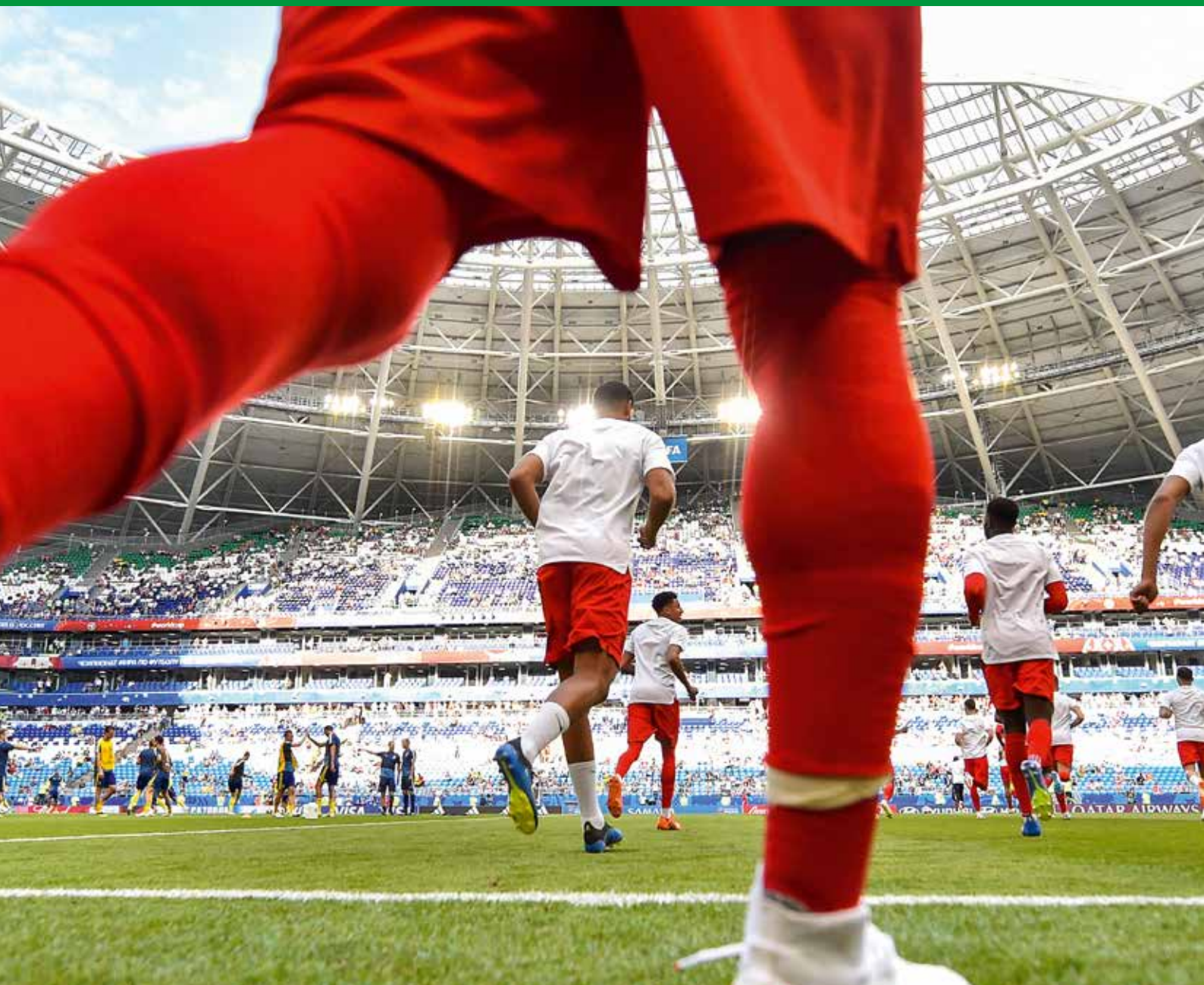


PROTECT THE INTEGRITY OF FOOTBALL

Practical Handbook for FIFA Member Associations



Introduction

One of FIFA's core objectives is to protect the integrity of football. As stated in its Statutes, FIFA's objectives include *"preventing all methods or practices, such as corruption, doping or match manipulation, which might jeopardise the integrity of matches, competitions, players, officials and member associations or give rise to abuse of association football"*¹. FIFA has adopted an effective approach towards all forms of manipulation and/or unlawful influencing of football matches or competitions.

The main principles of FIFA's integrity initiative are the promotion of integrity and the protection of football matches and competitions. This means promoting integrity internally and to the public at all times, as well as protecting football matches and competitions against match manipulation as far as possible and under all circumstances.

In this context, FIFA has also streamlined and optimised its internal structures by creating the FIFA Integrity Department within the Integrity & Institutional Legal Subdivision, which itself is situated within Legal & Compliance Division. FIFA Integrity is in charge of implementing FIFA's integrity initiative by engaging with various partners in order to expand its integrity network, by assisting member associations and confederations to develop their own integrity initiatives, by establishing preventive measures to protect FIFA competitions, as well as by conducting preliminary investigations in connection with match manipulation and integrity.²

Enabling, empowering and supporting FIFA member associations and the confederations to create and implement their own integrity initiatives is vital for the promotion of integrity and the prevention of match manipulation worldwide. Therefore, FIFA has developed this Practical Handbook in order to provide member associations with a guide on how to build and/or strengthen their own integrity initiative. This Practical Handbook is divided into the following sections:

- 1. WHERE TO BEGIN** – This section outlines and explains the core requirements that are suggested by FIFA to its member associations to start their own integrity initiative, which includes adopting an integrity policy, appointing an Integrity Officer, developing a sustainable action plan as well as ensuring an adequate regulatory framework;
- 2. WHAT TO DO** – The second section explains what an integrity action plan can look like, what areas should be covered and which specific measures should be taken by member associations and confederations in order to promote integrity and protect their football competitions;
- 3. WHAT TO KNOW** – This last section serves to impart the essential knowledge with regard to preliminary investigations related to integrity alerts (i.e. match manipulation incidents within a sport governing body). This section explains what a preliminary investigation is, which specific situations are subject to preliminary investigations, what kind of evidence can be produced and which standard of proof shall applied in match manipulation proceedings. Furthermore, the value and importance of betting reports are outlined and the main contents of a preliminary investigation report are listed together with other important topics such as the application for worldwide sanctions and relevant integrity-related case studies.

This Practical Handbook shall serve as a guide and a support tool, assisting FIFA member associations and the confederations through the standard steps and best practice measures on how to implement successful and sustainable integrity initiatives while also acting as a day-to-day reference tool to promote integrity and to protect football competitions from match manipulation worldwide.

¹ Art. 2 (g), FIFA Statutes, 2018 edition (FIFA Statutes, 2018 edition) <https://resources.fifa.com/image/upload/the-fifa-statutes-2018.pdf?cloudid=whhncbdzio03cuhmwfxa>
² See Annexe 4.1 for an overview of FIFA's internal structure and a recommendation on how an integrity department can be set up

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1. WHERE TO BEGIN – integrity initiative

1.1. Adopt an integrity policy

At the beginning of every integrity initiative stands an integrity policy.

a. What is a policy?

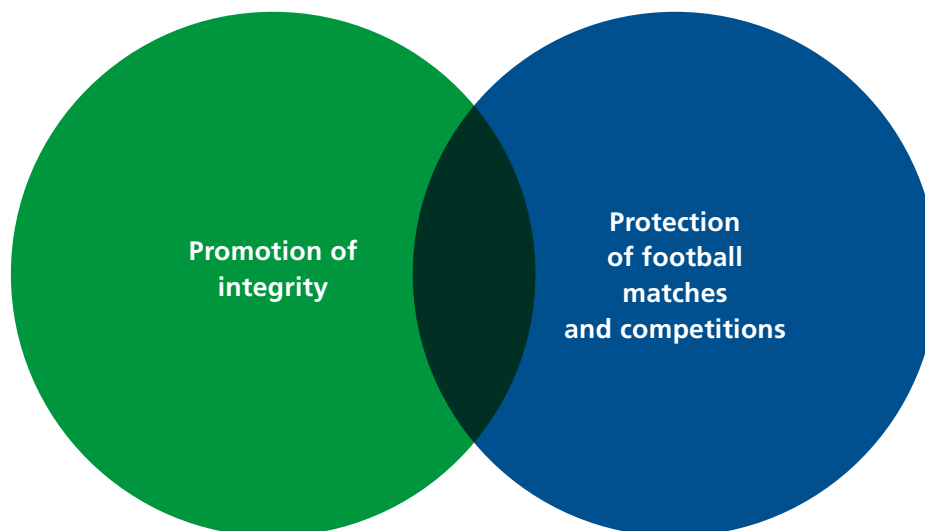
A policy is a set of basic principles and associated guidelines, formulated and enforced by the governing body of an association to direct its actions in pursuit of long-term goals.

b. Integrity policy: promotion of integrity and protection of matches and competitions

It is essential that every member association (“MA”) implements an integrity policy to protect the integrity of the game and to fight against manipulation of football matches and competitions. This shall be achieved by establishing its commitment to adopting an effective approach towards any form of manipulation and/or the unlawful influencing of match incidents/results. The core pillars of this integrity policy are the promotion of integrity and the protection of football matches and competitions.

Each MA shall ensure that it promotes integrity at national level to its members, stakeholders and the public in general in a sustainable and supported manner. Secondly, each MA has to make sure that it protects the football matches and competitions organised under its jurisdiction against match manipulation under all circumstances.

An integrity policy should therefore follow these two pillars:



Has your MA adopted an integrity policy?



1.2. Appoint an Integrity Officer

Main contact person for all integrity-related matters within the MA.

Each MA should appoint an Integrity Officer to lead and maintain the MA's integrity initiative and action plan. The Integrity Officer shall be the main contact person for all integrity-related communications within the MA, and between the MA, the confederation and FIFA.

