

To the members of FIFA

Circular no. 1424

Zurich, 30 May 2014
SG/mut

Specific Recommendations to Combat Match Manipulation

Dear Sir or Madam,

Match-fixing is a known problem in international sport. Where football is concerned, legal proceedings around the world have provided evidence that it is a global concern that can no longer be ignored. The football community must be united in response. There must be a holistic approach, collectively employed with the will and commitment to fight against corruption and to safeguard the integrity of football.

At the 63rd FIFA Congress in May 2013, FIFA member association delegates were presented with a thorough report on FIFA's ongoing fight against the scourge of match manipulation and were called upon to implement their own national integrity initiatives with FIFA's guidance and support. The Congress fully backed the FIFA President with overwhelming approval for renewed calls for member associations to take steps towards establishing a national integrity initiative, to seek more help from governments and law enforcement authorities, and to seek guidance and support to combat match manipulation through the five pillars of FIFA's integrity initiative: prevention, risk management, information gathering, investigations and sanctions.

Match manipulation has no place in football. For prevention to be effective, the football community must collaborate in a concerted and cohesive manner by enhancing the exchange of information and best practices, overcoming loopholes in existing legislation, improving legal and judicial cooperation, ensuring that administrative systems with appropriate and effective legal means are established and creating preventive measures and relevant training programmes.

We are pleased to enclose the FIFA **Specific Recommendations to Combat Match Manipulation**, which aim to form structures with corresponding procedural guidelines to effectively handle incidents of match manipulation. The document outlines specific recommendations for the sustainable development of a tailored national integrity initiative and it should form the basis of a concrete and effective structure within member associations, as well as further define the scope of the responsible persons empowered by these recommendations. In order to coordinate further activities in relation to the fight against match manipulation, we invite all FIFA member associations to **inform the FIFA Security Division of the appointed responsible person within your association who will act in all matters related to match manipulation (see 1.3 of the recommendations) via e-mail to integrity@fifa.org.**

Football's strength comes from within, thus only with the participation of our 209 member associations and the six confederations can the beauty of the game be protected.

We thank you for your commitment to safeguarding the integrity of football and contributing to the success of this initiative.

Yours faithfully,

FÉDÉRATION INTERNATIONALE
DE FOOTBALL ASSOCIATION



Jérôme Valcke
Secretary General

cc: - FIFA Executive Committee
- Confederations

Specific Recommendations to Combat Match Manipulation

Guidelines for FIFA member associations

May 2014 edition

FIFA[®]

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Introduction

At the 63rd FIFA Congress in May 2013, FIFA member association delegates were presented with a thorough report on FIFA's ongoing fight against the scourge of match manipulation, an undeniable global threat to the integrity of football. Member associations (MAs) were called upon to implement their own national integrity initiatives with FIFA's guidance and support and told that by joining together, the football community could send out a powerful signal of immutable commitment and protection against the threat from organised crime and others trying to damage our sport.

MAs were called upon to collectively strengthen the collaboration within the football community by enhancing the exchange of information and best practices, overcoming loopholes in existing legislation, improving legal and judicial cooperation, ensuring that administrative systems with appropriate and effective legal means were established, as well as raising awareness by continuing to educate players, referees and officials by establishing preventive measures and relevant training programmes.

FIFA President Blatter stated that FIFA and its MAs could not act alone in their efforts to eradicate match manipulation, but that it was essential for MAs to cooperate with the relevant police and governmental authorities in each country in order to combat match manipulation. The Congress fully backed the FIFA President with overwhelming approval for renewed calls for MAs to take steps towards establishing a national integrity initiative, to seek more help from governments and law enforcement authorities, and to seek guidance and support to combat match manipulation through the five pillars of FIFA's integrity initiative: prevention, risk management, information gathering, investigations and sanctions.

Specifically, effective measures must be taken by MAs to combat match manipulation and to ensure its disruption, through awareness-raising initiatives, education, fact-finding inquiries or investigations, prosecution and disciplinary sanctioning. MAs must be committed to developing anti-match manipulation tools, powers of inquiry and investigation, appropriate legal standings, and other organisational mechanisms for tackling manipulated matches beyond purely reactive measures. Similarly, a dedicated person/party within the MA must be appointed, and in coordination with the appropriate legal committee should seek the amendment of MA regulations, and where possible engage stakeholders to pursue national legislation to effectively standardise national regulations to combat match manipulation.

This document outlines specific recommendations for the sustainable development of a tailored national integrity initiative. These specific recommendations aim to form structures with corresponding procedural guidelines to effectively handle incidents of match manipulation. This document should form the basis of a concrete and effective structure within MAs, as well as further defining the scope of the responsible persons empowered by these recommendations. These recommendations should also be used as guidelines for drafting MA's own national regulations to combat match manipulation. The fight against match manipulation should be collective and sustainable through all levels of football structures.

It is clear that the world of football is under threat from organised crime and others attempting to corrupt players, referees and other officials in order to unduly influence football matches. The football community must be united in response. All stakeholders must be involved. All must feel a sense of responsibility for action. There must be a holistic approach, collectively employed with the will and commitment to fight against corruption and to safeguard the integrity of football. We must strengthen our defences within the world of football by establishing these outlined integrity initiatives within each MA and implementing these specific recommendations.

1 Prevention

All preventive measures should be built upon concrete, sustainable foundations as a basis for building deterrence structures. As such, these recommendations are founded upon specific structural measures which serve as the basis of an MA's national integrity initiative.

1.1 Establish a zero-tolerance policy

The MA should adopt a zero-tolerance policy towards any form of manipulation or unlawful influencing of match results. The MA should establish its commitment to this core principle by reflecting FIFA's policy in this regard. Further, the MA should announce its commitment to a zero-tolerance policy so that relevant stakeholders such as officials, clubs, players, referees, sponsors, administrators, organisers and others are informed accordingly.

