



HOW ABOUT THE
RESULT *BEFORE*
KICK-OFF?

SAFEGUARDING THE BEAUTIFUL GAME

A Guide to Preventing Match-Fixing in Football at Club Level



Transparency International (TI) is the world's leading non-governmental anti-corruption organisation. With more than 100 Chapters worldwide, TI has extensive global expertise and understanding of corruption.

Transparency International UK (TI-UK) is the UK chapter of TI. We raise awareness about corruption; advocate legal and regulatory reform at national and international levels; design practical tools for institutions, individuals and companies wishing to combat corruption; and act as a leading centre of anti-corruption expertise in the UK. TI-UK's registered UK charity number is 1112842.

Acknowledgements

This publication has been kindly supported by:

The European Commission, The European Professional Football Leagues, Edwards Wildman LLP

It has been developed as part of Staying on Side: How to Stop Match-fixing (EAC-2012-0568) a project commissioned and funded by the European Commission and European Professional Football Leagues.

We thank the following for providing their feedback:

Neil Doncaster and Iain Blair (Scottish Professional Football League), Michael Tattersall & Peter Hannon (Football League), Henry Stewart (Edwards Wildman LLP), David Folker (Dataco), Simon Barker (PFA).

Special thanks to Jeff Rees who provided extensive feedback on drafts and brought his considerable expertise to the project, informed by many years of fighting corrupt practices in cricket and tennis.

Expert Advisory Committee members: David Newton (FA), Antonio Suarez-Martinez (Edwards Wilman LLP), Deborah Unger (Transparency International), Governance Department (Premier League) and Jeff Rees (formerly Director of Integrity, Tennis Integrity Unit).

Project Team

Editor: Peter van Veen

Authors: David Winner, James Pyemont, Peter Wilkinson (Appendix)

Researchers: James Pyemont; Haim Levi and Sean Hamil (Review of existing codes, guides and training)

Designer & illustrator: Greg Stevenson

Publisher: Transparency International UK

Published: August 2014

ISBN: 978-0-9927122-3-5

© 2014 Transparency International UK. All rights reserved. Reproduction in whole or in parts is permitted providing that full credit is given to Transparency International UK and provided that any such reproduction, whether in whole or in parts, is not sold or incorporated in works that are sold. Written permission must be sought from Transparency International UK if any such reproduction would adapt or modify the original content.

This publication is printed on Forest Stewardship Council (FSC) paper.

Disclaimer: Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of June 2014. Nevertheless, Transparency International UK cannot accept responsibility for the consequences of its use for other purposes or in other contexts. Policy recommendations and best practice guidance reflect Transparency International UK's opinion. They should not be taken to represent the views of members of the Expert Advisory Committee, those interviewed, or of the European Commission, the European Professional Football Leagues, or Edwards Wildman LLP. Transparency International UK assumes no liability to any third party for the information contained herein, its interpretation or for any reliance of any third party. The document should not be construed as a recommendation, endorsement, opinion or approval of any kind. This Guidance has been produced for information only and should not be relied on for legal purposes. Legal advice should always be sought before taking action based on the information provided.

The project is funded by the EU. The contents of this publication are the sole responsibility of TI-UK and the European Commission is not responsible for any use that may be made of the information contained therein.

CONTENTS

1. Introduction	3
2. What is Match-fixing?	4
3. Impact on the Game and the Player	5
4. How Players are Recruited	6
Step 1: Find a target	6
Step 2: Seduction	6
Step 3: Entrapment	7
5. Scenarios	8
The Direct Approach	10
Scenario 1: A Business Opportunity	10
The Indirect Approach	12
Scenario 2: Trust the Captain	12
Scenario 3: A Difficult Time	14
Scenario 4: An Inappropriate Gift	16
The Opportunists	18
Scenario 5: A Friend in Need	18
Scenario 6: Careless Talk	20
Trapped	22
Scenario 7: A Quick Fix	22
Scenario 8: Paying Off the Debts	24
Scenario 9: New Opportunities	26
Appendix	28



1. INTRODUCTION

Match-fixing linked to corrupt sports gambling has been on the increase in recent years. To address the risks football authorities have introduced a number of counter-measures. For example, the FA, like the SFA, has banned anyone involved in football from any football-related betting anywhere in the world. FIFA has a new code of conduct that covers match-fixing. UEFA has issued an 11-point resolution outlining how its 54 federation members should tackle match-fixing. FIFA, UEFA and several European football leagues and national associations use technology to track betting patterns to identify fixed matches. However, more needs to be done to educate those directly targeted by match-fixers on the risks they face, how they might be approached and the action they should take to protect themselves and the integrity of their club and their sport.

This guide is targeted at football club officials and those who work with football players at all levels in the United Kingdom.

PURPOSE

The primary purpose of this guide is to help club officials prevent match-fixing in their clubs by:

- › helping raise players' understanding and awareness of different types of match-fixing recruitment approaches and helping clubs build strong anti-match-fixing defences.
- › enabling internal club training and discussion through the guide's fictional illustrative scenarios. Each scenario is accompanied by practical club advice to players and prevention advice for clubs.
- › suggesting procedures clubs can put into place to combat match-fixing and other corrupt practices.