Furthermore, the Integrity Officer shall be responsible for implementing and executing preventive measures against match manipulation within the MA and for conducting preliminary investigations into match manipulation incidents when necessary. The core responsibilities of the Integrity Officer are, *inter alia*, the following:

INTEGRITY INITIATIVE & ACTION PLAN	AWARENESS, EDUCATION & PREVENTION	PRELIMINARY INVESTIGATIONS
Establishment and maintenance of the measures set out in this handbook	Creation of training, awareness, education and prevention campaigns	Fact-finder in the preliminary stage of an investigation
Recipient and contact person for integrity-related information	Conducting integrity training sessions with relevant stakeholders	Conducting interviews with witnesses and suspects
Set-up and maintenance of reporting mechanisms	Contribution to best practices and information exchange	Drafting and submission of reports to independent judicial bodies

Has your MA appointed an Integrity Officer?

Remember that FIFA Integrity can support your MA in training your Integrity Officer.

Has your MA identified the Integrity Officer to FIFA?

1.3. Develop a sustainable integrity action plan

Each MA should develop, through its Integrity Officer, a sustainable integrity action plan in order to enforce its integrity initiative at national level.

The integrity action plan should consist, as a standard, of the following six core areas:



Has your MA developed a sustainable action plan at national level?

Remember that FIFA Integrity can support your MA in developing a sustainable action plan.

Is your MA implementing the measures set out in the action plan on a yearly basis?

Does your MA inform FIFA about the action plan on a yearly basis?

1.4. Ensure an adequate regulatory framework

Each MA should adapt its regulatory framework to specifically address match manipulation violations within its disciplinary code, its code of ethics and/or its code of conduct.

Equally, there shall be an **independent judicial body** in place that is competent to conduct proceedings into match manipulation violations and to sanction any breach of regulations mentioned in this handbook concurrent with the provided disciplinary/ethics provisions.

Has your MA adapted a regulatory framework to specifically address match manipulation violations?

Has your MA implemented an independent judicial body competent to conduct proceedings into match manipulation and integrity-related corruption?



2. WHAT TO DO – integrity action plan

2.1. Establish appropriate reporting mechanisms

If there is no reporting mechanism in place, incidents of match manipulation cannot be properly communicated to your association.

According to the FIFA Disciplinary Code, every person bound by the Code shall immediately and voluntarily report to the secretariat of the Disciplinary Committee any approach in connection with activities and/or information directly or indirectly related to the possible manipulation of a football match or competition.³ As part of its integrity action plan, every MA should set up its own reporting mechanisms.

In this regard, access to reliable information is crucial in order to investigate and appropriately handle allegations of match manipulation. The most valuable source of information comes from direct witnesses or individuals who may have access to privileged information and who are as close as possible to where manipulation attempts may take place.

The need to have the widest possible network of potential informants must be balanced against the need to appropriately protect the people who report. Therefore, an accurate, reliable and confidential reporting mechanism (or range of mechanisms) should be put in place.

Each MA should provide, according to their specific needs, the following reporting mechanisms and channels, and **actively** and **constantly** promote them to all members, stakeholders and to the public in general:

Dedicated area
on MA's website



Dedicated
email address



Dedicated mailbox
for letters/post



App for iOS
& Android



Reporting on the homepage of the MA's website: When someone wants to report an allegation to your MA, the first thing that he/she will most likely do is consult your website. Therefore, each MA should have a link or section on their homepage that leads to a dedicated confidential reporting mechanism or email address allowing any person to submit information (anonymously if needed). This is a critical measure for the MA to reach a wider audience, as the public may not know the existing reporting mechanisms in place if they have not been publicised enough, or even at all.

Reporting via email: Any allegation of match manipulation or integrity-related corruption could be sent to a single integrity email address put in place by the MA. Reporting via email should also provide the possibility to send a report or allegation anonymously in order to protect the informant.

Pro-activeness is key for the reporting mechanisms to be successful, therefore each MA should promote the existence of its reporting mechanisms as widely as possible through repeated messages (flyers, banners, briefings to teams, circulars at the beginning of tournaments, etc.) as regularly as possible.

³ See art. 18 par. 3 & art. 19 of the FIFA Disciplinary Code (2019 edition)

Reporting via letter/post: When reporting any allegation of match manipulation or integrity-related corruption, some people may still prefer to send a letter rather than an email (especially in some parts of the world with limited access to the internet). Therefore, if it is considered necessary, it could be beneficial for your MA to have an agreement with your national post service waiving the need for a stamp for letters sent to the dedicated integrity address. This would allow people who may not be willing to spend money on a stamp to make a report.

This initiative may also be coupled with the creation of physical mailboxes in the main stadiums or at your MA's headquarters where individuals could drop off letters and reports.

Reporting via app: This option is efficient and aligned with the most recent technology. The reporting app should be simple and user-friendly, allowing individuals to upload images and video files as well as deciding whether or not to remain anonymous when filing the report. If your MA is interested in establishing a reporting app, FIFA Integrity can assist in the process.

Has your MA created appropriate reporting mechanisms for integrity alerts/incidents?

See Annexe 4.1 for FIFA Integrity's reporting mechanisms.

Are these reporting mechanisms secure, confidential and/or anonymous?

Has your MA ensured that the public knows about these reporting mechanisms (through campaigns, publicity on the MA's website, leaflets, etc.)?

See the following examples of good practice by MAs and confederations:

- AFC - <http://www.the-afc.com/about-afc/departments/legal/integrity/>
- Australia - <https://www.ffa.com.au/governance/ffa-integrity-framework>
- Chile - <http://www.anfp.cl/canal-denuncias>
- Concacaf - <https://secure.ethicspoint.com/domain/media/en/gui/40739/index.html>
- Portugal - <https://integridade.fpf.pt/>
- South Africa - <https://www.safa.net/integrity/>
- UEFA - <https://integrity.uefa.org/index.php?isMobile=0>

Has your MA informed FIFA of the reporting mechanisms that are available?

As a good practice, each MA should also include the reporting mechanisms of FIFA and their confederation in the same section of the MA website where they provide their own reporting channel.

- Paraguay - <http://www.apf.org.py/p/linea-etica>
- Peru - <http://www.fpf.org.pe/transparencia-fpf/>

2.2. Introduction of integrity measures for football matches and competitions

It is the responsibility of each and every MA to promote integrity and protect its football matches and competitions.

This section introduces and recommends a series of integrity measures for each MA to evaluate in order to build up and/or strengthen their integrity action plan at national level. In order to efficiently protect football matches and competitions, each MA should implement **specific, measurable** and **sustainable** actions pertaining to their respective matches and competitions.

a. WHY SPECIFIC?

Integrity measures have to address the specific audience that they are intended for. In this regard, each measure has to be tailor-made for the audience that it is directed to, as the success of any integrity measure lies in the detail.

e.g. The more you tailor an integrity workshop to the targeted audience, the more effective it will be. For example, even though the main objective might be the same, it is not recommended to deliver the same content to youth players and professional players as they have different views and perceptions.

b. WHY MEASURABLE?

Integrity measures need to have accountability. Every action taken should have an impact, which should be measured and registered by each MA in a yearly activity/integrity report.

e.g. How many professional clubs received the integrity course during the course of the season?

c. WHY SUSTAINABLE?

Unendurable integrity measures have limited impact. Integrity measures have to be part of an integrity action plan, which has to be maintained and enhanced by the MA year on year.

e.g. The integrity plan of your MA makes provision for integrity courses to be held every season.

Does your MA implement any of the following integrity measures in its competitions?

If not, remember that FIFA Integrity can help your MA to define, establish and implement standard integrity measures for the protection of your MA's competitions.

The following is a non-exhaustive list of the areas and specific measures that can be implemented by an MA in order to protect its football matches and competitions:

OFFICIALS

Member association officials
League officials
Club officials

Activities:

- Integrity network at league/club level
- Introduction on integrity
- Integrity workshops
- Other measures



MEN'S FOOTBALL

Professional players
Non-professional players
Coaching staff

Activities:

- Integrity workshops
- Integrity declarations
- Integrity clause (contractual)
- Integrity campaign
- Other measures



WOMEN'S FOOTBALL

Professional players
Non-professional players
Coaching staff

Activities:

Integrity workshops
Integrity declarations
Integrity clause (contractual)
Integrity campaign
Other measures



REFEREEING

Professional refereeing
Non-professional refereeing
Video assistant refereeing

Activities:

Integrity workshops
Integrity declarations
Integrity checks
Other measures



GRASSROOTS & YOUTH

Players
Coaching staff/instructors
Other responsible individuals

Activities:

- Integrity sessions
- Focus on sporting values
- Integrity campaign
- Role models/legends



eSPORTS

Officials
Players
Coaching staff

Activities:

- Integrity workshops
- Integrity declarations
- Integrity clause (contractual)
- Integrity checks



Please find a table summarising all elements in Annexe 4.12.

Are the integrity measures implemented by your MA specific?

Are the integrity measures implemented by your MA measurable?

Are the integrity measures implemented by your MA sustainable?

2.3. Establish a media strategy

a. Why establish a media strategy?

The media provides an important channel for MAs to communicate to their members, stakeholders and to the public about their integrity action plan and initiatives.

By developing a tailored media strategy on integrity and by forming a positive and professional relationship with the media, MAs can play a role in promoting and helping to form positive attitudes around integrity in football.

b. The benefits of working with the media

Successfully working with the media has several benefits for an MA. In particular, building positive and professional relationships with journalists and establishing a specific media strategy for integrity can help to:

- **Educate** and **inform** members, stakeholders and the general public;
- **Enhance the credibility** of the MA;
- **Create trust** in football governance structures and the integrity of football matches and competitions;
- **Promote integrity** action plan and initiatives in place.

c. Good practices and key principles

- Develop a **targeted** media and communication strategy for integrity and a plan to inform internal and external stakeholders and the media themselves;
- Identify and **develop professional working relationships** with relevant journalists and local, national and international news organisations to work on the field of integrity;
- Aim to regularly **inform** and **educate** key media about integrity and anti-match manipulation measures in place;
- Be **courteous** and **timely** when responding to media enquiries;
- Ensure that the principles of **due process** and **confidentiality**, as well as relevant rules and regulations, are followed during any communication or media activity.

