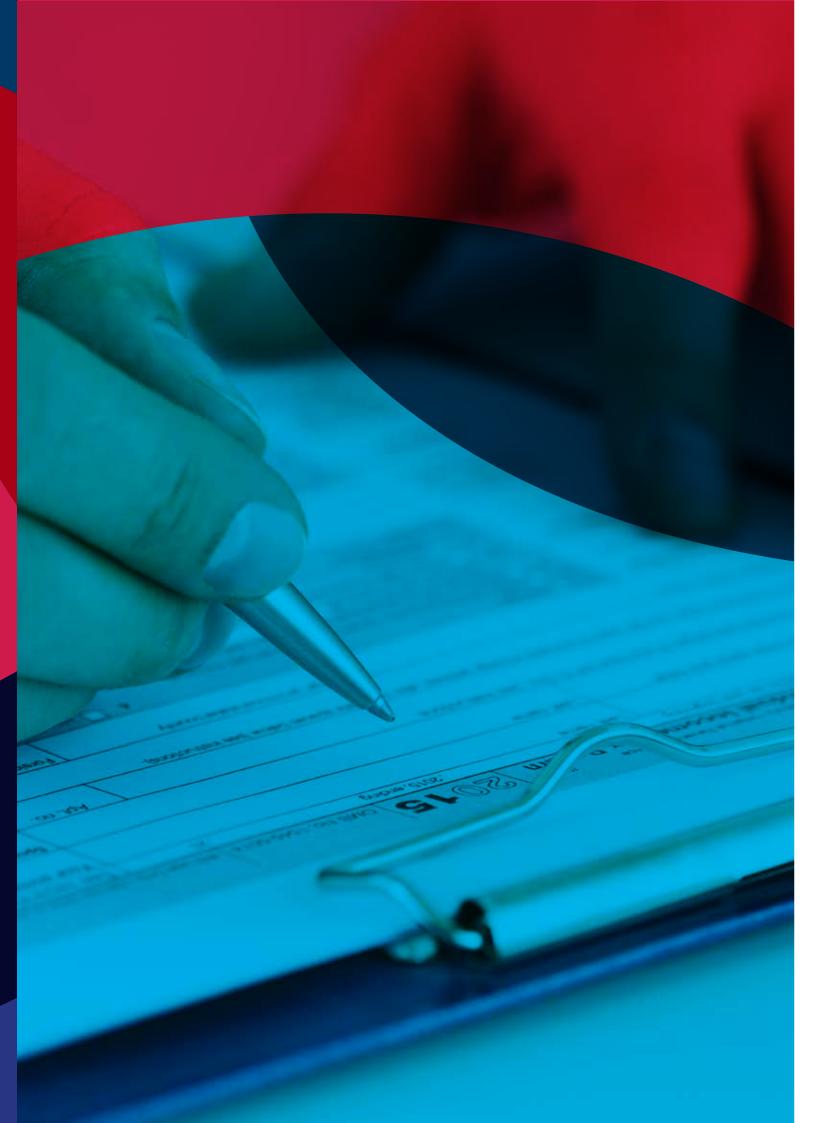
A significant element of Geeraert's seminal survey was the lack of established independent audit and ethics committees with sufficient authority to execute important functions such as: efficient financial controls, risk management, and proper implementation/audit of ethics codes. Very few federations have robust and independent audit and ethics committees. Most federations score a 2, indicating that their audit and ethics committees are not working independently and have very unclear or limited competences. On average, the federations score a modest 2.09

(audit committee) and 1.97 (ethics committee) in the system, where a score of 1 represents 'not fulfilled at all', 2 means 'weak', 3 is 'moderate', 4 is 'good' and 5 is 'state of the art', with FIFA being the only federation to score a 5. Geeraert concludes by suggesting that one of the biggest problems in this area is the lack of authority provided to the ethical committees; this meaning they do not have the power to instigate investigations without the consent of the president or executive committee.

SGO index

Figure 1. *Geeraert (2015a) Sports Governance Observer 2015 Index Scores showing to what degree the federations comply with the 36 indicators constituted in the four governance dimensions.*

Figure 2. *Geeraert (2015a) showing whether organisations have internal audit and ethics committees (n=35) and how competent they are.*

In response to the study some sports organisations, including FIFA, conducted governance reviews and proposed further reforms (FIFA 2016), and the The Association of Summer Olympic International Federations (ASOIF) introduced their own governance benchmarking framework, 'Key Governance Principles and Basic Indicators' (ASOIF, 2016), which is an externally verified self-assessment tool, but doesn't assess relevance or adherence. Again, as stated above, and of important relevance is the integrity of individuals and organisations who would use such tools or benchmarking frameworks. These frameworks and assessments are only as good as the people or organisations implementing them.

Although Geeraert's study focuses on IFs, National Federations or NGBs may be seen as being both ahead of, or behind, the curve in terms of sports governance compared to International Bodies. NGBs tread a fine line between compliance with the rules of their IF and any national funding or legislative requirements. Whilst publicly funded NGBs in the UK are now compelled to meet the standards of the UK Code for Sports Governance, they are equally influenced by their IFs which may have different standards, expectations and accountability, and often very different levels of resource and rewards. With regard to term limits for post holders, for example, the IFs have a much greater tolerance compared with the UK Code, putting UK NGBs at a potential disadvantage in influencing future decision-making. In contrast some IFs have better developed codes of ethics and committees. However, UK NGBs and their funding partners, sponsors and investors have bona fide (commercial and reputational) interests in ensuring that decisions relating to performance, elections, procurement and, for example, attribution of events are carried out in a fair, transparent and ethically sound manner.

A limitation to Geeraert's study is the lack of involvement of key stakeholders, with the exception of General Secretaries, and this is very surprising considering the frequency of the word "stakeholder" appearing in texts concerning governance, and the author referring to the Principal-Agent Model (Jensen and Meckling, 1976) as a powerful tool to examine relationships where one stakeholder acts on behalf of another.

A complementary view of the importance of assessing key stakeholder relationships can be found in Mitchell, Agle and Wood's (1997) "Stakeholder Typology", which suggests that the dynamic of relationships varies according to the three key elements of power, legitimacy and urgency. Furthermore, the Financial Reporting Council (FRC) has very recently developed its latest version of the UK Corporate Governance Code (FRC, 2018) with an added focus on relationships between organisations and key stakeholders being at the core of long-term sustainability and urging organisations to understand their stakeholders' views.
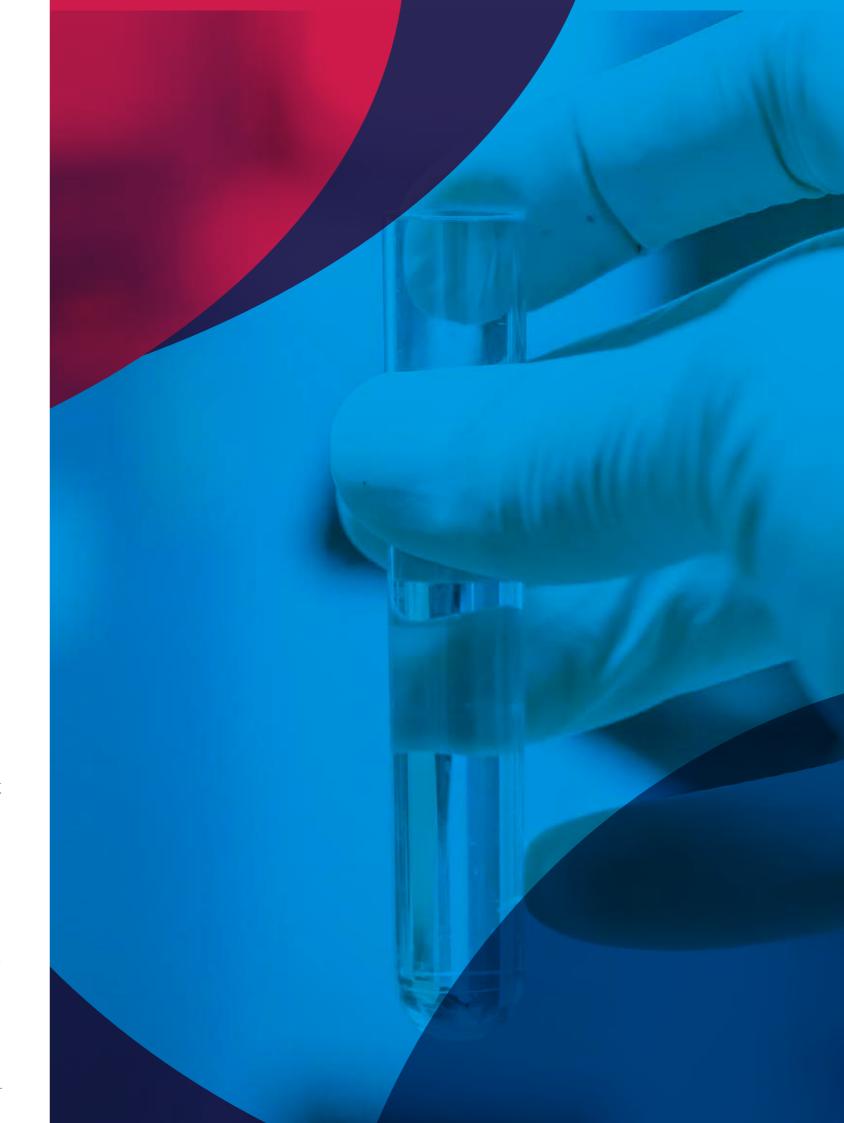
These representations of organisational approaches to the conduct of individuals and operations of sport organisations, by focusing on governance, have had a tendency to skew, or at least focus narrowly, on organisational aspects of sport integrity. Nevertheless, two key elements of good governance relating closely to organisational integrity, that must be explored in greater detail, are cultures and behaviours. Put in simple terms, both individuals and organisations must not only "talk the talk", but also "walk the walk".

Good sports governance is not only about structures, policies and procedures, but is also heavily reliant on having a culture within an organisation that allows it to thrive and make ethically informed decisions. Organisations can have the best policies and structures, with a clear vision, mission and values, but having values printed on documents, and living those values are two completely different, though inter-related matters. A governance framework in itself cannot assure personal integrity although it can place effective checks and balances for integrity threats or failures. It can also enable an organisation to demonstrate the tone and behaviours of a sport's operations.

Sport Scotland, Sport Wales and Sport Northern Ireland all launched their own Governance Frameworks over recent years with specific reference to the Nolan Principles and behaviours expected of Board Directors, with Sport England and UK Sport following suit with the launch of the Code for Sports Governance in 2017. Since then, UK Sport has established a Sport Integrity Function to help re-build trust through visible changes in behaviour and culture following some very high-profile cases of athlete bullying (Roan, 2017).

The framing of personal integrity is often captured in both negative and positive terms. Positively expressed, integrity statements typically list a range of desirable values, though the process of their selection and validity often goes un-noted. When it is more specific it is usually in negative terms, articulating misconduct and associated offences. UK Sport has developed a number of model policies for misconduct and offers a template for UK-based sport organisations to develop their own integrity-related aspirations and practices.

One of the key initiatives of this function has been developing a "Culture Health Check" that collates insights from all key stakeholders, including athletes and staff, with the aim of creating positive cultures, an early warning system highlighting potential

problems, and being a secure and anonymous way for individuals to seek support. What these initiatives bring to life is the importance of identifying key values and behaviours, and more importantly, living by and protecting them. Identifying such issues is not a novel idea within sports organisations, with such information usually being contained or referred to within a code of ethics.

Since first being introduced in the business world as a tool for promoting ethical behaviour, indicating a company's commitment to ethical business practices as well as to reprimand unethical behaviour (Singh, 2011), codes of ethics have become widespread instruments in sports organisations, but their effectiveness has been questioned (De Waegeneer, Van De Sompele and Willem, 2016; McNamee, 1998).

The different results on code effectiveness can be attributed to the different methods used to examine effectiveness. Kaptein and Schwartz (2008) looked at the number of violations against a code, but this method would not capture those individuals with a fear of disclosing due to an inappropriate or lacking whistleblowing policy. Another complicating factor in this discussion is the uniqueness of sport in comparison to traditional businesses. Babiak and Wolfe (2009) suggested that the sport sector has its own set of characteristics that could influence the effectiveness of ethical codes. One of the most prominent is the amount of scrutiny presented by high media visibility in comparison with other sectors.

A clear example of behaviour changes over the past few years can be seen in professional football, where footballers are regularly seen with their hands covering their mouths when speaking

to each other on the football pitch. The very clear added threats of social media attacks and hacking capabilities of groups such as the "Fancy Bears" are added complications that must be taken into account, as well as the problems of doping and match-fixing. Finally, Smith and Stewart (2010) suggest that some actions that are tolerated in sport would be enough to put employees of business companies in jail. This clearly suggests that there are conventions or actions in sport, such as fighting in ice hockey, that are expected and tolerated, and these must be considered when evaluating code effectiveness.

Therefore, the following questions arise: who is tasked with developing the code of ethics within a sports organisation?; what skills do these people possess in order to do so?, and who makes decisions related to sanctioning any violations of the code? Using the last example, we could ask rhetorically whether an individual working in a major bank who punched a colleague from a rival bank during a business meeting ought be treated differently to an ice hockey player punching an opponent?

As highlighted above by Geeraert (2015a), many IFs have established ethics committees, and these vary according to their scope and power. Due to the lack of available literature on the topic of ethics committees in IFs it is difficult to ascertain their effectiveness and whether they meet the required standards of good governance, especially in relation to democratic processes, separation of power, terms of office, and skills-based appointments.

Another reason for looking at the scope and function of ethics committees is related to scepticism about their purpose. There have been numerous reports of governance initiatives being

referred to as "whitewash" activities, suggesting that they are merely a means of covering up scandalous behaviour and misleading people into believing organisations or individuals are more upstanding than they otherwise might seem. Questions have been asked of people's motives when undertaking activities that could come under the banner of "governance" such as FIFA's governance reforms (FIFA, 2016), which included changes to its ethics committee. Are such reforms genuine, or as suggested by Riordan (2007) mere attempts at ego-boosting or to cover up dubious practices? In the current context, questions could be asked of all IF's ethics committees, as referred to in the research by Geeraert (2015a), as to whether their establishment and purpose is more a marketing ploy to provide members and key stakeholders with a perception that they are taking proactive steps to improve ethical behaviour within their organisation, or a genuine mechanism for improvement. It is also worth noting that some ethics committees may be established with a genuine intention to improve ethical behaviour but lack the necessary power to implement.

Considering the possibility of successful governance reforms, Katwala (2000) presented three possible scenarios: organisational change from within, external pressure, and most likely a forced change as a result of crisis. The key challenge that remains is for sports organisations to achieve fundamental rather than superficial change through the establishment of integrity functions.

According to Kotter (1995), whose work on change management is highly cited and respected, managing fundamental change within organisations requires following an 8-step process, one that can also be applied to

the formation, scope and role of the integrity functions. The 8 steps are as follows: -

1. Create urgency – Develop a sense of urgency across the whole organisation around the need for change, based on open and honest dialogue about what is happening in the sporting landscape.

2. Form a powerful coalition – Convincing people that change is necessary through strong leadership and support from key people in the organisation. Having a coalition of influential people whose power comes from a variety of sources.