1.2 Establish an independent judicial body and regulatory framework

The MA should adapt its regulatory framework to specifically address match manipulation in its statutes and have an independent judicial body in place, harmonised with the statutes of the MA.

The independent judicial body of the MA should be authorised to conduct proceedings into and sanction any breach of regulations mentioned in these recommendations concurrent with the provided disciplinary measure.

The independent judicial body should also convene with the responsible integrity persons to determine the scope of enquiries conducted into allegations, reports or irregularities relating to potential manipulation of matches.

The independent judicial body will apply the specific regulations concerning match manipulation recommended in section 6, and will impose the sanctions presented in section 5 below. Good governance measures should be harmonised through the regulatory framework of the MA to include match manipulation violations within disciplinary, ethical, or conduct codes, as defined in the relative FIFA codes (e.g. FIFA Disciplinary Code, FIFA Code of Ethics, FIFA Code of Conduct, FIFA Statutes and/or other regulations, directives and decisions.)

1.3 Appoint a Single Point of Contact ("SPOC")

MAs should appoint a Single Point of Contact ("SPOC") as a responsible person (such as an Examiner, Inquiry or Inspections Officer, and/or Integrity Officer) who will act in all matters related to match manipulation.

The primary responsibilities of the SPOC are to:

- Establish and maintain integrity initiatives within the MA
- Receive information related to match-manipulation matters within the MA
- Conduct inquiries as an administrative "fact finder" or appoint a responsible party
- Serve as a contact person for FIFA, and the efficient monitoring system
- Conduct, by mandate, inquiries or investigations as a fact finder for or in close cooperation with the independent judicial body of the MA
- Liaise with relevant authorities such as police and national law enforcement agencies

An outline of the knowledge, skills, roles, and responsibilities is detailed in the Annexe of this document. The FIFA Security Division will provide training sessions for the SPOC accordingly.

1.4 Establish a national integrity initiative

As specified at the 63rd FIFA Congress, the MA should establish a national integrity initiative, through a holistic approach, to promote and highlight these outlined integrity programmes. The implementation of these specific recommendations to combat match manipulation serves to guide the national integrity initiative through the five pillars of FIFA's integrity initiative: prevention, risk management, information gathering, investigations and sanctions.

1.5 Initiate training programmes

The MA should initiate specific training programmes through its appointed SPOC or incorporate such specific training programmes through its technical or training development officers, who will act for all training, education and prevention programmes related to combatting match manipulation.

FIFA and INTERPOL have established a joint project objective focused on training, education and prevention to train key stakeholders on how to "recognise, resist and report" attempts to manipulate matches. There are several resources available, which are low cost, e.g. pre-fabricated training tools such as the FIFA-INTERPOL e-learning tools¹ for players and officials. Further, INTERPOL's Training Needs Assessment report is an annually published document which outlines the full scope of the FIFA-INTERPOL project and additional tools which are easy to employ to establish an effective training regime².

1.6 Declarations and contracts

The MA should initiate several simple, cost-free yet effective measures throughout their structures for awareness and compliance against match manipulation.

Annually, FIFA issues the "Integrity Declaration" form³, which all FIFA international referees, assistant referees, futsal referees and beach soccer referees on FIFA's lists for appointment are required to read and sign, which declares that they shall:

- Not take part in betting connected with football
- Not tolerate any form of manipulation, bribery, or other attempted influence of results
- Not pass on insider information
- Report any approach or other unlawful activity
- Confirm, by signature, their compliance with the FIFA Statutes, Code of Ethics, Disciplinary Code and Regulations Governing International Matches
- Report any form of approach or knowledge of potential match manipulation to the FIFA Security Division at Integrity@fifa.org, noting that the information will be treated confidentially

FIFA has established that referees will not be assigned to FIFA tournaments, qualifiers or other international matches without said Integrity Declaration and acknowledgement of reporting.

As such, the Integrity Declaration is a no-cost, simple yet effective method for referees and referees committees within MAs or confederations to become aware of the regulations related to combatting match manipulation as well as the methods for reporting any suspicious behaviour.

In 2008, FIFA issued guidelines regarding the minimum requirements for contracts of professional football players which should serve as the basis for the MA and concerned parties regarding the agreements and obligations between players and clubs⁴. Those minimum requirements have several provisions which, if inserted into players' contracts, could form the basis for contractual anti-match-manipulation provisions.

¹ FIFA circular no. 1403, 14 January 2014

² FIFA circular no. 1344, 12 February 2013

³ FIFA circular no. 1378, 16 August 2013

⁴ FIFA circular no. 1171, 24 November 2008

Therefore, it is specifically recommended that MAs establish provisions in player contracts, in accordance with collective agreements, which include specific provisions on the sanctioning and potential contract cancellation if a player is sanctioned for violations related to match manipulation. Specifically, upon signing a contract, the player must read and sign declaring that he shall:

- Not take part in betting connected with football
- Not tolerate any form of manipulation, bribery or other attempted influence of results
- Report any approach or other unlawful activity
- Confirm, by signature, his compliance with the FIFA Statutes, Code of Ethics, Disciplinary Code and Regulations Governing International Matches
- Report any form of approach or knowledge of potential match manipulation to FIFA Security at Integrity@fifa.org and note that the information will be treated confidentially

1.7 Due diligence in administrative matters

The MA should establish due diligence in its business matters and establish regulatory compliance in order to protect it from potential intrusions of match manipulation.

Specifically, FIFA has implemented the Regulations Governing International Matches, which sets forth standards related to administering matches. The purpose and scope of these regulations is to protect the integrity of the game by creating a framework that allows the MAs, confederations and FIFA to prevent all methods or practices which might jeopardise the integrity of matches, competitions, players, officials and MAs or give rise to abuse of the game (cf. FIFA Regulations Governing International Matches, set to take effect on 1 May 2014).