2. WHAT IS MATCH-FIXING?

Any player or official who agrees to accept a bribe or other inducement to change the normal course of a football match is guilty of match-fixing. This is usually done on behalf of criminals who seek to fix games in order to make money by betting – for example, on the number of goals scored or the result of a game. In a fixed game, a corrupted match official might favour one side over the other. A corrupted goalkeeper might concede a penalty or fail to make saves. Corrupted outfield players might misplace passes, fail to defend, miss chances and so on. There are also some cases of players being bribed for spot-fixes – deliberately picking up a red card, for instance. The guide deals only with “fixing to lose” situations and the passing on of sensitive information by players. It does not address the potential role of referees or others in match-fixing, nor of clubs “fixing to win” – to avoid relegation, for instance.

3. IMPACT ON THE GAME AND THE PLAYER

Match-fixing leaves sport – and players – damaged. Sports fans and sponsors can lose interest in any sport that becomes tarnished by corruption. The effect on the individual players involved is serious: lives and careers are wrecked; once-great reputations are shattered and broken.

The threat to the integrity of football is part of a global malaise and not new. Various kinds of cheating and fixing have been around ever since the sport was invented. But the scale of the current threat makes it different. Globalisation and new technology – especially the internet – have combined to create new criminal-controlled betting markets.

It is now possible for people to bet large sums on almost any aspect of any sporting event on the planet – in real time. Even reserve matches and games between minor teams have been targeted all over the world. A youth tournament played in a park in Copenhagen was targeted. English players were banned for life for helping to fix games in the second-tier Victorian Premier League in Australia. Recent match-fixing scandals have occurred in places as diverse as Singapore, Malaysia, Germany, Italy, Turkey, Switzerland, Belgium, Austria, Bosnia, Norway and Canada.¹

The first UK convictions for match-fixing since the 1960s occurred in June 2014. Two businessmen from Singapore and a former professional footballer were found guilty of bribery after detectives foiled their scheme to set up a UK network of corrupt footballers.²

Career criminals see match-fixing as a relatively risk-free and lucrative way of making and laundering money.³ They can also make money from – and will pay for – anything that gives them an “edge” over other gamblers and bookmakers. This can be anything from obtaining inside information about an injury to a star player, to bribing a player to get themselves sent off – anything that skews the odds in their favour.

But it is not only professional criminals who look to exploit relationships with players to make money. Friends of players, opportunists and even family members can be tempted to do this too. The profits in such cases may be relatively small, but they can be enough to tempt those on modest incomes.

1. "Raids Expose Soccer Fixing Across Europe", *New York Times*, 20 November 2009.

2. "Two Guilty in Match-fixing Trial", *The Telegraph*, 17 June 2014.

3. "Illegal betting markets launder £83bn a year, reveals report", *The Guardian*, 15 May 2014

4. HOW PLAYERS ARE RECRUITED

STEP 1: FIND A TARGET

Most recruitment follows a surprisingly simple basic pattern. Fixers – often working globally – employ people who recruit others (often local criminals) to work as their agents. They in turn recruit players to manage the fraud on the field. Ideally from the fixer’s point of view this will be a senior player with credibility and influence. He is paid by the fixer’s agent and given money to use to persuade other players to join the fix.⁴ At every stage, people have to be “persuaded” to join the illegal enterprise.

What often happens is that the recruiters identify players with weaknesses they can exploit – then go to work to groom them. Players with money troubles are the most obvious targets. Those who are owed monies by their clubs or those with gambling-related money troubles are particularly easy prey. Poorly-paid lower league players are also vulnerable – as are players near the end of modest careers who are looking to cash in before they retire.

Some alleged fixers have boasted that recruitment is easy. In November 2013, an alleged fixer in Manchester told a Telegraph reporter: “Basically, what the players want, you know, they want the money ... players usually earn like £5,000 a month so for 90 minutes I pay them £7,000 for two hours.”⁵

STEP 2: SEDUCTION

Contrary to myth, fixers and their agents rarely corrupt players by threats or coercion. Only foolish or desperate fixers (or those operating in leagues and countries where corruption is normal) ever come right out with a direct approach. Instead, they prefer the softer, surer method of “fake friendship” – building relationships with their targets, doing them favours, pretending to be their friend – often over surprisingly long periods.

Fixers and their agents are skilful manipulators. A football referee in Germany was corrupted by criminals who befriended him in a café they owned. “It was an ongoing process that I wasn’t aware of any more in the end,” he said later. “It affected me in a way that I stopped noticing things going on around me. I only hung out at this café ... it was like my second living room.... I was treated by them like a very special person.”⁶

4. Marco Mensurati, interview by David Winner, *La Repubblica*, Feb 2014

5. <http://www.telegraph.co.uk/sport/football/10480451/Football-match-fixing-read-the-full-transcripts-of-The-Telegraph-investigation.html> [accessed 6 July 2014]

6. Referee Robert Hoyzer, interviewed on *Johannes B. Kerner TV programme*, Feb 2005, quoted in Declan Hill, *The Insider’s Guide to Match-Fixing in Football* (Toronto: Anne McDermid & Associates, 2013)

STEP 3: ENTRAPMENT

As Michael Franzese, former corruptor of athletes for the Mafia, put it: “Once you have done it once, the bookies have you... you were in their arms for life.” The trap has now been sprung. Under threat of blackmail, violence or both, the player is no longer in a position to refuse the fixer’s requests.⁷

In one case, a fixer acquired the services of nine players from a tiny Finnish club. Seven were from Zambia and had been recruited by one of the club’s former strikers who had been corrupted earlier. He set up football “academies” in Zambia to recruit young players and took them to Finland. Under his influence and thousands of miles from home, it was easy to persuade them to fix games for money.⁸

7. Declan Hill, 2013

8. Interview with Perumal by Alessandro Righi and Emanuele Piano, http://www.invisible-dog.com/match_fixing_eng.html

5. SCENARIOS

This section details nine scenarios illustrating some of the different ways players and others can be approached, compromised or trapped into match-fixing.