3. Create a vision for change – Create a vision that links all the great ideas that are being discussed around the potential change to create a vision that people can easily remember and understand.

4. Communicate the vision – Ensure communication is frequent and powerful, and embedded within the organisation. Keep it fresh and part of the organisation's day-to-day operations and "walk the talk" by demonstrating with actions and not only words.

5. Empower action – Provide key individuals and teams with the knowledge and resources to deliver the change and remove any obstacles or barriers that may present themselves.

6. Create quick wins – Using success to motivate organisations can be achieved through identifying easy and short-term wins. These targets should be achievable and with little room for failure.

7. Build on the change – It is important not to declare victory too early, and short-term wins should be built upon to achieve long-term change. Even some failures can be reviewed to improve future performance.

8. Make change stick – Change should become embedded as a core element within the organisation, and more importantly within its culture. Continuous effort should be made to ensure that the change is seen in every aspect of the organisation and driven by key leaders.

Reviewing current practices of ethics committees across some international sports federations indicates differences in approach and purpose.

Create a vision for change – Create a vision that links all the great ideas that are being discussed around the potential change to create a vision that people can easily remember and understand.

Some Useful International Benchmarks

What are International Federations doing with respect to Ethics and Integrity structure and functions?

Responses to the need for integrity development by IFs are, unsurprisingly, varied. The International Association of Athletic Federations (IAAF) recently established an Ethics Board which was set up as an independent judicial body in accordance with its articles. Its main aim is to safeguard the authenticity and integrity of athletics and take all possible measures to mitigate and eliminate corruption and harm from the sport. An important note is that members of the Board could not be current members of the IAAF and could only be appointed for two terms of four years each.

Within the Board's powers is the authority to appoint independent investigations, issue fines, or suspend people. But, since 3 April 2017, the Athletics Integrity Unit has assumed jurisdiction to deal with any new complaints or matters concerning integrity and ethics within athletics, regardless when the matters complained of or referred to occurred (unless the matter was already before the IAAF Ethics Board as at 31 December 2016). The Athletics Integrity Unit operates independently from the IAAF and has complete authority for the management of ethics and integrity in athletics in accordance with the applicable rules.

The Athletics Integrity Unit represents a new era in the management of threats to the integrity of sport. Through the formation of the Athletics Integrity Unit, athletics has become the first sport internationally to delegate complete authority for the management of its integrity programmes to an independent body. Fully separated from the IAAF, and reporting through its own Board, the Athletics Integrity Unit operates with the level of rigour and transparency expected by the world's athletes and supporters. The Board has a critical governance role rather than a management function, similar in style to that of a corporate board. It is responsible for approving and reviewing strategy, policies and plans for the Unit and for appointing and monitoring the performance of the Unit's Head who is in charge of its day-to-day operations.

The International Tennis Federation (ITF) has an Integrity and Development Department that focuses on the development of tennis worldwide, anti-corruption, anti-doping, science and medicine, and technical elements of the game. It is also responsible for coaching, the Grand Slam Development Fund, rules of tennis, ITF Constitution and good governance. The ITF is also one of seven key stakeholders alongside the Association of Tennis Professionals, Women's Tennis Association, and the four Major Tennis Tournaments which fund the Tennis Integrity Unit (TIU), an operationally independent organisation based in London. The TIU's main function is to prevent corruption, investigate threats and educate all players through a compulsory Tennis Integrity Protection Programme (TIPP). The TIU was established in 2008 and, following a recent independent review in 2016, has more than doubled the number of full-time staff to 17, including a dedicated three-person Education and Training Division.
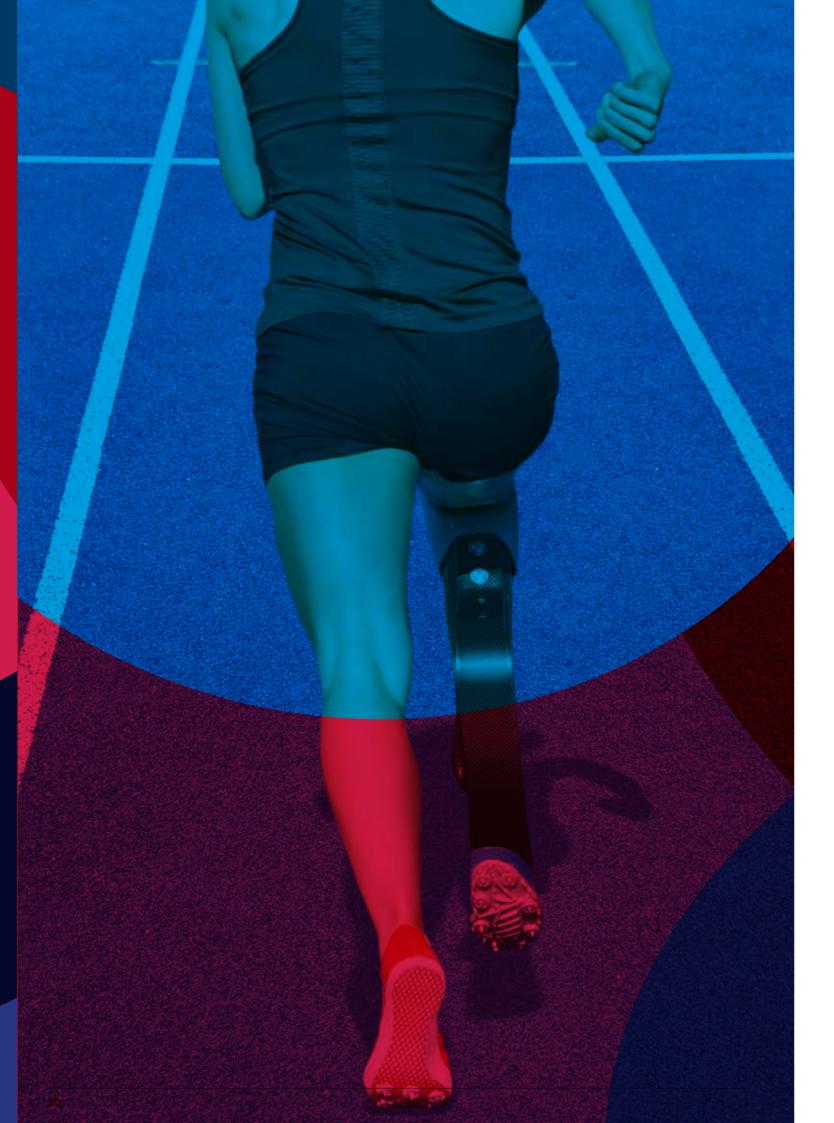
Following significant reforms in 2016 FIFA's (FIFA, 2016) aim was to become a modern, trusted, professional organisation. It is aware that it will take time to change the culture within the world of football but has committed to excel when it comes to governance. Its Executive Committee has been replaced by the new FIFA Council where the President has less power and plays more of an ambassadorial role, there is much more democracy in voting processes, and each member of the Council must be subjected to a fit and proper person check. A maximum of three terms of four years has been introduced and all remuneration will be disclosed each year. Another key change in FIFA has been the separation of powers (board versus business operations) in order to reduce conflict of interest and mirror best practice. The FIFA Council's new role will be supervisory and strategic and will be supported by a fully Independent Audit and Compliance Committee which will monitor the whole structure. In his recent follow-up report, Geeraert (2018) found that FIFA continued to score higher than other IFs when compared across 309 good governance indicators, with one of its key strengths in relation to internal accountability being related to the establishment of its ethics and audit committees and the adoption of a code of ethics. Its independent ethics committee is appointed by the general assembly and has the power and authority to investigate violations of its own accord.

The International Olympic Committee's IOC Ethics Commission has some major accomplishments to its name including reforming the IOC Olympic Charter, the Code of Ethics (IOC, 2016), and establishing an ethics and compliance office, but has also faced criticism for a lack of independence in relation to member composition, lack of transparency of reports produced for the IOC Executive Committee, and having a lack of decision making power, issuing opinions that are advisory but not binding.

As part of its Olympic Agenda 2020 (IOC, 2014), and to comply with the Basic Universal Principles of Good Governance of the Olympic Sports Movement (IOC, 2008), the IOC included a recommendation for its Ethics

Commission to become more independent. Following the proposed changes, members of the ethics commission will be elected by the IOC Session (member associations) and not by the IOC Executive Board (which included the IOC President). Although the IOC should be congratulated on its recommendation to improve the independence of the commission, its meaning of independence must be questioned as its function is to investigate and propose sanctions to the IOC Executive Board, through the hands of the President, who holds the power to implement or not, with recommendations remaining confidential until a decision is made by the Executive Board. The Commission has two key functions: continuously updating the ethical principles as well as implementing provisions based on the values and principles of the Olympic Charter; and conducting investigations into breaches of ethics submitted to it, and as mentioned, subsequently making recommendations for sanctions to the IOC Executive Board. The role that the IOC Ethics Commission plays is heightened by the fact that National Olympic Committees, International Federations, Recognised Organisations and the Organising Committees for the Olympic Games undertake to adopt, for their internal activities, a code of ethics based on the principles and rules of the IOC Code of Ethics, or for some, actually adopt the IOC Code of Ethics.

A recent governance review of the IOC conducted by Institute for Management Development (IMD, 2017) included recommendations to regularly update members on the code of ethics, improve the independence of the Ethics Commission by having an independent secretary, and delegate sanctioning of breaches of the code of ethics to a third party, and for it not to remain a function of the IOC's Executive Board. The International Paralympic Committee (IPC) is currently

conducting an extensive governance review for the first time since 2004 with the aim of improving its position as a world-leading sports organisation. The review includes looking into the structure, role and function of their Legal and Ethics Committee which offers advice to the Governing Board on issues including membership confirmation and ethical principles. The Committee also has responsibility for the IPC Code of Ethics and includes a set of legal obligations and seeks to describe boundaries of acceptable human behaviour and strives to encourage ethical behaviour through advice and education. The findings of the review were presented at the IPC's General Assembly in October 2019 and are subject to a 12-month consultation process.

It is worthwhile noting that ethics and integrity-related sports structures will develop according to the needs and nature of the particular host organisation. Although the principles of integrity remain the same, different organisations will apply them differently and should not directly be compared without due caution.

Aim of this Research Project

The aim of this research is to map the terrain and make recommendations as to the future, integrated development of sport integrity as a key element within the scope of good governance of sport within the UK.

Objectives:

1. Provide insight into the extant approaches to sport integrity, understood in its broadest sense as they currently stand.

2. Provide insight into the reasons for the development of the sport integrity agenda, and barriers to that development as they might be.

3. Provide recommendations for the synergystic development of the sport integrity agenda as well as sharing policies and emerging best practice.

Research Methods

The UK sporting landscape is very diverse with different cultures, historical influences and resource available to organisations. A mixed methods quantitative/qualitative approach allowed the researchers to capture and understand these differences. Additionally, the integrity functions must consider the views of all stakeholders and largely depend on individual or collective behaviours. Social interactions within the human community cannot be fully captured by survey data (Chappelet and Mrkonjic, 2013).

In order to capture the views of all key stakeholders, the researchers undertook the following:
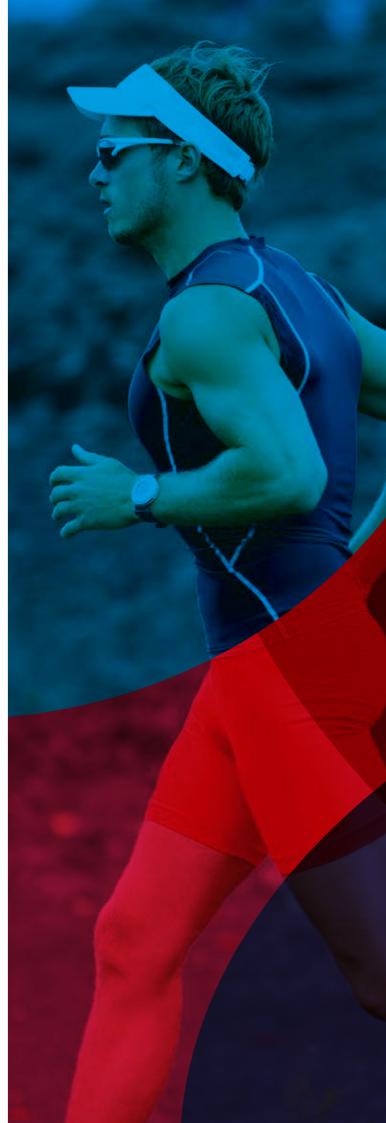
1. Mapping exercise undertaken via an online questionnaire that described extant approaches to sport integrity, understood in its broadest sense.

2. Analysis of the questionnaire led to two stakeholder focus groups (one North UK, one South UK) to tease out reasons for the development of the sport integrity agenda, and barriers to that development.

3. Insights gained from both phases led to the identification of key individuals and NGBs (n=10) who were invited for in depth interviews to probe in greater detail these issues and to elicit recommendations for policy development.

The online questionnaire was shared via Survey Monkey and consisted of 35 questions. 51/81 stakeholders completed the questionnaire giving a response rate of 63%. The sample respondents were from a range of key stakeholders including UK sports councils, national and British governing bodies of sport, law enforcement, government,

international sports federations and other non-sport related bodies. Confidentiality and anonymity measures mean that it is inappropriate to report further detail concerning the interviewees.

A semi-structured format using a topic guide (see Appendix 1) developed from the literature review and online questionnaire responses was used to explore people's feelings and experiences of sport integrity functions. All focus group and interview participants were asked to read an information sheet and sign an "informed consent" form to participate in the study and were encouraged to talk about their experiences including intrapersonal, interpersonal and environmental factors.

12 participants took part in the focus groups with a further 10 individuals being interviewed. Each focus group/interview lasted between 30 and 120 minutes. They were conducted by the researchers in July/August 2019 either at a safe, private location, making every effort possible to minimise the exposure of participants in the research study to others, or via skype/phone. All focus group and interview data were transcribed verbatim and independently read by both the researchers. Key quotations were independently identified and grouped in categories, themes and sub-themes, to achieve "consensus validation" and to reduce the potential bias among or between the research team, before resolving any disagreements and agreeing on the final cluster of categories.

Ethical Considerations

Ethical approval for the study was granted by Swansea University (reference 2019-037). Importantly, all participants were notified of the processes to secure confidentiality and anonymity in the information sheet and the informed consent process, but, as the sample was taken from a selective group, it would be impossible to guarantee absolute confidentiality and anonymity. Therefore, in order to protect individual participants as much as possible the following safeguards were put in place.

The identities of the sample were not revealed to any other participant other than those participating in focus groups who were participating under Chatham House rules. Each focus group and interview participant were coded with a letter and a number, and general labels such as "NGB", "sports council", and "law enforcement" used. Transcribing of all interview data was done by a member of the research team and will under no circumstances be shared or discussed with anyone outside of the team, except anonymously. The data was transferred to a secure laptop protected device immediately after each interview.

Key Findings

Online Survey

51 out of a possible 81 stakeholders who were sent the questionnaire via an email from UKAD's offices responded to the survey giving a response rate of 63%, which is extremely high and confirms the importance of the sport integrity agenda to the stakeholders.