Has your MA designed an appropriate media strategy for integrity?



If not, please refer to Annexe 4.2 for more details on how to design and implement a media strategy for your MA.

2.4. Cooperate with different stakeholders

Know who your partners are in the fight against match manipulation.

**Fédération
Internationale de
Football Association**



**Confederations
(AFC, CAF, Concacaf,
CONMEBOL, OFC, UEFA)**



**Betting
industry**



**Law enforcement
agencies and judicial
authorities**



a. FIFA

- FIFA has a dedicated team of professionals working exclusively on the promotion of integrity and the protection of football matches and competitions;
- Integrity alerts and/or claims are forwarded to FIFA Integrity by all relevant stakeholders (confederations, regional platforms, partners from the betting industry and MAs), including the public, through appropriate reporting mechanisms. In most instances, a MoU formally establishes the cooperation between FIFA and the stakeholders concerned;
- FIFA Integrity can be reached at the following address: integrity@fifa.org.

b. Confederations

- In principle, all confederations and MAs shall have a designated Integrity Officer or Integrity Department/Unit;
- As stated, this person or department/unit within the MA should be the first in line to handle allegations of match manipulation and integrity-related matters at national level;
- As a best practice, it is advisable for the Integrity Officer or Integrity Department/Unit to inform the MA's confederation as early as possible about the investigations and processes taking place, given that the confederation may have additional means and powers at its disposal to support the MA.

c. Betting industry

These stakeholders may possess the technical expertise required to provide the MA with expert analysis on the following:

- Betting patterns (prior to match and live betting);
- Detection of irregular betting behaviour (online/offline);
- On-field events;
- Performance reviews (players, referees, etc.).

d. Law enforcement agencies and judicial authorities

- Law enforcement agencies and judicial authorities play a critical role in the fight against corruption and, specifically, match manipulation in football;
- As a good practice, each MA shall engage with these authorities in order to build up a national integrity platform against corruption and match manipulation in football;
- Liaising and coordinating efforts on integrity with law enforcement agencies avoids disrupting each other's procedures and provides a valuable channel for information exchange.





3. WHAT TO KNOW – integrity investigations

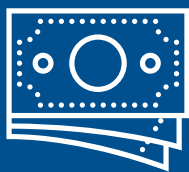
3.1. Situations subject to a preliminary investigation

Various situations can constitute a breach of integrity-related regulations, which can ultimately be subject to a preliminary investigation. Such violations can be connected to the manipulation of football matches and competitions, as well as individuals who are involved in unlawful betting on football.

In general, match manipulation is committed for the following reasons:

FINANCIAL GAIN

This mostly involves persons using prior knowledge about the manipulated match and placing bets on the same match in order to make financial gains through sports betting platforms.



SPORTING ADVANTAGE

e.g. progression in a competition, promotion to a higher division, avoidance of relegation.



OTHER

This can include any undue advantage for oneself or any third party.



A common definition of match manipulation defines it as an:

- **“intentional arrangement, act or omission aimed at an**
- **improper alteration of the result or the course of a sport competition**
- **in order to remove all or part of the unpredictable nature of the aforementioned sport competition**
- **with a view to obtaining an undue advantage for oneself or for others.”⁴**

The FIFA Disciplinary Code defines match manipulation as conduct by anyone, who:

- **“directly or indirectly, by an act or an omission, unlawfully influences or manipulates the course, result or any other aspect of a match and/or competition, or**
- **conspires or attempts to do so by any means.”⁵**

Each MA should note that any attempt to manipulate a football match or competition is sufficient for an individual to be convicted of match manipulation. This means that the manipulation itself does not have to be successful for a preliminary investigation to be conducted and for the conduct to be sanctioned.

⁴ Council of Europe Convention on the Manipulation of Sports Competitions, 18 September 2014, art. 3 par. 4.

⁵ FIFA Disciplinary Code, 2019 edition, art. 18 par. 1 Manipulation of football matches and competitions

The above definitions cover a wide range of match manipulation scenarios such as the following:

a. Actions not connected to the field of play (actions off the pitch)

Actions not connected to the field of play, which could be subject to a preliminary investigation, basically involve any action, omission and/or agreement in order to manipulate football matches or competitions that do not take place during the match itself (in other words, the conduct does not occur on the pitch).

The following is a non-exhaustive list of examples of actions that are not connected to the field of play:

Match manipulation agreement and/or conspiracy

- Any agreement or conspiracy (orally or in writing) between a match-fixer and any other person(s) that is directed at unlawfully influencing or altering the result of a match
- Accepting, giving, offering, promising, receiving, requesting or soliciting any pecuniary or other advantage in relation to the manipulation of matches

b. Actions connected to the field of play

Actions connected to the field of play, which could be subject to a preliminary investigation, basically involve any action, omission and/or agreement to manipulate matches or competitions that take place during the match itself (in other words, the conduct occurs on the pitch by one or more of the participants).

The following is a non-exhaustive list of examples of actions that are connected to the field of play:



- **The deliberate loss of a match or a phase of a match**
e.g. conceding goals, being awarded yellow & red cards, conceding penalties



- **The deliberate underperformance by a football player during a match**
e.g. poor defending or attacking



- **The deliberate misapplication of the Laws of the Game by the referee and/or other match officials**
e.g. wrongfully awarding red & yellow cards, penalties



- **Interference with play, the playing surface or equipment**
e.g. cutting the power supply of a football stadium



- **Agreeing to receive compensation from a third party in exchange for achieving a positive result in a match or competition⁶**
e.g. playing well in connection with accepting a bonus from a third party that would like to provide some “extra motivation” to a player or referee

⁶ “Therefore, the fact that a third party is compensating for this lack of motivation by paying a bonus to provide ‘extra motivation’ for another team to perform well evidently exerts influence not only over the outcome of the match but over the competition itself, jeopardizing the integrity of the competition and potentially giving an undue advantage to the third party that is paying this bonus (in case it is also taking part in the competition). Finally, allowing third parties’ bonuses could lead to the distortion of football competitions.” CAS 2014/A/3628 Eskisehirspor Kulübü v. UEFA, paras 118/119.

c. Omission

Match manipulation situations cannot only be committed through an action but also through an omission:

- **Deliberately deciding not to take an action on the pitch even though it would be indicated by the Laws of the Game**
e.g. unlawfully deciding not to award red & yellow cards, penalties, etc.
- **Failing to comply with the duty to report a match manipulation approach, incident or suspicion**
e.g. deliberately failing to report a match manipulation approach

d. Involvement with betting, gambling or similar activities

All persons involved in football shall be forbidden from directly or indirectly participating in betting or similar events related to football matches or competitions and/or any related football activities. Therefore, the following conduct could be the subject of an integrity investigation:

Direct involvement

e.g. a football player, a referee, a coach or an official places a bet on football matches or competitions and/or any related football activity

Indirect involvement

e.g.

- A third party places a bet in his/her name on football on behalf of a person involved in football, and the person involved in football receives the money;
- A third party places a bet in his/her name and with his/her own money on a match together with a person involved in football, and they share the money;
- A person involved in football shares inside information on an upcoming football match with a third party, and the third party places a bet on this football match due to the information received.

3.2. Standard of proof

Comfortable satisfaction: in between the standards of “balance of probability” and “beyond reasonable doubt”.

This section evaluates the standard of proof that shall be applied in ethics and/or disciplinary proceedings when dealing with integrity-related cases before a judicial body of an MA or the Court of Arbitration for Sport (CAS).

a. What is the standard of proof?

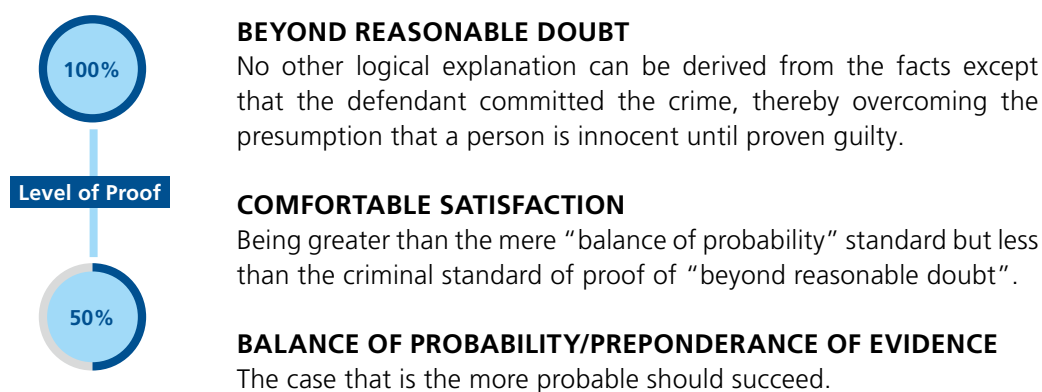
The standard of proof is defined as the level of certainty and the degree of evidence necessary to establish proof in criminal or civil proceedings.

In general, each MA can decide for itself which standard of proof shall apply during match manipulation proceedings, subject to national and/or international legislation.⁷ If there is no specific indication of the applicable standard of proof in the regulations of the MA as well as no agreement between the parties during the proceedings, CAS will apply the standard of “**comfortable satisfaction**”.⁸

Unless otherwise stipulated in the relevant regulations, sports governing bodies and MAs must establish the relevant facts “to the comfortable satisfaction of the Court having in mind the seriousness of allegation which is made”.⁹

b. What is the standard of “comfortable satisfaction”?

The “comfortable satisfaction” standard has been defined as being greater than the mere “balance of probability” standard but less than the criminal standard of proof of “beyond reasonable doubt”.¹⁰



FIFA recommends that every MA applies the standard of “comfortable satisfaction” in match manipulation disciplinary and/or ethics proceedings and stipulate the standard in its regulations accordingly.

For more details on CAS statements on the standard of proof in match manipulation cases, please refer to Annexe 4.7.

⁷ CAS 2011/A/2490 Köllner v. ATP

⁸ CAS 2010/A/2267 – 2281 FC Metalist et al. v. FFU

⁹ Ibid.