The scenarios (listed here and discussed fully on the following pages) focus on identifying the danger signs that someone is a potential or actual target for match-fixing. There's also scenario-specific advice for club officials and for clubs to give their players in recognising at-risk situations and how to avoid and respond to threats to recruit for match-fixing.

THE DIRECT APPROACH

Criminals can try to seduce players directly through various means....

1. A Business Opportunity

THE INDIRECT APPROACH

Criminals can also get those close to the player to set up a fix, for example through fellow players or others....

2. Trust the Captain
3. A Difficult Time
4. An Inappropriate Gift

THE OPPORTUNISTS

Sometimes those profiting did not set out to take advantage but merely overhear privileged information or seek information in a chance encounter....

5. A Friend in Need
6. Careless Talk

-
- » As a club official, can you spot the dangers?
 - » What should you do if you suspect a player is falling into trouble?
 - » Has your club given guidance to its players on how to spot dangers and what they should do if they have concerns or run into trouble?
 - » Are they familiar with the relevant rules and/or regulations?

TRAPPED

Once fixers have a hold on the player they will turn the screws.....

7. A Quick Fix
8. Paying off the Debts

THE INTERNATIONAL DIMENSION

Football is a truly international game with players from all over the world competing at all levels, including those from competitions where match-fixing is prevalent...

9. New Opportunities

THE DIRECT APPROACH

SCENARIO 1: A BUSINESS OPPORTUNITY

Player offered temptation to become a match-fixer

Rob, a former top flight player in his mid-30s, is now playing in a lower division team but is struggling with a persistent ankle injury that might end his career. This is not a good prospect as he has a young family and financial commitments. He gets an unexpected phone call from a man who says he represents a group of rich investors wanting to propose a “business opportunity”. The caller says he is organising a summer tournament in the USA and needs a “big name” to help him. Rob is intrigued and a little flattered so he accepts the man’s invitation to dinner at a smart hotel.

The investors look good and their tour sounds legitimate. They ask Rob which famous players and ex-players might be persuaded to get involved? Then one of the investors mentions some current scandals on fixing results and asks Rob if he has ever come across players knowing the result of a game before it kicks off. The investors’ talk turns to how they would be very interested in knowing in advance the results of games. They know this might be difficult for Rob to consider but they would make it very worthwhile for him if he could persuade a few footballers and referees to join in a scheme to fix results.



Comments

No playing career lasts forever. Players like Rob could be exploring new paths and legitimate business investments and opportunities. He is looking for financial security, ideally within the game, and he thinks they have chosen him because he is a big name. However, the investors see him as just a tool to persuade others to join the match-fixing ring. Rob MUST report such an approach to the relevant football association immediately.

Advice for Club Officials

- › Players should not be left adrift without prospects where they could become vulnerable to offers from match-fixers. That support should not be left too late in their career, as a career-ending injury or loss of form can happen at any time. The Professional Footballers' Association (PFA) offers advice and education to help players at all stages of their careers take control of their futures.
- › Encourage players to develop business and professional skills and, where possible, help them build links with businesses and advice bodies to help with post-football employment.
- › Train players on the relevant club's policies and football association rules – including where to seek advice and how to report any incident. Ensure that any breach of the rules by a player is reported to the relevant football association.
- › Appoint a trusted person in the club – a player welfare officer, for instance – to be the key contact for players with concerns, however slight.
- › Encourage players to speak to their relevant Players Association for advice and support.

Suggested Club Advice to Players

- › Understand the importance of looking ahead and preparing for and developing a career after your playing days are over.
- › When you get an invitation to discuss a business opportunity, before attending always ask for confirmation in writing of the meeting and its purpose (perhaps in an email). Do not attend the meeting unless that confirmation is given. People wanting to involve you in an illegal activity are unlikely to want to commit anything in writing that could be used in an investigation.
- › Take care that proposals put to you are genuine opportunities and not designed to entice you into illegal activity. Make sure you report any approach to fix to the relevant football association immediately.
- › Speak to an advisor, such as a lawyer, before agreeing to participate in any new venture. They will be able to ensure the contract is fit for purpose and that the new business partners are who they say they are.