There were 35 questions included in the survey (see Appendix 2). Respondents were free to answer as they saw fit, for example, depending on an answer to question 3 (yes/no) respondents would automatically move to either question 4 or question 23.

Definition of Sport Integrity

When asked to define the term sport integrity in their own words, numerous different definitions were received. As mentioned in the literature review it seems that there is no one definition of sport integrity being used across the UK thus making it difficult when trying to compare and asking people to respond on the topic. Below is a list of areas included in the definitions beginning with the most referenced.

Definition of Sport Integrity

Figure 3. *Key areas identified when considering the definition of sport integrity*

Interestingly, two respondents stated that sport integrity did not include safeguarding, equality and diversity. This heterogeneity reflects the literature and policy landscape internationally.

It was important for the research team to understand the variety of respondents' views and perceptions of sport integrity. Due to the huge disparity of responses, responses to the questionnaire can only be taken as individual responses based on the respondents' own organisations or individual perceptions of integrity definition, functions, scope and powers, and not as a collective discussing exactly the same phenomenon. Nevertheless, it is fair to say that most respondents were working within a reasonably close set of parameters to each other with some seeing integrity with a narrow focus, and others with a quite broad focus.

Further information gathered from the online survey provided useful information for developing the key topic areas to discuss in further detail during the focus groups and interviews.

Organisations with Integrity Functions

38 respondents (75%) stated they had a recognisable integrity function(s) within their organisations, and the majority of these functions had ultimate oversight by the Board (19) or Chief Executive Officers (CEO) (11).

Sport Integrity Budgets

Again, there was huge disparity in the annual resource available to organisations, with over half being less than £10,000, and others over £2m. 11 respondents were unable to answer this question as integrity was dispersed across different departments and different budgets across their organisation.

Job Titles and Experience of Lead Integrity Officers

When asked to list the job title of the person heading up the integrity function of the organisation the following variances were found. Listed in order of popularity (top to bottom, left to right).

Head/Director of Integrity	Head of Operations and Governance
Head of Legal and Compliance	Anti-doping and Integrity Officer
Performance Manager	
Anti-doping Officer	Child Protection Officer
Head of Governance	Technical Executive

Figure 4. *Job Titles and Experience of Lead Integrity Officers*

The majority of these roles listed above are accountable to the Board, CEO or Director of Legal and Governance. The range of legal/non-legal direction is something that will be picked up later.

It appears that integrity functions are reflected in personnel of a considerable degree of experience and/or seniority. 80% of the roles are full-time positions and with occupants either being in post for over 10 years and very experienced or have been in post for under two years. This may be a result of the recent increase in integrity related roles across sport. Many of the postholders have a background in management (35%) and law (30%), with others coming from police (15%) or safeguarding (15%).

In addition, 77% either have a Master's (36%) or degree (41%), and over half of them lead teams/units with four or more staff. 17% work alone with no other colleagues working within an integrity function.

Sport Integrity Staff
In addition to those heading up integrity units, the following job titles were shared for those working within integrity teams, again listed in order of popularity (top to bottom, left to right).
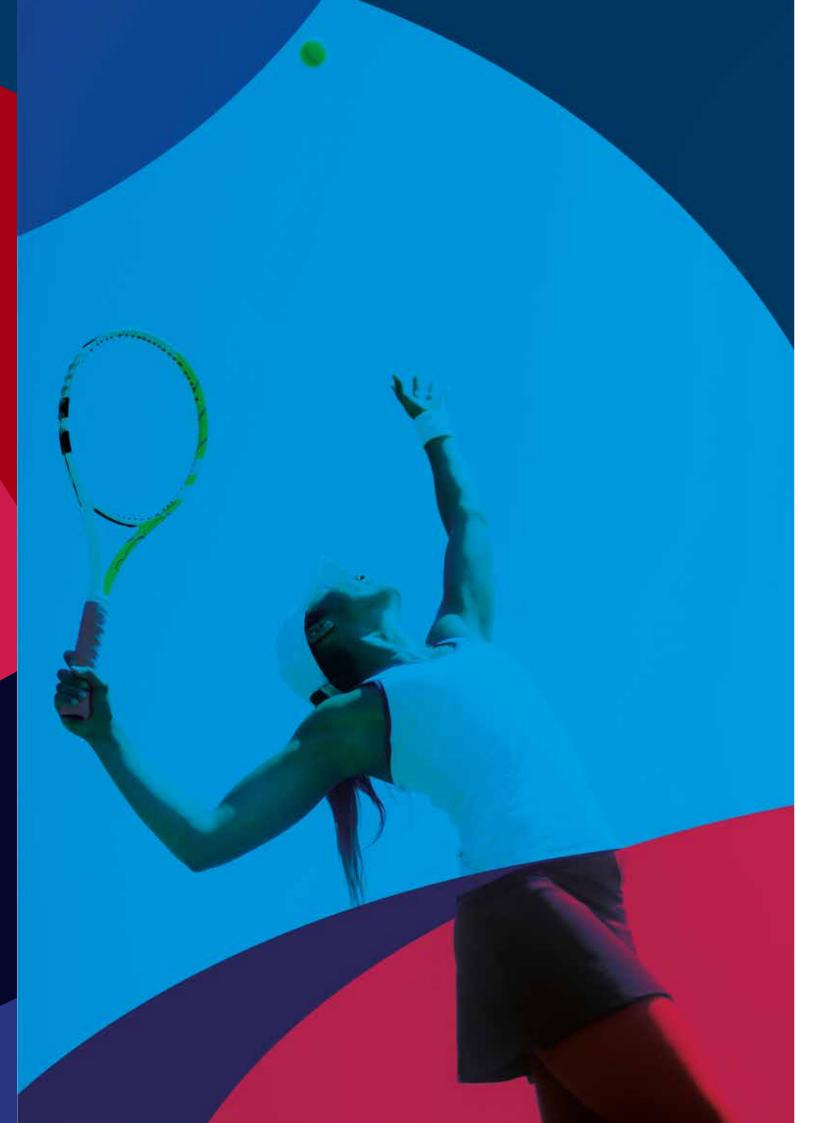
Safeguarding/Welfare Officer	**Integrity Investigations Manager**
Compliance Manager	**Integrity Analyst**
Integrity Manager	**Head of Business Operations**
Anti-doping Manager	**Customer Complaints**
Well-being Officer	**Clean Athletes Coordinator**
Discipline Manager	

Figure 5. *Sport Integrity Staff Roles*

Post-holders again came from a variety of backgrounds with the majority having experience as safeguarding officers, police, social workers, sports development, coaching and regulatory/law. 85% of these roles were full-time positions with 78% of post-holders holding either a degree or Master's degree.

Barriers to Sport Integrity
Outside those organisations currently with established integrity functions not many were looking at creating or establishing integrity functions. Some referred to the fact that integrity was seen as part of governance and was spread across many different functions as a reason not to establish a specific integrity function. Others listed the following barriers.

Lack of resource	**Bringing all integrity issues under one umbrella**
Organisation too small	
	Education done in a seperate function
Change of staff	
Serial complainers	**Sports development and core business function prioritised**

Figure 6. *Barriers to Sport Integrity*

Reporting Mechanisms
The term "whistleblowing" is the most commonly used label for processes of reporting misconduct. Even then the literature distinguishes "internal" and "external" whistleblowing according to whether the report uses an organisation's own system, or whether the whistleblower or complainant goes to an external agency or organisation to report their concerns. Moreover, internal systems are normally recommended as the default, and that external whistleblowing (e.g. to media) should only arise after internal mechanisms or procedures have been attempted or exhausted. In addition, these systems may require the whistleblower or complainant to identify themselves or enable anonymised reporting. Of course, for this to happen the organisation must have a publicised process.

85% of respondents provided either a whistleblowing or welfare support service to their members. The success or uptake of these initiatives is unknown. This would be an important item to be addressed in any ethics audit.

The data above does not provide sufficient detailed evidence to make any specific claims for the development of sport integrity across the UK. Its purpose is principally descriptive: in capturing this baseline data the research team could describe the existing sport integrity terrain in the UK, and was able to take an informed view of key areas to be probed in the next stages of the research. The findings above, combined with the recent literature review, allowed the team to identify key stakeholders in the UK and invite them to participate in more detailed discussions on sport integrity in the UK via interviews and focus groups. It also allowed the team to develop a clear topic guide of areas to explore during the focus group and interview discussions.

Focus Groups and Interview Findings and Discussion

After conducting and transcribing the interviews, the first two lead authors (McNamee, Parry) independently reviewed the transcripts to identify key concepts (codes) and sub themes (memes). In reviewing the data, 240 quotes were selected then grouped into the six key themes. Several sub themes were identified within those themes. These are listed below in Table 1 and are discussed in the order presented therein. Where the data emerges from a Focus Group (i.e. FG1; FG2) it will be indicated by FG, and where from an interview it will be indicated by a Participant and number (e.g. P5).

1. **Sport Integrity Definition and Concept**
   Clarity; Coherence; Resource; Three-Dimensional Model

2. **Drivers and Threats to Sport Integrity**
   Reputation; Reactive – Preventative Approach; Lack of Resource; Processes and Procedures; External Threats

3. **Current Approaches to Sport Integrity**
   Education/Compliance; Risk; Working Together; Tools for Compliance; Rules-based vs Values-based; Transparency

4. **Organisational Structures and Partnerships for Sport Integrity**
   Dispersed Model: Effective Leadership and Communication; International Relations; Partnerships

5. **Models of Delivery and Compliance of Sport Integrity**
   Financial Pressure to Comply; Resource; Principle-based Approach; Tiered Approach; Mandatory vs Non-mandatory

6. **Future Developments in Sport Integrity**
   Sharing Best Practice/Information; Education; Continual Professional Development on Culture/Behaviour; Creation of UK Sport Integrity Forum

Table 1. *Themes and Sub themes*

Sport Integrity Definition and Concept

It came as no surprise that the most basic lack of clarity in relation to sport integrity was evidenced in both focus groups and interviews. It would be unreasonable to expect clarity in operation where the research literature is itself a contested terrain. Without clear conceptualisation, comparisons between policy and provision are made problematic.

A key challenge then in simply charting the UK landscape is to compare different, albeit overlapping, maps without having a consistent working definition of sport integrity. The following comments highlight a plethora of views and some of the challenges faced in summarising sport integrity and making it applicable to a wide range of stakeholders.

"I think sports integrity is hard, it means different things to different people. Half of the art is being able to articulate something" (FG1)

"we've talked about a whole range of things here and this is one of the things, we've kind of classified integrity as meaning safeguarding, gambling, anti-doping" (FG1)

"The way we would describe integrity is anything from upholding the core values, sportsmanship [sic], teamwork, gamesmanship [sic], but also to include safeguarding, anti-doping, gambling, anti-corruption measures and agent's integrity, and through to financial integrity as well" (P8)

More generally another stated:

"it's things like, I've already said fair play, fair competition, standardised practices, honesty, team spirit, not such a good one but the values placed on camaraderie, character building, good citizenship, so I suppose if you define what a good citizen is, and therefore what a good

environment for good citizens to live in, that gives you the basis or the breadth really of integrity. The list is pretty extensive. Some more sport specific stuff, we are talking safeguarding, equality, culture." (P4)

These quotations are indicative of heterogenous views of sport integrity but reveal the basic confusion surrounding the conceptual boundaries (criteria) of the term. Often, interviewees or focus group attendees were more comfortable talking about particular elements of sport integrity. A problem arises then, in whether sport integrity is a separate, specifiable entity or whether it is merely the sum of particular parts (anti-corruption, anti-doping, safeguarding, etc). The problem can be captured by a fruit and vegetable analogy: is sport integrity like a peach, with a core, or like an artichoke comprised only of its leaves and with no core? Even if it were the latter, however, there would still be a need to achieve a consensus over what those constituent parts ought to be. There is no sense in which a universal standard exists before this research. To the contrary, and bearing in mind that the UK is a leading sport nation taking ethical issues more seriously than many, perhaps most, others, it is up to leading nations, and/or IFs (e.g. IAAF, FIFA) and/or event organisers (e.g. IOC, CG) to determine the boundaries and elements of the concept of sport integrity.

The conceptual problem is not simply an academic matter. It is both philosophical and practical at the same time. It has direct economic, legal, political and operational ramifications. This is revealed in organisational structures, scope, and powers. The following quotations are indicative:

"so, in our sports strategy we've got a section which is titled "The Integrity of Sport" which then breaks it down into anti-doping, manipulation of

sports competition, and fighting corruption and then goes on to governance. So that doesn't incorporate safeguarding and duty of care under the same." (P5)

Aside from issues of coherence, one participant spoke of some integrity issues being "big enough" to have a distinct function:

"The main things in terms of integrity we would say are anti-corruption, anti-doping which is one of my main areas, good governance and it's kind of a grey area as to whether or not safeguarding, welfare, duty of care that kind of area falls under it as well. We've actually got a separate team that deals with that side of things, but, there's obvious ways that would fall under integrity as well, so it's not strictly treated as integrity issues, they're seen as big enough issues that they're stand-alone but they can come under the integrity umbrella, but really for us its mostly anti-corruption, match-fixing, anti-doping and good governance." (FG1)

Even then, it was a moot point how sport integrity cohered with existing structures and policies:

"My immediate reaction here is I think integrity is a word that should sit above governance. I think integrity in my definition is very much a strategic word and it has to have a dotted line to governance. But I think there's a danger in putting it too close to governance, because the danger here is everyone thinks integrity is governance. Integrity is more than governance. You and I know there are many organisations and individuals who demonstrate and abide by good governance because they have to. But that doesn't necessarily mean they are abiding by the rules of integrity" (P7)

Finally, the point that sport integrity, whatever it is finally taken to mean, should not be seen as a problem only for elite sports was mentioned by two very different stakeholder interviewees:

"I think sports integrity is a phrase that's used quite a lot with high performance, elite sport, but it doesn't mean that it doesn't exist elsewhere, it's just managed in a different way. It's more the risks of things, bad things happening" (FG2)

Whereas we should be wary of the

"role the media plays also creates the link between sports integrity and high-performance sport. You've also had in football historic things about safeguarding issues, so I don't know whether other people would capture that in integrity, but I think that participants at grassroots level you might easily say a sport's got a lack of integrity if it's not able to protect its participants or people" (P3)

Not every participant agreed that heterogeneity was a good thing. The following quotation reveals diversity among well resourced professional sports;

"even similar sports can't agree sanctions in the same way because the sports run in different ways, and that's just in sports betting, before you get into intermediaries, financial misconduct, inclusivity all those different areas, because sports are so fundamentally different so I think what you're saying about a code I think you would have to be very careful in how that would work in order for it to be actually workable for every sport because they are so different in the integrity space, just around this table and we're a tiny fraction of the sports. Look how different we all interpret integrity and even within sports who have similar integrity, our sports are similar, we are big team sports, we both include financial misconduct or intermediary

breaches within integrity, but our breaches are completely different. So their clubs are allowed to do stuff our clubs wouldn't be able to do and our intermediaries are allowed to do things they're not." (FG1)

In contrast, a further and very significant explanation between heterogeneity of approaches to sport integrity was based on perceptions of available resource and prioritisation. In all interviews the issue of resource was addressed. It was universally acknowledged that disparate approaches were justified by the limiting factor of resources available to the relevant organisations.

