



PROTECT THE INTEGRITY OF FOOTBALL

Practical Handbook
for FIFA Member Associations

2024 EDITION

TABLE OF CONTENTS

01.

INTRODUCTION	4
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02.

WHERE TO BEGIN Integrity initiative	7
--	---

2.1 Adopt an integrity policy	8
2.2 Appoint an integrity officer	9
2.3 Integrity units	10
2.4 Develop a sustainable integrity action plan	11
2.5 Ensure an adequate regulatory framework	12

03.

WHAT TO DO Integrity action plan	13
-------------------------------------	----

3.1 Establish appropriate reporting mechanisms	14
3.2 Introduction of integrity measures for football matches and competitions	16
3.3 Establish a media strategy	19
3.4 Cooperate with different stakeholders	20
3.5 Design an engaging integrity education programme	22

04.

WHAT TO KNOW Integrity investigations	29
--	----

4.1 Situations subject to a preliminary investigation	30
4.2 Preliminary investigation	33
4.3 Preliminary investigation final report	39

05.

WHAT TO KNOW Adjudicating on integrity-related offences	42
--	----

5.1 Integrity-related disciplinary proceedings	43
5.2 Basic procedural principles	44
5.3 Managing proceedings	48
5.4 Standard of proof	51
5.5 Types of evidence	54
5.6 Betting reports	55
5.7 Decisions and appeals	56
5.8 Worldwide sanctions	58
5.9 Case studies	59

06.

ANNEXES

64

6.1	FIFA Integrity	65
6.2	Model template of an integrity policy	66
6.3	Recommendations to design a media strategy	67
6.4	Draft declarations for referees, players, coaches and officials	77
6.5	Draft integrity-related contractual clause for players, coaches and officials	78
6.6	Draft interview plan	79
6.7	CAS decisions and publications with links to integrity and match manipulation	81
6.8	Template: application for worldwide sanction	85
6.9	FIFA Integrity posters and flyer	86
6.10	Checklist for national integrity initiative	88
6.11	Integrity measures for football matches and competitions	91



5

INTRODUCTION

Following the issuance of a first edition of the Integrity Handbook in 2021, FIFA continues to focus in the fight against match fixing. 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 which oversees the implementation of 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, and 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 Protect the Integrity of Football – Practical Handbook for FIFA Member Associations to provide member associations with a guide on how to build and/or strengthen their own integrity initiative.

This handbook is divided into the following sections:



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, implementing a sustainable action plan as well as ensuring an adequate regulatory framework.



WHAT TO DO

The second 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.

¹ FIFA Statutes (2024 edition). Available in the 2024 edition of the FIFA Legal Handbook cf. FIFA Circular 1889. https://digitalhub.fifa.com/m/1a7fb4d1f00c11c3/original/Circular-1889_Amendments-to-the-FIFA-Statutes-the-Regulations-Governing-the-Application-of-the-Statutes-and-the-Standing-Orders-of-the-Congress.pdf

² See Annexe 5.1 for an overview of FIFA's internal structure and a recommendation on how an integrity department can be established.



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 applies 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 handbook is intended to serve as a guide and a tool to assist FIFA member associations and the confederations with the standard steps and present best practices to implement successful and sustainable integrity initiatives, as well as being a reference tool to promote integrity and to protect football competitions from match manipulation worldwide.





WHERE TO BEGIN
Integrity initiative

2.1 ADOPT AN INTEGRITY POLICY

Every integrity initiative starts with 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 can 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 must ensure that it promotes integrity at national level by supporting its members, stakeholders and the public in general in a sustainable manner. Secondly, each MA must 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 implemented an integrity policy?

If not, please refer to Annexe 5.2 for a model template of an integrity policy for your MA. FIFA Integrity can provide assistance to your MA by offering recommendations on how to establish and promote your customised integrity policy.

2.2 APPOINT AN INTEGRITY OFFICER

A main contact person is an essential part of being able to address 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 is the main contact person for all integrity-related communications within the MA, and between the MA, the confederation and FIFA.

The integrity officer is 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
Establishing and maintaining the measures set out in this handbook	Creating training, awareness, education and prevention campaigns	Fact-finding in the preliminary state of an investigation
Being the recipient and contact person for integrity-related information	Conducting integrity training sessions with relevant stakeholders	Conducting interviews with witnesses and suspects
Setting up and maintaining reporting mechanisms	Contributing to best practices and information exchange	Drafting and submitting reports to the 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 informed FIFA of its integrity officer?

2.3 INTEGRITY UNITS

FIFA is at its MAs' disposal to help them establish a robust integrity unit that upholds the values of the sport.

Maintaining the integrity of football is a fundamental responsibility of every MA. To strengthen your association's commitment to this crucial aspect of the game, FIFA encourages setting up an integrity unit. An integrity unit is an expert team dedicated to protecting the integrity of football matches and competitions. This section outlines the key benefits and practical considerations of establishing an integrity unit within your association.

A Comprehensive expertise

An integrity unit is composed of members who have different professional positions to ensure a holistic approach to preserving football's integrity. These positions may, *inter alia*, include the following:

- **Integrity officer:** leads the unit and oversees its operations
- **Integrity education manager:** develops and implements educational programmes to promote integrity and prevent match manipulation
- **Legal counsel:** provides legal guidance to address integrity-related matters
- **Senior investigatory counsel:** leads investigations into integrity breaches
- **Stakeholder relationship manager:** manages communication and relationships with relevant stakeholders, partners and industry leaders on integrity
- **Office manager:** ensures the smooth functioning of the integrity unit

B Increased efficiency

By assembling a dedicated integrity unit, your MA can respond more effectively to integrity concerns, investigations and educational initiatives. This efficiency leads to a more robust and responsive framework for promoting integrity and protecting football.

C Enhances prevention and detection

With professionals specialising in various aspects of integrity management, an integrity unit is better equipped to prevent, detect and address threats to football's integrity. This proactive approach minimises integrity risks and preserves football's credibility.

FIFA is committed to supporting its MAs in establishing and maintaining integrity units. If requested, FIFA can: (a) provide your MA with the job descriptions for the various positions in the unit which can be used as a reference and resource in your MA's efforts to protect the integrity of football; and (b) offer training for each of the positions assigned by the MA.

2.4 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.

As a standard, the integrity action plan should consist 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?

2.5 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, an independent judicial body should be in place that is competent to conduct proceedings relating to match manipulation violations and to sanction any breach of regulations mentioned in this handbook pursuant to the relevant disciplinary/ethics provisions.

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

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





GO

WHAT TO DO

Integrity action plan

3.1 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 must 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.

Depending on each MA's needs, it could provide the following reporting mechanisms and channels. It should actively and constantly promote them to all members, stakeholders and to the general public.



Dedicated area
on MA's website

Reporting on the homepage of the MA's website: When someone wants to report an allegation to your MA, the first thing that they will most likely do is consult your website. Therefore, each MA should have a link or section on its 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 reporting mechanisms in place if they have not been publicised, or only publicised a little.



Dedicated
email address

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. It should also be possible to send a report or allegation anonymously via email in order to protect the person disclosing the information.

A proactive approach is key for the reporting mechanisms to be successful. Each MA should therefore 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 article 11 paragraph 1 and article 12 of the FIFA Disciplinary Code (2023 edition).



Dedicated mailbox
for letters/post

Reporting via letter/post: When reporting any allegation of match manipulation or integrity-related corruption, some people may prefer to send a letter rather than an email, especially in some parts of the world with limited access to the internet. Where that might be the case, it might be worthwhile for your MA to have an agreement with your national postal services waiving the need for a stamp for letters sent to the dedicated integrity address. This would allow people who cannot afford a stamp or are not willing to spend money on one to make a report.

This initiative could 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.



App for iOS
& Android

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 making it possible for the person filing the report to decide whether to remain anonymous. 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 5.1 for FIFA Integrity's reporting mechanisms.

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

Has your MA ensured that the public knows about these reporting mechanisms (through campaigns, 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/>

Concacaf: <https://secure.ethicspoint.com/domain/media/en/gui/40739/index.html>

Portugal: <https://integridade.fpf.pt/>

Ghana: <https://www.ghanafa.org/integrity>

Malaysia: <https://www.fam.org.my/webform/integrity>

South Africa: <http://www.safa.net/integrity/>

UEFA: <https://integrity.uefa.org/index.php?isMobile=0>

Australia: footballaustralia.com.au/report

Ecuador: <https://fef.ec/canal-de-denuncias-f-e-f/>

England: <https://www.thefa.com/football-rules-governance/policies/betting-rules>



3.2 INTRODUCTION OF INTEGRITY MEASURES FOR FOOTBALL MATCHES AND COMPETITIONS

It is the responsibility of each 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 consider. They are intended to build up and/or strengthen the MA's integrity action plan at national level. In order to efficiently protect football matches and competitions, each MA should implement specific, measurable and sustainable actions for their respective matches and competitions.

A Why specific?

Integrity measures must address the specific audience for which they are intended and must be tailored to that audience, as the success of any integrity measure lies in the detail.

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

B Why measurable?

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

For example, How many professional clubs received the integrity course over the course of the season?

C Why sustainable?

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

The integrity plan of your MA should make 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.

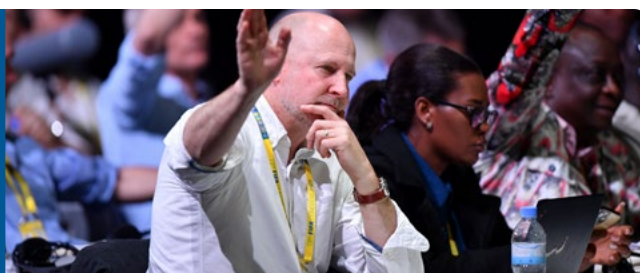
The following is a non-exhaustive list of the areas and specific measures that can be implemented by an MA in order to protect its football matches and competitions:

OFFICIALS

Members association officials - League officials - Club officials

Activities:

- Integrity network at league/club level
- Introduction to integrity
- Integrity workshop
- 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 referees - Non-professional referees - Video assistant referees

Activities:
Integrity workshops
Integrity declarations
Integrity checks
Other measures



GRASSROOTS & YOUTH

Players - Coaching staff/instructors - Other responsible individuals

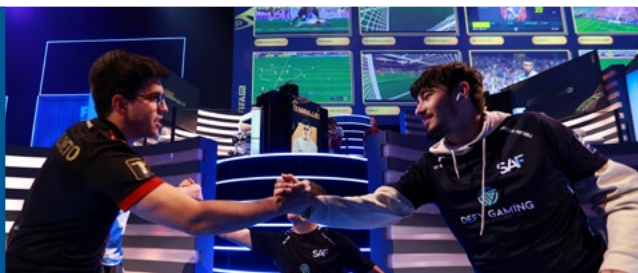
Activities:
Integrity sessions
Focus on sporting values
Integrity campaign
Role models/legends



eSPORTS

Officials - Players - Coaching staff

Activities:
Integrity workshops
Integrity declarations
Integrity clause (contractual)
Integrity checks



A table summarising all elements can be found in Annexe 5.12.