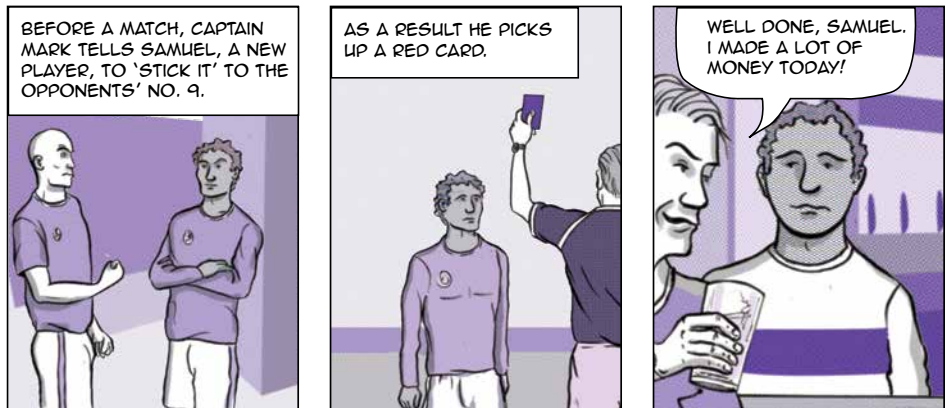
THE INDIRECT APPROACH

SCENARIO 2: TRUST THE CAPTAIN

But what if his intentions are not honest?

Samuel is 19 and has joined a second-tier football club. Since English is not his first language and he's trying to settle in a new country, club captain Mark has taken him under his wing. Before an important match Mark takes Samuel aside and tells him he has to really get "stuck in" early and target the opponents' playmaker.

As a result Samuel commits a number of early fouls and picks up a second yellow card just before half time. That evening, they pop into a local bar. Harry, a friend of Mark's, says to them: "Thanks guys. Well done, especially you Samuel. That sending off made me a lot of money today. This is the start of something."



Comments

Mark has been Samuel's main source of support since joining the club. But this is false friendship and the lack of other pastoral and language support has left Samuel over-reliant on one individual. It seems Mark's request to get stuck in has skewed the odds and at least one person, Harry, has made money out of Samuel's sending off. Samuel was too trusting and he has only realised what he has done after meeting Harry.

Spot-fixing – such as deliberately conceding free-kicks, throw-ins or corners, or picking up a yellow or red card – can appear minor, but is still considered match-fixing, is against football rules and possibly a crime. Spot-fixing can also be a so-called gateway offence, leading to much bigger fixes.

Senior players who abuse their status and the trust placed in them can seriously undermine their club. Armed with greater awareness, Samuel may have spotted the problems posed by Mark earlier. Under football rules, Samuel **MUST** report this incident to the relevant football association.

Advice for Club Officials

- › Regularly train players on the relevant club's policies and football association rules – including where to seek advice including from their players association and how to report any breaches of the rules.
- › Encourage a “speak-up” culture in the club so matters can be addressed straight away and incidents like this are properly reported.
- › Keep watch for any unusual on-pitch behaviour. You should talk through any concerns with players at the earliest opportunity.
- › Ensure staff are fully aware of their responsibilities when players confide in them. This includes reporting any such incidents to the relevant football association .

Suggested Club Advice to Players

- › Speak up if you are unsure of what is being asked of you, or if you feel pushed into something you feel uncomfortable about.
- › If players need confidential advice, they should be encouraged to contact their relevant players association.
- › Make sure you report any approach, or resulting spot-fix – deliberately picking up yellow cards, conceding throw-ins and so on – to the relevant football association immediately.
- › Report inappropriate requests and any suspicion that someone may have profited from their on-pitch activities.

SCENARIO 3: A DIFFICULT TIME

All clubs go through a difficult patch

Old Town FC was relegated two years ago and has missed out on being promoted for the second year running. The players, who stayed on since relegation, feel their careers have stalled. Players' anger towards management over unpaid bonuses and broken promises is palpable. Whilst discussing tactics with the goalkeeper and defenders before the last game of the season, Simon, one of the more experienced players, makes what sounds like a bad joke. "The way things are going around here we'd be better off taking money to lose than playing our hearts out for this lot..." He adds: "well, we'll probably lose anyway".



Comments

Poor results and financial difficulties have a negative effect on players' morale and fixers may look to exploit this. In addition, poorly-paid players in the lower leagues may be more susceptible than well-paid players at the top clubs. Simon's joke about fixing the game may be a deniable way of testing the mood in the dressing room.

Making such jokes is a tactic favoured by corruptors across a number of sports. Simon wants to know if anyone else in the team could be susceptible to a bribe. Of course, if no one takes up the bait, Simon will laugh it all off. It was only a joke after all...

If players suspect Simon's comments are a serious attempt to fix, they MUST report them to the relevant football association.

Advice for Club Officials

- › Regularly train players on the relevant club's policies and football association rules – including where to seek advice including from their players association and how to report any breaches of the rules.
- › Make sure off-pitch issues do not become the players' concern. Pay players promptly to keep their focus on football.
- › Beware so-called dead rubbers – where nothing rests on the results for one or both sides.
- › Find ways to maintain player morale. Ensure there is good communication between the players and the coach so that disaffection has less chance to grow and can be picked up in good time and addressed accordingly.