Furthermore, due diligence is required through all aspects of the MA's business matters. Due to the amount of outside influence of sponsors and potential financiers, it is imperative for the MA to conduct its affairs in compliance with regulations and in a transparent manner in order, among other things, to prevent the infiltration of unknown, unvetted organisations or "front" companies seeking to utilise football for illicit means (cf. FIFA Statutes, article 13 (i), under which MAs are obliged "to manage their affairs independently and ensure that their own affairs are not influenced by any third parties").

1.8 Establish a media strategy

The MA should establish a media strategy to address match manipulation that outlines the MA's role, response, actions and stance regarding allegations of match manipulation. Preparing for any possible instances of a media crisis regarding a match manipulation scandal enables the MA to tackle any crises in advance and handle the media's request for information.

Information revealed about possible incidents of match manipulation and allegations of involved persons should only be confirmed in accordance with article 88 of the FIFA Disciplinary Code pertaining to confidentiality and disclosure of facts of the case, contents of the deliberations and decisions taken, which remain confidential until final decision.

Any media strategy should be drafted with the MA's media department by means of planning, coordination and constant communication with the MA's management or SPOC. The media strategy enables the MA to control the information, avoid media whirlwinds and highlight the proactive nature of the MA's national integrity initiative to combat match manipulation.

2 Risk management

2.1 Conduct risk management assessments

It is advisable for MAs to conduct assessments to determine if their respective competitions are at risk of potential match manipulation.

2.1.1 Vulnerability to manipulation for betting purposes

The MA should determine if there is a risk of manipulation of matches within its jurisdiction based on factors involving the betting markets. An assessment can be made, assisted by a monitoring system such as the Early Warning System (EWS), which can provide data of the number of betting companies offering the MA's matches on the betting market. This available data informs a risk assessment on potential vulnerabilities of the MA's matches. Similarly, confederations can determine the same risk factors based on its confederation competitions.

2.1.2 Vulnerability to manipulation for sporting purposes

The MA should also determine through its competition structure if there exists a risk of manipulation of matches for sporting reasons. It is possible to identify "high-risk" matches for manipulation for sporting purposes, such as games towards the end of the season or the group stage of a tournament in which one team has no vested interest in winning or losing as their position is secure in the league or they have already qualified for the next round of a tournament, but their opponents are fighting relegation or qualification into the next round and needs the points and a result. This situation can produce "agreements" between persons belonging to teams or clubs to agree/arrange the result, thus manipulating the match.

2.2 Affiliation to an efficient monitoring system

It is advisable for MAs to be affiliated to an efficient monitoring system such as the Early Warning System (EWS) created by FIFA, to monitor the global legal sports betting market in relation to all matches under their jurisdiction.

The MA should ensure, through the terms of contract, that the competent monitoring system will inform it, through the SPOC, immediately on discovery of any irregularities. The same obligation should apply if a confederation is the signatory to the contract with the monitoring system.

The MA, through the SPOC, should immediately communicate any and all reports on irregularities received from the monitoring system to the point of contact in the relevant confederation and to the FIFA Security Division in order to assist in the recognition, management and prevention of match manipulation at regional and international levels.

2.3 Exchange of information and good practice

In order to increase the international capacity to address match manipulation and prevent the displacement of manipulation activities from one MA to another, it is the responsibility of the MA's SPOC to share progress, information and good practices regarding their case(s), judicial actions or significant intelligence information with the FIFA Security Division or judicial bodies of FIFA on a regular basis (cf. art. 70 par. 3 of the FIFA Disciplinary Code and art. 18 of the FIFA Code of Ethics).

2.3.1 Use of FIFA Security, the confederation integrity unit and the SPOC network

Further, information related to match manipulation should be shared, either in coordination with or directly through confederation task forces or responsible confederation integrity units and through FIFA Security for possible distribution to other SPOCs through the SPOC network. The increased sharing of information between MAs strengthens football worldwide from within by increased coordination across jurisdictions.

2.3.2 Coordination with betting stakeholders and law enforcement authorities

The SPOC should be encouraged to liaise with the relevant stakeholders such as betting regulators in the MA's jurisdiction as well as with other authorities such as police or national law enforcement agencies. Where possible, the betting stakeholders should provide valuable information. Similarly, conducting liaison activities with law enforcement promotes information exchange as well as coordination so as to not compromise criminal investigations. This is further expounded upon in section 4.9 below.

3 Information gathering

3.1 Establish a hotline or confidential reporting mechanism

It is recommended that MAs establish a mechanism that can be used for confidential reporting of suspicious approaches or activities related to match manipulation so that players, referees, officials, administrators, stakeholders and other members of the football community have an established outlet channel made available to report match manipulation, corruption or other infringements of ethics or other disciplinary matters. In all instances, the MA can link to and utilise the FIFA reporting channels and mechanisms.

FIFA has made available various channels:

- **FIFA/EWS Integrity Hotline and e-mail** available to the football community for anonymous 24/7 reporting on match manipulation and corruption⁵
- **Reporting mechanism** for confidential reporting of potential infringements of the FIFA Code of Ethics and the relevant FIFA regulations as well as match manipulation⁶

3.2 Centralisation of information

Information relating to potential match manipulation may originate from a variety of sources such as:

- Monitoring of the activities on the betting market
- Hotlines or confidential reporting mechanisms
- Sources or other points of initial collection of information
- Referrals, reports or inquiries from other jurisdictions such as law enforcement authorities, other MAs, confederations, FIFA, or even from media channels

The global and multi-jurisdictional nature of match manipulation necessitates the coordination of information relating to potential manipulation at national, regional and international levels through the MAs, confederations and FIFA.