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?

3.3 ESTABLISH A MEDIA STRATEGY

A Why establish a media strategy?

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

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; and
- promote the integrity action plan and initiatives.

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.
- 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 5.3 for more details on how to design and implement a media strategy for your MA.

3.4 COOPERATE WITH DIFFERENT STAKEHOLDERS

20

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



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 memorandum of understanding formally establishes the cooperation between FIFA and the stakeholders concerned.
- FIFA Integrity can be reached at the following address: integrity@fifa.org.



Confederations

- In principle, all confederations and MAs must have a designated integrity officer or integrity department/unit.
- 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, given that the confederation may have additional means and powers at its disposal to support the MA.



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 and offline);
- on-field events; and
- performance reviews (players, referees, etc.).





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 should engage with these authorities in order to build up a national integrity platform against corruption and match manipulation in football.
- Liaising and coordinating with law enforcement agencies regarding integrity matters avoids disruption to both the MAs and the law enforcement agencies' procedures and provides a valuable channel for information exchange.



3.5 DESIGN AN ENGAGING INTEGRITY EDUCATION PROGRAMME

How to design an integrity education programme

A Focus on your goals

Whenever you design a new programme of education, begin by defining what you want to achieve. Examples of questions that you might ask about desired outcomes could include:

- Is your desired outcome to raise general awareness of integrity issues?
- Is your desired outcome for people to be able to answer test questions?
- Is your desired outcome to force/frighten people to change their behaviour?
- Is your desired outcome to encourage/entice people to change their behaviour?
- Is your desired outcome to force/frighten change in team attitudes and culture?
- Is your desired outcome to encourage/entice change in team attitudes and culture?

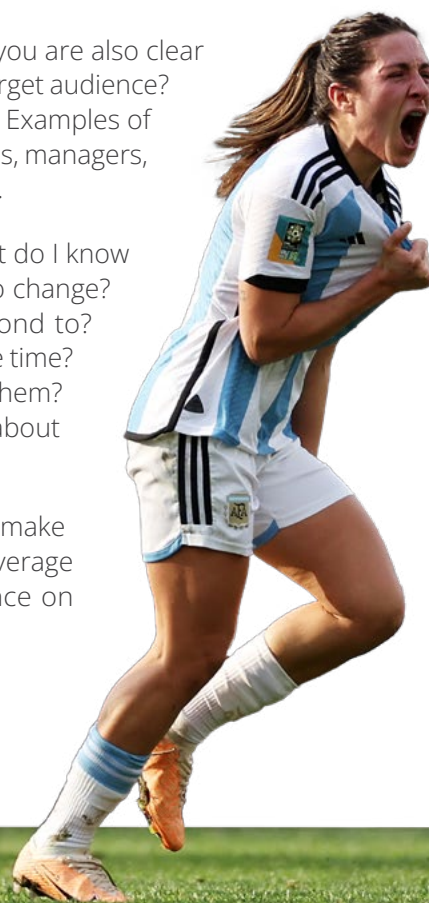
Each different outcome requires a very different approach to the way you design, develop and deliver your new programme of education.

B Define your audience

Once you are clear on what you want to achieve, make sure you are also clear on your audience. Start with the simple question: who is my target audience? In particular, is there one specific target audience or several? Examples of target audiences include youth players, senior players, coaches, managers, executives, stakeholders, law enforcement and policymakers.

Once you have identified your audience(s), begin to ask: what do I know about this audience? For example, how do you want them to change? What kinds of educational formats are they likely to respond to? What kinds of media do they like? What do they do in their free time? What do they choose to spend money on? What motivates them? What do they value? And especially, why should they care about engaging with your new programme?

Finally, ask yourself: how can I leverage these observations to make my programme more interesting and engaging? How can I leverage these observations so that my programme has an influence on long-term attitudes and behaviour?



C Key performance indicators

Make a list of things you can observe and monitor in order to measure and quantify the degree to which you are achieving your educational goals. Some measurements may be directly quantifiable. Others might not be and it will only be possible to infer progress. For example:

- If you want to raise awareness, it may be enough to measure the percentage of your audience who were present at presentations, watched videos or received leaflets.
- If you want to change attitudes and culture, if your MA has access to marketing or PR professionals, you can use qualitative market research to explore what your audience feels about different kinds of behaviour.
- If you want to find out if players feel confident using your reporting tool, you can use user-experience research tools to explore how players feel about the tool.

D Brain-based learning

To understand brain-based learning, you could think of it as containing four prime colours of cognition:

(a) logical/informational/intellectual; (b) analogical/impressionistic/metaphorical; (c) emotive/narrative/social/experiential/ and (d) scary or enticing/emotive/primal.

For instance:

- Informational programmes tend to be logical/informational/intellectual. They are characterised by formal language and detailed diagrams. These provide a helpful structure for academics, policymakers, lawyers and scientists, but will not have any impact on acquiring practical skills or changing attitudes and behaviour.
- Awareness-raising and engagement programmes tend to use formats that are analogical/impressionistic/metaphorical. They are characterised by the use of informal language, lots of illustrations, engaging artwork, anecdotes and systems thinking.
- Programmes that focus on acquiring practical and soft skills tend to use formats that are emotive/narrative/social/experiential. They are characterised by stories, case studies, educational games, first-person role play, problem-solving and realistic simulations.
- Programmes that address attitudes and changes of culture tend to require formats that are scary, enticing or emotive, at a deeply emotional or primal level. An example of this approach can be found in the kinds of strong imagery used in high-end adverts and the kinds of emotional storytelling used in films and TV shows that are moving or evoke joy in the viewer.

E Become a great storyteller

The best educational programmes make heavy use of anecdotes, case studies, stories, games, role play and simulations. All of which require you to become a great storyteller.

At best, an average person:

- can only listen to someone talking intellectually for five to ten minutes;
- will only recall a few seconds of content from an intellectual presentation;
- is unable to apply much of a talk-based presentation to their daily life.

If further proof were necessary, you need only look at the failure of many information-based health campaigns. Everyone knows smoking is bad for your lungs. In some countries, you will see graphic images printed on the side of cigarette packs. Yet still people smoke. By contrast, many people will happily binge-watch a gripping, on-demand TV series. If the TV series is popular, they will be able to recall enough of the story to be able to chat and discuss the story with family, friends and colleagues over coffee the next day. Then, they might even go out and spend money on the clothing and products they have seen in the series.

Seven top tips for impact

1st

The human brain likes to process ideas in threes or fours. Hence, the best communicators tend to keep what they have to say short and focused. They organise what they have to say around three or four, major takeaway ideas.

2nd

Once you are clear on your top three or four takeaways, think about how you can integrate those takeaways as themes in a single, compelling story so that the story makes your takeaways easier to recall. You could even use sophisticated techniques, such as anecdotes, flashbacks, segues and case studies, to deliver emotional engagement.

3rd

Map the default emotion of your audience and the emotion that is required to get your audience to act on your key messages. For example, if an audience is resistant to your message, begin with stories that highlight negative emotions, like hostility and disinterest. In that way, you start to set up a resonance between your own messaging and the emotional state of your audience. Then imagine a series of emotional stepping stones to bridge the gap between hostility and enthusiasm, where each story introduces a more positive emotion. For example, hostility > disinterest > surprise > intrigue > curiosity > enthusiasm.

4th

The human brain likes new activities, but only if those activities feel familiar. So, ideally, educational assets will be based on activities that you know your audience likes. For example, if your audience likes to read a specific brand of magazine, write text and select images that mimic the style of that magazine. If your audience likes skills-coaching sessions, find a way to script your coaching sessions so they combine learning physical skills with the key ideas and information you want to convey.

5th

The human brain is inefficient at processing negatives. So, focus on telling your audience what you want. Avoid mentioning what you want them to stop doing. For example, if you have ever taken a small child for a walk beside a busy road, you will know that if you ask the child to keep away from the road, they will become interested in cars and walk towards the road. However, if you distract the child with something shiny in a shop window, they will walk closer to the shop window, and away from the road. In terms of integrity education, telling an audience not to fix matches leads to them imagining match-fixing. In contrast, telling people that match-fixing is a fast way to end your career focuses the audience's attention on not being allowed to participate in football anymore.

6th

You could think of the adult brain as consisting of four “sub-brains”: left brain, right brain, midbrain and lower brain.

- **LEFT BRAIN:** The left brain is **where** words, focus and logical puzzles are primarily **processed**. This part of the brain is **good** at goal-setting, making up rules, making judgements and following detailed instructions. It is **poor** at applying abstract ideas to real-life situations, for example, someone might know the rules, but fail to follow them.
- **RIGHT BRAIN:** The right brain is able to **visualise** practical skills and **process** the big picture and analogical puzzles. This part of the brain is **good** at creative expression, seeing connections between ideas and visualising practical solutions to real-life challenges. It is poor at following rules, making firm decisions, taking the time to take a deep dive into theoretical details, and considering the potential side effects of a new idea. An example of this is a **football coach** who comes up with a new team strategy for winning matches but lacks the social and verbal skills to explain the strategy in ways that others can follow.
- **MIDBRAIN:** The midbrain is **where** empathy, cooperation and loyalty to family, friends, leaders and close team-mates are **processed**. This part of the brain is **good** at storytelling, making up role-play games and intuitively responding to situations, based on social attitudes, family values, leaders' expectations and team culture. It is **poor** at questioning community attitudes and values, questioning team culture and questioning orders from people with perceived authority. An example of this is a **young player** who unquestioningly follows instructions given by senior players.



- **LOWER BRAIN:** The lower brain instinctively **recognises** and **responds** to danger. It is **good** at subconscious processes, such as what is going on around a person, and automatic behaviour before the conscious mind has even registered a potential threat. It cannot do anything more than reacting with fear, freezing or fleeing, unless physically trained and habituated to act with confidence. For example, **there are differences between how a civilian and a special forces soldier** is likely to react to social and physical intimidation.

To convert the above model into a game plan:

- **MIDBRAIN:** The aim of integrity education is to impact attitudes, values and social behaviour. Hence, the focus of any educational programme needs to be the midbrain. If you look at the characteristics of the midbrain, you will see that you need to focus on storytelling, role play and community-based challenges.
- **LOWER BRAIN:** Some individuals might respond to your programme and others might not. This is likely because there is a conflict between those who want to do “right” and those who want to force colleagues to carry on doing “wrong”. We see that the lower brain is the gatekeeper for confidence levels and remaining calm in conflict situations. We therefore need to teach people how to regulate their focus and the physiology of the lower brain, to enable individuals to resist social/peer pressure.
- **RIGHT BRAIN:** In an ideal world, you would ensure a well-rounded educational package by using sports psychology, visualisation tools and/or mindfulness tools, with the aim of encouraging your audience to imagine applying what they have learned in a wide variety of challenging situations (such as recognising, resisting and reporting advances from a team-mate who is working on behalf of a fixer).
- **LEFT BRAIN:** In the modern world, there is a cultural expectation that good-quality education contains classroom-style or digital learning briefings and presentations. Therefore, if people are to take your educational programme seriously, you need to provide at least one 10-to-20-minute briefing/presentation to feed your audience's cultural expectations. Ideally, this would include some simple tests and logical puzzles so your audience does not become too passive while sitting through your briefing/presentation.