Suggested Club Advice to Players

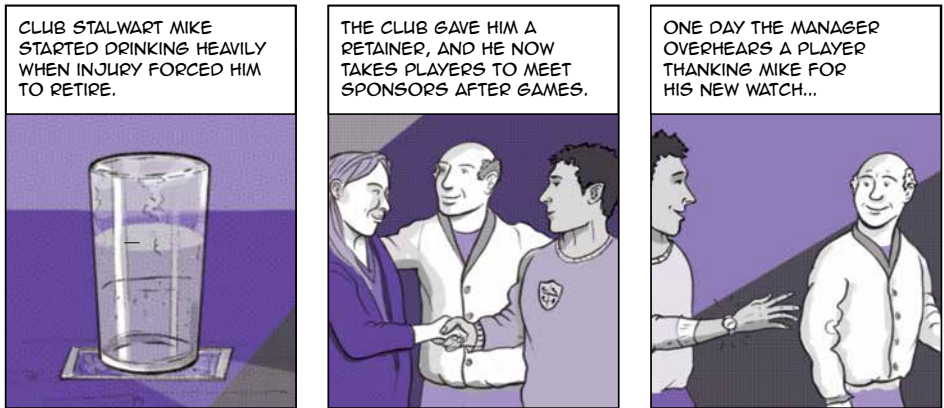
- › Understand Simon's comments for what they are: either a very poor joke or an attempt to get them in on a fix. Speak up and reject any similar approach, making it clear that such jokes are bad taste.
- › No matter how bad the results might be, fixing a game is a sure way of ending your career prematurely. Make sure you report any suggestions by players to fix results to the relevant football association immediately.

SCENARIO 4: AN INAPPROPRIATE GIFT

Was it a reward to a player for giving information?

Mike, a former lower division club stalwart started drinking heavily when injury forced him to retire in his early 30s and he hit financial trouble. To help him out and keep him involved in football and the club where he had spent his entire career, he was given a weekly retainer to act as a host at corporate entertaining events at the club stadium. He now greets club corporate guests and introduces players to guests after the match. He proudly calls himself a club ambassador and is a popular figure amongst fans and local businesses.

One day, the club manager sees one of his players talking to Mike after training; he is thanking Mike for his new watch, which is clearly a desirable and expensive item.



Comments

Why is Mike giving a player a gift? With his financial problems, the obvious question is how can he afford to hand out such lavish gifts? In any event there would seem no reason for Mike to make a gift.

There may be an innocent explanation but it seems out of the ordinary. If someone else is paying for the gift, their motivation may not be honourable and Mike would be abusing the access he has to players. This access would allow him to get inside information that could be of use in betting or fixing. By receiving an expensive gift, the player could now be in Mike's or a fixer's debt. The club should investigate the motivation behind the gift further. If the evidence suggests the gift is for an attempt to fix or for insider information, the club MUST report the incident to the relevant football association.

Advice for Club Officials

- › Provide policies and guidance for all those involved with the club on how to behave. They should be set out in a code of conduct and supported by guidance and training.
- › The code of conduct should state rules for receiving and giving gifts and hospitality – including limits on value – which strike a balance between innocent gifts with no ulterior motive and those which carry a future obligation as the price tag.
- › Ensure everyone at the club understands that a gift could be a form of non-cash payment for inside information or a fix. Unexplained gifts falling outside the club rules on gifts may be suspect and should be reported. Club training should include where to seek advice and how to report breaches of the rules.
- › Contracts for those working with players (such as a former player acting as a host) should set out precisely the scope of their activities and how they should manage their relationships externally and internally.

Suggested Club Advice to Players

- › Be careful about accepting gifts and favours – especially from “new friends”. They could claim they have gained in some way from inside information you provided in exchange for the gift/ benefit. Follow the guidance in the club’s code of conduct.
- › Be wary too of gifts apparently made for goodwill. They could place you under an obligation – which might lead to a future request to provide inside information or become involved in fixing.
- › Any gift that you suspect is payment for a fix or inside information, **MUST** be reported to the relevant football association immediately.

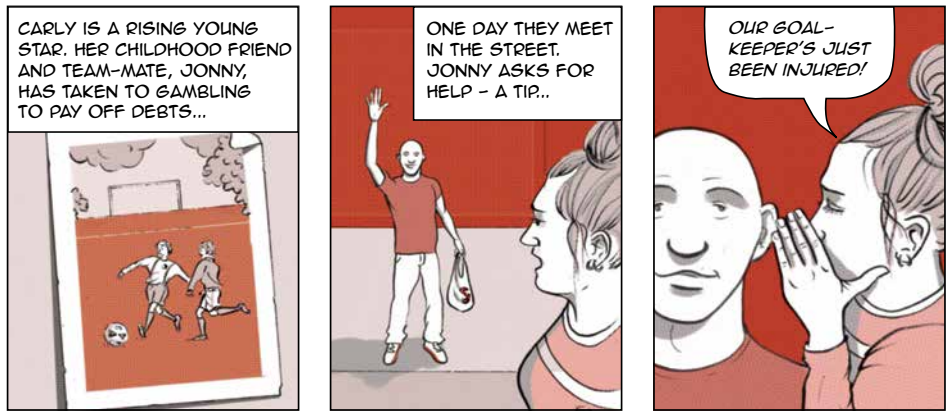
THE OPPORTUNISTS

SCENARIO 5: A FRIEND IN NEED

Past friendship used to extract inside information for betting

Carly is a rising young football star. Jonny was her best friend at school. They were often in trouble and Jonny once even took the blame for Carly's shoplifting. Jonny's early football promise was cut short by a knee injury. He has no job, still lives at his mum's, and his girlfriend is pregnant. Desperate, Jonny has taken to gambling to try to pay off some debts. The friends have drifted apart but one afternoon they meet, by accident, in the street. As they chat, it becomes painfully clear to Carly that Jonny is having a hard time. Jonny confides that he's just lost heavily on a bet and pleads with Carly to give him an inside tip so he can recoup his losses.