All information and reports of potential manipulation that arise either before, during or after a match, including any attempted approach by a person trying to manipulate any aspect of a match, or a report of betting irregularities from the monitoring system, should immediately be notified to the SPOC of the MA, who should, without undue delay, inform the FIFA Security Division for awareness, additional coordination and potential support.

3.3 Collection of information

As stated in Section 2.3 above, the exchange, collection and receipt of information on tangible match manipulation activities, including open source/media reports, is essential to informing not only a risk management approach of the national integrity initiative, but also for information collection, gathering and analysis. Such information exchange is a best practice which is vital to the protection of integrity in football, and furthermore prevents the displacement of match manipulation from one MA jurisdiction to another.

⁵ FIFA circular no. 1337, 22 January 2013

⁶ FIFA circular no. 1338, 31 January 2013

4 Investigation

4.1 Establishment of investigative procedures

The MA should establish capabilities to effectively investigate or conduct “administrative fact-finding inquiries” into incidents or allegations of match manipulation. Such procedures should:

- Establish a system for management of allegations or suspicions of manipulated matches which:
 - Identifies the person(s) appointed to initiate the investigative procedure
 - Collects, examines and determines the validity of the information
 - Identifies key provisions and charges violated
 - Identifies potential violators and potential witnesses to obtain statements and corroboration
 - Plans fact-finding procedures or inquiries
 - Identifies resources, case prioritisation and the timeframe for accomplishing the inquiry
- Obtain, analyse and use relevant suspicious betting information from a monitoring system to determine suspicious activity during the match
- Perform preventive measures, as defined in section 4.2 below
- Initiate fact-finding inquiries or investigations, either through the SPOC or identified external parties,
- Manage investigative findings, evidence, documents and reports
- Pursue sanctioning proceedings by the independent judicial body
- Establish a coordination mechanism with other stakeholders nationally and internationally
- Establish cooperation between the SPOC and the independent judicial body
- Maintain confidentiality, anonymity and impartiality throughout, and
- Seek results for a decision on sanctions pursuant to the violations

The FIFA Security Division will provide investigative or administrative fact-finding training sessions for the SPOC, once 1) the SPOC is identified and 2) regulations are in place to sanction match manipulation.

4.2 Suspicious activity or irregularities before or during a match

The SPOC, upon receipt of a report of potential irregularities or indication of a risk of potential manipulation prior to or during a scheduled match, must consider immediate action in order to preserve the integrity of a match or competition.

The SPOC will be responsible for potential action, as deemed appropriate with relevant competition organisers or stakeholders within the MA or Confederation, whilst taking further steps to gather, collect and preserve additional information and evidence in the interest of corroborating the reliability of the information.

Where irregularities are discovered prior to or during the match, the SPOC should consider preventive measures that enhance the security, monitoring, observation and reporting of the match. The SPOC should coordinate with match commissioners or organisers from the MA, if possible, to hold or participate in briefing sessions as necessary. In serious circumstances, the SPOC, after coordination with the appropriate authorities within the MA or tournament, may consider the reassignment of referees, or delay or postpone the match.

Preventive action taken by the SPOC must be within the scope of their confirmed duties and in accordance with the regulations of the MA, confederation or competition regulations for matches within FIFA’s jurisdiction.

Furthermore, the SPOC should coordinate any suspicious activity or irregularity reported to the independent judicial body, in order for the latter to be in a position to take additional provisional measures (for example, a provisional suspension of a player or official, to be made in accordance with the applicable regulations)⁷.

4.3 Standard procedures and agreements

There should be previously agreed standard operating procedures within the MA and/or confederation for such instances where potential irregularities are detected prior to or during a match. The MA or confederation should nominate, appoint and empower a senior competition official to take responsibility for coordinating and approving the intended actions of the SPOC related to suspicions of manipulated matches.

The decision to postpone or reschedule a match carries considerable ramifications and should only be considered where there is a significant, corroborated risk to the integrity of the match and in coordination with the responsible event organiser. Moreover, such decision should only be taken by a competent independent judicial body.

After the match, the SPOC should initiate fact-finding proceedings to fully investigate the initial irregularity/report and prepare a dossier for consideration by the independent judicial body.

Additional examples of preventive measures are listed in the Annexe.

4.4 Administrative fact-finding processes or investigative inquiries

The MA should carry out an internal investigative procedure, such as an administrative inquiry or fact-finding process based on the specific recommendations outlined in this document. This process should be initiated on receipt of reports or discovery of irregularities after a match is completed. FIFA Security will work closely with the SPOC in this regard.

4.5 Basis for fact-finding inquiry

The MA should have in place, or should establish, regulations that enable and empower it to investigate, inquire or conduct fact-finding activities into allegations of match manipulation or other infringements outlined in this document.

The SPOC of the MA should be authorised under the aforementioned regulations to conduct the inquiries him/herself or with a task force established to that effect, thus assisting the independent judicial body of the MA.

4.6 Case coordination meeting(s) with independent judicial body

When the SPOC deems that fact-finding inquiries are necessary in pursuit of potential disciplinary action related to match manipulation, the SPOC should conduct an initial meeting with the independent judicial body of the MA for case coordination and to potentially request that the independent judicial body open a formal case into the matter.

The opening of a formal case ensures due process and the accurate application of legal and regulatory provisions in pursuit of sanctions. Similarly, opening a formal case places an obligation of compliance with the formal proceedings on the part of the accused party. This compliance may assist with the establishment of the facts of the case.