¹⁰ CAS 2014/A/3562 Josip Simunic v. FIFA

3.3. Types of evidence

Any type of evidence may be produced.

This section explains the types of evidence that shall be admissible in ethics and/or disciplinary proceedings before a judicial body of an MA or CAS. Any type of proof that is relevant to the case may be produced in disciplinary investigations (cf. art. 35 par. 1 FIFA Disciplinary Code, "FDC", 2019 edition).

a. Direct evidence

On the one hand, MAs can produce direct evidence that can consist of evidence directly related to the fact in dispute (i.e. evidence of a witness who testifies to the truth of the fact to be proven, evidence directly related to the person under investigation, etc.).

b. Indirect evidence

On the other hand, indirect evidence is also admissible if it meets the standard of proof of "comfortable satisfaction". Direct evidence is not always necessary as long as the indirect evidence meets the "comfortable satisfaction" standard (cf. art. 35 par. 3 FDC, 2019 edition).

In this regard, below you will find an overview of possible indirect evidence that can be produced in ethics and disciplinary proceedings in regards to match manipulation and integrity-related corruption¹¹:

Expert opinions/ reports



Emails



Letters



Witness/party declarations



Audio recordings



Video recordings



Betting reports



Any kind of document

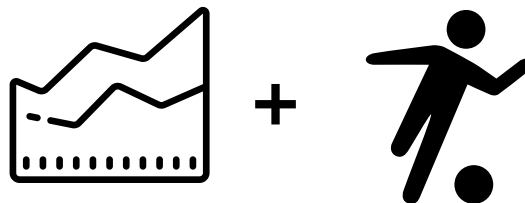
In proceedings before the judicial bodies of an MA, the deciding body shall have absolute discretion regarding the evaluation of evidence (cf. art. 35 par. 2 FDC, 2019 edition). In practice, this means that the bodies are allowed to:

- freely decide the evidentiary weight of any evidence on record without being bound by any predefined distinction between the kind of evidence; and
- freely deliberate between contradictory elements of evidence in their decision-making process.

¹¹ List non-exhaustive.

3.4. Betting reports

The analysis of the performance in connection with the deviation from an expected betting pattern can be enough evidence to prove that someone has committed match manipulation.



a. What should an MA know about betting reports?

- Betting reports are one of the most important elements of indirect evidence in match manipulation investigations and proceedings.
- It is also usual that in match manipulation cases the betting report stands at the beginning of an investigation where the respective MA is not in possession of any direct evidence.
- The betting report detects and highlights irregular betting movements, both pre-match and in-game from the monitored betting operators, together with match-specific information (e.g. current form of the teams involved, on-field action, and player and match officials' data).

b. Are betting reports sufficient evidence to prove that a football match has been manipulated?

- Irregular odds movements detected by a monitoring system **may not independently prove match manipulation**. Equally, football matches **may have been manipulated without irregular odds movements being detected** by the monitoring system.
- According to CAS, the mere analytical information derived from a betting report is not enough to prove that a football match has been manipulated.¹²
- The analytical information needs to be supported by other, **different and external elements** that point in the same direction.¹³ Examples of such external elements are suspicious actions on the field of play (e.g. underperformance).
- **A link between the deviation in the betting patterns and the external elements** such as suspicious actions on the field of play should be established,¹⁴ for example if the timing of the suspicious actions on the pitch exactly coincides with the observed deviations in the betting patterns.
- The analysis of suspicious actions in connection with the deviation from an expected betting pattern **can be enough to prove that someone has committed match manipulation**.¹⁵

¹² CAS 2016/A/4650 Skenderbeu v. UEFA, pg. 27 no. 85

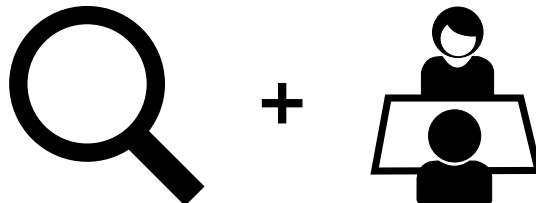
¹³ Ibid, pg. 27 no. 86

¹⁴ Ibid, pg. 30 no. 100; CAS 2017/A/5173 Joseph Odartey Lamptey v. FIFA, pg. 24 nos 83 & 84

¹⁵ CAS 2017/A/5173 Joseph Odartey Lamptey v. FIFA; CAS 2016/A/4650 Skenderbeu v. UEFA

3.5. Preliminary investigation

The facts: What? Who? Where? When? Why? How?



a. What is a preliminary investigation?

A preliminary investigation refers to a limited-scope inquiry undertaken to verify whether an allegation merits a full investigation through the analysis of the available evidence.

b. What are the objectives of a preliminary investigation?

The main objective is to establish the facts and details and, following a careful examination, evaluate whether to recommend the opening of disciplinary and/or ethics proceedings according to internal regulations through a final investigation report. Below are a few key elements that should be taken into account during the preliminary investigation process:

- Keep the investigation confidential as information could be leaked and affect the investigation;
- Use public/open sources in order to widen the scope of your investigations;
- Ensure that the actions of the person in charge of the investigation stay within the boundaries of the mandate and do not get in the way of potential criminal investigations;
- In cases when you do not have direct evidence, a combination of indirect evidence pointing towards the same conclusion is sufficient to ascertain facts and take the case forward.

c. Interviewing of persons subject to investigations or potential witnesses

- Come prepared: have an interview plan ready ahead of the interview meeting (see Annexe 4.5 for an example of an interview plan);
- As a good practice, remember to ask for the interviewee's consent to be recorded (audio and/or video) during the interview;
- Your security and the security of the interviewee should be a priority under all circumstances;
- Remember that any person involved and/or under investigation has the right to be heard and his/her version of events should be given due weight and consideration;
- The interview should be recorded and transcripts drafted for future reference in potential proceedings;
- Seek the assistance of a qualified interpreter if needed.

3.6. Preliminary investigation final report

a. What is a final report?

A final report is the main investigative report that the Integrity Officer and/or the person responsible at your MA submits to the relevant body within your MA to serve as a basis for the opening of formal proceedings or the provisional archiving of the case.

b. What are the main objectives of a final report?

- To **inform** the relevant body within your MA about the results of the preliminary investigation;
- To provide an **accurate summary of the facts** and the **available means of evidence**;
- To keep a **written record** of the findings of the preliminary investigation.

c. How to draft a final report

- Establish a clear timeline of events: if several matches or incidents are concerned, analyse each match or event separately (generally proceed in chronological order);
- If deemed appropriate for the case in question, it is preferable to have a separate report for each individual potentially involved in match manipulation;
- Each point or argument you make should be appropriately referenced to the source where the information is found: **use a reference for each statement or fact** you seek to establish;
- At the stage of the preliminary investigation, all statements or findings are still allegations, and all individuals mentioned are to be presumed as innocent. To be cautious and avoid making potentially false claims, use adverbs like “**allegedly**” or “**reportedly**”;
- Draft the report in a concise, factual and executive manner;
- Classify the document in accordance with the **confidentiality** rules of your association.

d. What is the content of a final report?

- Clear identification of the individuals or entities targeted by the investigation (e.g. full names, dates of birth, licence registrations, contact details, etc.);
- Detailed records of all actions undertaken during the preliminary investigation phase (interviews, official correspondence exchanged, etc.);
- The documented presentation of the facts;
- An analysis of the elements of proof available or collected during the investigation (see types of evidence in Section 3.3);
- A preliminary assessment of all possible applicable provisions potentially violated;
- Final recommendations on further actions to be carried out based on the findings of the preliminary investigation (e.g. opening of formal proceedings, provisional archiving of the case or a recommendation to investigate further).

Is your MA interested in having a template for a preliminary investigation final report?

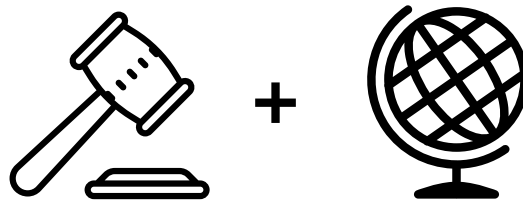
If yes, please contact FIFA Integrity for guidance in the drafting and structuring of a final report template.

e. Next steps – adjudicatory phase

Once a preliminary investigation report has been drafted and submitted to the competent independent judicial body of an MA, the process enters the next phase. Formal disciplinary proceedings are opened, while the following guiding principles should apply to the adjudicatory phase:

- Everything disclosed to the judicial body in connection with the proceedings shall remain confidential;
- Any type of proof may be produced;
- When evaluating the proof, the body will have absolute discretion regarding proof;
- The parties are free to choose their own representation and legal representation;
- The parties shall be obliged to collaborate to establish the facts. In particular, they shall comply with requests for information from the judicial body;
- The official proceedings shall guarantee the protection of anonymous participants, in situations where, among others, a person's testimony could lead to threats on his/her person or put him/her or any person particularly close to him/her in physical danger;
- The parties shall be heard before any decision is passed;
- The judicial body shall pass their decisions entirely independently, in particular, they shall not receive instruction from any other body;
- The decision, which must be duly notified to the relevant parties, shall contain the following minimal requirements:
 - a) the composition of the committee;
 - b) the names of the parties;
 - c) a summary of the facts;
 - d) the grounds of the decision;
 - e) the provisions on which the decision was based;
 - f) the terms of the decision;
 - g) notice of the channels for appeal.
- An appeal may be lodged in front of an Appeal Committee against any decision passed by the judicial body.

3.7. Worldwide sanctions



a. Why apply for worldwide sanctions?