Carly takes pity on his old pal and tells him something that no one else knows: the team's goalkeeper has just been injured and a young goalkeeper will be making his first team debut.



Comments

Inside information relating to football is information that is not publicly available and which someone has obtained due to their position in football. The relevant football association's rules and regulations are clear. By passing information to help Jonny make a bet, Carly is in breach of those rules and regulations.

Carly should have resisted Jonny's request for a betting tip and reported it to the relevant football association. But Carly's guard was lowered as she trusted Jonny, and it may have been no accident that they met. Jonny could have engineered the "chance" encounter.

Anyone, strangers, friends and family can present similar risks, especially those with financial problems. Carly may have believed that giving information to help Jonny's betting would be a minor bending of the rules. But it is an offence and could be followed by further demands. Given Jonny's difficulties, further requests for information are likely and other people may also become involved. The occasional "mere" passing on of information may later on turn into demands for more serious offences such as match-fixing. Carly would then be threatened that unless she complies, her breach of the relevant rules will be revealed, perhaps leading to disciplinary action.

Advice for Club Officials

- › Advise players that improper activity can result from requests from anybody – even from within a player's trusted social and family circle. Approaches can seem innocuous, and friends and relatives may not know the relevant football association rules and regulations.
- › Make sure your players fully understand that they don't need to gain personally from passing inside information. If someone else gains, it is still an offence. Any gain or benefit could take a less obvious form than money – tickets for a concert, for instance.
- › Train players on the club's policy and football association rules, the risks of breaching them, and how to recognise and deal with risky approaches. Ensure they know where to seek advice including from their players association and that any breach of the rules must be reported to the relevant football association.
- › Appoint a trusted person in the club who players can turn to for advice and help.

Suggested Club Advice to Players

- › Make sure you report any approach for information for or in relation to betting to the relevant football association. Disclosing inside information about the club that could be used to place a bet is prohibited by the football associations.
- › If you've given inside information in error, always seek advice on what to do from the club.
- › You have a responsibility to protect yourself and be on your guard against any approaches – whatever their shape or form. You can lose your integrity and football career in the blink of an eye.

SCENARIO 6: CARELESS TALK

Never be off guard – as a player you are of interest

Pavel plays in a lower league. He's often in the local nightclub and has become friendly with another regular, Phil, who is impressed that Pavel is a pro footballer. He likes hearing about what Pavel does and how the team is doing. One evening, Pavel mentions to Phil that two key players are down with flu so there is a good chance the team will lose on Saturday.

A few days later Phil tells Pavel: "Sorry about the result. I hope you don't mind but once you told me about the lads with flu, I bet against your side as it seemed like a sure thing and I made quite a bit. What's happening this week? If I am lucky again I'll share the winnings with you."



Comments

Activities off the pitch can bring players into contact with many different types of people. Pavel let his guard down with someone he thought he could trust and was careless. In a place where he felt safe and relaxed, and perhaps after a few drinks, he let slip inside information that Phil used to make money. Perhaps Pavel was trying to impress Phil? Or was it just a chance remark – an unlucky one-off? Or had Phil deliberately made friends with Pavel to lure him into giving information?

Career gamblers search for the smallest advantage to tilt the odds in their favour. They are looking for any piece of knowledge that improves their chances of success. Even if the information changes the probability from 50-50 to 55-45 in their favour, they'll jump on it. Pavel MUST report this incident and Phil's follow-up request for more information to the relevant football association.

Advice for Club Officials

- › Make sure that all players at the club understand that those seeking to influence or benefit from gambling on football can feed off scraps of information. Run through some scenarios with players showing how inside information might be given out in error or how people might try to extract inside knowledge.
- › The club should have a policy on information release including on social media. Ensure players understand what is inside information and what is not, and what information can be released to whom and when. Instruct all players that they can only discuss team or match information within the team and its management. Impress on all players that if pressurised to reveal inside information, they must stand firm and decline.
- › Impress on players that passing on inside information in relation to betting is against the relevant football association rule. Make sure they know the club's code of conduct and rules, the relevant football association rules and regulations on betting and inside information, and the potential sanctions for passing or letting slip inside information. Ensure they know that any breach of the rules must be reported to the relevant football association.
- › Adapt supplier/contractor contracts to specify clearly the rules on confidentiality of information and the sanctions to be applied if those rules are breached. Consider including due diligence in the club's recruitment process when recruiting employees and contractors who will have regular contact with players.

Suggested Club Advice to Players

- › Be aware at all times of the dangers of being targeted or approached, even by someone you think you can trust.
- › Be careful who you talk to outside the club about upcoming games, team plans or other information such as transfers or injuries, if this information has not yet been released by the club. If in any doubt about whether you can say anything about the club or other players, divulge nothing.
- › Report any situation where you've been approached or could have given out inside information by mistake. This is for your own protection. It is always best to report a concern or worry immediately and ask for help than try to sort out problems yourself.