7th

Structure the assets in your programme to be **iterative**, rather than **linear**. This means that your messaging contains a lot of repetition. Each time the message is repeated, it should add a new level of detail, while reinforcing what has already been learned.

Suggestions for putting these ideas into practice

Use the following process to devise your own custom integrity education programme:

1. Review your MA's stated goals and strategy.
2. Review your overarching integrity strategy and policies.
3. Collaborate with key stakeholders to identify risk groups involved in wrongdoing.
4. Collaborate with key stakeholders to rank the key risk groups based on potential impact.
5. For each risk group, identify aspects of values, attitudes and behaviours that need to change, with an emphasis on changes that are likely to create the greatest impact.
6. For each desired change, determine a set of key performance indicators.
7. Gather four sets of real-life stories and case studies that are relevant for each desired change, with: (a) one set focused on the advantages that individuals who did the right thing experienced; (b) another set focused on individuals who struggled, did the right thing and all went well; (c) a third set focused on relatable scenarios where an individual made bad choices and things went badly; and (d) a final set of stories and case studies that consists of extreme stories, that will make your audience go "wow" and then either laugh, cry or feel appalled.
8. Work out a set of key messages and consistent phrases that you can repeat throughout all assets and all activities that you design for each risk group.
9. Within the constraints of time and resources available to you, think of each risk group as a separate audience. Research how individuals in each separate audience like to spend their time and money. To the extent possible, research any aspects relevant to the values, attitudes and habits that dominate in each group.
10. Now begin to think about categorising educational activities as digital interactive, live online and in-person. Remember as you do this that digital interactive is the most expensive to create but the most inexpensive to distribute. Live online is the easiest for people to attend but reduces the emotional connection. In-person is the least expensive to design, maximises emotional impact, but can be expensive to deliver.
11. Ensure you are clear on your budget, and begin to imagine a set of digital activities, online activities and classroom/coaching activities that will complement one another.
12. Use a generative AI, such as ChatGPT, Claude or Microsoft Copilot, to help you structure your programme. You can also use AI to help you design each individual asset.

Moving to the forefront of integrity education

Up until recently, integrity education mainly focused on reminding players, coaches, referees and match officials about the rules related to match manipulation and betting, and was aimed at frightening the audience with threats of punishment and bans from the sport.

Having read the above, you will see that there are many ways that you can go beyond this by establishing, encouraging and normalising new attitudes and team culture.

The idea is to establish attitudes and values that make it even harder for criminals, fixers and fraudsters to operate. In addition, the aim is not only to dissuade people from undesirable attitudes and behaviours, but also to begin to promote the attitudes and behaviours that we do want to see.





WHAT TO KNOW

Integrity investigations

4.1 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 people 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

Match manipulation is commonly defined 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. It is important to note that any legal person, such as an MA or a club, may also be held liable for the actions of their members, players, officials or any individuals acting on their behalf. Consequently, MAs and clubs may face sanctions in cases where integrity breaches are committed by a natural person affiliated with the MA or clubs.

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

⁵ Article 20 paragraph 1 of the FIFA Disciplinary Code (2023 edition).



The above definitions cover a wide range of match manipulation scenarios. Below are some examples.

A Actions off the pitch

Actions not connected to the field of play, which could be subject to a preliminary investigation, are any actions, omissions and/or agreements 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 oral or written agreement or conspiracy between a match-fixer and any other person or people that is aimed 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 on the pitch

Actions connected to the field of play, which could be subject to a preliminary investigation, are any actions, omissions and/or agreements to manipulate matches or competitions that take place during the match itself. In other words, the action takes place on the pitch and is carried out by one or more people.

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 and red cards, or conceding penalties, corner kicks or throw-ins



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 and yellow cards, penalties



Interference with play, the playing surface or equipment

e.g. cutting off the power supply at 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 who would like to provide some “extra motivation” to a player or referee

C Involvement in betting, gambling or similar activities

Any individual involved in football is forbidden from directly or indirectly participating in betting or similar actions 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

This is where a football player, a referee, a coach or an official, for example, places a bet on one or more football matches or competitions and/or any related football activity.

Indirect involvement

This is where, for example:

- A third party places a bet in their name on a football match or competition on behalf of a person involved in football, and the person involved in football receives the money;
- A third party places a bet in their name with their own money on a match together with a person involved in football, and they share the money; or
- 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 as a result of the information that they have received.

D Investigation and sanctioning competence

As a rule, MAs are responsible for conducting investigations into all potential integrity violations detected within their organised competitions. If deemed appropriate, MAs must impose sanctions for such conduct in accordance with their rules and regulations.

It is important to note, however, that FIFA reserves the right to investigate, prosecute and impose sanctions in cases where no formal investigations have been initiated by the competent MA within 90 days after the matter became known to FIFA.

In addition, MAs have the option of delegating the competence to investigate and sanction to FIFA. In such instances, FIFA will collaborate closely with the respective MA throughout the investigation.

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



4.2 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 warrants 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 disciplinary and/or ethics proceedings should be opened according to internal regulations. This is done through a final report. Below are a few key elements that should be considered during the preliminary investigation:

- keep the investigation confidential as information could be leaked and affect it;
- use public/open sources to broaden the avenues of investigation;
- ensure that the actions of the person leading the investigation stay within the scope of the mandate and do not hinder potential criminal investigations; and
- in cases where there is no direct evidence, ensuring there is sufficient indirect evidence pointing towards the same conclusion to ascertain facts and take the case forward.

C Conducting a preliminary investigation

The MA's integrity unit receives preliminary information which may trigger a formal investigation. This preliminary information is typically sourced from:

- betting alerts received from betting monitoring partners;
- information received from FIFA stakeholders (e.g. the IOC (SPOC) or FIFPRO);
- whistle-blower information received on FIFA's reporting platform; and
- other sources such as open-source media reports and FIFA Integrity's observations.

The integrity unit identifies the degree of severity and accuracy of the information

Upon receiving preliminary information in the form of a betting alert, the integrity unit must first determine the severity level of the information before deciding whether it warrants initiating a formal investigation.

Betting alerts received from monitoring partners are typically classified as severe, triggering a formal investigation.

If preliminary information is received through the integrity unit's reporting/whistle-blowing platform, the integrity unit will first ascertain the veracity of the information received.

Whistle-blowers will be contacted through the reporting platform to ask them to provide additional information to supplement their initial claims or to clarify their statements. The integrity unit will then typically request its betting monitoring partners to confirm the status of the match concerned.

Similarly, the integrity unit will verify the legitimacy of any other information received. For instance, leaked audio or video recordings alleging integrity misconduct will be verified for authenticity.

Appointment of an integrity expert and opening of formal proceedings

Once it has been decided that preliminary information warrants formal investigation, the MA will open formal disciplinary proceedings by appointing an integrity expert to help conduct formal investigations. Selected integrity experts will be contacted and issued with a letter of appointment.

The integrity unit shares case materials with the integrity expert

A meeting between the integrity unit and the integrity expert will be conducted to ensure that the integrity expert receives a complete overview of the background of the case. The integrity unit will then provide the appointed integrity expert with access to the case materials.

D Fact-finding phase: collection of direct evidence

Identify availability of direct evidence, e.g. witness statements and/or confessions

First, the integrity expert must ascertain the presence of direct evidence, e.g. evidence directly related to the fact in dispute. This could, for example, be evidence given by a witness who testifies to the truth of the matter concerned or evidence given directly by the person under investigation, i.e. a confession.

If possible, record the witness statement/confession in an interview

If direct evidence is available in the form of witness statements or voluntary admission by the person or persons involved in the manipulation, the integrity expert must then conduct an interview session.

Interviewing individuals under investigation or potential witnesses

- Come prepared: have an interview plan ready ahead of the interview (see Annexe 5.6 for an example of an interview plan).
- It is good practice to ask for the interviewee's consent to be recorded (audio and/or video) during the interview.
- Your safety and that of the interviewee should be a priority at all times.
- Remember that any person involved and/or under investigation has the right to be heard and their version of events should be given due weight and consideration.
- The interview should be recorded and transcribed for future reference in potential proceedings.
- Seek the assistance of a qualified interpreter if needed.

E Fact-finding phase: collection of indirect evidence

Procure betting analysis reports from multiple sources

Betting reports from monitored betting operators detect and highlight irregular betting movements, both pre-match and in-game, and are used together with match-specific information (e.g. the current form of the teams involved, on-field action, and player and match officials' data).

It is important to note that according to CAS, the mere analytical information derived from a betting report is not enough to prove that a football match has been manipulated. The analytical information needs to be supported by other, different, and external elements that point in the same direction. For example, suspicious actions on the field of play. The analysis of suspicious actions in connection with a deviation from an expected betting pattern can be enough to prove that someone has committed match manipulation.

By leveraging its established contact with the above-mentioned betting monitoring entities, FIFA Integrity is able to assist the integrity expert in procuring multiple betting reports on the match/competition of interest. The reports, which contain a detailed analysis of the betting patterns seen, may confirm whether there was suspicious betting activity during the match.

Obtaining similar conclusions from multiple different sources will reinforce the argument that match manipulation for betting purposes has occurred. With FIFA Integrity's help, the integrity expert will be able to compile these reports as betting evidence.

The integrity unit will be able to help the integrity expert to procure multiple betting reports on the match/competition concerned. This would typically be a partner company responsible for match and betting monitoring.

Procure the full match footage of the match(es) being investigated

To prove that a match has been manipulated, the betting evidence must be corroborated by supporting evidence. An expert technical analysis of the match incidents is a crucial component of such evidence. This analysis is crucial for the identification of suspicious actions taken by individuals on the field of play which may be in line with the suspicious betting patterns identified.

The integrity unit will be able to facilitate the compilation of the full match footage of the match(es) being investigated. If full match footage is not available, the integrity unit must at least look for the highlights of the match(es) being investigated.

Obtain technical performance analysis reports from external and internal sources

Expert technical performance analyses are intended to pinpoint any irregular behaviour by players or officials during a match which might correlate with the suspicious betting patterns. Special attention should be given to key moments that directly affect the betting outcomes, such as actions leading to conceded goals.