"my advice to other sports, smaller sports with less resources is to look at integrity in the round and to consider what is integrity, because it is broad. In my view sports ethics and integrity are more than just sports betting which might not be high priority to many of the smaller sports at all, but safeguarding, doping and probably should be higher priority because of player welfare, athlete welfare" (FG1)

This broader concept of sport integrity was supported across the selected stakeholders. Interviewees were presented with the three-dimensional model of sport integrity highlighted in the literature review above (personal; competition; organisational). Respondents were unequivocal in their support for it. One respondent, below, reported that an existing Culture, Integrity and Welfare Group is already using a similar terminology but extended its scope to an international landscape. The support is captured in the quotations below:

"I'm more comfortable with that kind of classification than just saying it's safeguarding, gambling, anti-doping, because I kind of, for me at the moment there is an integrity challenge to what is sport" (FG2)

"I quite like the simplicity of that" (FG1)

"I think that for me that [three areas of integrity] works quite well because, I came into this meeting thinking where does this start and where does this finish, and I think at a very early stage, that clearly you are, I think this absolutely [is] something [that] could be written up around it, and I would like to think most people would buy into" (FG2)

"So I kind of see this as, as long as this is backed up by the idiots guide or Sports Integrity 101 then there is a way that you can make it work" (FG2)

"Tanni Grey's report [Duty of Care In Sport Report] covered so many different things but, in the end, they broke down into seven areas or principles. I think when you do that, people find it easier to know where they fit and what they can influence and maybe play a part with, so it's as good a model as I think, yeah" (P4)

"and obviously we've now set up policies, we ensure governing bodies have illegal betting and anti-bribery policies as well. So that would also sit underneath integrity. A broader definition for me now, as it now sits under culture, integrity and welfare is probably along the lines of three areas. One is personal integrity, second is organisational integrity, and the third is what I would call Global Sporting Integrity" (P7)

From this a model can be proposed, consistent with the stakeholder perceptions and adding some detail to operationalise the three dimensions.
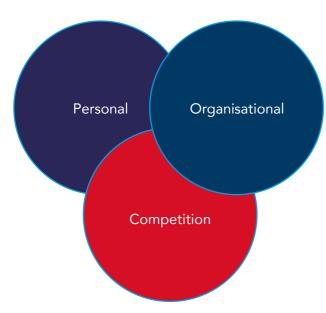
Figure 7 is a depiction of what the three-level model of integrity could look like. All three dimensions of integrity overlap and thus are not mutually exclusive. For example, safeguarding can be a personal issue with each individual involved in sports playing a role in protecting children and vulnerable people, but it also comes under an organisation's responsibility in ensuring there are clear safeguarding policies and procedures in place, and that these are clearly communicated to all members. Equally, bribery is an interpersonal transaction, a form of personal misconduct, but it can drive sports betting manipulation, and it needs organisational responses. This kind of approach to articulating sport integrity is likely to allow actors and organisations to approach integrity issues 'in the round' so to speak.

SPORT INTEGRITY

Personal Integrity:
- Individual behaviour
- Individual values
- Moral compass
- Safeguarding
- Personal responsibility
- Do the right thing
- Sportsmanship
- Player Agents

Organisational Integrity:
- Collective behaviour
- Systemic action
- Culture
- Good governance
- Organisational values
- Collective decision making (Board)
- Environment
- Equality and Diversity
- Discrimination
- Financial Integrity
- Education/Support

Competition Integrity:
- Rules of the sport
- Competition structure
- Fair competition
- Anti-doping
- Match-fixing
- Bribery/Corruption

Figure 7. *A tripartite model of Sport Integrity*

Drivers and Threats to Sport Integrity

As a way of understanding the genesis of extant sport integrity developments, we probed interviewees about the drivers for sport integrity. What kinds of issues or incidents had made their organisation develop policies and practices to combat integrity threats? It was clear that integrity functions were developed through a more reactive approach often concerned with limiting reputational damage. In some cases, this had led to more proactive discussions and developments with some focused around protecting the "fair game". Thus:

"those issues come from the misconduct space and understanding why they were happening and what mechanisms we can put in place to prevent them or how best to manage them. It was a reaction to issues that were going on and now it's trying to be preventative in nature and educating sports." (FG2)

"Yeah, from our perspective there's always a driver, for us in terms of integrity and in the context of your question there are different issues that rise under that heading, for us it was child safeguarding in the mid 90's, so integrity in that form was our driver" (FG1)

*"integrity matters that fall within my remit and our legal and governance remit its 10-12-15 things. The answer to the question in terms of what drives each of the initiatives in all of those integrity issues the answer is going to be totally different for all of those so, we are … have sports betting side of things and I'd say the driver in that area is seeing what other sports who are more advanced than us… and just being round these tables with the likes of ***** and listening to what they're doing and us going away and thinking we should do something more preventative because we know ***** is quite, it's not hugely bet on compared to other sports in England so that would be more of a preventative approach. But then safeguarding [is] obviously the driver and [is] very much driven by legislation" (FG1)*

"So I think that's a really hard question to answer what the driver is, I think most sports or certainly ours has always been concerned about having a fair game whether that be fair in having financial regulation provision or fair and having inclusivity and standing up against any discrimination through to fair as in making sure that what people are seeing on the pitch is a fair game, whether that be because people are not doping or not betting and match fixing" (FG1)

"So, there's an element of us wanting to keep a lid on it for reputational reasons obviously" (FG2)

The threats to sport integrity thus vary according to the sport, the challenges it presents, the prevalence of the issue and whether it is related to criminal laws (cf safeguarding v sport betting manipulations), and of course proper self interest by way of reputation management and its potential financial implications, which is possibly the only driver likely to be shared by all organisations, albeit to differing degrees.

By way of anticipating future developments we asked respondents what they believed the biggest threats to sport's integrity were and would be in the future from their respective organisations and those they worked with. The sum of responses was again quite varied depending on the structure and type of sport stakeholder, yet the key organisational threat to most seemed to be lack of resource for integrity related developments and functions.

"If you say to anybody in a governing body outside of the compliance team that we're going to take money out of performance, so we can get a lawyer on board, then nobody else is going to vote in favour of that at all, until something goes wrong and that's the thing, when you said "why have you done that" I mean I can say this is the reason they've done it, but there has been stuff out in the press about us and I imagined it would have been the driver of that, that needs to be sorted before it happens and

I don't think you can say. I don't think sport should be in a position where we wait for something to go wrong and then ok now, we'll drag something out of performance, because otherwise we can't carry on" (FG1)

"So if I'm writing bids for public money, and I'm explicitly not allowed to exceed a certain amount in that tender for our core costs, i.e. turn the lights on, have a legal department, have a finance team, consider governance, I can't go across a threshold for any of our core costs, so any of our staffing, that's wrong. Fundamentally that needs to be addressed if there's going to be a genuine change in compliance" (FG2)

"… I just genuinely think there needs to be a recognition that while we're an organisation that has these functions, and therefore when applying for money that's available the organisations that are putting these conditions should recognise it as simple as that. Because at the moment, if you apply for funding from certain government departments it's like 15% that you can put on staff, well good luck even getting the delivery costs out of that let alone the actual cost of doing business" (FG2)

At a more local, policy-based level others mentioned that existing misconduct processes or procedures in their organisations do not make it easy for individuals to disclose or appeal decisions, and time for educating athletes is at a premium with integrity education not seen as a priority. This is further heightened when moving away from high performance to grassroots sport, where fewer resources were perceived to be available. Simply stating resource as a threat to sport integrity does not do justice to the multiplicity of ways in which this could be instantiated. Consider the following three responses:

"We just need to be mindful that this doesn't come, and is a potential cost, either on getting

it wrong, or a financial cost that you have to take money out of development or have to take money out of performance to provide a compliance officer or an ethics officer or somebody that's got that in the job title" (P8)

"a lot of sports are scared of an appeals policy so they won't promote it to athletes, so it's hidden, and it's super complicated and it's 20 pages long, so an athlete will never appeal a selection decision because they just can't understand the document or navigate through it so it's trying to encourage sports to make policies readily available, easy to understand for everyone who sits in the NGB (National Governing Body) and make them understand running a disciplinary appeals process doesn't mean they're a bad NGB. It's just the reality of life, there's always going to be issues. It's just making sure they're dealt with in a fair and transparent manner" (P1)

"There is that disconnect between regional people and HQ, we don't really need you until there's an issue and I think that's down to the organisation as well to build up that relationship" (FG2)

In their responses, others focused not on their organisations but on external threats. Some participants spoke about the strategic use of risk management processes, though the majority did not. Some predictable responses such as betting, corruption of officials, and pecuniary threats were discussed. Others indicated newer threats to sport integrity, such as classification in Paralympic sports becoming more prominent, and the effect of social media. Thus:

"one of the woolly areas in the sport is officiating. First and foremost, that is they should be flag bearers for integrity in terms of rules and regulation, unfortunately they are as susceptible to approaches in our sport and have an ability

to manipulate the data feeds, so they are a risk group" (P7)

"what I think we've done pretty well with, over last couple of years, is athletes being constantly abused on social media and threatened and stalked, we used to - as part of the investigatory function - in other words [say to athletes], tell us what's happened, go away and sort it out yourselves" (F1)

When asked whether anti-doping or classification manipulation was the biggest threat to the integrity of Paralympic sport a respondent said:

"I would say classification would be the biggest threat because anti-doping has more resources, it affects the Olympic side as well as the Paralympic side and it's more established. The WADA Code was first signed up to in 2003 so familiarity with the issues are far more embedded and across sport. It's not Paralympic sport on its own that's driving this. Classification is, by comparison, significantly under resourced, it's very much the core of Paralympic sport so we're on our own with that issue. We can use or apply principles or policies that have been implemented for other integrity issues but we're under resourced, and it's not as clear what your stance is. With anti-doping you're against people taking drugs solely to enhance performance because it's a dangerous area for athletes. For classification you're not against anything, it's actually a function that needs to exist for Paralympic sport to happen so you're against the abuse of that function. The function itself needs to continue to evolve and grow to better understand how athletes' impairments are effected on the field of play". (P9)

Current Approaches to Sport Integrity

In an effort to understand the sporting integrity landscape in the UK we also invited respondents to inform us about their approach to sport integrity, including details of current initiatives and developments. It is important to note, first, that the majority of respondents in the questionnaire have some form of integrity function, and of those interviewed, proactive educational approaches were in place. What is noteworthy, however, is that others utilised education as something of a compliance tool alongside regulatory developments;

"so, the answer is different depending on which integrity area you're talking about I'd say on our anti-doping side that would have been more preventative as well along with sports betting which is why we dedicate the majority of our resources in those two areas to education. Getting our regulations correct but once we've done that 85% of our time is education and training" (P8)

Interestingly, the context for educational interventions was considered effective and efficient by some respondents. Here is one example:

"In the [international tournament] it's become your passport very much, you need to do education including team managers and coaches, or you don't participate. Being an integrity officer for the [international tournament] I was really surprised by the reaction of the team management within squads in terms of they allow you a slot and made you feel very welcome, they couldn't be more welcoming, it wasn't the day of the game, it was the week running up to it, they are in camp for a long time and do have time for education, so from our perspective on the world stage, they are very welcoming and even in our club environment they are very receptive to education". (FG1)

Another Focus Group stakeholder provided several potential educational interventions that had proved successful with a range of other issues, not necessarily integrity-focused ones. They stated:

"we've done some creative stuff around education like designing workshops to challenge moral compass, largely about cheating on the field of play" (FG2).

Others were more sceptical of International Federation approaches where lead bodies were seen simply to throw money at problems in order to be seen to be doing something, whether or not this was effective in educational or compliance terms:

"They give each national association £50k per year to do with what they want. Some appoint. You have to have an integrity officer, but you don't have to use that £50k to fund that person. And you'll find the integrity officers have a massively different function across each. To compete in the [international tournament], you've got to deliver an integrity education programme" (FG1)

One could foresee that educational interventions would be a necessary component of policy and practice development in sport integrity. Given the array of sport integrity issues it would be worth further international investigation as to how anti-doping organisations have balanced education versus testing controls and examined the processes by which such a determination was made. Relatedly, then, in management terms, it was somewhat surprising that so few stakeholders mentioned, when asked, whether sport integrity featured strongly in organisational risk assessments or risk registers. Again, this may be down to the fact that integrity elements are captured or dispersed across other areas of such documents. One respondent was clear as to its importance:

"risk management is really key to understand your risk profile is in this area. To your original question, our main drivers for integrity are child safeguarding and anti-doping and probably sails down from there. In reality, and that's also resource driven. What recourse do we have, what can we focus on, where can you start? For us we recognised that's probably our highest risk profile" (FG1)

Another area closely aligned to education, and one that could minimise risk was the sharing of good practice and making the right connections. Here are some illustrative quotations concerning the importance of sharing good or best practice across organisations:

"But a lot of the work we've done is trying to create resources, policies for sports that they can download and use and adopt within their organisation. We also run integrity workshop days where we get experts in different areas and sports can come in and meet their peers and can learn best practice. For example, introducing sports to the gambling commission. Lots of the sports don't know anything about the gambling commission or sports betting group." (P1)

"We do a lot of work with UKAD in trying to monitor all the anti-doping requirements […] Everything is resource driven because as mentioned before, especially anti-doping, it's just handled by the role of someone else […] sports like volleyball and softball, that are completely run on a voluntary basis and you have someone who is responsible for anti-doping and they're just learning about it, trying to navigate their way through it," (P1)

"we introduced a set of templates based on best practice and indeed we had them validated from ACAS and got a gold star so we produce these templates and said to sports, you don't have to do this stuff often but when you do get it right. Here are some templates if you use these by and large they will get you to the right place." (P1)

Not everyone, however, supported practice sharing initiatives. Given the potential for reputational damage some stakeholders, typically those in highly economically driven environments, might be expected to be circumspect. For example, one respondent noted with caution:

*"No, I think we would be very careful … we would share things with people we trusted, maybe even by word of mouth, but maybe within certain sports, and certainly certain bodies within ***** we use a software tool ***** which helps, these sort of charts you would see in criminal cases where you have masses and masses of data generated through phone calls, generated through associations, who drives what cars, who meets what people, who makes what phone calls, and ***** helps you have analysts and we now have three dedicated analysts in the world of anti-corruption maintaining our database using ***** to make sense of all the data. Now we share that data***** is a pretty safe set-up to share data through" (P2)*

Others, by contrast, looked to utilise existing tools such as codes of conduct to facilitate integrity compliance:

"In our funding agreement we do talk about safeguarding, in terms of bullying and stuff like that, we would cover it under codes of conduct, and diversity and inclusion which comes under the code for sports governance" (P3)

While another remarked about a useful integrity supportive technique used in another sport:

*"So for example, he advised me of a technique they use in ***** that if you can't pin someone who's causing you real problems, you can ban him from appearing at your events, and then build it in to the code of conduct of your people, who are bound by your code of conduct that they mustn't associate with that" (P2)*