TRAPPED

SCENARIO 7: A QUICK FIX

But long-term bad outcomes

Tony is a top-flight club defender. After an injury-prone 18 months, he has struggled to re-establish himself in the first team. For the last few months, he has been taking some illegal steroids to help build his strength without his club's knowledge.

Tony meets his supplier to collect another batch of steroids and, just as he is about to hand over the cash, his supplier tells him not to worry about it, these are on the house. However, there is a condition: he has to give away a penalty in the next match.



Comments

Tony is trying to get back his previous form, but at what cost? Doping is a serious offence in itself and, if caught, he risks a lengthy ban and, depending on the substance, a potential criminal record. But who has been supplying the steroids? Criminals always look for weaknesses to get leverage and the supply of drugs, performance enhancing or recreational, is only one avenue open to them.

Tony now finds himself dependent on people who are leaning on him to fix. Tony MUST report this approach to the relevant football association, even though it means he will have to explain how he made himself vulnerable to blackmail and take the consequences. He should also report the incident to the police and his club.

Advice for Club Officials

- › Understand that players may feel they are putting their careers in jeopardy if they reveal physical weakness. But hiding the problem and going outside the law means they are risking much more – their career and their health.
- › Work on creating a culture of integrity, trust and support in the club. Monitor players for issues or abnormal patterns of behaviour. Encourage players to be open and honest about their medical condition or other issues. With the right support, players' needs can be addressed.
- › Ensure that medical staff are equipped to provide the right support for those recovering from injury so they are not tempted to self-medicate. Ensure medical staff are familiar with the WADA Prohibited List and the signs of doping abuse and its side-effects. More information and training is available from the relevant football association and UK Anti-Doping.
- › Regularly train players on the relevant club's policies and football association rules – including where to seek advice including from their players association and how to report any breaches of the rules. Impress upon players the consequences of taking illegal or classified drugs – for their own careers and for the club.

Suggested Club Advice to Players

- › Understand that needing support is not a weakness. Everyone needs support, but it must come from legitimate sources.
- › Don't look for support outside the system. Going outside the system – whether it's getting illegal steroids or borrowing money from a dubious source – opens you to blackmail and threats. (In this scenario the supplier can damage Tony more than Tony can damage the supplier).
- › Seek support from your club, and for substance misuse guidance from your players association or from confidential hotlines open to the public.
- › Report any approach to fix a match to the relevant football association.

SCENARIO 8: PAYING OFF THE DEBTS

A one-off fix is the bait for greater crime

Xavier is a respected defender for a lower league club which is at the top of the table. He's also a gambling addict with big debts and the lenders are becoming aggressive. What's more, he's in a bitter custody battle over his two children who are everything to him. With the knowledge of the club, Xavier has been having counselling for his gambling addiction and hasn't placed a bet for two months. However, his legal fees for the custody case are hefty.

One of his creditors, Mr Wilson, rings Xavier, tells him that he has defaulted on a monthly payment and asks to meet him to discuss the problem in a nearby cafe. They meet and Wilson apologises and explains that in fact Xavier has not defaulted – this was an administrative error. They discuss football and the team's next game. Xavier talks about his children.

Wilson tells Xavier that he might see a way of financing Xavier's expensive court case as a one-off event, so that Xavier's kids "will grow up really knowing their dad". Wilson says that he will pay Xavier £20,000 if he is sent off in the second half of next Saturday's game.



Comments

Xavier sees Wilson as someone who can help him. Wilson sees Xavier as a way of making money. Xavier is vulnerable – he has his debts and the mounting costs of the court case. Add in his unstable home environment – and possibly a lack of a support network outside football – and Xavier's vulnerability is even greater. The proposal for skewing the odds in favour of Wilson is unlikely to be a one-off event but the first step in ensnaring Xavier into regular and large fixes. It's also a breach of football association rules and regulations.

Xavier may think that he can cross the line on one instance for the sake of his family. In fact, if his involvement is discovered, he may face the loss of his football career and possibly a prison sentence, which would affect his battle for custody of his children. Xavier **MUST** resist this approach and report it to the relevant football association. He should also seek advice and support from his players association and club.

Advice for Club Officials

- › Encourage a club culture of integrity and openness in which players feel comfortable to raise issues affecting them on and off the pitch. An open and supportive club is in the interests of the club itself. Happy players tend to be good players. Good behaviour means the club's reputation is not damaged and avoids the risk of any sanctions coming from player misbehaviour.
- › Develop confidential ways for players to discuss concerns and get advice. It's vital that when players reveal concerns or seek help that the club responds well. It is a huge step for a player to open up – perhaps the one opportunity the club has to make a positive intervention.
- › Train players on the club's policy and football association rules, the risks of breaching them, and how to recognise and deal with risky approaches. Ensure they know where to seek advice including from their players association and that any breach of the rules must be reported to the relevant football association.
- › Watch out for unusual behaviour which could be a player's "cry for help". You don't have to be an expert on addiction or financial problems. But you should be able to spot a player in need and know how to listen and guide the player to appropriate support. This can be through the PFA, experts at the club or outside.

Suggested Club Advice to Players

- › Tell your agent, club and/or your players association if you are experiencing difficulties in your personal life. Help will be available and no player should be left to deal with issues alone. You will be able to discuss your problems, get counselling and, if you want, professional advice.
- › Report any approach to fix a match to the relevant football association.