Once the judicial body of your MA has passed a decision related to the unlawful influencing of match results on an individual in accordance with internal regulations and procedures, your MA can apply to FIFA for the sanctions to be extended to have worldwide effect. This is particularly relevant for decisions carrying a ban from all football-related activities for a given period as it increases the weight of such bans.

b. How to apply for worldwide sanctions

In order to apply for worldwide sanctions to be pronounced by FIFA, your MA needs to submit the following documentation and material to FIFA:

- An official request for extension of the sanctions (see Annexe 4.8 for a template)
- A copy of the decision translated into one of the four official FIFA languages (English, French, German or Spanish), if required
- The complete and precise identification of the person who has been sanctioned (full name, address, association, club, nationality and date of birth)
- A document indicating the infringement committed by the sanctioned person (letter citing/charging the person)
- Proof that the right to be heard of the individual was duly respected according to set standards
- Proof that the person subject to the decision has been duly notified of the decision, and of the document citing/charging him or her (fax confirmation, post confirmation, email)

Note: An appeal may be lodged in accordance with the applicable appeal regulations and procedures established within your MA. The applicable FIFA regulations regarding the extension of sanctions to have a worldwide effect can be found in the 2019 edition of the FIFA Disciplinary Code, art. 66.

3.8. Case study

A person's involvement in match manipulation can have serious consequences.

a. The case of a match official (international FIFA referee)

The decisions of the Disciplinary Committee and the Ethics Committee, which are a result of preliminary investigations conducted by FIFA Integrity, may be appealed before the FIFA Appeal Committee¹⁶. Furthermore, appeals against final decisions passed by FIFA's deciding bodies (including the Disciplinary, Ethics and Appeal Committees) may be lodged before the Court of Arbitration for Sport (CAS)¹⁷. Finally, since the seat of CAS arbitration is Lausanne, Switzerland, the court of competent jurisdiction to hear actions to set aside CAS awards is the Swiss Federal Tribunal.¹⁸

Case background:

The referee officiated a match in the preliminary competition of the 2018 FIFA World Cup Russia™. **The final score of the match was 2-1.** The first goal was scored by Team A in the 43rd minute of the match, after a penalty was awarded by the referee because of a deliberate handball seemingly committed by a player of Team B. The rest of the match was described as relatively uneventful.

Evidence of match manipulation:

Irregular live betting movements and activities:

Shortly after the match, five different and internationally renowned betting monitoring companies independently and simultaneously reported to FIFA that irregular betting activities had taken place during the match, all of which were indicative of match manipulation.

All reports reached the conclusion that during the first half of the match, there were movements of betting activities for the "overs"¹⁹ betting market on the so-called "totals"²⁰ live betting market that significantly deviated from the usual, mathematically calculated market developments. Therefore, all five betting operators deemed the betting activities witnessed during the match to be highly irregular and indicative of match manipulation, concluding that **bettors held prior knowledge of the total number of goals that would be scored during the match** (at least two goals to be scored in total).

Relevant quote from the Court of Arbitration for Sport:

"The Panel is convinced by the concurring opinion of a number of experts, who rendered declarations in this arbitration, and find it extremely meaningful that a number of entities active on the betting markets immediately (i.e., soon after the Match) and spontaneously detected the irregular betting patterns and raised concerns as to the integrity of the match. It is on the other hand obvious even to the non-expert that the live betting market for Totals is affected by the lapse of the playing time: the shorter the playing time, the lower the probability of any number of goals to be scored. In other words, with respect to 'overs' (...), it is obvious that the probability of a win decreases (and therefore odds increase) as the playing time runs and no goal is scored."²¹

¹⁶ Art. 55 FIFA Statutes 2018; art. 57 FDC 2019

¹⁷ Art. 57 et seq. FIFA Statutes 2018; art. 49 FDC 2019

¹⁸ Art. 191 Swiss Private International Law Act (PILA)

¹⁹ **"Over"**: The bettor might speculate for "over" 2.5 goals. This means that if 3, 4, 5, 6 or more goals are scored in the match, the bet is successful. However, 0, 1 or 2 goals will mean that the bet is unsuccessful.

²⁰ **"Totals"**: Totals is a market where bets are placed on the total number of goals scored in a game. A line is offered by bookmakers, and bettors may speculate for "over" or "under" the given line. In live markets, the live Totals "lines" change throughout the match. For instance, if a goal has been scored, the "line" (on which bettors speculate the match will finish under or over said line) must increase.

²¹ See award CAS 2017/A/5173, par. 80 – Link: [jurisprudence.tas-cas.org/Shared Documents/5173.pdf](https://jurisprudence.tas-cas.org/Shared%20Documents/5173.pdf)

Sporting and referee performance analysis:

Following the reports highlighting the irregular betting activities, a sporting analysis of the match was also conducted. The analysis confirmed that the referee **clearly took two wrong refereeing decisions, which led to two goals being scored** by Team A at the end of the first half: the penalty was awarded to Team A for a handball which clearly did not happen; and the referee failed to stop a quick restart by Team A which led to a second goal being scored in the 45th minute.

Relevant quote from the Court of Arbitration for Sport:

“The Referee himself now admits that the Field Decisions were mistakes: (...) only submits that they were ‘innocent’ mistakes which find some justification. The Panel, however, cannot accept the Referee’s devaluation of his mistakes. The images reviewed by the Panel, in fact, clearly show that both Field Decisions were directly taken by the Referee. In particular, the Penalty Decision was taken within a couple of seconds, leaving no time for the communications with Assistant Referee 1 (...), and are inexplicable for an expert referee. With respect to the decision to allow the Quick Restart, the Panel cannot agree with the Referee’s justification that the Quick Restart occurred out of his control: indeed, the failure to control the restart of the playing action appears to be the mistake more than its justification; and the images of the Match show that initially the Referee was about to blow his whistle and stop the restart, but then decided to let the action continue. (...) the Panel notes that the refereeing department of FIFA, (...), confirmed, inter alia, that it is ‘unusual’ for a FIFA elite referee to make two wrongful decisions in such a short time period.”²²

Reasoning:

It was established by the Panel that the suspicious betting activities reached their climax precisely during the time when the referee took the incorrect decisions between the 40th minute and the end of the first half of the match. When the second goal was scored, the betting market appeared to be satisfied, causing the live betting odds to return to the expected figures, because the expectation of at least two goals being scored in the match had been fully met. This proved that there was **a clear correlation between the irregular betting activities and the wrong decisions taken by the referee.**

Relevant quote from the Court of Arbitration for Sport:

“As a result, the Panel finds that the deviation from the expected, ordinary movement in the odds on ‘overs’ in the Match, contradicting the mathematical model, is a decisive sign that bettors had some information that the mathematical model did not have and expected that at least two goals be scored irrespective of the lapse of time. In addition, the Panel finds it remarkable, (...), that the Match was uneventful up to the moment the Field Decisions were taken, that the deviation from the ordinary betting pattern occurred prior to those Field Decisions and that after that moment the market appeared to be satisfied, because its expectations had been met.”²³

Ruling:

It was ruled by the Panel that the referee had intentionally taken two wrong decisions with the sole purpose of enabling a specific number of goals to be scored which would make the pertinent bets successful, thus **clearly unlawfully influencing the result of the match.**

The referee received a **lifetime ban from all football-related activities**, a sanction that was later deemed proportional and appropriate by the Court of Arbitration for Sport.

²² See award CAS 2017/A/5173, par. 79

²³ See award CAS 2017/A/5173, par. 83

Relevant quote from the Court of Arbitration for Sport:

“The Panel (...) is persuaded that the Referee, by his Field Decisions, influenced the result of the Match in a manner contrary to sporting ethics. It is in fact obvious that any decision taken by a referee, whether correct or not, de facto may influence the result of the match he officiates. However, the fact that wrong decisions were intentionally taken is in itself ‘contrary to sporting ethics’. This conclusion, in addition, is reinforced by the obvious link between the wrong Field Decisions, deliberately taken, and the deviation from normality in betting patterns for the live Total market. Such link shows that the Field Decisions were taken to influence the Match in a manner contrary to sporting ethics as they appear dictated by purposes contradicting the principles of fair play and compliance with the rules which are at the basis of sporting activities.”²⁴

b. The case of the head coach of a national team

Case background:

Team A was due to play a match against Team B in the preliminary competition for the 2018 FIFA World Cup Russia™. One day before the match, the players of Team A held a press conference during which they reported that they had been approached by a third party who had offered financial compensation to them in exchange for their altering of the result of the match; an offer they had chosen to refuse. However, it was then discovered that the head coach of the team **had allowed the meeting between the team and the third party to take place.**

Reasoning and sanction:

FIFA's investigation found that not only did the head coach have knowledge of the meeting, but he had also **allowed it to happen despite knowing that undue financial compensation would be offered to the players.** In addition, he had **failed to report** the matter to the appropriate authorities (FIFA and/or the corresponding confederation).

In this regard, the adjudicatory chamber of the Ethics Committee found the head coach guilty of having violated **article 21 (Bribery and corruption)** and **article 18 (Duty of disclosure, cooperation and reporting)** of the FIFA Code of Ethics. The head coach was therefore **banned for a period of two years from all football-related activities** at national and international level, and also received a CHF 20,000 fine. The ban became effective on 2 May 2018.

Ultimately, CAS confirmed the decision of the FIFA Appeal Committee, considering that the appellant had breached the FIFA regulations²⁵ and that the ban from taking part in football-related activities at national and international level as well as the fine were fair and proportionate.²⁶

²⁴ See award CAS 2017/A/5173, par. 85

²⁵ Arts 18 & 21 of the FIFA Code of Ethics (2012 edition)

²⁶ See award CAS 2018/A/5886, par. 140



4. ANNEXES

4.1. FIFA Integrity

a. Structure and roles

FIFA Integrity, in the context of the FIFA administration, is a department within the Integrity & Institutional Legal Subdivision, which itself is situated within the Legal & Compliance Division.

Head of Integrity	Defines the strategy and policy of the whole department and is the lead handler of integrity investigations
Group Leader, Integrity	Executes the strategy of the department and supervises the work and responsibilities of the integrity managers
Integrity Manager	Conducts integrity investigations, supports the MAs in their integrity initiatives, and executes the preventive measures in connection with FIFA competitions
Office Manager	Provides administrative, organisational and logistical support to the department

b. How to contact FIFA Integrity

FIFA Integrity is reachable through the following channels:



FIFA Integrity inbox: integrity@fifa.org

Anyone can report an integrity concern by sending an email directly to the FIFA Integrity inbox.



