



Match-fixing in Football

Training Needs Assessment

2013



Date of publication: 14 August 2013

Original: English

Available in: Arabic, English, French, Spanish, German

Reference: Match-fixing in Football TNA 2013

Contents

1	FOREWORD	4
2	EXECUTIVE SUMMARY	6
3	RECOMMENDATIONS FOR INTERPOL	7
4	INTRODUCTION	8
5	METHODOLOGY	8
5.1	Approach	8
5.2	Limitations	9
6	TRAINING STRATEGY	9
6.1	Partnerships	9
6.2	Information	10
6.3	Coordination	10
6.4	Prevention	10
6.5	Proactivity.....	10
7	ENVIRONMENTAL SCAN	10
7.1	Context	10
7.2	Scale of Match-fixing.....	11
7.3	Case Studies	12
7.3.1	Case Study #1: Bochum	12
7.3.2	Case Study #2: Wilson Raj Perumal.....	13
7.3.3	Case Study #3: Turkey	14
7.3.4	Case Study #4: Republic of Korea.....	15
7.3.5	Case Study #5: Operation SOGA	15
7.3.6	Evaluation.....	15
7.4	The Actors	16
7.4.1	Players.....	17
7.4.2	Match Officials.....	17
7.4.3	Criminals.....	18
7.4.4	Senior or Retired Players	18
7.4.5	Coaches and Managers.....	18
7.4.6	Club Executives	18
7.4.7	Member Association Officials.....	18
7.4.8	Players Agents	18
7.4.9	Match Agents / Event Organizers	19
7.4.10	The Bookmakers	19
7.4.11	Evaluation.....	19
7.5	Modus Operandi	19

7.5.1	Evaluation.....	21
8	TRAINING NEEDS ASSESSMENT	22
8.1	Training Delivered	22
8.1.1	National and Regional Workshops.....	22
8.1.2	International Conferences	23
8.1.3	FIFA events	24
8.1.4	Specialized Training Seminars.....	24
8.1.5	E-learning.....	25
8.1.6	Evaluation.....	25
8.2	Other Integrity in Sport Training providers	26
8.2.1	FIFPro: Don't fix it! An education & prevention programme.....	26
8.2.2	European Elite Athletes Association: Educating European elite athletes	26
8.2.3	International Rugby Board: Keep rugby onside	26
8.2.4	Transparency International: Staying on side - How to stop match-fixing.....	27
8.2.5	Institut de Relations Internationales et Stratégiques (IRIS): What national networks in the EU to fight match-fixing?.....	27
8.2.6	SportAccord: Global Programme to Stop Match-Fixing in Sport.....	27
8.2.7	Evaluation.....	27
8.3	Training Needs Assessment Survey	27
8.3.1	Training Delivery by Topic	27
8.3.2	Training Delivery Methods	28
8.3.3	Content of Suggested Training.....	29
8.3.4	Evaluation.....	29
9	CONCLUSIONS AND RECOMMENDATIONS	30
9.1	Conclusions	30
9.2	Recommendations for INTERPOL.....	30
10	APPENDIX A – RECOMMENDATIONS FROM TNA 2011.....	32
11	APPENDIX B – TRAINING NEEDS ASSESSMENT SURVEY	33

1 FOREWORD

Let's start with numbers.

At the last World Cup competition in South Africa in 2010, about 2.2 billion people – almost a third of the population of the world at the time – tuned in to watch part of the games on television.¹

A “big count” survey done by FIFA back in 2006 found that there were approximately 265 million football players and approximately 5 million referees worldwide at all levels of the sport, yielding a total of about 270 million people who are active on the football field.² While the numbers from FIFA's subsequent “big count” in 2011 are not yet available, it seems reasonable to assume that the numbers have most likely grown over time.

Add in the hundreds of millions of parents, siblings and other relatives who watch their loved ones play, the fans who attend games, watch them on television, follow them online, and play football related video games every day. Then factor in the ripple effect of football on industries from sports clothing to advertising, from hospitality to construction, and from travel to finance. It becomes easy to understand that the game of football alone touches the lives of close to half of the world's population. A good estimate of the worldwide football fans alone would seem to be 2 to 3 billion people.³

Football, like other sports, is certainly entertainment, but it is also far more than that. It mirrors our society, and serves as the repository for some of our most cherished values. Children and adults look to athletes as heroes, drawn by the aspects of character that play out on the pitch: Determination, grit, talent, respect, fair play, and justice. At their best, sports in general – and football in particular – are the stage on which we strive for physical, even spiritual greatness. They are a significant ingredient in the social glue that binds modern society together.

Match-fixing erodes all of this. When sports become a model of corruption, the demoralizing effect influences all of society. Athletes are heroes, especially of the young. When the heroes are corrupt, we have a very undesirable type of role model setting the bar for our youth. The important crucible of identity and values that sports comprise is stolen from our society.

Even more tangible things are stolen as well. Fans who pay for tickets and cable subscriptions are defrauded. Legal gamblers have their money stolen by the fixers, and the entire sports industry – from players, referees and coaches to the clubs, their directors, and advertisers – loses when disillusioned fans stop coming.

Add to that the violence and the benefits of match-fixing to organized crime, and we have, as a society, a significant problem on our hands.