THE INTERNATIONAL DIMENSION

SCENARIO 9: NEW OPPORTUNITIES

Or will trouble follow them?

Two talented players arrive for a month-long trial at a lower league club from outside the UK. They look terrific and the manager and coaching staff think that they would be great additions to the first-team squad. One of the players is a goalkeeper. Both have recently left an overseas club seeking to rebuild after a match-fixing scandal that unearthed long-running corruption amongst senior players. Neither man was directly implicated, and both have said that they want to make a new start in a league and club untainted by scandal. The players have the same agent and their wage demands are more than reasonable. Neither speaks much English and have never played football in the UK before.



Comments

If either of the players has been corrupted before, there's the potential to contaminate the UK club and the existing playing squad. If there are fixers behind one or both of them (or behind the agent) it is likely that they will follow them to their new club. Although neither player has been implicated, they nevertheless come from a tainted club. It may be that a corrupt environment is all either or both of them have ever known. Or they may be football "journeymen" who stay in a club for only a season or two and then move on, often to a club in another country. This makes it difficult to access information, and makes building a comprehensive picture of their careers even more difficult. In addition, one of the players is a goalkeeper – with a potentially decisive role on the field – always a prime target for fixers.

Advice for Club Officials

- › Carry out due diligence and do as much research as possible on new players from outside the UK. If internal resources are limited, consider using a specialist to compile a background report.
- › Consider appointing an official intermediary or interpreter where necessary. This will help prevent anyone in the new player's entourage or their agent becoming too dominant a figure in their life (and help to exclude these individuals from knowledge of tactics, team problems and so on).
- › Make sure new players are instructed on the relevant football association rules, codes and regulations, reporting procedures and information on contractual agreements. Ensure they understand their responsibility to report any breaches of those rules and regulations to the relevant football association.
- › Encourage the players to talk openly about their motivations for coming to the club and their negative view of the corrupt practices at their former club.
- › Provide relevant support and pastoral care to help them settle into their new surroundings. For example, help find suitable accommodation (even if only short-term), provide English lessons and help them familiarise themselves with aspects of local culture and norms.

Suggested Club Advice to Players

- › Protect yourself against becoming a target for match-fixing in a new country by properly understanding the relevant football association's rules and regulations.
- › Ensure you understand each section of your contract fully (and, where necessary, the contract is properly translated).
- › Be aware of your responsibility to report any approach to fix a match to the relevant football association.

APPENDIX

GOOD PRACTICE PRINCIPLES

These principles are recommended as a starting point for preventing match-fixing in Football Clubs and are based on good practice guidance relevant to any organisation.

1. THE CLUB COMMITS TO PROHIBITION OF BRIBERY AND CORRUPTION IN ANY FORM INCLUDING MATCH-FIXING

A public commitment to integrity sets the environment for countering match-fixing. A code of conduct as well as the policy on prohibition of bribery and corruption should refer to prohibition of match-fixing and a policy for management of conflicts of interest.

2. TOP-LEVEL COMMITMENT

The Board and management should commit to and oversee the implementation of procedures to prevent match-fixing. This includes showing high level commitment and support to the implementation of the procedures with statements on the club's website, in brochures, publications and match-day programmes and speaking to employees and players on the importance of the anti-match-fixing policy.

3. RISK ASSESSMENT UNDERPINS THE PROCEDURES FOR PREVENTING MATCH-FIXING

Regular risk assessment forms the basis for the design of the procedures for preventing match-fixing.

4 PROCEDURES ARE IMPLEMENTED EFFECTIVELY TO PREVENT MATCH-FIXING

The club should implement effective procedures that are reasonable and proportionate to the club's assessed risks and its structure and circumstances.

4.1. Communication and training to build awareness

The club builds awareness and understanding of the risks and its procedures for preventing match-fixing through its internal and external communications. Tailored training is given to the Board, employees, players, volunteers and contractors. The club reports publicly how the procedures have been implemented.

4.2 Human resources and player management practices to support match-fixing prevention procedures

The procedures for recruitment, employment and management of personnel, volunteers and players are aligned with the procedures for preventing match-fixing. This includes due diligence in recruiting, contractual requirements and procedures for application of sanctions.

4.3 Communication channels for help and advice or raising concerns

The club provides confidential and trusted ways in which players and others can get advice on the application of the procedures for preventing match-fixing. If someone knows of or suspects a match has been, or is being, fixed they are required to report this to their relevant football association.

4.4 Management and coaching staff alert to the risks of match-fixing

Club officials and coaching staff are vigilant in looking out for red flags and indications of match-fixing or vulnerabilities that could pave the way to match-fixing.

4.5 Contingency planning for an incident, however unlikely

A plan is in place to handle a match-fixing incident including assignment of responsibilities, reporting to the authorities, internal and external communications, and implementation of the sanctions procedure including suspension of an employee or player.

4.6 Monitoring and evaluation of the procedures

Management monitors the implementation and effectiveness of the procedures to counter match-fixing and submits reports on the results of monitoring to the Board for review.



Transparency International UK

32-36 Loman Street

London SE1 0EH

Tel: 020 7922 7906

Fax: 020 7922 7907

info@transparency.org.uk

www.transparency.org.uk