The case coordination between the SPOC and the independent judicial body should define the scope of the fact-finding mission, potential sources of evidence, the scope of interviews and witnesses, the course and

⁷ Article 62, par. 4 of the 2012 FIFA Stadium Safety and Security Regulations grants the FIFA Security Division the right to appoint an investigator or investigators to any match or event that is under suspicion of illegal activities, illegal gambling or match-fixing without prior communication with the association, confederation or event organiser.

nature of interviews and rules of evidence. The SPOC and the independent judicial body should also determine where, due to issues of resources, complexity or jurisdictional boundaries, additional investigative assistance is required.

4.7 Complex and multi-jurisdictional cases

Where the scope of the fact-finding mission exceeds the available resources, ability or capacity of the responsible party, particularly where cases are complex, the SPOC may submit a written request through the general secretary's office of the MA to contact and engage the FIFA Security Division for support in these matters. This request must clearly define in writing that the relevant MA retains primacy in the investigation but requests assistance from the FIFA Security Division in pursuit of relevant disciplinary or ethical violations. The FIFA Director of Security will, at his own discretion, make a decision based on available resources, and the veracity and nature of the allegations of match manipulation.

In cases which cross jurisdictional boundaries, FIFA recommends that member associations stipulate in their relevant regulations that they remain competent to sanction players who breached the regulations of the association concerned at the time they were affiliated to the association, even if the player has been transferred internationally before a decision has been passed. The same principle shall apply to officials.

Where the FIFA Security Division provides support to the MA with conducting their investigations, the MA should ensure that the FIFA Security Division is able to operate in an effective way. Therefore all persons under the jurisdiction of the MA are obliged to comply with the investigation by clarifying the facts and circumstances to the SPOC and the FIFA Security Division, under the provisions recommended in section 6.3 below. The SPOC and the FIFA Security Division will take the necessary measures in accordance with the applicable national or MA laws and regulations. In certain circumstances, the FIFA Security Division retains the right to assume primacy of investigative matters if necessary and required. The foregoing is without prejudice to the competence of FIFA's judicial bodies to decide on their own competence and, where applicable, based on the facts of the case in hand.

4.8 Dossier preparation for disciplinary proceedings

In every case, it is recommended that the SPOC prepare a written report which contains all relevant information about the findings related to match manipulation discovered throughout the fact-finding mission. This document should be sent to the independent judicial body of the MA for recommended disciplinary action, with a courtesy copy to the FIFA Security Division for information and to inform them about the case proceedings.

The dossier should contain in particular:

- Detailed records of all actions during the investigation
- Documented presentation of the facts
- Report of the monitoring system (if available) about irregularities on the betting market
- A (preliminary) assessment, especially regarding provisions possibly violated and violators identified, and
- Recommendations regarding further actions based on investigative findings

The SPOC will forward the report to the independent judicial body of the MA to acquaint them with the facts and circumstances and to initiate the next steps, notably disciplinary proceedings. The information contained in the report should enable the independent judicial body of the MA to conduct disciplinary/judicial proceedings against the suspect(s). It is recommended to have one report/dossier for each possible suspect of match manipulation. Further contents of the dossier are contained in the Annexe.

4.9 Coordination with law enforcement

Where applicable and necessary, the SPOC should be encouraged to liaise with the relevant authorities such as police or national law enforcement agencies. However, it should be noted that the referral of a

matter to the police or national law enforcement authorities does not prevent the MA from conducting proceedings in the case. These matters should continue on parallel and complementary paths, where possible. It should be further noted that SPOCs are recommended to liaise with police counterparts in order to prevent the disruption of criminal or other police matters, while maintaining the momentum of a disciplinary or ethical violation case.

5 Disciplinary Proceedings & Sanctions

This section provides procedural and organisational guidelines to conduct disciplinary proceedings and sanction any instance of match manipulation. These guidelines should be harmonised with the relevant FIFA codes accordingly.

5.1 The independent judicial body

The independent judicial body is constituted when at least three members, including the chairman, are present. They should be provided with a secretariat to assist with administrative requirements.

The independent judicial body should be convened at such time as necessary, or as feasibly convenient, upon receipt of a report of potential match manipulation derived from the SPOC or other sources. Furthermore, the potential accused shall be informed of the charges against him when the disciplinary proceedings are opened.

5.2 Types of evidence

Any type of evidence may be produced, such as but not limited to documents, reports from officials, declarations from parties, declarations from witnesses, audio and video recordings, expert opinions and all other proof that is relevant to the case. The technical information delivered by the monitoring system can and should be used as evidence in judicial/disciplinary proceedings and the monitoring system employees can be involved as expert witnesses in the same proceedings.

The independent judicial body will in particular use the report, information and evidence received from the SPOC and from all other parties involved.

The independent judicial body has absolute discretion regarding evaluation of proof. It should decide on the basis of their personal convictions.

The burden of proof regarding disciplinary infringements rests on the MA.

5.3 Collaboration of the parties and of witnesses

It is advisable that the MA establishes the obligation on parties to collaborate to establish facts. In particular, the latter should comply with requests for information from the independent judicial body.

It is also advisable that the MA establishes the obligation on the persons bound by these recommendations to establish the facts of the case, to tell the absolute and whole truth and to answer questions put to them to the best of their knowledge and judgement.

If the parties and the persons bound by these recommendations are dilatory in responding, the independent judicial body may, after warning them, impose an appropriate sanction proportionate to the act (which can go as far as a ban from all football-related activities for a duration of two months).

It is advisable to add provisions regarding the possibility of testifying anonymously pursuant to articles 47 and 48 of the FIFA Code of Ethics.

5.4 Proceedings and decision

The parties may arrange to have legal representation. If they are not required to appear personally, they may be represented. The parties are free to choose their own representation and legal representation.

The parties should be heard before any decision is passed. They may, in particular:

- a) Refer to the file;
- b) Present their argument in fact and in law;
- c) Request production of proof;
- d) Be involved in the production of proof;
- e) Obtain a reasoned decision.