It is critical to engage an expert who possesses profound knowledge of the sport and is independent. **The chosen expert should have no prior association with the teams or players under investigation to avoid any potential conflicts of interest.**

FIFA Integrity is able to facilitate access to FIFA's internal experts from the FIFA High Performance Programme Department. These experts will conduct a thorough review and document their findings in a detailed written statement, providing their expert perspective on the match incidents. Additionally, external integrity monitoring services offer specialised expertise in match action analysis.

In cases where the person subject to investigation is a referee, FIFA Integrity can also facilitate contact with the FIFA Refereeing Subdivision for an analysis of the referee's performance during the match being investigated.

Upon receipt of the analysis, the integrity expert will then identify if the suspicious incidents identified by the expert correspond with the betting analysis.



Request FIFA Integrity to procure an expert performance analysis from FIFA's High Performance Programme Department.



Procure an expert performance analysis from external analytics providers.



Compile and record all the information received from the experts.



Conduct own analysis to identify if the suspicious incidents identified by the expert correspond with the betting analysis.

Identify and record miscellaneous information

Miscellaneous information includes, for instance, suspicious history or intel involving the person or team being investigated.

The appointed integrity expert may also identify, compile and analyse other miscellaneous forms of indirect evidence. Essentially, any type of evidence that is relevant to the case may be produced. This includes audio and video recordings, as well as email, text message and letters and must first be verified as to their legitimacy.

Open-source intelligence (OSINT) is another type of information that can be used as evidence. If needed, the appointed integrity expert may request that the integrity unit procure OSINT reports from integrity intelligence service providers. OSINT reports typically also include information on the relationship between known match-fixers and the person/team being investigated.

The appointed integrity expert may also identify any suspicious history of the team/individual under investigation as supplementary evidence. This is to highlight the consistent and sustained involvement in suspicious activities.



Compile and record, if any, materials whose legitimacy has been verified, such as audio and video recordings, emails, text messages, letters and other types of communications.









Conduct an OSINT investigation. If deemed necessary, request FIFA Integrity to procure the services of integrity intelligence service providers such as Sportradar and Genius Sports.



Conduct interview with persons deemed to be potentially complicit in the match manipulation

Upon identifying persons of interest in an investigation, the appointed integrity expert may conduct an interrogative interview with them, similar to a witness interview. This includes arranging a qualified interpreter, where necessary.

-  Facilitate the organisation of an interview session, including inviting the interviewees and making other relevant logistical arrangements.
-  Prepare an interview plan ahead of the meeting.
-  Prior to the interview session, request the interviewees' permission to record the session.
-  Share the recording of the interview session with the integrity unit and request for it to be transcribed. Transcription is important for future reference in potential proceedings.
-  Should interpretation be needed for the interview session, procure the services of a qualified interpreter.
-  Analyse the statements made by the interviewee and record any disclosure.

Record the attendance/non-attendance of the invited interviewee. A no-show needs to be assessed in the context of the duty to collaborate (cf. art. 12 par. 2 of the FIFA Disciplinary Code (Duty to Collaborate)).

4.3 PRELIMINARY INVESTIGATION FINAL REPORT

A What is a final report?

A final report is the main investigation 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, analyse each match or event separately (generally proceed in chronological order).
- If deemed appropriate, it is preferable to have a separate report for each individual potentially involved in match manipulation.
- Each point or argument in the report should appropriately reference the source of the information: use a reference for each statement or fact you seek to establish.
- At the preliminary investigation stage, all statements or findings are still allegations, and all individuals mentioned are to be presumed innocent. Be cautious and avoid potentially making false claims, use adverbs like “allegedly” or “reportedly”.
- Draft the report in a concise, factual and professional informative manner.
- Classify the document in accordance with the confidentiality rules of your association.



D What should be included in a final report?

- It should clearly identify the individuals or entities under investigation (e.g. full names, dates of birth, licence registrations, contact details, etc.).
- It should contain detailed records of all actions undertaken during the preliminary investigation stage (interviews, official correspondence exchanged, etc.).
- It should document the facts.
- It should analyse the elements of proof available and those collected during the investigation (see types of evidence in Section 4.3).
- It should contain a preliminary assessment of all possible provisions that have potentially been breached.
- It should make final recommendations on further action based on the findings of the preliminary investigation (e.g. the opening of formal proceedings, the 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 it is, 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. The following guiding principles should apply to the adjudicatory phase, which are further detailed in the next chapter:

- everything that is disclosed to the judicial body in connection with the proceedings must remain confidential;
- any type of evidence may be produced;
- the body has absolute discretion when assessing the evidence;
- the parties are free to choose their own representation, including their legal representation;
- the parties must collaborate to establish the facts and comply with requests for information from the judicial body;
- the proceedings must guarantee the protection of anonymous witnesses, where that person's testimony could lead to them being threatened or putting them or any person close to them in physical danger;
- the parties must be heard before any decision is passed;
- the judicial body must hand down its decisions entirely independently and may not receive instruction from any other body;

- the decision, which must be duly notified to the relevant parties, must at the very least contain the following:
 - 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; and
 - g. the notice of the channels for appeal.

An appeal may be lodged before an Appeal Committee against any decision passed by the judicial body.





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WHAT TO KNOW

Adjudicating on
integrity-related
offences

5.1 INTEGRITY-RELATED DISCIPLINARY PROCEEDINGS

As highlighted in section 1.5, provisions regarding integrity violations must be included in the relevant regulatory framework of the MA and must be adjudicated on by the competent judicial body/authority.

It should be noted that an MA must adapt their disciplinary provisions to the general principles of the FIFA Disciplinary Code in order to ensure harmonised disciplinary measures.

Processing and sanctioning match-fixing offences in the correct legal fashion is as important as conducting the necessary investigations. To do so, an independent and impartial adjudicatory system must ensure that an accused party enjoys the right to fair proceedings, including but not limited to the right to be heard, the right to produce and examine evidence, the right to a motivated decision and the right to appeal.



5.2 BASIC PROCEDURAL PRINCIPLES

5.2.1 INDEPENDENCE AND IMPARTIALITY

Independence and impartiality are cornerstones of a reputable judicial body. This means that the members of a judicial body must be impartial and not subject to conflicts of interest that could jeopardise disciplinary proceedings and the proper sanctioning of infringements.

A deciding member of a judicial body may not decide on a matter where there are legitimate grounds for questioning their independence or impartiality and/or if there is a conflict of interest. They must disclose any circumstance that may give rise to any such ground.⁷ Equally, a party is entitled to challenge a deciding member where there are legitimate doubts about their independence or impartiality.

In general, a conflict of interest arises if the ability of a deciding member to exercise proper judgement is at risk of being affected by a personal interest or by a competing duty. In other words, a situation arises where the deciding member cannot properly evaluate the weight to be given to the relevant considerations on which the decision is based.

Examples of situations that can jeopardise the independence or impartiality of a deciding member include:

- Familial relationship: if they have a familial relationship with one of the attorneys involved in the case, or to one of the parties.
- Financial interest: if they have a possible financial interest in the outcome of the case.
- Personal connection: if they have a personal connection to one of the parties involved.

In football, due to the nature of the game and the necessity to safeguard integrity, it is also fundamental to consider additional factors that might not be apparent at first. These include:

- Other duties: if a deciding member serves in any other function related to one of the parties in the proceedings or a third party that would benefit from a particular outcome of the proceedings.
- Sporting interest: if a deciding member has a possible sporting interest in the outcome of the case.

Rules regarding independence and impartiality, as well as the functioning of challenges, must be included in the relevant MA's legal framework.

It goes without saying that deciding members must ensure that all information disclosed to them while performing their duties remains confidential (including the facts of the case, the contents of the deliberations and the decisions taken). For transparency and integrity reasons, especially in connection with safeguarding the integrity of a competition, the opening of proceedings as well as any decisions that have already been notified to the respective addressees may be made public.

⁷ FDC, art. 32 par.1.

5.2.2 BURDEN OF PROOF

The burden of proof regarding disciplinary infringements rests on the MA, or the authority to which it has delegated the powers to prosecute those infringements.⁸ In other words, the MA (or its authorised agent) must prove that the integrity-related infringement took place. The relevant evidence and assessment in this respect is further explained below.

Notwithstanding the above, any party claiming a right on the basis of an alleged fact carries the burden of proof of this fact. During the proceedings, the party must submit all relevant facts and evidence of which they are aware at that time, or of which they should have been aware by exercising due care.

This effectively means that while the MA must prove that a party has committed a disciplinary violation, the burden to prove facts alleged by a party rests with them. It is therefore advisable that within the framework of an MA, facts contained in match officials' reports and in any additional reports or correspondence submitted by the match officials are presumed to be accurate. Proof of their inaccuracy may be provided.⁹ This is because match officials are first-hand witnesses, and their testimony, laid down in their reports, is more often than not material to the outcome of a case.

5.2.3 LIMITATION PERIOD FOR PROSECUTION

Time limits provide legal certainty. If such limits did not exist, an individual (or club/association) could have an offence hanging over them indefinitely, not knowing if they were going to be prosecuted.

At the same time, evidence may deteriorate or become less reliable as time goes by. For instance, witnesses may no longer be available, or their memory of the events may be affected. Time limits help ensure that cases are prosecuted while the evidence is still fresh, and it can also promote efficiency by encouraging the prompt investigation and prosecution of offences.

As such, time limits are a way to ensure fairness, as a party has a fair chance to defend themselves. This is connected to their right to fair proceedings.

The regulatory framework of the concerned MA must therefore establish a limitation period for prosecution of match-fixing offences. Such period cannot be so short as to prevent infringements from being prosecuted. As a benchmark, the FIFA Disciplinary Code establishes a limitation period of ten years for match-fixing offences.¹⁰

⁸ In some jurisdictions, disciplinary charges are put forward by a body that is not the administration/secretariat of the member association.

⁹ FDC, art. 40.

¹⁰ FDC, art. 10 par. 1.

5.2.4 RIGHT TO BE HEARD

The right to be heard is a fundamental principle of law, encapsulated in the legal term “*audi alteram partem*”. This principle means that every party has the right to make representations before any decision is taken that might affect their rights, interests or legitimate expectations.

In the context of disciplinary proceedings, this principle requires that a party accused of an offence be given an opportunity to defend themselves before a properly constituted disciplinary tribunal. To comply with this requirement, the party must be notified about the allegation of wrongdoing, along with the directives on how to respond, including the relevant deadlines, all of which must be communicated in a timely manner and in writing.

If a party is served with the notification to attend disciplinary proceedings but decides not to attend, said party is taken to have waived their right to be heard. The right to be heard is not an absolute immutable rule of law. It can be waived or forfeited by the party concerned but cannot be overruled by the judicial body; in other words, a party must always be granted a chance to make representation.