One of the key areas that marked out the mode of integrity planning and implementation regarded the regulatory approach. Although it is difficult to generalise, the strongest commercial sport represented in the interview sample population was characterised by a multi-method approach, but one that was legally driven. This may mark an important fault line. Clearly issues of personal integrity that are moved through misconduct processes will apply employment law as a framework and tool, whereas volunteer-driven processes will not. Moreover, it is reasonable to assume that less wealthy organisations will not make recourse to law but use alternative dispute resolution processes. Yet economic resource is not the only parameter that distinguishes the stakeholders. NGBs simply have different corporate goals to Home Country Sport Councils. It is interesting then, though not wholly surprising, that the relations between an NGB and its members will differ in style and approach and powers to those of, for example, a Home Nation Sport Council and its constituent NGBs, or UK Sport and its funding recipients. We quote below responses from both a focus group discussion between a legalistic rules-based approach to integrity vs a culture values-based approach, and later an interview that concentrated particularly on this topic. First, we present a legal approach:

"So, all of those elements are underpinned by our regulations and the regulation of the game sits within the legal and governance department. And that includes everything from getting involved, if we're making regulations advising on the regulations, getting involved in projects that have implications on the regulations, and broader through to educating on the regulations and policing them. So from our perspective our integrity function very much sits within the legal and governance department and we, well if we were to include safeguarding within legal and governance department and we, we probably have at any one time at least six individuals who are working exclusively on some element of integrity during the day." (P8)

Elsewhere in the interview the same respondent remarks:

"but we have a number of rules that focus on all of those things in some capacity, so the misconduct is very all-encompassing for us, that's where we would put most of our personal integrity type issues where we're focusing on the conduct of a particular individual or club so we can use a misconduct charge to charge a club with an integrity offence, particularly if a club has systematically done something or not done something. So, we would see that as a corporate integrity type case. But we probably would have broken down like that. We tend to draft our regulations as broadly as possible to enable us to make them fit a number of different integrity offences I suppose, and then we do have specific regulations to corruption, betting, anti-doping, eligibility and fair play on the field" (P8)

Secondly, compare these remarks with a culture-driven approach:

"It's not good enough just believing in sport. We need to make sure they have the right beliefs and right philosophy. So that backdrop to high challenge here is, clearly over the last two to three years some people are uncomfortable with the word winning because it's been associated with "at any cost" and things, so we've gone down the root of high challenge because it fits with the phrase high performance" (P7)

*"unlike ***** who I felt were just picking up culture at a late stage I did some workshops with our whole high-performance team and our starting point was to challenge our beliefs, our philosophy, and our values. Because I think you need to go back to that before you can really enter what you mean by integrity and culture. And what came out of that, we now have a mantra that I think [is] what high performance sport should look and feel like in *****." (P7)*

A similar tone is struck by another interviewee that brought athlete well-being into the same ambit as a cultural approach:

"There is some specific stuff at the minute with regard to well-being, but there will be a wider project to do with all aspects of an athlete's development so that's being worked on and [is] as much about the environment as well, what kind of environment they're in, so we're doing some practical work at the minute on parents and on well-being, but there'll be more stuff" (P4)

A final point, worth noting here, concerns the extent to which sport organisations treat transparency in relation to integrity breaches. The international sport landscape embodies organisations that include public reporting of misconduct and those that do not. Similarly, in the sample we found a range of approaches.

*"the difference between the ***** and us is that we don't share the details of any discipline process on public domains. We will just simply say an allegation was made, an investigation was conducted, a disciplinary panel sat, and the appropriate sanctions were applied or something like that. We don't say an allegation was made into ***** about bullying. The panel sat and he was given a final warning, so we anonymise it. ***** are very open, and they will put all the results of their misconduct discipline panels on their website therefore in the public domain" (P1)*

Whether there are good reasons for this is a moot point. Commercially driven sports may consider the negative financial consequences more seriously than less wealthy sports. Being clear about the levels of transparency and consistency of reporting, especially where this relates to the use of public monies, seems a clear candidate for integrity development.

Although it is difficult to generalise, the strongest commercial sport represented in the interview sample population was characterised by a multi-method approach, but one that was legally driven

Organisational Structures and Partnerships for Sport Integrity

In order to evaluate which organisations were better placed on their sport integrity trajectory, and to consider how those better placed might assist those less far on their journey, we looked at how some of the respondents' organisations had established their integrity functions, and how they fitted within their organisation's structures. Even for those organisations with fully-fledged integrity functions, it seems as though these are still widely dispersed across organisations i.e. not sitting in one integrity space. This is especially the case when looking at legal and ethics-driven functions, as the following quotations illustrate:

"Last year I think there were about four people, and this is we now have 11 or 12. That's split between sub departments, we have the legal dept, which deals with any contracts or legal issues so like injury claims or insurance parts, there is our part which is the ethics and compliance, so we deal with all the anti-doping issues" (FG2)

"There's no single defined function in the organisation. It tends to pervade all directorates or business areas, or should pervade, should be part of the stuff there… there's no single function that has responsibility for it, it's definitely a collective" (P4)

"but I struggle with the idea of a single department with responsibility for it. I would much prefer a very effective joint or collaborative responsibility across the organisation and that isn't easy, and sometimes people avoid their responsibility when they're not held to account properly. So, there's got to be a process where I think you can have it collaboratively across the organisation but how do you make sure people are doing a good job of that across the organisation. We face it already with some of our Equality Act stuff, as soon as you create a department for equality, people just see it as a tick box or something they've just got to do. Do

they really believe in it and live it? And do they really implement it as well as they could? I think there's some lessons to be learnt with that. I think you're better off bringing people with you and them seeing it as part of their day to day job as opposed to imposing it on them"* (P4)

"I wouldn't say there's any one person that's solely responsible for integrity, it's right through the whole organisation so there wouldn't be one board member who would be like an integrity champion if you like. There would be a collective responsibility" (P6)

Building on the above, other respondents commented that implementing integrity functions was not affected as much by the location in the organisation that the integrity function resides, but had more to do with having personal and cultural factors such as effective leaders and good communication:

"the corporate structure is less important than actually the conversations that happen on the shop floor, and that's what's got to be important, an integrity individual is embedded within the relevant departments" (P3)

*"what matters is those conversations that ***** was talking about is those individuals who are responsible for integrity actually work together, know each other, have those cross departmental conversations."* (FG1)
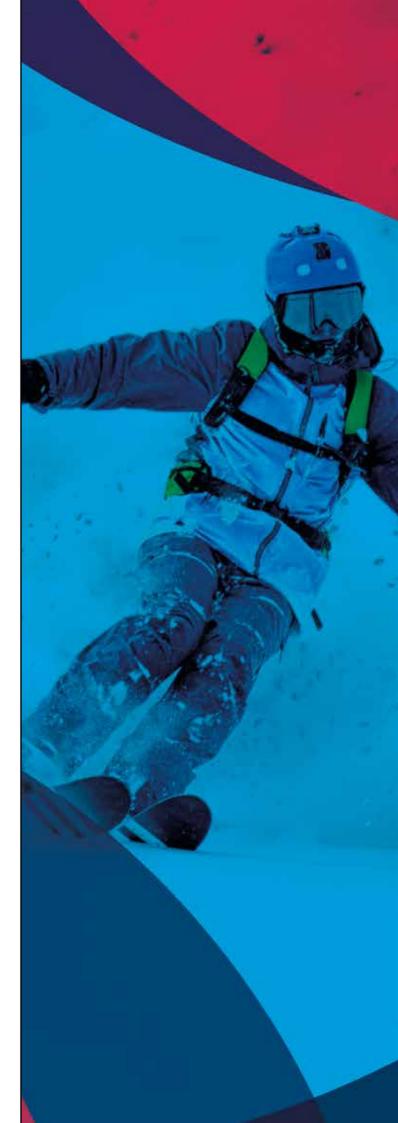
"It's how you live it and having an individual who's aware of it, and it's not just about organisation, having people who are leading aware and visible to other areas, and that's the responsibility of an organisation, whether it be corporate or sports." (P7)

"It's just about responsibility within organisations. So internally you have to educate senior leaders

within the team how this fits in to your strategic aims, your values and what your organisation stands for. And that has to, of course, be led by the board. In terms of the regulation, that's a separate conversation, in terms of independence particularly in cricket, tennis etc what the IAAF are doing, but nonetheless you have to take ownership within the sport first and have that cross communication"* (P4)

The last quotation draws out a key point regarding the management of any innovation: the location of responsibility. While responsibility is often thought to be a personal matter, we saw above how one NGB respondent talked about corporate responsibility, where a club might be held responsible for actions or cultures that were improper in some way. In this way a club is treated as a person; a singular entity. There are clear benefits, of course, to having identifiable persons, often referred to as 'champions' of this or that cause, issue or policy. Scepticism of individual responsibility across institutions can lead to a practice of distributed responsibility, which is common in law (joint enterprise) and politics (collective responsibility) and other spheres of life. Here accountability is dispersed in a model of distributed responsibilities. When we pushed one interviewee about this, we used the following prompt "if it's everyone's responsibility, then it's no one's responsibility". The respondent commented;

"No, I think it's worth flagging. It's … you can be, not necessarily complacent, but I would say blindsided because nobody is taking responsibility for it" (P4)

Clearly, then, any future strategic developments within and across sport organisations must address the issue of personal and corporate responsibilities for integrity development.

It was noted above that organisational structure and objectives will influence how integrity policy and practice is enacted. So, it is important to recognise that the UK sport integrity landscape sits within or below an international landscape. The picture they presented, perhaps a counter-intuitive one, was one where developments were not necessarily driven by IFs but were secured via iteration between partners both vertically (i.e. up and down; national to international and vice versa) and horizontally (i.e. between different sport organisations). One organisation detailed how they had re-structured in order to cater for this.

"Because of the crossovers of what happens domestically and internationally, now there is a single function around governance and international relations, it's two separate teams but they come under a single umbrella […] so there is a lot of stuff we're picking up domestically that we're transferring internationally and vice versa of course" (P6)

Others described how they were aware of, or were involved in, other partnerships focused on sport integrity at an international, national or local level, including the following third parties:

Law Enforcement (in relation to event manipulation i.e. match fixing)

"That's the whole series of what I've called MOU, memorandum of understanding. So, it could be in the case of Australia it could be the Australia Federal Police. We have a documents MOU with them. We have documented partnership agreements with other sports, some of them, particularly tennis, with regulated betting industry

in the UK and with police investigative bodies. That's the sort of effective partnerships" (P2)

Parents (as noted above in a different context)

"There is some specific stuff at the minute with regard to well-being, but there will be a wider project to do with all aspects of an athlete's development so that's being worked on and as much about the environment as well, what kind of environment they're in, so we're doing some practical work at the minute on parents and on well-being, but there'll be more stuff" (P4)

Non-traditional organisations i.e. Gambling Commission (when discussing their involvement in future discussions)

"I'd say it's probably worthwhile depending on if they have no more or no less influence than other people around the table. But they're bound to have knowledge and intelligence that would be useful in forming an approach to this. Again, a similar comparison would be in anti-doping with [the] supplements and IPEDs situation. If you don't bring the health authorities and public health around the table and just treat it as a sports issues, you're missing lots of information that is really important to people's motivations and how big and how complicated the matter is. If you just treat it as a sports issue, you'll end up with a solution that doesn't answer the complexity of the situation. So yeah, I think they should be around the table." (P4)

On the International Scene the International Partnership Against Corruption in Sport (IPACS) group is very active in terms of sports corruption, with DCMS playing a very active role in representing the UK, especially around the signing and ratification of the Macolin Convention.

"identified three focus areas. One around the risks around procurement around major events, one is around major events bidding itself, and the third [is] around the governance of international sport. And so these are all areas […] we are particularly interested in, especially the major events and the international sports governance and so we are deeply involved together with DCMS in the running of the partnership and delivering certain pieces of work where sport is learning from other sectors, in particular the public sector from a variety of different countries, but also brings government closer to sport to understand the needs and challenges that sport is facing. So that's now become something called IPACS and has been running for 13 months or so and brings together all of the Olympic movement and other arms of international sport, and then several multi-lateral organisations such as the OECD and Council of Europe. It provides a platform for dialogue and action around what needs to be addressed" (P5)

Sports Betting Integrity Forum (SBIF)

"There is certainly a group of lay stakeholders that look at this area, but I think it's more focused on betting and match-fixing, and given the areas have broadened" (P5)

UK Culture, Integrity and Welfare Group

"It's fallen out of HPSAG (High Performance Strategic Advisory Group), so the Culture, Integrity and Welfare Group is answerable to HPSAG. I'm particularly picking that up here and quite simply it's the "how". So, we're all very outcome driven, we all invest in sports for various outcomes, but what this is about is not just about the outcome it's about the how. This is very much about leadership and management" (P7)

The sheer range of potential partnerships is noteworthy, and even this range is not exhaustive (cf Cleret, McNamee, and Page, 2017). It underscores the scope of integrity work, its dispersal, the plethora of related organisations that need coordinated action to maximise effectiveness of policy and practice development in the integrity landscape. This point is especially important when considering the different models of delivery and compliance in sport integrity and considering what elements are properly the subject of mandate, which may be considered aspirational or voluntary.

Models of Delivery and Compliance of Sport Integrity

To understand the importance of integrity work across the UK, respondents were asked for their views on how sport integrity might effectively be audited, and what compliance processes were in place to ensure organisations were performing to an acceptable standard. There were many interesting comments not least around financial pressure to comply with directives that came from funding organisations. In this regard, we found a somewhat defensive response from home nation and UK sports councils that was reasonably widely shared. Respondents from these organisations did not see themselves as regulators yet acknowledged that they had a substantial regulating lever in the distribution or withholding of public monies. The following are comments from home nation sport council representatives.