The decision passed by the independent judicial body contains:

- a) The composition of the independent judicial body;
- 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.

Decisions and other documents intended for players and officials are addressed to the club concerned on condition that it forwards the documents to the parties concerned. In the event that the documents were not also or solely sent to the party concerned, these documents are considered to have been communicated properly to the ultimate addressee four days after communication of the documents to the club.

5.5 Worldwide sanctions

All decisions passed by the independent judicial body of the MA should be sent to FIFA together with a translation, if need be, in one of the four official FIFA languages in order to be extended to have worldwide effect. Therefore the following documentation should be provided to FIFA:

- 1) Request for extension
- 2) Copy of the decision in one of the four official FIFA languages
- 3) Identification of the person who was sanctioned (complete name, club, nationality and date of birth)
- 4) Document indicating the infringement committed by the sanctioned person (letter citing/charging the person)
- 5) Proof that the right to be heard was respected (in the text of the decision)
- 6) Proof of the notification of the decision and of the document citing/charging the person (fax confirmation, post confirmation, e-mail)

An appeal may be lodged in accordance with the appropriate appeal procedure established within the MA as listed in the applicable regulations/disciplinary codes.

6 Substantive law

Hereinafter, these recommendations focus on general organisational and procedural rules and substantive law pertaining to match manipulation. Harmonisation with the FIFA codes is recommended.

6.1 Scope of application

These recommendations apply to every match and competition organised by the MA. The following are subject to these recommendations:

- All direct and indirect members of the MA, in particular the clubs
- Players
- Referees
- Officials⁸
- Licensed players' agents and match agents as defined in the FIFA Statutes

6.2 Conditions for sanctions

6.2.1 Culpability

Infringements mentioned in these recommendations are punishable regardless of whether they have been committed deliberately or negligently.

6.2.2 Acts amounting to attempt

Acts amounting to attempt are also punishable.

6.2.3 Involvement

Anyone who intentionally takes part in committing an infringement mentioned in these recommendations, either as instigator or accomplice, is also punishable.

6.2.4 Limitation period for prosecution

Prosecution for unlawfully influencing the course or the results of matches and corruption is not subject to a limitation period.

Other infringements mentioned in these recommendations may not be prosecuted after a lapse of ten years.

6.2.5 Repeated infringements

The independent judicial body of the MA may increase the sanction to be pronounced as deemed appropriate if an infringement has been repeated.

6.2.6 Concurrent infringements

If several sanctions are pronounced against someone as a result of one or more infringements, the independent judicial body of the MA bases the sanction on the most serious offence committed and, depending on the circumstances, may increase it by up to fifty per cent of the maximum specified for that offence. The same applies if a person incurs several time sanctions of a similar type as the result of one or several infringements.

⁸ Definition: every board member, committee member, referee assessor, coach, trainer, fourth official, match commissioner, person in charge of safety and any other persons appointed by the MA to assume responsibility in connection with a match and any other person responsible for technical, medical and administrative matters in an association, league or club.

6.3 Prohibitions and obligations

6.3.1 Protecting the integrity of football

Persons bound by these recommendations must refrain from any behaviour that damages or could damage the integrity of matches. They must cooperate fully with the competent bodies at all times in their efforts to combat such behaviour.

6.3.2 Unlawfully influencing the course or result of matches

1. Anyone who attempts to conspire or conspires to influence the course or result of a match in a manner contrary to sporting ethics should be sanctioned with a match suspension or a ban on taking part in any football-related activity as well as a significant, proportionate fine, irrespective of whether the breach of this provision is committed for financial gain, sporting advantage or any other purpose. In serious cases, a lifetime ban on taking part in any football-related activity should be imposed.

2. Anyone who supports someone to commit one of the actions mentioned in par. 1 will be sanctioned in the same manner.

3. In the case of a player or official unlawfully influencing the course or result of a match in accordance with par. 1, the club or association to which the player or official belongs may also be sanctioned. Serious offences may be sanctioned with expulsion from a competition, relegation to a lower division, a points deduction and/or the return of awards.

4. Even in cases of the unlawful influencing of matches, the results of the matches remain in force.

6.3.3 Corruption

1. A person bound by these recommendations who offers, promises or grants an unjustified advantage to a body of an MA, a player, an official or any other third party within or outside the MA on behalf of himself or a third party in an attempt to incite them to violate these recommendations of the MA, will be sanctioned:

- a) with a significant, proportionate fine,
- b) with a ban on taking part in any football-related activity, and
- c) with a ban on entering any stadium.

2. Passive corruption (soliciting, being promised or accepting an unjustified advantage) will be sanctioned in the same manner.

3. In serious cases and in the case of repetition, sanction 1b) may be pronounced for life.

4. In any case, the body may order the confiscation of the assets involved in committing the infringement. These assets will be used for training programmes or for ethical or integrity purposes.

6.3.4 Not participating in betting connected with football

Persons bound by these recommendations should be forbidden from taking part in, either directly or indirectly, or otherwise being associated with, betting, gambling, lotteries and similar events or transactions connected with football matches. They are forbidden from having stakes, either actively or passively, in companies, concerns, organisations, etc. that promote, broker, arrange or conduct such events or transactions.

6.3.5 Disclosure and utilisation of insider information

Persons bound by these recommendations should not use for their own or any third party's financial gain, benefit or any other purposes, information in any form which is not publicly available, is obtained through his position in football and damages or could damage the integrity of a match organised by the MA.

Persons bound by these recommendations shall not disclose or provide any such information as described in the above paragraph to any third party within or outside the MA for said third party's financial gain or benefit or for any other purpose.