5.2.5 RIGHT TO EXAMINE AND PRODUCE EVIDENCE

The right to examine evidence in disciplinary proceedings is also an important aspect of the principle of fair proceedings and is also part of a party's right to be heard. This right includes the ability to cross-examine witnesses and review the evidence being used against them. For instance:

- Examination of the case file: a party is entitled to receive a copy of the case file and examine it before submitting its position on the alleged offences.
- Scientific evidence: when the questions put to the deciding authority are complex, the right to a fair trial means that the party must be awarded time to read the material and to test its authenticity and evaluate its probative value.
- Cross-examination of witnesses: generally, a party has the right to cross-examine witnesses in proceedings.

However, there are limitations to these rights. For instance, the legal framework may provide exceptions for hearsay evidence, the protection of vulnerable witnesses and the protection of privileged information; it may also permit the use of redacted evidence for security or confidentiality reasons.

The right to produce evidence in disciplinary proceedings is another crucial aspect of the right to fair proceedings. This right allows the party facing the disciplinary action to present their own evidence together with their statement of defence. Examples include:

- Documents
- Expert reports
- Witness testimony
- Written statements
- Audio or video recordings
- Photographs
- Digital evidence¹¹
- Scientific findings

11 This includes both data and the media storing the data, such as emails, text messages and social media posts.

5.3 MANAGING PROCEEDINGS

5.3.1 THE SECRETARIAT

Handling complex match-fixing cases is a task that must be performed with care and diligence. This task usually falls to the secretariat of the concerned judicial body or the administration of the MA.

The secretariat is thus tasked with providing the necessary support, infrastructure and staff to the judicial bodies. These bodies may also be assisted by legal counsel or experts as needed. The secretariat is responsible for handling the administrative work, which can also include writing decisions taken by the relevant body, exchanging correspondence with parties, keeping records or minutes of the meetings, coordinating the logistical aspects of hearings, and in general managing the case files.

In this regard, the secretariat oversees the case files. All decisions and the relevant files must be kept for a minimum period, which in the case of the FIFA judicial bodies is ten years.¹²

Depending on the legal framework, the secretariat is also tasked with conducting necessary investigations *ex officio*. This is the case for the secretariat of the FIFA judicial bodies.¹³

5.3.2 COMMUNICATIONS AND CASE FILES

Proper communication with the parties about disciplinary proceedings is essential. This includes making sure that parties are properly summoned to proceedings and receive all necessary communications from the judicial body, including the decisions of that body.

To ensure proper communication, MAs are strongly encouraged to use adequate electronic tools when conducting their proceedings. As a reference, since 1 May 2023 all proceedings related to the FIFA judicial bodies are handled via the FIFA Legal Portal, a dedicated platform.

By the same token, MAs have to ensure that, for their records, clubs and other affiliated entities keep their contact details (including their address, telephone number and email address) up to date.

Naturally, keeping a proper record of the contact details of natural persons (officials, players and coaches) is not always a straightforward task. Given the nature of football, it is therefore advised that decisions and other documents intended for players, clubs and officials are addressed to the (regional) association or club concerned, who then have the obligation to forward the documents to the relevant parties.

¹² FDC, art. 35 par. 3.

¹³ FDC, art. 35 par. 5

5.3.3 HEARINGS

Subject to the particularities of each jurisdiction, disciplinary proceedings are conducted in general without oral statements: the deciding authority rules on the basis of the file. The FIFA judicial bodies do it this way, for instance.¹⁴

This is, however, only a general approach and there are instances where a hearing may be necessary. If that is the case, all the parties should be summoned accordingly. The MA must ensure that rules regarding hearings are included in their national framework.

As the hearings occur within the context of proceedings before the FIFA judicial bodies, they might take place at the motivated request of one of the parties or at the discretion of the chairperson, the deputy chairperson, or the competent single judge.¹⁵ However, if one or all parties fail to appear at the hearing, decisions can still be handed down.

Hearings should be recorded and archived for a reasonable period in compliance with the local legal framework. In the case of the hearings held in proceedings before the FIFA judicial bodies, recordings are kept for five years, after which they are destroyed.¹⁶

Hearings as part of proceedings before the FIFA judicial bodies are not open to the public, except in cases of anti-doping rule violations by individuals if duly requested by the defendant and approved by the chairperson of the relevant judicial body or their nominee. In cases of match manipulation, the relevant chairperson or their nominee will decide whether a hearing is open to the public. The chairperson or their nominee decides at their discretion if and under what conditions a public hearing may take place.¹⁷

¹⁴ FDC, art. 53 par. 1.

¹⁵ FDC, art. 53 par. 2.

¹⁶ FDC, art. 53 par. 4.

¹⁷ FDC, art. 53 par. 7.



5.3.4 PROTECTED TESTIMONY

As explained earlier, witness statements are important means of proof in disciplinary cases. However, there are instances when giving testimony might put a person in jeopardy, or could lead to threats to them, or put them or any person close to them in physical danger. To that end, a witness may be able to give protected testimony to keep them safe.

A few measures can be undertaken to protect the witness's identity. These are usually ordered by the authority presiding over the proceedings and can include:

- the person not being identified in the presence of the parties;
- the person not appearing at the hearing;
- the person's voice being distorted;
- the person being questioned outside the hearing room;
- the person being questioned in writing;
- all or some of the information that could be used to identify the person being included only in a separate, confidential case file.

To ensure their safety, persons granted anonymity must be identified behind closed doors in the absence of the parties. This identification must be conducted by the members of the competent judicial body present and be recorded in minutes containing the relevant person's personal details. These minutes may not, however, be communicated to the parties; instead, they will receive a notice confirming that the person concerned has been formally identified but does not contain any details that could be used to identify such person.¹⁸

¹⁸ FDC, art. 43.



5.4 STANDARD OF PROOF

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

This section discusses the standard of proof that will 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 the level of certainty and the degree of evidence necessary to establish proof in criminal or civil proceedings.

In general, each MA can decide the standard of proof it applies in match manipulation proceedings, subject to national and/or international legislation.¹⁹ If there is no specific indication of the applicable standard of proof in the MA's regulations nor agreement between the parties during the proceedings, CAS will apply the standard of “comfortable satisfaction”.²⁰

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”.²¹



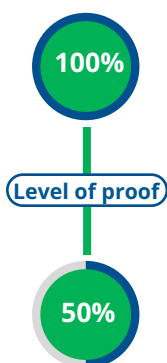
¹⁹ CAS 2011/A/2490 Köllerer v. ATP.

²⁰ CAS 2010/A/2267 – 2281 FC Metalist et al. v. FFU.

²¹ Ibid.

B What is the standard of comfortable satisfaction?

The standard of comfortable satisfaction has been defined as being greater than the mere standard of “balance of probability” but less than the criminal standard of proof of “beyond reasonable doubt”.²²



BEYOND REASONABLE DOUBT

No other logical explanation can be derived from the facts except that the defendant committed the crime, thereby overcoming the presumption that a person is innocent until proven guilty.

COMFORTABLE SATISFACTION

Being greater than the mere standard of “balance of probability” but less than the criminal standard of proof of “beyond reasonable doubt”.

BALANCE OF PROBABILITY/PREPONDERANCE OF EVIDENCE

The case that is the more probable should succeed.

FIFA recommends that every MA apply 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 5.7.



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

The reason for applying the standard of comfortable satisfaction is in line with 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.²³
- CAS jurisprudence clearly established that to reach this comfortable satisfaction, the Panel should have in mind “the seriousness of the allegation which is made”.²⁴
- It follows from the above that this standard of proof is a kind of sliding scale, based on the allegations at stake: the more serious the allegation and its consequences, the higher the certainty (level of proof) of the panel would need to be to be “comfortably satisfied”.²⁵

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 ... having in mind the seriousness of allegation which is made.”²⁶

The independent Disciplinary Committee applies the standard of comfortable satisfaction (art. 39 par. **3 of the FIFA Disciplinary Code (FDC), 2023** edition).

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

23 Paragraphs 131 and 132 of CAS 2014/A/3625; CAS 2009/A/1920; CAS 2013/A/3258; CAS 2010/A/2172.

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

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

26 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. Coetzee Wium.

5.5 TYPES OF EVIDENCE

Any type of evidence may be produced.

This section explains the types of evidence that are 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. 39 par. 1 of the FIFA Disciplinary Code (FDC), 2023 edition).

A Direct evidence

MAs can produce direct evidence that can consist of evidence directly related to the fact in dispute (e.g. 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

Indirect evidence is also admissible if it meets the standard of proof of comfortable satisfaction. Direct evidence is not always necessary provided that the indirect evidence meets the standard of comfortable satisfaction (cf. art. 39 par. 3 of the FDC, 2023 edition).

Below you will find an overview of types of indirect evidence that can be produced in ethics and disciplinary proceedings in regard to match manipulation and integrity-related corruption:²⁷

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 competent body has absolute discretion regarding the evaluation of evidence (cf. art. 39 par. 2 of the FDC, 2023 edition). In practice, this means that such bodies may:

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

²⁷ This list is non-exhaustive.

5.6 BETTING REPORTS

The analysis of a performance that deviates 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 common in match manipulation cases for the betting report to be used at the beginning of an investigation when 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, by monitored betting operators, as well as providing match-specific information (e.g. the current form of the teams involved, on-pitch action, and players' and match officials' data).
- FIFA will inform the relevant MA if a match within its jurisdiction has been identified as exhibiting suspicious betting patterns that are indicative of match manipulation. At the MA's request, FIFA may request an extended betting report on the matter and subsequently share it with the MA for use in its investigation.

B Are betting reports sufficient to prove that a football match has been manipulated?

- Irregular odds movements detected by a monitoring system alone may not be sufficient to prove match manipulation. Equally, football matches may have been manipulated without irregular odds movements being detected by the monitoring system.
- According to CAS, the analytical information derived from a betting report is not enough on its own to prove that a football match has been manipulated.²⁸
- The analytical information needs to be supported by other, different and external elements pointing in the same direction.²⁹ Examples of such external elements are suspicious actions on the pitch (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,³⁰ 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.³¹

28 Paragraph 85 of CAS 2016/A/4650 Skenderbeu v. UEFA.

29 Paragraph 86 of CAS 2016/A/4650 Skenderbeu v. UEFA.

30 Paragraph 100 of CAS 2016/A/4650 Skenderbeu v. UEFA; paragraphs 83 and 84 of CAS 2017/A/5173 Joseph Odartei Lamptey v. FIFA.

31 CAS 2017/A/5173 Joseph Odartei Lamptey v. FIFA; CAS 2016/A/4650 Skenderbeu v. UEFA.

5.7 DECISIONS AND APPEALS

5.7.1 ADJUDICATION AND THE RIGHT TO A MOTIVATED DECISION

The right to a motivated decision is also an essential part of fair proceedings. It means that the deciding body, such as the disciplinary tribunal, should provide clear and comprehensive reasons for its decision. A sound decision includes some of the following key aspects:

- The deciding body should explain the reasoning that led to the decision. This includes how the evidence was assessed, the legal principles that were applied, and how these factors led to the final decision.
- A motivated decision includes a summary of the facts, the infringed article(s), the considerations relevant to the potential breach of the relevant framework, and the criteria used to determine the possible sanction. It does not need to include every single contention.
- Providing a motivated decision promotes transparency and allows the party to understand why a particular decision was made. It also enables the party to effectively appeal the decision if they believe it was unjust.
- A motivated decision is crucial for any potential review or appeal process. It allows a reviewing body to understand the reasoning behind the decision and assess whether it was fair and just.