"Well it's a conditional award. It's a funding condition in an award agreement. So, to receive public money they have to comply with the code or have an action plan in place to comply. So, it's a condition of award. Award being the money they get." (P3)

"Yeah, we don't have any role beyond that, our only lever is public money. And there's a variety of different options, you could change payments to monthly in arrears, and nuclear is probably we're not going to fund you, but reputationally there would be other things going on" (P3)

"we are of course an investor not a regulator" (P1)

"We have an obligation to make sure that the money we invest is spent ethically and ensures the highest standards. That is the lever we use. We are sort of regulating in our assessment. That's a small 'r' in regulation" (P1)

"NGBs are responsible for running their sports, the principle we run from in this country is that sports are self-regulating and do not come under

political control and indeed you cannot be a member of an International Federation if you are subject to political control, so what you're suggesting there is a fundamental change to the landscape if you want someone to come in and regulate" (FG2)

Slightly less defensive were the following acknowledgements:

"so, although we're trying to safeguard the use of public money, we're also trying to encourage sports to think broader and improve themselves as organisations, so that will cover finance and HR and how they manage their policies. Some of the conditions we expect for public investment we do expect them to meet certain safeguarding standards, we go into more detail with that and we do expect them to meet the GDPR requirements. There is an anti-doping compliance requirement, there's also a sports betting policy requirement, so we do touch on that. And then internally we obviously have legal and finance teams and we work with those closely and some of that's for us but also get their advice on how we work with our partners" (FG2)

"Obviously, the challenge we have here is in some instances we can police and enforce it, and we do, so for example, all the governing bodies we invest in, we insist they have clean sport policies and processes and that they are compliant. If they are not, we can intervene and threaten to withdraw money. It's the same with anti-bribery and illegal betting. The grey area here is when it comes to how people behave, dismissible behaviours, then [it] starts getting in to a grey area, and whilst we don't shy away from addressing things, we have to be careful we're not policing ourselves the same time we are writing the policies" (P7)

In addition, we also found examples of where existing tools such as funding agreements, governance frameworks or even sponsorship contracts could be used to improve sport integrity compliance. The range of responses is presented below:

"But, that's interesting because often if an athlete misconducts themselves and they've got sponsorship, then the sponsors have an even greater effect on their conduct than we possibly could." (P1)

"I think we're getting ourselves into a reasonable space now where we've got a trusting dialogue with the sports where ideally we can intervene early if needs be. We do have a power in the funding agreement to commission an investigation into any matter we choose should we need it, but we haven't had to" (P1)

"yeah I think once you get to deciding what it is, what it looks like, yeah it makes sense to make it mandatory, because we've got various codes both internationally and nationally we've got the Sports Governance Code, so evolving that up to beyond sports governance into integrity, because sports governance looks at ensuring people don't have capacity to abuse their position if you like, but what I don't think it can do is measure that integrity and measure that sort of, I think you need something else to really measure and capture that look and feel." (P9)

"I think in a couple of years' time this is probably worth updating, and I think we can put a bit more detail around requirement [specific regulation] which is having appropriate policies and procedures in respect [of] its obligations for looking after people. I think we can tighten that up a bit, because it all refers to safeguarding, whistleblowing etc, so I think the Code for Sports

Governance was a really great first step, I think it can be strengthened second time around" (P1)

A final point worth mentioning here is how, without prompting, several of the respondents linked integrity work to good governance. This may be due to the recency of the wide adoption of the Good Governance Code, or their mindset of working with partner NGBs as opposed to the delivery of events or the generation of sport rules themselves. In these cases, competition integrity is not seen as directly within their scope. What is not acknowledged is the scope of integrity work that falls outside of a good governance framework.

In the space of discussions concerned with models of delivery and compliance, the availability of resources again arose as an issue in relation to compliance, both from the perspectives of "regulator" and the "regulated". A proactive, principle-based approach dependent on resources was proposed by some, and from a regulator perspective, it was suggested more of a risk-based, supporting approach would be more beneficial. Their views are nuanced. Here is one that points out the nature and level of the activity is not of overriding importance when it comes to safeguarding:

"So, I don't think a child taking part in orienteering should be any less safe than a child taking part in organised football but how you would go about that and what would it look like in those two situations would be different. So for me the outcome is actually there is a safety that we've got, that people know what they need to know, and how stuff gets handled will be down to them, but for moderate sized NGBs that have got some resources but aren't as well-resourced as you here today, where response would mean putting more money into something, which is fantastic, but impossible at the other end. So, from a

safeguarding and integrity point of view overall, what should people be addressing rather than this is the model, and how can we take this model and apply it to *****. But you might be saying ***** still needs to have their own arrangements" (FG1)

Here is another response that says resources dictate effectiveness:

"We've got one of the wealthiest sports governing bodies in the country. It has a dedicated intelligence team that dwarfs the Gambling Commission's and that's just dedicated to one sport. It's got analysts, it's got investigators, it's got a national reach and you compare that with something like British Tiddlywinks which is Barry working out of his garden shed who still has the same legal obligations and compliance obligations, observant of GDPR etc" (FG2)

Another offers a response to resource differences and a partnership model of development. What is especially important, given our elision of commercial sport with legalistic integrity approaches, is the idea of alternative dispute resolution which may be perceived, when appropriately targeted, as less expensive and quicker.

"The oversight is very light touch in as much [as] we require NGBs to write to us each year and confirm they are in compliance with the funding agreement. I think we can be more specific in terms of what we want them to inform us about and I think it would be beneficial if once a year we met with each of the NGBs and I sat down with them and went through their processes and went through their history of what they've done over the last 12 months and so it wasn't just a case of tell me, it was a case of show me. So much of the issues around conduct and conflict in these environments stems from poor induction and regular refreshes of people on what their rights

and responsibilities and duties are. You talk about culture; it all plays into culture. If people don't understand how to treat people properly, they don't understand what the mechanisms are for calling stuff out, if people don't understand how to deal with things quickly and efficiently, then [there is] the scope for conflict to escalate and the more it escalates the longer it takes to resolve. Often the worse it gets. So, it's all about dealing with things early and one of the areas we have identified for further investment over the coming six months is increasing the capacity within the system for mediation" (P1)

When use of resources and scope of powers was considered by one respondent, they gave consideration to the levels of seriousness or significance and whether legal responses were proportionate. They argued for increased use of mediation rather than legally driven responses like arbitration. Deciding which routes should be followed, whether through (e.g.) Sport Resolutions, with which many UK sports organisations have direct or indirect (funded) access they remarked:

"it depends what level they want to go to… Sport Resolutions has a lot of arbitrators but doesn't have a lot of on the ground mediators who have that skill set to be able to talk to the athletes." (P10)

A pragmatic balance is struck by the following respondent:

"so, I think we wouldn't have the resource or capacity to monitor closely, neither would we want to because that would make us a regulator, it wouldn't be our job to do that, but it's using a risk-based approach. Even in the integrity space, because it's unclear what actually is it, there might be room for people to play in and around grey areas, like in selection processes, but there will

always be grey areas and subjective, it's not clear cut and that is difficult" (P3)

One of the values of a focus group approach is to reveal practices in one population that others had not considered. The following description garnered considerable support. One sport discussed how it attempted to prioritise its educational agenda according to the significance of the ethical or integrity threats. The point was pursued by others in the focus group and later became the object of an extended discussion within an interview. The discussion progressed into whether there should be a tiered (i.e. prioritised) approach to sport integrity. It was important to note that prioritisation was not presented as a way of avoiding certain issues or pathways, but as a pragmatic response to the allocation of resources that, even in wealthy NGBs, was likely to be outstripped by demand. They discuss their risk-management driven process as follows:

"so, we have done that, and we have integrated the programmes and the education and identified those three topics (anti-doping, sports betting, concussion) of being of highest priority for our professional game. That's not to say we forget safeguarding and all that sort of thing, that's almost dealt with separately by different individuals within a professional environment, and we do separate work on that, but in terms of those three topics we educate the clubs and the players and team management together now, and what that enables us to free up time to educate on a whole range of category B type topics. So, we have category A, B, C and D topics which go from being mandated (three mentioned), so that's their passport into the game every summer. Category B are strongly recommended topics, things like addictive behaviours which cover a whole range of things including gambling awareness. We can escalate

topics from one category to another. Recently with the social media side of things we've escalated it to category B. International squads and professional players have more education on that side of things. Cultural awareness I think has moved up to B. Some of it can be reactive, some of it is proactive. Category C topics are things like agents, what to look out for with agent relationships, financial management, pension. Recommended but not … they generally won't have a player welfare implication if things go wrong. It won't be pleasant, but not a matter of life or death, like some of the category A topics. That works for us. We've done that really recently. We ticked that off about two and a half years ago, it's a new thing for [their sport]. It took us a long while to get there and it's not necessarily the answer, but it's certainly worked for us, and not least because it does free up a chunk of time" (P8)

Another responded with an emphasis on inclusion and buy in from the relevant population:

"yes, I think there should be a tiered approach. I think there's some legal ones that we really can't avoid, there's some fiscal ones, other legal ones we have to have, because we're dealing with public money in terms of our organisation. They have to apply those kinds of checks and balances. I suggest a tiered approach is sensible, but I also suggest that designing it with the people it's going to be applied to is sensible as you get a better buy-in and better information and decision making as a consequence of involving them early. Not being beholden to everything they might say because there is a degree, or there can be a degree of self-interest in some of those partners so we need to be mindful of that, but involving them early and helping them co-design it is very sensible and a tiered approach likewise" (P4)

Finally, another respondent acknowledged the problem of prioritisation in a result driven environment for high performance sport, versus a mass participation perspective:

"That's a fascinating debate. Is that more important than the integrity of competition? Personally, I would think yes because I'm a father and it's also part of our culture within society that we don't harm children. I'm not necessarily saying we have the same culture that we don't cheat in sport, not everybody does, but some people do. Really difficult, I like the idea of a framework, but I think it'll be really difficult to nail this and say this is compulsory, this is optional. I think by having a framework and having it discussed, is how you actually implement integrity, so people start to think is it acceptable to fall over in the box? Is it acceptable to whatever it might be to push a young athlete in a performance programme beyond what is actually what they are physically and mentally capable? And then there are others who say if you're going to get a gold medal that's what you have to do. Some will say it's acceptable if you want a gold medal and others not" (FG2)

These comments above bring us seamlessly to the final meme in this topic, of whether a tiered (i.e. prioritised) approach justifies the decision regarding mandatory elements (e.g. safeguarding, and child-protection are obligatory for all) and/or should the approach take the form of guidance with some elements acknowledged as legal requirements, while others might be strongly advised and a final list that would only be aspirational. Every participant in the focus groups and interviews was supportive of a proportionate strategy for sport integrity. Most respondents preferred a hybrid model that had built in flexibility, incorporating elements of both a 'carrot and stick' approach. For example:

*"the approach we have in ***** is a governance framework, which is more, it's not mandatory, and*

actually the culture that has changed in governing bodies over the last seven to eight years has been very positive and many of them want to comply because, comply is not the right word, they want to improve best practice"(FG2)

*"For a UK framework, UK-wide buy-in, I would argue probably that you'll need to go down a framework approach, like ***** have done with governance versus a doctrinal sign-up approach like the UK Code for Sports Governance which was comply or die basically" (FG2)*

"I'm for a framework and I think we're talking about really challenging issues that may be different for different sports and be different for different issues. It's people. So, my level of acceptance of bending the rules will be slightly different to everyone else around me" (FG2)

"I think you need to mandate a policy; you need some mandated process. I think you need guidance, and you also need judgment and that judgment often requires both experience and also training… So, discipline, grievance and that, would be for athletes and members of staff because there are subtle difference there, then you want one around whistleblowing, and you need to mandate a policy around diversity and inclusion. And lastly, selection and independent elements" (P1)

"both Sport England and UK Sport have governance managers and each of them has a portfolio of sports, and they work with those sports to ensure they are compliant with the Code. Where they're not compliant a governance action plan is developed and [they] monitor them in delivering on that action plan. So as an example I referred to this investigation we did into an NGB, as part of that investigation an amendment to the governance action plan was produced so that shortcomings that were identified as part of that

investigation were added onto the governance action plan and it was expanded to take care of that" (P1)

"Mandating something is helpful for a sport to have regulations and hooks upon which you can put things as and when you find out about offences, whether through proactive intervention or policing, or reactive. The other thing not to forget is for a sports regulator it's as much about educating as it is mandating, so if [it's] the carrot and stick approach, we try to get a good balance of both" (P8)

It could be asserted, with some justification, that a multidimensional model of implementation and compliance was entirely predictable. Nevertheless, it is important to emphasise this is what the key stakeholders in our focus group and interviews have recommended and thus believe will be successful. The devil, as the saying goes, will be in the detail. What kinds of sticks? What kind of carrots? Also, it will not be straightforward to work up a national agenda. Having said that there was a clear commitment to partnerships working, the issues of leadership and ownership are likely to be thorny ones. How, and when to develop an effective strategy that determines the priorities after legal requirements have been addressed. Given that 2020 is a Summer Olympic year and is likely to be the focus of national media and public attention on results more than performances, these issues are urgent and require critical attention.

Future Developments in Sport Integrity

The final element of the research was to capture people's aspirations not only for clarifying the sport integrity landscape across the UK, but for improving it. These discussions were not entirely separable from the issues that arose above. Nevertheless, we have created a distinct theme that can serve as a segue into the recommendations. Discussions around planned and aspirational developments for the future centred around sharing best practice, education, clear mapping of all existing groups, and the formulation of a UK Sport Integrity Forum.

Can we talk about good or best practice? This distinction has been used in the anti-doping literature to capture the confidence of stakeholders with various different aspects of clean sport policies and practices. Perhaps some specific policies are capable of authoritative guidance. Yet, given cultural variations on a global scale, can we ever meaningfully talk about "best practice" in the singular when it comes to much of the issues that comprise sport integrity? For the purposes of this report we elide the distinction and do not adopt a specific stance, except to conjoin the two.

With regards to sharing good/best practice, many respondents noted that it would be good to have a platform(s) to facilitate this along with creating user friendly integrity guides and sharing intelligence, something which the Macolin Convention may be able to assist with in the future.

"my view would be sharing best practice sharing what we do is a really good idea, and I know we've learnt a lot from groups like the sports betting group, a team sports anti-doping group, there's all sorts of little groups set up where we share what we do and I know I find them tremendously useful, the contacts and learning best practice, for us we just tend to say, this is what we do, what works, what do you do, do you know that works well for other people? We are now interested in it" (P8)

"I think it's important each of us know what the other is doing and filtering that resource in terms of what's working and what isn't, and any new method that's being used" (FG1)

"I'm early on in my career so if there was somewhere where you can post a question on there and keeping it confidential that - any ideas how I would deal with this issue" (FG2)

*"the approach I would take is what's achievable, you know starting from that. What's desirable may not be achievable at least in the short term and therefore my approach would be let's start with something like a forum with agreed principles that nobody can object to, ok it may be a little bit motherhood and apple pie, but let's start with at least coming together, let's start sharing databases of intelligence, because what I'm certain of, on one occasion we managed to ban a guy who owned a team in *****. So, we had him banned from ***** for life for trying to fix the whole tournament and we got enough evidence by where he was banned. What did I learn within two or three months, he bought a ***** team. Now do you think that's because he's interested in *****, or he's interested in gambling and the opportunities for gambling. That's my point, these fixers run across sports. We have to work across sports" (P2)*

Finally, one respondent pointed to the guidance already offered by UK Sport with respect to template policies for misconduct that gave clear guidance about setting up robust processes to achieve integrity related outcomes.

Another critical component of future developments, stated by several respondents, was being proactive, especially in offering effective education programmes and pooling resources. This respondent in particular focused on efficiency gains by looking at synergies across the integrity dimensions, acknowledging that good practice has been made in several areas already:

"I think the integrity functions of a sport need to work together. So particularly [the] education side, I mean where we are, correcting slightly there, in terms of proportion of our time and resources we spend more of our time and resources on education rather than regulation compliance side. And I would probably say 70/30 on that. I would say to sports which work, anyone working on sports betting and integrity and agents, work with and along[side] those working on anti-doping, and actually treat integrity as a broad number of subject areas rather than have different silos working on integrity, on anti-doping, player registration. Have individuals who are across all of those areas and can work together to get that time in the club to educate on all those areas all at once if possible" (FG1)

Similarly, another responded:

"Yeah, exactly, because actually integrity, regardless which area you're working in, the themes are very much the same. Education is key. Communication is key, having good regulations is key and having a good disciplinary process to discipline individuals as and when we need to is also key. So the themes are all very similar, the subject matter is different but the themes are all very similar, and recognising that is the key, you don't have to necessarily have someone who specialises in anti-doping or sports betting, you can have a number of individuals who specialise in a number of those areas and able to work across them all and pool resources accordingly. That's where I think we can somewhat address the resourcing challenges sports have, including the bigger sports and I include ourselves in there. We have resourcing challenges all the time" (FG1)

There was also reference to looking beyond traditional education programmes with sports organisations and tackling the root of the problem in schools and with parents.