FIFA Integrity App:

The Integrity App is available to all teams, players, officials, referees and any third parties in order for them to report any suspicious incidents relating to match manipulation and integrity.



FIFA Online Reporting Platform (BKMS):

<https://www.bkms-system.net/FIFA>



Home of FIFA:

+41 (0) 43 222 77 77

If you are ever in a position in which you require a meeting in person with FIFA Integrity, feel free to contact us at any time through any of the channels mentioned above.

4.2. Recommendations to design a media strategy

a. Proactive communications – raising awareness, promotion and prevention

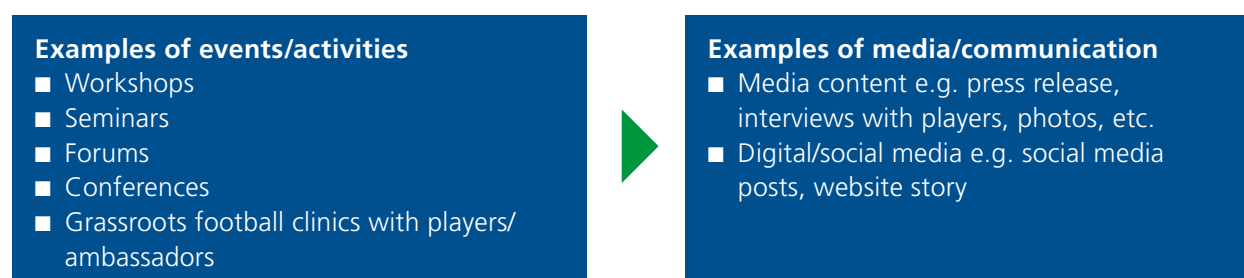
The media can play an important role in raising awareness about new or existing integrity action plans and measures in place. Examples of integrity-related activities that could be proactively communicated by MAs include:

- **Integrity education** – e.g. integrity-related workshops, grassroots football clinics, etc.
- **Awareness-raising** – e.g. values-based campaigns involving ambassadors, promotion around events, meetings and competitions, etc.
- **Preventative/institutional integrity measures and partnerships** – e.g. signing of MoUs/ agreements, betting monitoring partnerships, regulatory updates, etc.
- **Case management updates** – e.g. sanctions, case outcomes

Integrity education

Conducting educational activities – such as workshops and football clinics – with stakeholders provides an opportunity to proactively communicate with external/internal stakeholders and the media.

In particular, grassroots football clinics involving ambassadors or players provide an opportunity to promote positive messages around integrity and/or values (e.g. respect, fairness, honesty) in a football setting, whilst workshops and forums provide an opportunity to share general information about a particular initiative, as well as promoting collaboration between stakeholders in the area of integrity.²⁷



Examples of activities/content:

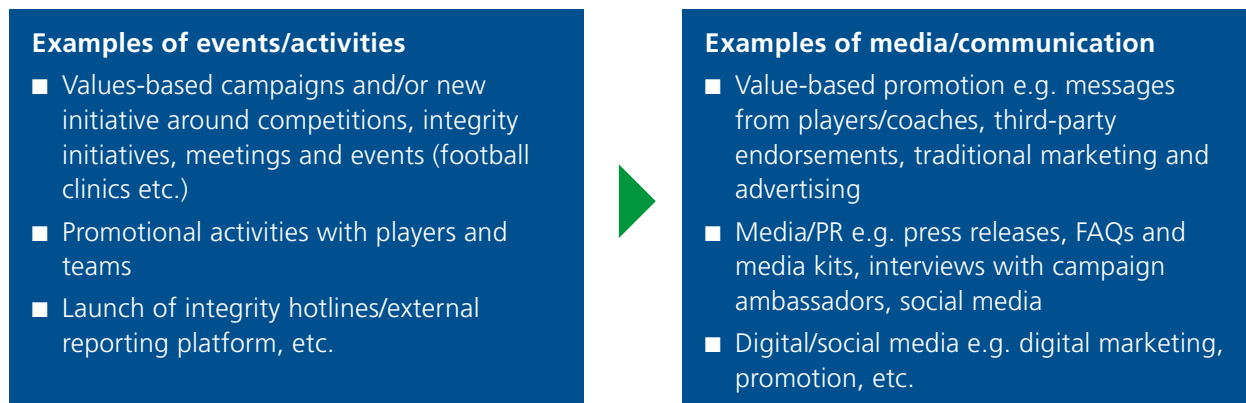
Material	Examples of information
Press release/website story	<ul style="list-style-type: none"> ■ General information about workshop/clinic e.g. participating stakeholders (organisations/groups), general topics discussed, purpose and type of activity ■ Quote from member association representative/workshop participant ■ Background information about relevant integrity initiatives ■ High-quality (1-3+ MB) image to accompany press release
Video news release	<ul style="list-style-type: none"> ■ B-roll footage e.g. general footage of venue, branding, collateral, workshop taking place, etc. ■ Interview with spokespersons e.g. participant (e.g. player, coach), relevant MA representative
Digital/social	<ul style="list-style-type: none"> ■ Pre- and post-event posts with images ■ Links to relevant pages about integrity action plan on MA website ■ Link to post-event press release

²⁷ As good practice, information communicated around integrity education should be developed with the agreement of the participants or organising body before promoting it. It is also recommended that specific operational aspects and tactics about integrity/monitoring programmes and specific case studies that may be discussed during an activity should not be communicated within media materials.

Promotion and awareness-raising

Value-based promotion can play an important part in encouraging and raising public awareness and stakeholder support for integrity action plans that MAs have in place.

Furthermore, developing an effective, proactive media strategy and implementing campaigns focusing on positive integrity-related values such as honesty, fair play, teamwork and respect can also help to raise awareness, provide an opportunity to highlight ongoing initiatives (e.g. reporting mechanisms) and create a positive and supportive environment for integrity work to take place.



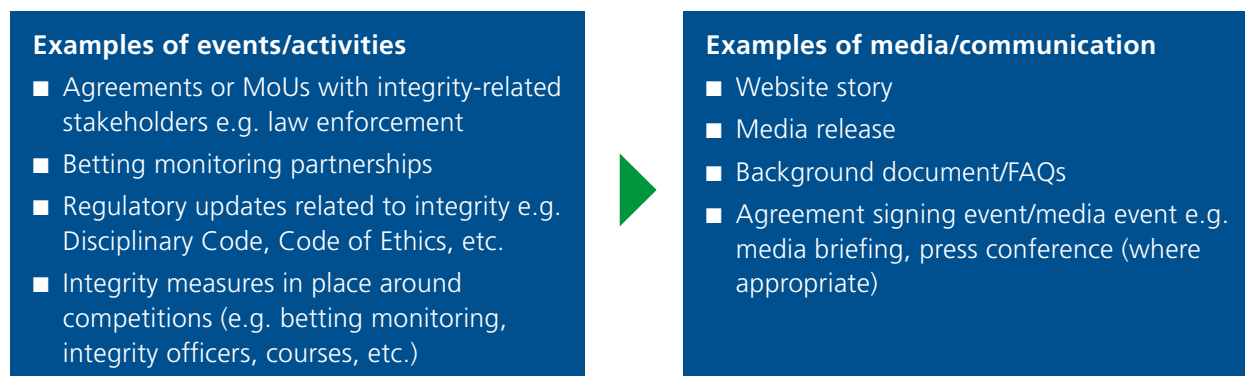
Examples of activities/content:

Material	Examples of information
Media materials related to integrity e.g. press releases, media releases, website	<ul style="list-style-type: none"> ■ General information about campaign and activities e.g. purpose of campaign, type of activities taking place ■ Quotes from ambassador, high-profile players/coaches, MA representatives and third-party endorsers (e.g. stakeholders) ■ Background information about relevant ongoing integrity initiatives/"call to action" (e.g. social media: Twitter/Facebook, others)
Video footage for integrity purposes	<ul style="list-style-type: none"> ■ Promotional/supportive messages from integrity campaign ambassadors e.g. players, coaches, etc. ■ Videos explaining campaign ■ Footage of activations already undertaken (e.g. stadium messages, films)
Digital/social	<ul style="list-style-type: none"> ■ Pre- and post-event posts with images, video ■ Links to relevant pages about integrity programmes on MA website ■ Link to post-event media release

Preventative/institutional measures

Communicating institutional initiatives and partnerships in the area of integrity plays an important part in helping to educate and inform the media and stakeholders about the operational structures and integrity partnerships formed by a MA.

Furthermore, communicating partnerships and integrity/regulatory measures in place can also play a preventative role and underline ongoing efforts to protect and safeguard the integrity of a particular competition and/or event.



Examples of activities/content:

Material	Examples of information
Press release/website story	<ul style="list-style-type: none"> ■ General information about partnership/agreement/initiative e.g. participating stakeholders (organisations/groups), general topics discussed, purpose and type of activity, etc. ■ Quote from member association representative/workshop participant ■ Background information about relevant ongoing integrity initiatives ■ High-quality (1-3+ MB) image to accompany press release
Video news release	<ul style="list-style-type: none"> ■ B-roll footage e.g. general footage of agreement signing, ceremonial activities, etc. ■ Interview with corporate spokespeople at partnership signing e.g. MA and partner
Digital/social	<ul style="list-style-type: none"> ■ Pre- and post-event posts with images ■ Links to relevant pages about integrity measures on MA website ■ Link to post-event press release

Case management updates and outcomes

Updates on cases may occasionally need to be communicated on a proactive basis. For example, an investigation into an integrity case may have been concluded and a sanction may have been imposed by the relevant bodies e.g. disciplinary. As a result, these outcomes will need to be communicated publically and to stakeholders/media.

With this in mind, the MA should consider developing a strategy and/or an agreed approach in collaboration with the relevant bodies (e.g. integrity, disciplinary, ethics, legal, etc.) to inform the media following the conclusion of a case in which sanctions may have been imposed.

b. Reactive communications – good practice and principles

Media and issue management

Information may occasionally be published in the media that results in follow-up media enquiries about an ongoing integrity topic and/or case.