6.3.6 Obligation to report

Persons bound by these recommendations shall immediately and voluntarily report to the MA's SPOC any behaviour that they are aware of that is prohibited by these recommendations. In particular, they shall immediately report any offer made to them in relation to behaviour prohibited by these recommendations, regardless of whether they accepted or refused that offer. Beyond that, they shall immediately inform the MA's SPOC if approached in connection with activities aimed at influencing the course or result of a match or competition, if possible before the start of such match/competition.

6.3.7 Sanctions

Any violation of these recommendations shall be sanctioned according to this subsection if the provision infringed does not contain a specific disciplinary measure.

The sanction imposed shall be proportionate to the severity of the violation.

The possible sanctions are the following, whereby the list is not exhaustive:

- warning
- reprimand
- fine
- return of awards
- match suspension
- ban from dressing room and/or substitutes' bench
- ban from entering a stadium
- ban from taking part in any football-related activity
- transfer ban
- suspension or withdrawal of licence
- expulsion
- social work or involvement in compliance training programmes

The MA has the obligation to notify FIFA of any sanction taken based on these recommendations and to request the extension thereof in accordance with art. 136 of the FIFA Disciplinary Code.

Due consideration shall also be made of art. 12 of the Regulations on the Status and Transfer of Players.

Annexe

This Annexe contains the following: knowledge-based skills, roles and responsibilities of the Single Point of Contact (SPOC); examples of preventive actions; and contents of the dossier for disciplinary sanctions.

1. Knowledge-based skills, roles and responsibilities of SPOC

The roles and responsibilities of the SPOC include, but are not limited to, the following points; however, it is not intended to limit the potential actions to be initiated by this responsible person, but rather to act as guidance for specific, minimum responsibilities as a SPOC.

1.1 Knowledge-based skills

The SPOC should develop an appropriate knowledge of the relevant national laws or applicable regulations so that the SPOC:

- Can decide which case falls under which jurisdiction (national, international, FIFA, confederation, and if any criminal case exists for law enforcement)
- Knows how to apply the different codes and what information is needed for sanctions within the respective MA
- Can differentiate between disciplinary and criminal offences (which cases should (also) be referred to the police)
- Knows the requirements of the independent judicial body imposing the sanctions to be fulfilled
- Is aware of the modus operandi of match-fixers, e.g. grooming techniques, approaches, indicators on the pitch, for both betting and sporting advantage purposes
- Has knowledge of how betting works – legal and illegal, overseas and online betting
- Knows how to develop and manage sources of information
- Maintains confidentiality standards and anonymity, if applicable
- Knowledge of the standard of proof of “personal conviction”⁹
- Understands the disciplinary process and appeal process, including the principles of diligence, the colour of law, ramifications of action, liability and other challengeable procedures vis-à-vis the appeal process through CAS

1.2 Roles

The SPOC should undertake the following roles:

- Implementation of the MA’s national integrity initiative
- When requested, reporting the progress of this initiative to the executive board of the MA
- Planning course of action and purpose of inquiry, e.g. “What is the end goal?”
- Conducting fact-finding inquiries or investigations in accordance with the respective codes
- Collecting documents, reports, paperwork, documentary evidence and other relevant items
- Obtaining and collecting other forms of evidence, through consensual requests, of financial records, phone logs, other forensic evidence such as e-mails and correspondence, etc.
- Conducting interviews with witnesses, suspicious/accused persons, whistleblowers, etc.
- Analysing and assessing information for veracity or legitimacy

⁹ This standard corresponds to that of “comfortable satisfaction” according to CAS jurisprudence

- Using the information in an applied manner without exposing confidential information, e.g. parallel construction techniques
- Creating and submitting reports to independent judicial body for sanctions

1.3 Responsibilities

The SPOC should undertake the following responsibilities:

- Coordinate regularly with independent judicial body on cases, inquiries and investigations
- Liaise with the police, judicial authorities such as prosecutors or solicitor generals, and other stakeholders as well as establish working partnerships
- Contribute to best practices, lessons learned and information exchanges with other MAs, confederations and FIFA
- Create training, awareness, education and prevention campaigns for the MA corresponding to the pillars of FIFA's integrity initiative: prevention, detection, information gathering, investigations and sanctions; and the FIFA-INTERPOL integrity campaign focusing on the "PICPP" (partnerships, information, coordination, prevention and proactivity) framework for players, officials, referees and other stakeholders and bring these campaigns into effect throughout all levels of the MA governance structure and organisation
- Develop and implement a thought-out media strategy to control the information, avoid media whirlwinds and highlight the proactive nature of combatting match manipulation
- Remain fair and unbiased in fact-finding missions; remain impartial and not motivated by external pressure or other political motivation

2. Preventative Measures

The following examples of preventive actions for suspicions of a fixed or otherwise manipulated match, scheduled or already in progress, could be considered as preventive measures to be taken.

Any actions taken by the SPOC must be within the scope of his confirmed duties as defined by the regulations of the MA, the confederation and FIFA:

- Attendance at pre-match meetings
- Coordination with assigned match commissioner
- Pre-match briefings of referees
- Pre-match briefings of teams, coaches and other officials
- Pre-match briefing of referees' assessor, independent/separate from assigned referees
- Coordinated monitoring of pre-match and in-play betting markets through monitoring system
- In serious circumstances: a recommendation to the match commissioner to substitute the assigned referees, within compliance of the FIFA Regulations Governing International Matches
- Intensified security measures in competition area and field-of-play area to include corridors by dressing rooms, team locker rooms, tunnel access to pitch, team areas on pitch
- Increased scrutiny of identification and accreditation access to changing rooms
- Scrutiny of physical identification of referees, players or officials for verification
- Increased security and restricted access to competition area including tunnel access
- Television recordings of the match for evidential purposes including alternative-angle video-feed recordings

- Coordination with venue security coordinator and/or stewards, police officers or other private security company at venue
- Contacting of FIFA Security Division investigators for assistance
- Coordination with teams' security officers for increased vigilance at team hotel
- Coordination with competent law enforcement authorities for additional preventive action
- Enactment of prohibition on use of mobile communication devices, including wireless laptop communication inside competitions area
- Immediate production of referee's match report
- Detailed reports documenting action taken, to include name, position, activity conducted, observations, etc.
- Coordination with independent judicial body with a view to imposing provisional measures (if violations are observed prior or during a match) and opening disciplinary proceedings
- In grave circumstances: consideration of delay or postponement of a match could be submitted for approval, only with agreement of the match commissioner, competition coordinators and other authority figures. Otherwise, the focus should remain on collecting evidence in pursuit of disciplinary sanctions.