"Imagine a football match where you go into it where there is a learning outcome for kids which is based on resilience. The way you ensure they learn that is you know that your team is going to suffer at least three deliberate injustices during the match and during those points in the match ref pauses the game, you have the opportunity to debrief and discuss how you're going to tackle it. So, you're kind of using competition in different way. There's all kinds of innovative stuff out there that you can do that I think will be quite interesting" (FG2)

"this goes beyond sport. It starts in the home; it starts at school. It starts at such a young age. I don't doubt there are people playing professional sport nowadays that wouldn't nick a pack of McVities Digestives from the corner shop" (FG2)

*"It's not until I've been listening around the table today, I'm thinking, yeah. There are times I've dealt with ***** or ***** or people like that where they've had a guy who's got into a fight and so there's other elements of integrity they've got to deal with, but I am incredibly task focused. I'm just concentrating on my task in hand, rather than taking a step back and seeing the bigger picture, because there are other elements that we need to contribute. There are parents that need to contribute." (FG2)*

"Our anti-doping education needs to be geared towards teenagers or it'll be too late. We need a way of working collectively with schools and all organisations could do this in some form. Generic education in schools, not really sport specific." (FG2)

"We've got an app for parents of talented athletes which at the moment focuses more on the development of the adolescent brain. We could easily have integrity of sport as a block of units with three learning units based on personal, organisational and procedural integrity, or safeguarding, doping etc." (FG2)

Others commented on the need to focus training and continuous professional development on culture and behaviour:

"I would say they need to call it a suitable priority, they need to make sure everyone understands the processes of how you look after people, they need to make sure they match the investment they put in to technical coaching into emotional intelligence (soft skills), encouraging coaches to have difficult conversations, better understanding of stress and mental health, which I hasten to add is happening. So, it's focusing on the soft people skills [rather] than the how do you jump, run and shoot, which has been very much the priority. I think those would be my key areas, and the last point is, I think I used to refer to them as independent points of reference, I used to say to *****, have a couple of independent points of reference, people who know they can tell you what you need to hear and your door is always open and it'll never get slammed in your face and you will respect their confidence and their judgment and reflect on it." (P1)

"we need to remind people at the start of each year, this is how we treat people, this is about diversity, if you've got a grievance this is how you make it, here's the policy, here's the guidance, actually just making people more aware has two benefits. One, if you make people more aware it just reminds them of how they should be talking to one another, but secondly, if there is a problem, they know how to deal with it and they start to deal with it quickly. So I think that's a

really important missing element of the process, because people get inducted to an Olympic programme at the start of a 4-year cycle but by the time they get to year 3 when the pressure is really coming on, because they're lining up for selection they've probably forgotten all of that stuff." (P1)*

"I talk a lot to coaches about bullying and I say to them, the trouble with bullying is people think it's a box you tick and that's it, I've done that and heard the lecture and move on. 'It's not: it's persistent vigilance. Because bullying is a normal state of affairs in a number of situations and if there aren't some safeguards in place people will very quickly revert to bullying behaviour. I'm absolutely with you, I think anything like that, that can create persistent vigilance within an organisation is really important and is an area in our coaches that is woefully neglected" (P1)

Participants were keen to understand the full nature of current/existing working groups around integrity, prior to progressing with any new plans and potentially duplicating or 'reinventing the wheel'. The desire to create a UK-wide Sport Integrity Forum was unanimous. Support came in several forms and was qualified by the respondents in line with their own organisational needs. Here is a sample:

"so, in terms of when you complete your landscape of what exists now, I think it would be a tremendous step forward to have a UK-wide Forum as a first step to see what we could agree across" (P2)

"I think any sort of forum like that would be useful. Clearly it's only as useful as the membership of the forum, so you obviously need, you certainly need people who would question it as much as people who support it, because you'd get a better

outcome, so I don't think it should just comprise massive advocates and nothing but advocates because you won't question potential outcomes as well. I think you need, not nay sayers, but people who are willing to throw some questions in to see if it's the right thing being done" (P4)*
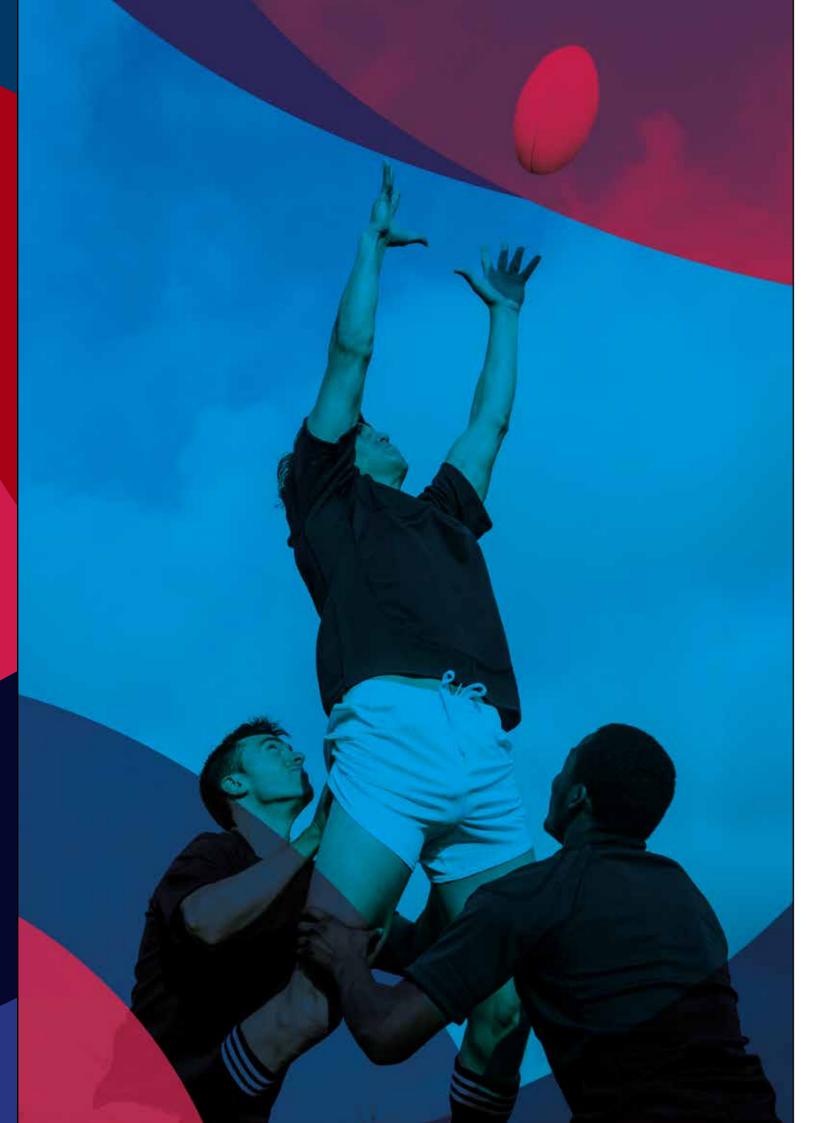
"The challenge is to map that out to the different areas and stakeholder groups" (FG1)

Further issues arose, however, in specific relation to purpose, composition, independence and leadership of such a forum. The latter elicited a multitude of commentary, not least because of the politicised nature that such a forum would be unable to avoid. Several stakeholders queried whether the funder of this research, UKAD, had a vested interest in leading developments in the integrity sphere. When the research team informed them that they were not aware of any such expansion of UKAD's role, a more open discussion tended to follow. Sample comments included:

"Who should lead on it? It is an important point because they obviously need to be respected, they also need to effectively not be seen to have any personal or organisational interest, because that is a difficult one then because someone has to put their head above the parapet. It might be worth looking at other similar scenarios in history. How have certain complicated things been resolved successfully, how did they go about it? Who were the key players? How did they lead it? How did they appoint someone? I haven't got an answer as to who, I just think the principles of potential independence, or some sort of independence, some sort of standing within the sector and within this area of integrity is probably paramount, but it won't be easy. There are bound to be some good people out there, but they won't be very well-known names" (P4)

"I think you need really good leaders there. I think the danger is if you don't just want representation from certain organisations, I think you want good leaders there because otherwise you're not going get the level of commitment and discussion that's required. So straight away I mean UK Sport, Sport England, all the National Sports Councils, I would throw in that group as well probably DCMS and then look at other parties that are relevant to our high performance environment such as the Commonwealth Games Federations and quite simply I think one needs to look at people here. What's going to make this work is people who understand this environment and, in my experience, not many people do. So even though, I'm suggesting one needs to look at the political landscape, inevitably the danger here is that if you don't get the right people who understand this area it could hold things back. So inevitably you're going to have to target key people who hopefully are respected within the system, who you know can come tighter and make things happen quite quickly" (P7)

"operationally I would see DCMS possibly setting it up and maybe funding it and getting buy-in on a national and international perspective. Because once you write terms of reference and remit, I think that group could have an international dimension as well as a, who's to say it couldn't have a continental dimension. It could be responsible for Europe or UK, I obviously haven't thought this through but if it was just within the UK DCMS would have to be involved. But I would see DCMS once it was established just receiving reports, because what this group would do then would be an advisory group on one level, but also sent in to quality assure, spot check, and in some instances police our system, because ultimately what we're trying to do here is protect the integrity of sport" (P7)

"Potentially. That could be something they (DCMS [staff]) could facilitate. I know in the past they have showed a lot of interest in the sport betting side of things and probably in other areas as well that I might not have been directly involved in myself. Certainly, they have come to some of our meetings in the past on our sport betting side, so I think they do have an interest. What I'm not quite sure about is the relationship between DCMS and Sport and Recreation Alliance for example. But yeah, quite who should oversee a forum like that I'm not entirely…" (P8)

"it's relatively new territory in understanding the, I suspect the roles and responsibilities of each and every organisation which have a specific anti-doping or betting focus, so I could see potentially UK Sport being a little bit more neutral than having a specific, as an organisation, specifically set up to focus on an aspect of sport integrity. I do wonder whether this is something that one would look to government and particularly DCMS to play, if they don't play already, a really active role in coordinating this forum, that should be the case. Because effectively, I think DCMS has got its hands on, its funding many of these organisations and is involved both domestically and at an international level. And I just wonder whether it would therefore [be] an automatic you know, body that would be suited for coordinating this forum. But if so, then it would have to be appropriately resourced and deemed important enough to be near the top of DCMS' agenda. I'm not sure whether that's been the case" (P6)

"there are a lot of people and organisations [who] do similar things. There's not a standardised approach to this. What I strive for is… I am not bothered about if I am about mediation, or resolutions as long as the athlete […] gets the best service available and they are not confused about who is delivering what. So for me there must be clarity of purpose, clarity of roles and responsibilities, across all these stakeholders and a grown up conversation: so, ensure that the athletes and … the important stuff is being looked after, not, people's ideas of; this belongs to me versus… the other thing belongs to me as well". (P10)

It was clear that DCMS was cited several times by respondents as an entity that could play a leading role, although support for this idea was not unequivocal. Others mentioned the Sport and Recreation Alliance, or indeed UKAD. Clearly, it is beyond the scope of this research to make specific recommendations here. Equally clearly, some kind of national strategy plan will need to be drawn together and funded. Which oragnisations and sources of funding and leadership emerge should follow as a response to this report.

Nevertheless, one respondent was already planning a local forum that could feed into a UK Forum:

"I'm going to probably speak to my directors about whether we do need to set up an integrity forum or group, because we've got all the various elements. Because the legal team [members] probably don't see themselves as integrity, they're doing legal stuff. We've got a clean sport working group which I'm on and then there's other bits. But I think we can pull some of that together. Ideally a vision I would like us to start is to start using this language with governing bodies. As you well know we have the UK Governance Group and I talk to governing bodies about governance and maybe we need to think about governance and integrity" (P7)

The same respondent questioned the need for a completely independent body to monitor compliance to sport integrity across the UK.

"I think if you were going to set up, I think straight away I would agree with you, I think what's missing now is if you asked the question, so how close are we all to what's going on, and the answer in some instances, well maybe we're much closer now because we've done all this. But how close was UK Sport to British Cycling? How close was British Cycling to what was going on? Clearly in the past everyone was clearly outcome driven and weren't necessarily having spot checks or dare I say it, being policed or quality assured. I think there is a strong argument now under the umbrella of integrity to ask the question, should we occasionally be quality assuring our system in terms of, not only culture but integrity, and if the answer is yes, and I think it is yes I think it's probably wrong to say that we can do that ourselves, because it would be no different from the police investigating the police and the public challenge. So I think there is, I think a discussion should be had, is this the right time to have an integrity group or forum whose responsibility I think is to dare I say it, police and spot check, and quality assure on an independent basis? And at the same time, I think whenever bad behaviour happens that group could then go in and investigate. I mean the challenge we have at the moment is there is no group that is responsible for policing FIFA or Sport Wales, or Sport Scotland really. I mean we're all answerable to our respective governments but at the moment I think we need to have simply an independent body that at times of bad behaviour or bad leadership comes down quite strongly" (P7)

We note this view was not widely shared. Indeed, this was the only comment that specifically advocated an investigatory function for the proposed Integrity Forum. Much more prevalent was the notion of evolving partnerships. It was clear that any potential forum could then be a vehicle to connect and communicate across the national and international landscapes. Thus:

"I think sometimes we can be quite insular and be good at dividing things up, but I think the reality of how integrity, or more specifically around governance and anti-corruption stuff, is a running thread across different areas so it becomes you're fire-fighting everywhere, and what you're potentially doing is reducing the effectiveness of what you're trying to ultimately achieve which is a stronger, more robust sport integrity, awareness within the UK and at an international level as well. I think there is value in that definitely" (P6)

This comment was developed in another interview regarding an example of betting integrity. It was thought that other countries had been more proactive in criminalising some integrity breaches. It is noteworthy that the examples used were all Commonwealth countries:

"countries actually passed criminal legislation to prevent manipulation of sport to facilitate illegal gambling. Here in the UK I've been pushing for that through our, you know the Select Committee and culture and sports etc, but they think at the moment that the bribery legislation we have here is ok. I'm not so sure that it is ok. We have a case coming off in October and I've asked the QC to look specifically at the adequacy at the bribery legislation in dealing with corruption and sport and whether there's something much more specific like Australia, New Zealand and now South Africa have passed. We have found it very helpful" (P2)

In terms of principles of procedure, it was seen to be important to some interviewees that any developments were not imposed on the sector but developed with it, with specific mention of the importance of athlete involvement.