By way of example, decisions rendered by the FIFA judicial bodies are passed either by a single judge or by a simple majority of the members present. In the event of a tie, the chairperson has the casting vote.³² There are various ways in which decisions can be reached, including through personal meetings, telephone conferences, video conferences, or any other similar method.³³ The relevant legal framework should define how adjudication takes place because this ensures legal certainty.

In FIFA's case, its judicial bodies issue the terms of decisions without grounds.³⁴ Only these terms are notified to the parties, who are then informed that they have ten days from that notification to request a motivated decision in writing. If such a request is not made, the decision becomes final and binding, and the parties are deemed to have waived their right to lodge an appeal.

³² FDC, art. 54 par. 1.

³³ FDC, art. 54 par. 2.

³⁴ Per art. 54 par. 7 FDC, doping-related decisions are issued with grounds. In cases of urgency or under any other special circumstances, the relevant judicial body may notify the party of only the terms of the decision, which become immediately applicable.

5.7.2 RIGHT TO APPEAL AND STANDING TO APPEAL

The right to appeal is equally a cornerstone of fair proceedings. It allows a party to challenge a decision that has been made against them. The rights ensured to a party at first instance shall be respected also during appeal proceedings.

There may be instances, however, where an appeal cannot be lodged. The FIFA Disciplinary Code for instance establishes that if the sanction issued is a warning, a reprimand, a suspension of up to two matches or of up to two months,³⁵ or a fine of up to CHF 15,000 imposed on an association or a club or of up to CHF 7,500 in other cases, no appeal can be filed.³⁶

In this context and the FIFA Disciplinary Code, the appeal does not have a suspensive effect except with regard to orders to pay a sum of money. The chairperson, the deputy chairperson or, in their absence, the longest-serving member available, may, on receipt of a reasoned request, award a stay of execution.³⁷ It is advisable to MAs to establish in their legal framework the effects of an appeal to ensure legal certainty.

Anyone who has been a party to the proceedings may lodge an appeal, provided this party has a legally protected interest in filing the appeal. Due to the nature of football, associations and clubs may appeal against decisions sanctioning their players, officials or members.

5.7.3 PUBLICATION OF DECISIONS

FIFA is committed to promoting transparency and full disclosure in relation to the activities of its independent judicial bodies. Effective and transparent governance and management practices are critical for ensuring the accountability of key stakeholders for actions and decisions taken. For this reason, FIFA publishes the decisions of its judicial bodies. However, if the decisions contain confidential information, FIFA may decide, *ex officio* at the request of a party, to publish an anonymised or a redacted version.

FIFA's statutory objective is to improve the game constantly and promote it globally. Publishing decisions helps to enhance the football development landscape by providing clear guidelines and precedents. FIFA advocates that these principles are shared by MAs who should adopt similar guidelines on the publication of decisions of their judicial bodies.

³⁵ Except for doping-related decisions.

³⁶ Per DRC, art. 61 par.1 as well as decisions concerning the enforcement of decisions made by FIFA, its subsidiaries, and the Court of Arbitration for Sport in line with art. 21 of the FDC.

³⁷ FDC, art. 65 par. 2.

5.8 WORLDWIDE SANCTIONS



A Why apply for worldwide sanctions?

Once the judicial body of your MA has passed a decision on the unlawful influencing of match results by 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

To apply to FIFA for sanctions to have worldwide effect, your MA needs to submit the following documentation and material to FIFA via the FIFA Legal Portal (<https://legalportal.fifa.com/home>):

- An official request for the extension of the sanctions (see Annexe 5.9 for a template)
- A copy of the decision translated into an official FIFA language (English, French or Spanish), if required
- The complete and accurate personal details of the person who has been sanctioned (i.e. their full name, address, association, club, nationality and date of birth)
- A document stating 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 in accordance with established standards
- Proof that the person under investigation has been duly notified of the decision, and of the document citing/charging them (confirmation by fax, post or email)

Note: An appeal may be lodged in accordance with the applicable appeal regulations and procedures established within your MA. The applicable FIFA provisions regarding the extension of sanctions to have a worldwide effect can be found in article 70 of the 2023 edition of the FIFA Disciplinary Code.

5.9 CASE STUDIES

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 Committee.³⁸ Furthermore, appeals against final decisions passed by FIFA's judicial bodies (including the Disciplinary, Ethics and Appeal Committees) may be lodged before CAS.³⁹ Finally, since the seat of CAS is in Lausanne, Switzerland, the Swiss Federal Tribunal is the competent court to hear actions to set aside CAS awards.⁴⁰

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"⁴¹ betting market on the so-called "totals"⁴² 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 had 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).

Quote from CAS award:

"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:

38 Article 53 of the FIFA Statutes (2022 edition); article 60 of the FDC (2023 edition).

39 Article 56 et seq. of the FIFA Statutes 2023; article 52 of the FDC (2023 edition).

40 Article 191 of the Swiss Private International Law Act (PILA).

41 "Over": the bettor might speculate for "over" 2.5 goals. This means that if three, four, five, six or more goals are scored in the match, the bet is successful. However, zero, one or two goals means that the bet is unsuccessful.

42 "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) must increase.

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."⁴³

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 had clearly taken two wrong refereeing decisions, which had 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 that clearly did not happen; and the referee failed to stop a quick restart by Team A that led to a second goal being scored in the 45th minute.

Quote from CAS award:

*"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."*⁴⁴

Reasoning

It was established by the Panel that the suspicious betting activities reached their climax precisely 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.

Quote from CAS award:

*"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."*⁴⁵

⁴³ See paragraph 80 of CAS 2017/A/5173, jurisprudence.tas-cas.org/Shared Documents/5173.pdf.

⁴⁴ See paragraph 79 of CAS 2017/A/5173.

⁴⁵ See paragraph 83 of CAS 2017/A/5173.

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 CAS.

Quote from CAS award:

“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.”⁴⁶

B The case of a legal person sanctioned for the conduct of its staff

Case background

A series of matches in the top-tier league of an MA's domestic league came under scrutiny following repeated instances of suspected match manipulation between 2018 and 2020. Investigations by FIFA Integrity revealed that individuals associated with a particular club were responsible for the manipulation. Consequently, the club was found to be liable for the actions of its members in this case.

Notably, the case marked a significant milestone following the amendments to the FIFA Disciplinary Code, as it was the first time that a legal entity had been held liable by a FIFA judicial body for the conduct of its members in relation to match manipulation. The FIFA Disciplinary Committee determined that the club had violated both article 8 and article 18 of the FIFA Disciplinary Code (2019 edition).

FIFA Integrity investigation

The FIFA Integrity investigation into the matter was centred on the potential violation of FIFA regulations by the club in connection with two matches played in the aforementioned top-tier league. FIFA Integrity received reports from three different companies specialised in sports integrity services, including companies specialised in the monitoring of sports betting worldwide, which deemed that match 1 and match 2 were suspicious and had possibly been manipulated as suspicious movements on the betting market were detected. The betting evidence seemed to indicate that the bettors had held prior knowledge of the club losing the matches. This was also supported by the fact that some bookmakers had removed all their markets or some of their markets during matches 1 and 2.

⁴⁶ See paragraph 85 of CAS 2017/A/5173.

In addition to the above, FIFA Integrity also received reports from the above-mentioned companies in which they identified a high number of defensive errors and alleged incidents of underperformance by players of the club.

FIFA Integrity also obtained an affidavit from the then coach of the club, describing the alleged involvement of various players in match manipulation over the course of the 2018-2019 and 2019-2020 seasons of the said top-tier league.

Reasoning and sanction

One of the main points in the FIFA Disciplinary Committee's decision on this matter revolved around whether the club can be held accountable for the alleged misconduct of its players, particularly in cases of match manipulation. The FIFA Disciplinary Committee referred to article 8 paragraph 1 and article 18 paragraph 2 of the FDC (2019 edition), which establish a strict liability rule, stating that clubs or associations can be held liable for the behaviour of their players and officials, even if the club or association itself is not found to be negligent. This means that if players from a club were involved in match manipulation, the club could be held liable for their actions.

The FIFA Disciplinary Committee also cited a relevant CAS award involving another club, KS Skënderbeu, and UEFA. CAS ruled that the strict liability of a club can be established without the need to identify a specific perpetrator, as long as the offence was committed by an individual under the club's umbrella, such as by its members, officials, supporters or players. This approach was also confirmed by the Swiss Federal Tribunal.

Although the case in question did not pertain to FIFA but rather UEFA regulations, the FIFA Disciplinary Committee found that the relevant provisions in both sets of regulations were similar. Therefore, the FIFA Disciplinary Committee decided to apply a similar approach. Consequently, if the club's players were involved in match manipulation without third-party involvement (e.g. a referee), the club would be held responsible for the infringement committed by its players based on the provisions of article 8 paragraph 1 and article 18 paragraph 2 of the FDC (2019 edition).

C 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 and article 18 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, as well as receiving 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 regulations⁴⁷ 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.⁴⁸



47 Articles 18 and 21 of the FIFA Code of Ethics (2012 edition).

48 See paragraph 140 of CAS 2018/A/5886.



90

ANNEXES

6.1 FIFA INTEGRITY

A Structure and roles

FIFA Integrity is a department within the Judicial Bodies Subdivision, which comes under FIFA's Administration Branch.

Head of Integrity	Defines the strategy and policy of the whole department and is the lead handler of integrity investigations
Team Lead, 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 inbox: integrity@fifa.org

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



FIFA Reporting Portal (GAN):

<https://fifa.gan-compliance.com/p/Case>



Home of FIFA:

+41 (0) 43 222 77 77

If you ever need to get in touch about having an in-person meeting with FIFA Integrity, you can do so at any time through any of the above-mentioned channels.

6.2 MODEL TEMPLATE OF AN INTEGRITY POLICY

The [name of member association] is fully dedicated to strengthening the integrity of the sport and protecting clean athletes. We aim to organise, propagate, develop and promote football in all its forms with, among others, the principles of sporting integrity and fair play.

This work encompasses the fight against match-fixing, the use of doping and any other forms of cheating in sport, alongside the strengthening of ethics with improvements in transparency, good governance and accountability.

The [name of member association] is committed to promoting and upholding the integrity of our sport across the whole football family. We stand for integrity in football, for a sport you can trust. Having clean competitions is our greatest asset. Matches should be decided on the football pitch, not on the gambling market.