As a result, several strategies and principles can be applied to anticipate and respond to integrity-related media enquiries and to help effectively manage any issues and topics that may arise, as well as to reduce the risk of further information being made public which could compromise an ongoing case.

In particular:

- Develop an issue and crisis communications plan, including details of internal policies and procedures on how to handle media enquiries, spokespersons as well as pre-drafted holding and reactive statements.
- Be responsive and timely to media enquiries, regardless of whether or not written comment or an interview can be offered.
- Allocate departmental focal points to liaise with the media department on media enquiries, as well as a spokesperson to conduct interviews as appropriate.

Examples of activities/content:

Material	Examples of information to include
Issue and crisis communications and media plan	<ul style="list-style-type: none">■ General structure and governance, e.g. divisional structures, departmental focal points/reporting lines, etc.■ Allocated spokespersons■ Potential scenarios■ Examples of holding statements, e.g. "X is seeking further information...", "X has contacted X regarding the allegations...", etc.

4.3. Draft declarations for referees, players, coaches and officials

FIFA recommends that MAs require affiliated players, coaches and officials to sign an integrity declaration. Please find below an example of a declaration that can be adapted to the needs of each association.

INTEGRITY DECLARATION

For referees/players/coaches/officials

This information will be treated confidentially and will not be passed on to third parties:

Surname:		Photo
First name:		
Date of birth:		
Member association:		
Nationality/nationalities:		
Profession:		
Email address:		

The undersigned referee/player/coach/official agrees that he/she shall:

- a) not take part in any betting connected with football, including soliciting or facilitating or attempting to solicit or facilitate another person to do so;
- b) not tolerate any form of manipulation (by offering or attempting to offer a bribe or by receiving or attempting to receive or seek a bribe) or unlawfully alter or influence the result or any other aspect of a football match or competition;
- c) report any approach or other activity which contravenes, or which may contravene, the sport's regulatory framework, in particular any statutes, regulations or any other law applicable to the undersigned, and cooperate with any investigation and/or request for information;
- d) confirm, with his/her signature below, that he/she will comply with all provisions applicable to him/her in relation to his activity within the sport, particularly those of the FIFA Statutes, the FIFA Code of Ethics, the FIFA Disciplinary Code and the FIFA Regulations Governing International Matches.

Any form of approach or knowledge thereof in connection with potential match manipulation must be reported immediately to your head of delegation, a FIFA official or directly to FIFA Integrity (integrity@fifa.org).

Any information provided will be treated with the utmost confidentiality.

I confirm that I have read the above and that I will contact FIFA immediately in the event of any suspicious situations, contact or information.	<input type="checkbox"/> yes	<input type="checkbox"/> no
---	------------------------------	-----------------------------

Date:	
Signature:	

This document shall be completed, signed and returned by the referees/players/coaches/officials concerned by no later than DATE.

4.4. Draft integrity-related contractual clause for players, coaches and officials

FIFA recommends that the MAs establish an “integrity clause/provision”, specifically addressing match manipulation, as a best practice in the standard labour contracts to be concluded between clubs and players, coaches and officials in order to promote integrity and strengthen the protection of their football matches and competitions.

Please find below an **example of such provisions** that can be adapted to the needs of each MA and included in said contracts.

Integrity matters for players/coaches/officials in relation to football matches and competitions:

1. The player/coach/official shall not, directly or indirectly, be part of any form of manipulation, bribery or other attempt to unlawfully influence or alter the results of a football match or competition, irrespective of whether the relevant behaviour is committed for financial gain, sporting advantage or any other purpose. In particular, the player/coach/official shall not accept, give, offer, promise, receive or solicit any pecuniary or other advantage, on behalf of himself/herself or a third party, in relation to the manipulation of football matches or competitions.
2. The player/coach/official shall not take part, either directly or indirectly, in betting, gambling, lotteries or similar events or transactions related to football matches, competitions or any related football activities. The player/coach/official shall not have any interests, either directly or indirectly (through or in conjunction with third parties), in entities, companies, organisations, etc. that promote, broker, arrange or conduct betting, gambling, lotteries or similar events or transactions connected with football matches or competitions.
3. The player/coach/official shall immediately report any approach, information and/or suspicious activity in connection with a manipulation, or a potential manipulation, of a football match or competition to the MA, confederation and FIFA Integrity (integrity@fifa.org).
4. The player/coach/official confirms by signing the present contract that he/she understands and shall comply with the relevant provisions relating to match manipulation, bribery and betting contained in the FIFA Statutes and regulations.

4.5. Draft interview plan

TEMPLATE – INTERVIEW PLAN

Security measures checked	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Confidentiality	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Status – closed	Yes <input type="checkbox"/>	No <input type="checkbox"/> Reason

Case			
Date	Location	Time from/to	Interviewer

Surname and first name(s) of interviewee	Role	Consent given to be recorded <input type="checkbox"/> Yes <input type="checkbox"/> No
Background of interviewee	Short history and case involvement regarding the interviewee	
Exhibits presented to the interviewee	List of reports (e.g. match report, betting monitoring report, ...) List of video clips	
Potential regulatory breaches	List of articles potentially breached	
Interview objectives	<ul style="list-style-type: none"> ■ Corroborate acknowledgement of the integrity provisions he/she is subject to ■ Establish account of the lead-up to and preparation of the match in question ■ Establish account of own performance in the match in question, with special attention to the critical mistake ■ Establish degree of responsibility in a potential match-fixing scheme during the match under investigation ■ Establish account of any possible misplay/conspiracy to underperform by players on the field of play ■ Establish willingness to continue to cooperate in any further investigative action if needed 	

Facts established Controversial penalties awarded Controversial red cards awarded (Witnessing of) underperformance	Facts to be established Key gameplay decisions Specific conduct noticed on the field of play Specific conduct noticed off the field of play
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Points to prove	<ul style="list-style-type: none"> ■ Knowledge/understanding of match manipulation ■ Integrity training over the years ■ Acknowledgement of integrity provisions (especially duty to report) ■ Awareness of any rumours relating to fixing (continent and countries) ■ Preparation leading up to the match under investigation ■ General evaluation of the performance in the match under investigation ■ Opinion on mistakes made in the match under investigation ■ Evaluation of the gameplay in the match under investigation ■ What were the discussions at half-time? After the match? ■ Awareness of any possible underperformance of players/referees ■ Awareness of any suspected player's gameplay directly and indirectly contributing to the manipulation of the match in question ■ Awareness of a potential conspiracy to manipulate this match
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Topics to be discussed	Topics arising during the interview
<ul style="list-style-type: none"> ■ Match-fixing problem in relevant country ■ Career of interviewee ■ Match under investigation <ul style="list-style-type: none"> ■ Preparation and lead-up ■ Performance ■ Key decision ■ Awareness of players'/referees' conduct ■ Conclusion: acknowledging match-fixing approach 	

Closure	<ul style="list-style-type: none"> ■ Seek interviewee's continued cooperation and information in the investigation ■ Establish interviewee as a witness to be used in this case, or ■ Establish interviewee's lack of involvement in/knowledge of in any suspicious activity regarding the match in question
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Assessment, corroboration and review (TBD in interview)

4.6. CAS decisions and publications with links to integrity and match manipulation

a. CAS decisions

- CAS 2009/A/1920 FK Pobeda, Aleksandar Zabrcanec, Nikolce Zdraveski v. UEFA
- CAS 2010/A/2172 Mr Oleg Oriekhov v. UEFA
- CAS 2010/A/2266 Norbert Mészáros & Vukasin Poleksic v. UEFA
- CAS 2011/A/2362 Mohammad Asif v. ICC
- CAS 2011/A/2364 Salman Butt v. ICC
- CAS 2011/A/2528 Olympiakos Volou FC v. UEFA
- CAS 2013/A/3062 Kevin Sammut v. UEFA
- CAS 2013/A/3256 Fenerbahçe Spor Kulübü v. UEFA
- CAS 2013/A/3258 Besiktas Jimnastik Kulübü v. UEFA
- CAS 2013/A/3297 Public Joint-Stock Company “Football Club Metalist” v. UEFA & PAOK FC
- CAS 2014/A/3562 Josip Simunic v. FIFA
- CAS 2014/A/3625 Sivasspor Kulübü v. UEFA
- CAS 2014/A/3628 Eskisehirspor Kulübü v. UEFA
- CAS 2016/A/4650 Klubi Sportiv Skenderbeu v. UEFA
- CAS 2017/A/5173 Joseph Odartei Lamptey v. FIFA
- CAS 2018/A/5886 Ramón Enrique Maradiaga v. FIFA

b. Publications

- CAS bulletin 2014/1, EFRAIM BARAK & DENNIS KOOLAARD, *Match-fixing. The aftermath of Pobeda – what have the past four years brought us?*
- CAS bulletin 2018/1, EMILIO GARCIA SILVERO, *The match-fixing eligibility criteria in UEFA competitions: an overview of CAS case law*
- CAS bulletin 2018/2, GIULIO PALERMO & BRYCE WILLIAMS, *Match-fixing and the evolution of CAS Jurisprudence*
- Football Legal December 2018, OLIVER JABERG, VINCENT VEN, RODRIGO ARIAS GRILLO, STEPHANIE EICHENBERGER, *Protecting the Integrity of Football: A Legal Analysis of FIFA’s Integrity Framework and Challenges Connected to Match Manipulation Proceedings*

Is your MA interested in having one or more of these integrity-related CAS awards or publications for reference, study and consideration?

If yes, please contact us at integrity@fifa.org and we will provide you with the requested documentation/awards.