"It's been designed by the sector and not imposed on the sector so that's the other opportunity" (P4)

"My aspiration would be to get the athletes on board with that. The development of education will be there, and not having to force athletes to do it." (P3)

"for us it's about ex-athletes that they look up to and they can connect with in some way. And that's a challenge but can be like an alumni network that you engage with each week. We've had some significant challenges. The whistleblowing work we've done on the back of some instances have proven quite successful, but it's also not just about the athletes on world class programmes, it's about staff and them understanding and spotting issues, it's engaging and coaching the coaches to be able to identify what key problems are where in safeguarding, betting, integrity etc, there are things you can do in that space as well but it's really down to the sport how that sport runs. One of our big worries is where safeguarding sits. My view is that it's separate, if you lose it under integrity banner or heading the message may be lost, that's a little concern for me." (FG1)

Finally, and possibly the most radical suggestion from our sample, was a proposal to lobby for or create a sport integrity commissioner or ombudsman. In this regard, the respondent was mooting a recommendation similar to one of Baroness Grey-Thompson's recommendations in the Duty of Care in Sport Report, which has been pursued in non-sport contexts:

"this public process of having commissioners, the Children's Commissioner, and Older People's Commissioner, I don't know how successful those have been because I've not examined their rationale or what they've achieved, but that might be another approach worth looking at. Does the Commissioner model work? Would it apply here, even if they have work in those other areas?" (P4)

That an Integrity Forum should be established was an unequivocally supported proposal. This however, begs a litany of questions: How it should be formed?; with what scope and powers?; who should lead it?; with what degree of independence from existing sporting and governmental bodies?; what governing structure would be most effective? These questions must be addressed after this report has been disseminated.

Summary and Recommendations

Delivery of, and compliance with sport integrity aspirations, requires more than top down regulation. Crucially, it cannot be reduced to a tick box exercise. There must be a layered approach that combines education, regulation and cultural development to drive sport innovation and, where necessary, reform. Enhancing policy and practice in sport integrity must aim beyond merely staying just above the bottom line. It must also be fit for purpose recognising the levels of sport and its significance. While common standards can be short in a number of integrity elements, a one size fits all approach should be eschewed in favour of fit for purpose variations around a common model, that should be driven by a national strategic plan for sport integrity.

The first step of developing a sense of urgency across the UK sporting landscape was instigated by the initial meeting hosted by UKAD in November 2018. The unequivocal support and recommendation for creating a UK Sport Integrity Forum must be seen as the second step in forming a powerful coalition, but crucially this needs the right leadership and support from key/influential people/organisations. The Forum must create a vision for reform and innovation, and communicate this vision on local, national and international levels. Once the above has been established, the group can focus on empowering action, creating quick wins, of which establishing the Forum and creating a clear concept of sport integrity will already have been achieved, then building and embedding positive change throughout the sport integrity landscape in the UK.

We are mindful that ethical innovation cannot be forced on unwilling minds or organisations. Each of the recommendations below flow from our discussions with stakeholders and are respectful of their views. In attempting to develop a national agenda we have selected those that garnered strong support and were identfied as areas for development of sport integrity functions. Our approach should be considered as those of a critical friend.

With this in mind we recommend specifically:

R1. A Sport Integrity Forum (SIF) should be established as a first priority. The SIF must include elements of independence from sport stakeholders in line with good governance. The SIF must be seen by stakeholders as a platform for discussing key issues and agreeing priorities/work plan. It will also be used as a platform to share best practice, with a clear communication plan of disseminating information to all key stakeholders. It should seek to identify the prioritisation of its efforts from the continuum of mass participation to high performance sport. The identification of funding sources and leadership for the development of a national sport integrity plan is critical to this first priority recommendation.

R2. Organisations with the responsibility for allocating funding to sports organisations should consider prioritising investment into core integrity and governance work, or risk organisations continuously prioritising participation and high performance.

R3. The initial remit for SIF should be to discuss its scope and function, and prioritise key actions around short and medium term goals in the form of a national strategic plan. These need not be determined by Olympic Cycles although they are a commonly applicable cycle for planning within the sports system.

R4. Membership of SIF to include a representative sample of NGBs, Home Country Sport Councils, and other relevant bodies such as UKAD, CPSU, Gambling Commission. The membership should not be limited to political representation but also should be competence based.

R5. The development of links to internationally relevant bodies should be a short term goal in order that SIF gains international credibility from its inception.

R6. There is a pressing need to agree upon the conceptual boundaries of sport integrity. It should provide a definition of operational value to sport stakeholders.

R7. The operational definition should be based on a 3-dimensional model incorporating Personal, Organisational and Competition Integrity.

R8. It (the definition) should be supported by a simple guide that shows how elements of sport integrity might be combined in order to create synergy and minimise overlap and cross-purposed activity.

R9. The definition, and the processes to secure agreement on it should be approved by the SIF.

R10. The SIF should create an online portal for information sharing, including elements where confidentiality can be assured.

R11. The SIF should develop an overarching Education Strategy that seeks to pool resources and encourage networked approaches to delivery. It should seek to drive consistent messaging and content on culture, values and behaviours. It should seek to utilise and develop evidence based strategies and build on existing leaders in the field.

R12. Consideration should be given as to how strategic educational delivery can be formed across sports levels (eg primary, secondary schooling, academy, professional) in order for it to be credible and meaningful to the athletes, administrators, coaches, and so on, involved. Home Country Sport Councils should be encouraged to develop this alongside the Physical Literacy agenda.

R13. UK Sport/Home Country Sport Councils should seek to identify how organisational integrity can be built into good governance developments. This might include the development of ethical audit tools, tailored to the nature and size of sport organisations.

R14. UK Sport/Home Country Sport Councils should seek to empower NGBs by providing working models of ethics committees, and to provide appropriate training thereon, based on existing models from outside sports such as the finance, healthcare, and police sectors.

R15. UK Sport/Home Country Sport Councils should reach out to the more commercial sports which already employ risk assessment tools in order to evaluate integrity threats, in order to guide good practice in smaller, less commercial, sport organisations.

R16. In order to achieve greater standards of consistency UK Sport should expand its template policies for misconduct by advising on when alternative methods for dispute resolution should be pursued. This would range from mediation practices, to arbitration, and legal processes as appropriate.

R17. UK Sport/Home Country Sport Councils must develop a co-ordinated approach to the use of funding levers to support integrity function development. To do this will require some form of monitoring or audit that should be consensually developed.

R18. All sport stakeholders should consider how to develop a consistent strategy with regard to communications and transparency in relation to integrity breaches.

R19. Home Country Sport Councils ought to consider developing criteria for modelling good practice in (e.g.) small, medium and large NGBs in order to develop an understanding of a scaled response to resources needed to deliver sport integrity functions.

R20. When developing sport integrity officer roles, consideration should be given by SIF to standardise job descriptions, and identify key knowledge and competencies.

R21. Attention must be given to considerations of power by all stakeholders, particularly in relation to the consistent investigation, reporting and censuring of integrity breaches.

R22. Sport organisations are encouraged to ensure sport integrity elements are visible and considered on their corporate risk assessments/risk registers.

R23. Where integrity functions are dispersed throughout, organisations are encouraged to bring together relevant "integrity" officers on a regular basis so it is seen as a corporate not individual responsibility.

R24. Finally, a number of strategies will be needed to embed integrity awareness. Again, good governance protocols can be used to develop the integrity agenda. Board Members should be encouraged to become champions of Integrity for their organisation.

Limitations

Research takes various forms, and the idea of a singular 'gold standard' methodology does not exist. Each research method has its strengths and limitations. Moreover, the timings of research, the state of mind of the participants, the political milieu at the precise time of the interviews, and so on, cannot be controlled. It is worth re-stating that the focus groups and interviews were conducted under conditions of anonymity and confidentiality, allowing participants free rein to say exactly what they wished to.

Nevertheless, the principal limitation of this study is that it is a relatively small-scale investigation, albeit of important highly-placed stakeholders' attitudes and beliefs. The responses are thereby partly structured by contextual factors. This study, especially in its qualitative elements is not, by its very nature, generalisable across all UK sport stakeholders. Greater resources could be directed toward a larger group of stakeholders over a longer period, which may yield new data. Given, however, the large degree of convergence between the stakeholder perceptions this is not taken to be a very significant concern by the researchers.

The short timescale in which to conduct the research also meant some key individuals were not available to participate in either focus groups or the more detailed interviews, nevertheless, this should not take away from the very detailed data provided and analysed from influential and significant stakeholders from a wide range of organisations across the UK. The recommendations provided are unable to go into great detail but provide a foundation or platform on which to confidently move forward with ambitious/aspiration plans for sport integrity in the UK.

When completing the online questionnaire some respondents reported that some of the questions were too broad for them to answer and were therefore left unanswered, meaning the depth of responses to some questions was not as strong as others. Given, however that the research targeted a necessarily wide range of stakeholders across the UK, the researchers required broad questions in order to provide as many respondents the possibility of being able to answer. The aim of the questionnaire responses was not to provide highly specific information about the operations of each stakeholder, merely enough to map structures and personnel, and to illicit the key areas to explore in more depth during the focus group and interview stages.

The final limitation of the study was that there was no direct athlete voice/representation. Rather, the voice of athletes was captured with past national and international athletes participating in all three stages of the research, and from one representative body for athletes among the many that exist in the sporting landscape of the UK as part of the interview sample.

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Appendices

Appendix 1 – Interview Topic Guide

1. **Tell us a bit about your organisation, your role, and its links to sports integrity**
a. How important is an integrity function to your organisation?
b. Focused
c. SI scattered across various departments
d. Broad or narrow scope
e. What drives your integrity function - Crises, good governance, key person, culture, brand protection?

2. **How realistic is it to get everyone working to the same definition of sports integrity?**
a. Personal integrity
b. Organisational Integrity
c. Competition Integrity
d. Can we capture all parts of Sports Integrity under these headings?
e. One size fits all approach - broad principles and deliver differently?
f. What would fit where?

3. **Should integrity issues be mandatory for sports organisations?**
a. What are the key mandatory areas?
b. Tiered approach
c. Managing audit/compliance/concordance?
d. Risk analysis

4. **What are the current biggest threats to sports integrity?**

5. **Investigating threats to integrity?**
a. Functions and mechanisms
b. Committees with power to sanction
c. Codes of ethics?
d. Good practice?
e. Whistleblowing - good or bad?

6. **How can you better work together?**
a. Think of those present around the table today.
b. Who needs to be involved?
c. Are you happy with current arrangements?
d. Please share these

7. **What are your aspirations and realistic future plans for sports integrity?**
a. Barriers
b. Cost
c. Good practice examples? What are you doing well?

8. **Anything else integrity related you would like to discuss?**
a. Key things we should know
b. Suggestions going forward

Appendix 2 – Online Survey

1. **What is the name of your organisation?**

2. **In your own words, please define the term "sports integrity"? What does it include and/or exclude?**

3. **Does your organisation have an internal integrity (or integrity related) function?**

IF YES

4. **Who has ultimate oversight of this function? i.e. CEO, Board**

5. **What is the annual budget attached to this function?**

6. **Is it connected with any other national or international organisations working on integrity issues? If yes, please list**

7. Is there a named individual who is responsible for that function(s)? Please name them if not you

8. What is your/are their job title(s)?

9. Do they/you have a job description? If so, please attach

10. To whom are you/they accountable? (please identify role, not individual name)

11. How many years' experience do you/they have in the role?

12. What background do you/they have?

13. What is your/their highest educational qualification?

14. Are you/they full-time/part-time?

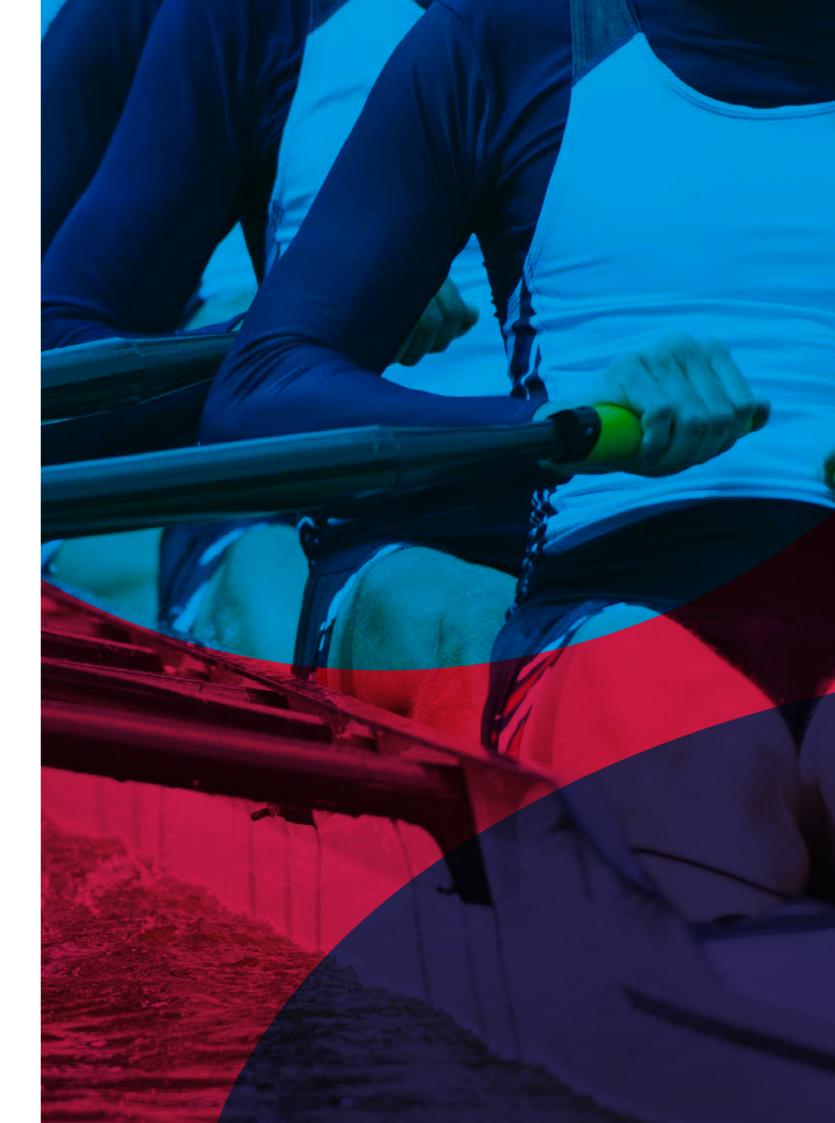15. How many, other than that person, are in the unit responsible for integrity matters?

IF ADDITIONAL REPEAT QUESTIONS 8-14

IF NO FROM QUESTION 3

23. Why do you not have an integrity function?

24. Do you have plans to establish an integrity function?

25. What have been the barriers to establishing an integrity function?

26. Who/what do you see playing a role in an integrity function?

FOR ALL

27. In your organisation is there a clear separation between work on sport betting integrity (i.e. event manipulation/match fixing) and other non-betting issues?

28. Is your organisation a member of the Sports Betting Integrity Forum (SBIF)?

29. Does your organisation include integrity considerations as part of its risk assessment? If so, please attach

30. Does your organisation have any external integrity functions i.e. outsource whistleblowing reporting lines?

31. Does your organisation provide any of the following services?

a) Welfare support to members
b) Independent whistleblowing/reporting line

32. If so, who is it delivered by (internal/external), and what annual budget is attached to it?

33. Does your organisation have a Code of Ethics/Conduct? If so, please attach.

34. Does your organisation regularly liaise with law enforcement or other sport/professional regulators? Please list

35. Does your organisation have any information sharing agreements in relation to integrity issues?

36. If you would like us to share the results of this survey with you, please provide your contact details below

Notes