Match-fixing is an intentional arrangement, act or omission aimed at an improper alteration of the result or the course of a sports competition in order to remove all or part of the unpredictable nature of the sports competition with a view to obtaining an undue benefit. This is against the rules of the game and often the law. We want to preserve what is great in the beautiful game and have devised rules regarding betting in football to help protect the integrity and future of football. These rules apply to everyone involved in football.

Our disciplinary bodies are responsible for ensuring that these fundamental principles of football are respected and help to promote integrity in sport. Therefore, we will always adopt a zero-tolerance policy to match-fixing. We have opted for a combined repressive and preventive approach comprising a wide range of actions and measures. If you attempt match-fixing, breach the [name of member association's] betting rules, or pass on inside information, you are likely to get caught and be charged.

To support this, we have a set of rules to which all club officials, players, match officials and [name of member association] staff must adhere. These rules apply to betting, the use of inside information and match manipulation. The rules help ensure that any individual involved in a football match is performing to the best of their ability without any conflicting objectives. Under the terms of our membership of [name of confederation] and FIFA, we also enforce international regulations.

All [name of member association] members must report any signs of attempted match-fixing immediately. Any individual who has seen something suspicious or has been directly or indirectly approached about fixing matches can report this (anonymously if desired) by phone on XXXXX or email via XXXXX.

Integrity is the key to success. Within our association, integrity means always doing what is right. It is essential for our proper functioning, the preservation of our reputation and that of football in general. Our basic ethical principles help us to ensure the integrity of our day-to-day responsibilities.

6.3 RECOMMENDATIONS TO DESIGN A MEDIA STRATEGY

Practical summary

This annexe contains a collection of messages and tools relating to your integrity policy. Your media strategy should form the basis of all of your future interactions – from interviews to social media and all other forms of external communication – proactive or reactive, in person or online.

The key is to identify the good work that you are doing within your organisation in the field of integrity and to determine whether, when and how communication is needed. This strategy touches upon proactive and reactive communication, and the last page contains a ready-made template for you to fill in.

Introduction

The purpose of a media strategy is to ensure that the key message of your integrity policy is relayed to the right audiences through external and internal communication channels at the most opportune time.

Communication is a critical part of the success of your integrity policy, which describes how to promote sporting values and prevent misconduct. You want to share and explain your vision of protecting the integrity of football in an understandable way.

The objective is to effectively portray your organisation as a leader in the protection of the game and as a trusted partner with skills and expertise on this topic. In this annexe, we define key messages, context, target audiences and intended outcomes.

Why a media strategy?

Media provides an important channel to communicate with stakeholders and the wider public about integrity programmes and initiatives.

By developing a tailored media strategy and forming a positive and professional relationship with the media, you can help to play a role in promoting and helping to form positive attitudes around integrity and governance structures in football.

The goals of your integrity policy:

- A. To promote integrity in football: uphold the values of integrity in football
- B. To protect the integrity of football matches and competitions in your country: ensure football remains free from corruption and manipulation
- C. To protect your national football community (as a whole) from integrity threats and misconduct (associations, clubs, players, referees, fans and spectators)

Proactive communication objectives:

Increase awareness	Not just of the consequences of match manipulation, but also of the good governance and positive aspects of clean sport
Drive development	Reinforce the work of your integrity officer as an investment in sport and not an expense – integrity is a development concept for football
Foster education	Model standards by showcasing your integrity strategy in your country
Enhance corporate reputation	Foster and optimise cooperation with relevant stakeholders and organisations that add value to your integrity mission and strategy; your member association should gain public trust and the confidence of its stakeholders and the public by effectively communicating its integrity work and policy and the impact they have on the sport
Promote reporting	Effectively promote the reporting channels available to report misconduct and help protect sport from misconduct; reinforce the whistleblower protection policy and guarantees made by the association
Key messages	<p>The [name of member association] wants to protect the integrity of matches and competitions in [name of country].</p> <p>The [name of member association] wants to enhance the reputational standing of players and officials.</p>

What you need

- A key messages document (as a main source): everything you communicate should refer back to this document (“Our mission is to protect the integrity of matches and enhance the reputational standing of players. We aim to showcase the best of integrity protection.”)
- A section on the website of the member association
- An internal roadmap for the next 12 months: the timeline with key events and milestones regarding integrity
- Who are possible ambassadors of the integrity policy?
- In essence, protecting the core values of football is strengthened by strong figures in sport (current and former elite players and coaches), ensuring that they are experienced by individuals under our regulations and the fans, spectators and public



Benefits of working with the media

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

- educate and inform stakeholders and the wider general public;
- enhance the credibility of your member association;
- create trust in football governance structures and the integrity of football competitions; and
- promote integrity programmes and initiatives that are in place.

Key principles

- Understand the role and specific needs of journalists
- Develop an integrated and targeted media and communications strategy and plan to inform internal and external stakeholders and the media accordingly
- Identify and develop professional working relationships with key journalists and influential local, national and international news organisations
- Aim to regularly inform and educate key media about integrity programmes and anti-match manipulation measures that are in place
- Be courteous and timely when responding to media enquiries
- Ensure that principles of due process and confidentiality, as well as relevant regulations, are followed during any communications or media activity



Proactive communication – raising awareness, promotion and prevention

The media can play an important role in raising awareness of new or existing integrity programmes and measures that are in place. Examples of integrity-related activities that could be proactively communicated by member associations include the following:

- **Integrity education** – e.g. integrity-related workshops and grassroots football clinics
- **Awareness-raising** – e.g. value-based campaigns involving ambassadors, and promotions at events, meetings and competitions
- **Prevention/institutional integrity measures and partnerships** – e.g. memorandums of understanding/agreements, betting monitoring partnerships and regulatory updates
- **Case management updates** – e.g. sanctions and case outcomes

Integrity education

Conducting educational activities with stakeholders – such as workshops and football clinics – 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 and 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.⁴⁹

Example events/activities		Example media/communication
<ul style="list-style-type: none"> • Workshops • Seminars • Forums • Conferences • Grassroots football clinics with players/ambassadors 	→	<ul style="list-style-type: none"> • Media content, e.g. press releases, B-roll video footage, interviews with players, photos • Digital/social media, e.g. social media posts, website stories

⁴⁹ It is good practice for the information communicated regarding integrity education to 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 in media materials.

Example activities/content:

Material	Example information
Press releases/website stories	General information about workshops/clinics, e.g. participating stakeholders (organisations/groups), general topics discussed, purpose and type of activity
	Quote from member association representatives/workshop participants
	Background information about relevant integrity initiatives
	High-quality (1-3MB) image to accompany press release
Video news releases	B-roll footage, e.g. general footage of venue, branding, marketing collateral and workshops
	Interviews with spokespeople, e.g. participants (players and coaches) and relevant member association representatives
Digital/social media	Pre- and post-event posts with images
	Links to relevant pages about integrity programmes on member association's website
	Link to post-event press release

Promotion and awareness-raising

Value-based promotion can play an important part in raising public awareness and encouraging stakeholder support for integrity programmes that member associations 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 raise awareness, provide an opportunity to highlight ongoing initiatives (e.g. integrity hotlines) and create a positive and supportive environment for integrity work to take place.

Example events/activities		Example media/communication
Value-based campaigns and/or new initiatives regarding competitions, integrity initiatives, meetings and events (football clinics)	→	Value-based promotion, e.g. messages from players/coaches, third-party endorsements, traditional marketing and advertising
Promotional activities with players and teams		Media/PR, e.g. press releases, FAQs, media kits, interviews with campaign ambassadors, digital/social media
Launch of integrity hotlines/ external reporting platform		Digital/social media, e.g. paid-for campaigns, digital marketing, promotion

Example activities/content:

Material	Example information
Media materials, e.g. press releases, media kits, website stories	General information about campaign and activities, e.g. purpose of campaign, type of activities taking place
	Quotes from ambassadors, high-profile players/coaches, member association representatives and third-party endorsers (e.g. stakeholders)
	Background information about relevant ongoing integrity initiatives/calls to action (e.g. phone/contact integrity hotline, Twitter, Facebook)
	High-quality (1-3MB) image to accompany press release
Video footage and video news releases	Promotional/supportive messages from campaign ambassadors, e.g. players, coaches
	Videos explaining campaign
	B-roll footage of activations already undertaken, e.g. stadium messages, films
Digital/social media	Pre- and post-event posts with images, videos
	Links to relevant pages about integrity programmes on member association's 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 media and stakeholders about the operational structures and integrity partnerships formed by a member association.

Furthermore, communicating partnerships and integrity/regulatory measures that are 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.

Example events/activities		Example media/communication
Agreements or memorandums of understanding with integrity-related stakeholders, e.g. other member associations and law enforcement	→	Website stories
Betting monitoring partnerships		Media releases
Regulatory updates related to integrity and/or anti-match manipulation, e.g. Disciplinary Code and Code of Ethics		Background documents/FAQs
Integrity measures in place for competitions (e.g. betting monitoring and integrity officers)		Agreement signing ceremony/media event, e.g. media briefing and press conference (where appropriate)



Example activities/content:

Material	Example information
Press releases/website stories	General information about partnership/agreement/initiative, e.g. participating stakeholders (organisations/groups), general topics discussed, purpose and type of activity
	Quote from member association representatives/workshop participants
	Background information about relevant ongoing integrity initiatives
	High-quality (1-3MB) image to accompany press release
Video news releases	B-roll footage, e.g. general footage of agreement signing, ceremonial activities
	Interview with corporate spokespeople at partnership signing, e.g. member association and partner
Digital/social media	Pre- and post-event posts with images
	Links to relevant pages about integrity programmes on member association's 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 concluded and a sanction may have been applied by relevant bodies, e.g. disciplinary bodies. As a result, these outcomes will need to be communicated publicly and to stakeholders and/or the media.

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

Reactive communication – best practice and principles

Media and issues management

Information may be published occasionally 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 that could compromise an ongoing case.

In particular:

1. Develop an issues and crisis communications plan, including details of internal policies and procedures on handling media enquiries and spokespeople as well as pre-drafted holding and reactive statements.
2. Be responsive to media enquiries, regardless of whether a written statement is issued or an interview can be held.
3. Allocate departmental focal points to liaise with the media department on media enquiries, as well as a spokesperson to conduct interviews as appropriate.

Example activities/content:

Material	Example information to include
Issues and crisis communication/media plan	General structure and governance, e.g. divisional structures, departmental focal points/reporting lines
	Allocated spokespeople
	Potential scenarios
	Example holding statements, e.g. "X is seeking further information...", "X is reaching out to Y about the allegations..."

Checklist in case of an issue

1. What is the narrative? Keep it as clear and simple as possible.
2. Draft a holding statement, in line with the key messages document.
3. Who are the key people responsible for communications?
4. What are the scenarios?
5. What documents, articles or presentations are available?

What is the narrative? A maximum of 100 words

Holding statement

*Who is the right spokesperson to communicate the story and do so credibly?
Who are the key people to reach out to? Do you have any quotes?*

What are the scenarios?