It should be noted that this list is not exhaustive, and there may be other courses of action and methods of rectification which specifically target and address the risk posed.

3. Contents of the dossier for disciplinary proceedings

As defined in the specific recommendations, information contained in the dossier should enable the independent judicial body of the MA to initiate and administer disciplinary/judicial proceedings against the suspect(s). Therefore, the report should be detailed and organised, remain factual and do the following:

- Identify the person against whom judicial proceedings are to be opened
- Focus on one person as the potential accused subject
- If several persons cooperated in the infringement (instigators, accomplices, etc.), it is recommended that only the necessary information regarding the person accused is mentioned in the report (i.e. the goal is to avoid confidential information regarding the person accused being present in other disciplinary files)
- Describe all the pertinent facts, e.g. mention the pertinent match(es), actions of the potential accused, etc.
- Indicate the work undertaken by the investigatory body of the MA, e.g. interviews were conducted by the SPOC on (date) and the following persons were interviewed (or the ones who refused to cooperate), etc.
- Indicate the issues investigated
- Enclose all the evidence, such as interviews, declarations of third parties, reports of the monitoring system, bank statements, records, supporting documents, etc.
- Mention whether witnesses will remain anonymous
- Present conclusions for the attention of the competent independent judicial body
- Point out if any contained information is factual and corroborated or is only a legal assumption, and/or information based on hearsay or other indirect evidence

The information contained in the dossier is not exhaustive and can contain any or all relevant documentation or other information, insofar as such information is not deemed excessive or will bias the independent judicial body unfairly in pursuit of proceedings.

4. Checklist for national integrity initiative

This checklist contains suggested action items which could serve to guide the MA towards the establishment of its national integrity initiative.

ADMINISTRATIVE MATTERS

- ☑ Establishment of a Single Point of Contact (SPOC)
- ☑ Sufficient regulations in place to sanction incidents of match manipulation
 - Is match manipulation an offence?
 - Is there an obligation to report potential offences?
 - Is betting related to football prohibited?
- ☑ Risk assessment conducted on threat of match manipulation for betting; sporting purposes
- ☑ Affiliated to betting monitoring system
 - ↳ If yes: is the SPOC knowledgeable about suspicious betting patterns?
 - ↳ If no: was a risk assessment conducted of manipulation for betting purposes?
- ☑ Good governance in the administration of football matters
 - Are there applicable codes of conduct, ethics, disciplinary codes, or other statutes or directives?
 - Is there harmonisation with FIFA codes (e.g. conduct, disciplinary, ethics, statutes)?
 - Are affairs managed independently and not influenced by third parties?
 - Are contracts and integrity declarations in place for players, referees, etc.?
 - Are referees assigned in accordance with Referees Committee policies?
 - Are friendly matches scheduled and financed in accordance with FIMA procedures?
- ☑ Zero tolerance policy in the MA? Is it communicated to stakeholders?
- ☑ Established reporting mechanism (e.g. e-mail or hotline)
- ☑ Media strategy in place regarding match manipulation allegations
 - What will be said? What will not be said? Who is the spokesperson?

TRAINING, EDUCATION, & PREVENTION

- ☑ FIFA/INTERPOL regional/national workshop on match manipulation
 - ↳ What was the result? Action plan developed within the MA?
 - ↳ Was there a partnership development meeting (PDM) with other stakeholders, such as the police, sports ministry, betting markets, others? Result?
- ☑ National training programme in place which addressed match manipulation
- ☑ Awareness sessions before competitions, tournaments, training seminars
- ☑ SPOC or other trainer attendance at FIFA/INTERPOL “train the trainer” courses
 - ↳ Are there any “train the trainer” instructors within or close to the MA’s jurisdiction?
- ☑ Training of players, referees, officials, administrators on prevention of match manipulation
- ☑ FIFA/INTERPOL e-learning tools (free) utilised for players, young players, referees, managers and coaches within the MA and/or found on the MA website¹⁰

INVESTIGATIVE MATTERS

- ☑ Is the SPOC enabled to conduct administrative fact-finding inquiries?
 - ↳ If yes: has he/she received FIFA/INTERPOL investigative training?
 - ↳ If no: who would be tasked (e.g. external party) with conducting fact-finding inquiries?

¹⁰ FIFA circular no. 1403, 14 January 2014

- ☑ Standard operating procedure (SOP) for investigations established within the MA
 - ↳ If no: will the MA executive management authorise an ad-hoc committee for inquiries?
- ☑ Upon receiving information, match(es) and/or allegation under jurisdiction of the MA
- ☑ Collection and centralisation of information
- ☑ Analysis and prioritisation of referrals and allegations
- ☑ Coordination with FIFA Security and/or confederation
- ☑ Coordination with law enforcement authorities for parallel processes
- ☑ Preliminary disciplinary report and/or presentation for formal disciplinary referral
- ☑ Preparation of relevant information: videos, reports, evidence, statements and reference material
- ☑ Dossier of charges to independent judicial body for sanctioning
- ☑ Submission of decisions to FIFA for extension of sanctions to have worldwide effect

End