4.7. Standard of proof

The reason for the application of the standard of “comfortable satisfaction” is according to the established jurisprudence of CAS that:

- *“The standard of comfortable satisfaction has been consistently upheld in CAS jurisprudence regarding match-fixing cases and has been defined as being greater than a mere balance of probability but less than proof beyond a reasonable doubt.”*²⁸
- CAS jurisprudence clearly established that to reach this comfortable satisfaction, the Panel should have in mind *“the seriousness of the allegation which is made”*.²⁹
- It follows from the above that this standard of proof is then a kind of sliding scale, based on the allegations at stake: the more serious the allegation and its consequences, the higher certainty (level of proof) the Panel would require to be *“comfortably satisfied”*.³⁰

and

- *“[T]aking into account the nature of the conduct in question and the paramount importance of fighting corruption of any kind in sport and*
- *also considering the nature and restricted powers of the investigation authorities of the governing bodies of sport as compared to national formal interrogation authorities,*
- *the Panel is of the opinion that cases of match-fixing should be dealt in line with the CAS constant jurisprudence on disciplinary doping cases of the Court having in mind the seriousness of allegation which is made.”*³¹

Like CAS, the independent Disciplinary Committee applies the “comfortable satisfaction” standard (art. 35 par. 3 FDC, 2019 edition).

In practical terms, the “personal conviction” standard is not fundamentally different to the “comfortable satisfaction” standard that is also applied by CAS panels in match manipulation proceedings.

²⁸ CAS 2014/A/3625, paras 131-132; CAS 2009/A/1920; CAS 2013/A/3258; CAS 2010/A/2172.

²⁹ CAS 2016/A/4650 Klubi Sportiv Skenderbeu v. Union Européenne de Football Association (UEFA), CAS 2014/A/3625, par. 132, CAS 2005/A/908, CAS 2009/A/1902.

³⁰ CAS 2014/A/3625 Sivasspor Kulübü v. UEFA

³¹ CAS 2010/A/2172 Oriekhov v. UEFA; CAS 2009/A/1920 FK Pobeda v. UEFA; CAS 2005/A/908 World Anti-Doping Agency (WADA) v. Coetsee Wium

4.8. Template: application for worldwide sanction

EMAIL

Secretariat of the FIFA Disciplinary Committee
FIFA
(Email: disciplinary@fifa.org)

[Place, Date]

Ref. No [Insert Reference No. of the case]

[Position, first and last name of sanctioned individual]

Dear Sir or Madam,

On [date of the decision], the [name of the judicial body] of the [name of your association] adopted a decision [banning/suspending] [name and identification details of the sanctioned individual] for a period of [length of suspension] from all football-related activities.

In accordance with article 66 of the FIFA Disciplinary Code, the [name of your association] hereby wishes to submit to the FIFA Disciplinary Committee the documentation required in order to request FIFA to extend the sanction imposed as to have worldwide effect.

The documents and information listed below are respectfully submitted to the FIFA Disciplinary Committee:

- A certified copy of the decision³² of the [name of the judicial body] dated [date of the decision] (see Annexe XX)³³;
- Documentary evidence that [name of the sanctioned individual] has been cited properly (see Annexe XX);
- Documentary evidence that [name of the sanctioned individual] has been given the opportunity to state [his/her] case (see Annexe XX);
- Documentary evidence that the decision has been communicated to [name of the sanctioned individual] properly (see Annexe XX³⁴).

We thank the FIFA Disciplinary Committee for its valuable cooperation in this matter and remain at its disposal to respond to any comments or questions in relation to this case.

Yours faithfully,

[NAME POSITION SIGNATURE]

(*) Please note that this template is not an official FIFA document but it shall provide some guidance to MAs on how to draft a communication addressed to the FIFA Disciplinary Committee requesting the extension of a sanction to have worldwide effect and outlining the mandatory content of such request according to the FIFA Disciplinary Code.

³² The decision shall show the name and address of the person who has been sanctioned and those of the club and the association concerned. The decision needs to be translated into one of the four FIFA languages if required (English, French, German or Spanish).

³³ Specify whether an appeal has been lodged by the sanctioned individual. If yes, specify whether this appeal has suspensive effect.

³⁴ Please attach relevant evidence such as copies of emails, fax confirmations, DHL reports, stamped letters, etc.

4.9. FIFA Integrity posters and flyer

Integrity-related material and documentation made available by FIFA for the MAs and confederations:

a. Match manipulation and corruption



b. Betting on football



c. Protect the integrity of football

PROTECT THE INTEGRITY OF FOOTBALL

NO TO MATCH MANIPULATION AND CORRUPTION:

- Do not bet on football**
It is forbidden to bet on any football match – any match, anywhere, anytime.
- Do not have betting interests**
It is forbidden to have any direct or indirect interest in betting companies or entities.
- Do not disclose sensitive information**
Sharing insider/sensitive information with someone placing a bet puts you at risk.
- Do not accept undue advantages or gifts**
It is forbidden to accept any undue advantages and gifts in any form including money.
- Do not follow unlawful instructions**
It is forbidden to unlawfully alter the course, the result or any aspect of a football match.

REPORTING, HOW TO DO IT:

- Report immediately**
Any form of potential match manipulation or corruption must be reported.
- Three reporting mechanisms available**
Use one of the three match manipulation reporting channels. Confidentiality is guaranteed.
- integrity@fifa.org**
Write to FIFA using this email address and share all relevant information.
- www.bkms-system.net/FIFA**
Use FIFA's confidential reporting platform and share all relevant information.
- FIFA Integrity App**
Download the FIFA Integrity App (available on Google Play and App Store) and follow the instructions to report.

BE ALERT SAY NO DO YOUR DUTY

RECOGNISE RESIST REPORT

If your MA is interested in having the above integrity posters personalised with its own association's logo and in the corresponding FIFA language, please contact FIFA Integrity in order to obtain the final design in the required format and resolution.

d. Integrity flyer



4.10. FIFA Integrity logo and hashtag



**#FOOTBALL
INTEGRITY**

If your MA is interested in incorporating the FIFA Integrity logo in its own documentation or material, please contact FIFA Integrity for pre-approval and in order to obtain the logo in the required format and resolution.

4.11. Checklist for national integrity initiative

This checklist contains suggested actions that can serve to guide the MA towards the establishment of its national integrity initiative.

a. Adopt an integrity policy

Has your MA adopted an integrity policy?

Does your MA promote integrity internally and to the public in a sustainable way?

Does your MA protect its football matches and competitions against the threat of match manipulation?

b. Appoint an Integrity Officer

Has your MA appointed an Integrity Officer?

Is your Integrity Officer the recipient and contact person for integrity-related information?

Does your Integrity Officer manage and handle your MA's reporting mechanisms?

Does your Integrity Officer create and conduct integrity training and education and prevention campaigns with the relevant stakeholders?

Does your Integrity Officer contribute to good practices and information exchange?

Does your Integrity Officer act as a fact-finder in the preliminary stage of an integrity investigation (e.g. conduct interviews with witnesses and suspects)?

Does your Integrity Officer create and submit reports to the independent judicial bodies?

Has your MA shared the identity of the Integrity Officer with FIFA?

c. Adequate legal framework

Are sufficient regulations in place to investigate and sanction incidents of match manipulation?

For examples of such applicable regulations, see the FIFA Disciplinary Code.

Is an independent judicial body in place that is authorised to conduct proceedings into match manipulation violations and sanction any breaches of integrity-related regulations?

d. Establish reporting mechanisms

Has your MA implemented accurate, reliable and confidential reporting mechanisms?

- on the MA's website
- via email
- via letter/post
- via a dedicated app

e. Introduce integrity measures for football matches and competitions

Has your MA implemented any measures to protect the integrity of football competitions? Are they:

- Specific?
- Measurable?
- Sustainable?

Has your MA implemented any measures in the following areas?

- Officials
- Men's football
- Women's football
- Refereeing
- Youth & grassroots
- eSports (if applicable)

f. Establish a media strategy

Has your MA established a media strategy?

- Understanding of the role and specific needs of journalists/media platforms
- Development of an integrated and targeted media & communications strategy
- Regular information to key media about integrity programmes
- Principles of due process and confidentiality are in place

g. Cooperate with different stakeholders

Does your MA cooperate with different stakeholders?

- FIFA
- Confederation
- Betting industry
- Law enforcement agencies and judicial authorities

h. Conduct integrity investigations

Is your MA able to identify situations that can be subject to an integrity investigation?

e.g. actions on the pitch, actions off the pitch, omission, betting on football, etc.

Has your MA stipulated the “comfortable satisfaction” standard of proof in regards to match manipulation incidents in its regulations?

Is your MA using betting reports related to potential match manipulation as evidence in investigations and ethics and disciplinary proceedings?

During preliminary investigations, does your MA take into account the following elements?

- Confidentiality of investigation
- Use of public/open sources
- Combination of indirect evidence to take the case forward (when no direct evidence is available)

Are you able to draft a comprehensive preliminary report for the attention of the competent judicial body within your MA?

- Clear timeline of events
- Reference the information to the source
- Clear identification of individuals/entities
- Detailed records of all actions
- Presentations of the facts
- Analysis of the elements of proof
- Preliminary assessment of the possible applicable provisions
- Final recommendation

Does your MA know how to apply for worldwide sanctions pronounced by FIFA?

This checklist contains suggested actions that can serve to guide the MA towards the establishment of its national integrity initiative.

4.12. Integrity measures for football matches and competitions

OFFICIALS

Member association officials
League officials
Club officials

Activities:

Integrity network at league/club level
Introduction on integrity
Integrity workshops
Other measures

MEN'S FOOTBALL

Professional players
Non-professional players
Coaching staff

Activities:

Integrity workshops
Integrity declarations
Integrity clause (contractual)
Integrity campaign
Other measures

WOMEN'S FOOTBALL

Professional players
Non-professional players
Coaching staff

Activities:

Integrity workshops
Integrity declarations
Integrity clause (contractual)
Integrity campaign
Other measures

REFEREEING

Professional refereeing
Non-professional refereeing
Video assistant refereeing

Activities:

Integrity workshops
Integrity declarations
Integrity checks
Other measures

GRASSROOTS & YOUTH

Players
Coaching staff/instructors
Other responsible individuals

Activities:

Integrity sessions
Focus on sporting values
Integrity campaign
Role models/legends

eSPORTS

Officials
Players
Coaching staff

Activities:

Integrity workshops
Integrity declarations
Integrity clause (contractual)
Integrity checks





Notes

Lined writing area consisting of horizontal lines for text entry.