Do you have any facts or figures to share to back up the story?

6.4 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/they shall:

- not take part in any betting connected with football, including soliciting or facilitating or attempting to solicit or facilitate another person to do so;
- 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;
- 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;
- confirm, with his/her/their signature below, that he/she/they will comply with all provisions applicable to him/her/them 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.	Yes	No
Date:		
Signature:		

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

6.5 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 and officials in relation to football matches and competitions:

1. The player, coach or official must 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 or official must not accept, give, offer, promise, receive or solicit any pecuniary or other advantage, on behalf of themselves or a third party, in relation to the manipulation of football matches or competitions.
2. The player, coach or official must 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 or official must 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 or official must 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 or official confirms by signing the present contract that they understand and will comply with the relevant provisions relating to match manipulation, bribery and betting contained in the FIFA Statutes and regulations.

6.6 DRAFT INTERVIEW PLAN

Interview plan – Mr [Name]

TEMPLATE – INTERVIEW PLAN

Security measures checked	Yes	No	
Confidentiality	Yes	No	
Status – closed	Yes	No	Reason

Case			
Date	Location	Time from/to	Interviewer

Surname and first name(s) of interviewee	Role	Consent given to be recorded Yes 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 they are 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 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)

6.7 CAS DECISIONS AND PUBLICATIONS WITH LINKS TO INTEGRITY AND MATCH MANIPULATION

A CAS & SFT decisions on match-manipulation and integrity

- 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
- CAS 2018/A/6075 Igor Labuts v. Football Association of Ireland
- CAS 2019/A/6219 Sidio José Mugadza v. FIFA
- CAS 2019/A/6439 Samson Siasia v. FIFA
- CAS 2020/A/7345 Papa Dema Dieye, Lokwa Tesera Antonio Georges and Samvel Safaryan v. Football Federation of Armenia
- CAS 2021/A/7866 Taras Durai v. Ukrainian Association of Football
- CAS 2021/A/8453 Ofosu Appiah v. Latvian Football Federation
- CAS 2022/A/8651 Edgars Gauračs v. UEFA
- CAS 2023/A/9715 Fudbalski klub "Kolubara" Lazarevac v. Football Association of Serbia
- Swiss Federal Tribunal_4A_462 KS Skenderbeu v UEFA

Independence and impartiality

- CAS 2021/A/7859 NK Inter Zaprešić v. Serder Serderov & FIFA
- Swiss Federal Tribunal _4A_318/2020_Sun Yang v WADA
- Swiss Federal Tribunal _4A_100/2023_A v B

Burden of proof, standard of proof

- CAS 2019/A/6179 Gambia Football Federation (GFF) v. Confédération Africaine de Football (CAF) & Fédération Togolaise de Football (FTF)
- CAS 2011/A/2426 Amos Adamu v. FIFA

Limitation period for prosecution

- CAS 2021/A/8054 FC Hamrun Spartans v. UEFA
- Swiss Federal Tribunal _4A_22/2023_A v Professional Tennis Integrity Officers

Right to be heard, production of evidence, and protected testimony

- CAS 2019/A/6388 Karim Keramuddin v. FIFA
- Swiss Federal Tribunal _4A_424/2018_A v B & International Tennis Federation
- Swiss Federal Tribunal _4A_486/2022_A v Professional Tennis Integrity Officers

Appeals

- CAS 2020/A/7144 Raja Club Athletic v. Léma Mabidi
- CAS 2011/A/2474 Antonio Urso & Marino Ercolani Casadei v. International Olympic Committee
- Swiss Federal Tribunal 4A_184/2023_A v UCI

C 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
- CAS bulletin 2020/1, PHILIPPE VLADIMIR BOSS, Duty to cooperate in disciplinary proceedings and its limitations deriving from standard rights in criminal proceedings – A review under Swiss law
- CAS bulletin 2022/2, MATTHEW J. MITTEN & KRISTINA FRKOVIC, Protecting Human Rights, Competitive Equity, and Sports Integrity in Binary Athletic Competition in a Nonbinary World
- CAS bulletin 2023/1, DESPINA MAVROMATI, An Overview of the Appeal Procedure before the CAS
- CAS bulletin 2024/1, JANIE SOUBLIÈRE & BJÖRN HESSERT, Safeguarding and beyond - The role of sports regulations, human rights and the balance between the rights of interested parties in sports investigations and the disciplinary proceedings that arise from them
- 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
- Olympic Movement Code on the Prevention of the Manipulation of Competitions, International Olympic Committee
- Model Rules to Assist Sports Organisations in Implementing the Olympic Movement Code on the Prevention of the Manipulation of Competitions, International Olympic Committee
- Legal Approaches to Tackling the Manipulation of Sports Competitions, International Olympic Committee and United Nations Office on Drugs and Crime
- Handbook on Protecting Sport from Competition Manipulation, INTERPOL and International Olympic Committee
- Resource Guide on Good Practices in the Investigation of Match-Fixing, United Nations Office on Drugs and Crime
- Investigation of Cases of Competition Manipulation: A Practical Guide, United Nations Office on Drugs and Crime, INTERPOL and International Olympic Committee
- A Practical Guide to the Prosecution of Cases of Competition Manipulation, United Nations Office on Drugs and Crime, INTERPOL and International Olympic Committee
- UNODC Global Report on Corruption in Sport, United Nations Office on Drugs and Crime
- Reporting Mechanisms in Sport: A Practical Guide for Development and Implementation, United Nations Office on Drugs and Crime and International Olympic Committee

D Publications on integrity education programmes

References and recommended reading – the basics

- Map It: The Hands-on Guide to Strategic Training Design by Cathy Moore, Montesa Press, 2017
- Resonate: Present Visual Stories that Transform Audiences by Nancy Duarte, John Wiley and Sons, 2010
- Slide:ology: The Art and Science of Creating Great Presentations by Nancy Duarte, O'Reilly Media, 2008
- Wired for Story: The Writer's Guide to Using Brain Science to Hook Readers by Lisa Cron, Ten Speed Press, 2012
- You Talkin' to Me: Rhetoric from Aristotle to Trump and Beyond by Sam Leith, Profile Books, 2019

References and recommended reading – intermediate

- Mental Training for Peak Performance by Steve Ungerleider, Rodale Books, 2005
- The Speed Reading Book: Read More, Learn More, Achieve More by Tony Buzan, Pearson Education, 2010
- Use Your Brain Raise Your Game: The Professional Footballer's Guide to Peak Performance by Mark Bowden, Rethink Press, 2017
- Use Your Head: Innovative Learning and Thinking Techniques by Tony Buzan, Pearson Canada, 2006
- Use Your Perfect Memory: Dramatic New Techniques for Improving Your Memory by Tony Buzan, Plume, 1991

References and recommended reading – advanced

- De Bono's Thinking Course by Edward De Bono, Pearson Education Canada, 2006
- Brain-Based Learning: Teaching the Way Students Really Learn by Eric Jensen, Corwin, 2020
- Dynamic Learning by Robert Brian Dilts and Todd Epstein, Dilts Strategy Group, 2017
- Persuasion Engineering by Richard Bandler and John La Valle, Independent Publication, 2022
- The Einstein Factor: A Proven New Method for Increasing Your Intelligence by Win Wenger, Harmony, 1995

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

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

6.8 TEMPLATE: APPLICATION FOR WORLDWIDE SANCTION

EMAIL

Secretariat of the FIFA Disciplinary Committee

(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 that FIFA extend the sanction to have worldwide effect.

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

- A certified copy of the decision⁵⁰ of the [name of the judicial body] dated [date of the decision] (see Annexe XX)⁵¹
- 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 XX⁵²)

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 is intended to 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.*

50 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 FIFA languages where relevant (English, French or Spanish).

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

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



6.9 FIFA INTEGRITY POSTERS AND FLYER

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



BE ALERT OF ANY APPROACH

RECOGNISE

MATCH MANIPULATION

What is match manipulation?

- The unlawful influencing or alteration of the course, result or any other aspect of a football match or competition.
- Match manipulation can be committed for financial gain, sporting advantage or other purposes.

What can match manipulation look like?

- Conspiring to lose or draw a football match.
- Performing below your abilities on the football pitch on purpose.
- A referee and/or match official deliberately making wrong decisions.
- Accepting, offering, receiving or requesting money or other incentives for the manipulation of football matches.

How can match manipulation affect you?

- Being involved in match manipulation can lead to a lifetime ban from any football activity.
- If you do not comply with your duty to report any match manipulation approach or incident, you can be sanctioned.
- Match manipulation may have direct links with organised crime.
- One wrong decision can put your life, the safety of your loved ones and your career in danger.

WATCH OUT FOR THESE WARNING SIGNS

"Follow these instructions" "We need you to cooperate"

"Need a penalty / red card" "Take it easy, don't give 100%"

BE ALERT OF ANY APPROACH

RESIST

FIFA INTEGRITY

DO YOUR DUTY

REPORT

BETTING AND SIMILAR ACTIVITIES

You are bound by the FIFA Code of Ethics and therefore you **CANNOT**:

- Bet on football matches – **ANY MATCH – ANYWHERE – AT ANYTIME**
- Have **ANY** direct or indirect interest in betting companies or entities.
- Risk to ensure to place bets with you or on your behalf
- Share insider / sensitive information with someone placing a bet

Betting on football can lead to a ban from any football activity for up to 3 years.

FIFA REPORTING PORTAL

Use the QR code to submit an anonymous report or email FIFA integrity direct at info@fifa.org

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

FIFA
—
INTEGRITY

FIFA
—
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 to obtain the logo in the required format and resolution.



6.10 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 integrity officer's details with FIFA?

C Adequate legal framework

Are sufficient regulations in place to investigate and sanction incidents of match manipulation?
For examples of the applicable regulations, see the FIFA Disciplinary Code.

Is an independent judicial body in place that is authorised to conduct proceedings regarding 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? Make sure they are:

- specific;
- measurable; and
- long term.

Has your MA implemented any measures in the following areas?

- Officials
- Men's football
- Women's football
- Refereeing
- Youth and grassroots
- esports (if applicable)

F Establish a media strategy

Has your MA established a media strategy?

- Understand the role and specific needs of journalists/media platforms
- Develop an integrated and targeted media and communications strategy
- Provide regular information to key media about integrity programmes
- Ensure that 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 might 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 standard of comfortable satisfaction in regard 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 consider the following elements?

- Confidentiality of the 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
- Source of the information
- Clear identification of individuals/entities
- Detailed records of all actions
- Presentation 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 to FIFA for the extension of sanctions to have worldwide effect?

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

6.11 INTEGRITY MEASURES FOR FOOTBALL MATCHES AND COMPETITIONS

OFFICIALS

Members association officials
League officials
Club officials

Activities:

Integrity network at league/club level ☐
Introduction to integrity ☐
Integrity workshop ☐
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 referees
Non-professional referees
Video assistant referees

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 ☐