In response to this problem, INTERPOL and FIFA entered into a ten-year agreement in 2011 to work together to combat match-fixing. In a word, the essential goal of our efforts against match-fixing is prevention. Prevention through education, and prevention through law enforcement.

Education raises awareness among all the key actors in football – players, coaches, referees, directors – in order to prepare them for their inevitable encounters with criminals who would corrupt them. The more prepared these key actors are, the more they are able to recognize the tactics of the match-fixers and resist them.

¹ “Almost half the world tuned in at home to watch 2010 FIFA World Cup South Africa™,” FIFA.com, 11 July 2011.
<http://www.fifa.com/worldcup/archive/southafrica2010/organisation/media/newsid=1473143/index.html>

² “Big Count,” FIFA.com. <http://www.fifa.com/worldfootball/bigcount/index.html>

³ Library of Congress, “The Science of Soccer,” *Business & Economics Research Advisor*, Issue 3 / 4, Summer 2005 (Updated July 2013) <http://www.loc.gov/rr/business/BERA/issue3/soccer.html#overview>

Successful law enforcement deters crime. It not only takes match-fixers off the streets, but also sends a warning to organized crime and their agents, as well as to key actors in sport, that fixing matches carries significant risks, and is no longer worth it.

INTERPOL has emphasized a holistic approach to combat match-fixing that focuses on five interdependent elements: Partnership, Information, Coordination, Prevention, and Proactivity. How do these fit together?

Prevention - through education and enforcement - is the goal. To reach this goal effectively, all those interested in preventing match-fixing will need to adapt to the interconnectedness of this world and the international nature of the crime. Partnerships with other agencies, both in the civil arena of sports clubs and in law enforcement, are necessary. When we build these partnerships, we must share with each other the information necessary to stay on top of the fixers, who are doing everything to stay ahead. And we must coordinate our efforts with our partners in order to do this most effectively.

Match-fixing will not go away by itself. As we pursue our goal of prevention, as we form international partnerships, share information for the greater good, and coordinate our efforts against organized crime, we must remain pro-active, and never be content to rest on our laurels. The match-fixers, for their part, are not.

The training needs assessment you have before you is the second such report since the beginning of our work on this issue with FIFA. It evaluates our efforts and makes important recommendations for the future. We hope you find its analysis and prescriptions useful. We at INTERPOL remain committed to working with you to prevent match-fixing.



Ronald K. Noble
Secretary General

2 EXECUTIVE SUMMARY

Since the publication of INTERPOL's first TNA report on the problem of match-fixing in January 2012, it is clear that integrity in sport is still under threat from corruption infiltrating sports associations around the world. This is often caused by match-fixing and the manipulation of sports events for monetary gain through betting markets. The football community in particular is faced with a significant number of match-fixing incidents and allegations of corruption. Match-fixing in football is a global challenge.

With large profits to be made, criminals pursue every avenue to infiltrate the sport. They utilize advancements in sports betting technology to operate globally online and in real time. They target matches in lower or semi-amateur leagues all the way up to top level competitions. While players and match officials are their prime targets, criminals also engage management, administrators and other key actors within the football community. Often working in vast, organized networks, criminals are also able to be active in several geographic locations at any one time.

Combatting match-fixing effectively requires the engagement of all stakeholders from the football community, public authorities, sports governing bodies and betting organizations. This concept underlines the five core principles that form the basis of INTERPOL's training strategy to protect the integrity of football: Partnerships; Information; Coordination; Prevention; and Proactivity (PICPP). The PICPP approach has been incorporated into existing training programmes developed under the INTERPOL-FIFA initiative, with over 1200 individuals from 149 countries representing the above-mentioned stakeholder groups trained since April 2012.

This work should be continued and expanded upon to assist all INTERPOL member countries and FIFA member associations in developing and implementing effective anti-match-fixing programmes under the PICPP framework. There is an additional need to increase training capacity at the national and regional level. Training opportunities and partnerships with external partners that have existing access to identified target groups should be explored where possible. Train-the-trainer courses should be delivered to members of football associations and law enforcement. A variety of training tools and strategies, in various formats, should be developed that can be distributed to identified additional target groups .

The transnational, organized and mobile nature of the criminals involved in match-fixing also requires that investigators from law enforcement and football associations receive specialized training focusing on specific investigative techniques, understanding illegal betting markets and coordinating with international partners.

These efforts will empower stakeholders worldwide to take action – individually and collectively – to understand the risks posed by match-fixing, investigate and prosecute the criminals involved, and protect integrity in sport.

3 RECOMMENDATIONS FOR INTERPOL

1. Continue to deliver face-to-face training to the key target groups identified – players and match officials involved in international competitions. Training should be delivered at FIFA events and additional training opportunities explored with other external partners with direct access to these target groups such as FIFPro⁴ and football youth academies.
2. Develop a variety of training tools, in various formats, that can be distributed to identified additional target groups – such as players and match officials in lower leagues – where face-to-face training delivered by INTERPOL is not feasible.
3. Distribute developed e-learning modules in conjunction with FIFA to ensure they are accessible to key target groups. Consideration should also be given to making modules accessible to players / match officials in lower leagues and in developing countries.
4. Develop tools, in consultation with FIFA, to monitor and record the completion of training and to assess that the objectives of training have been achieved.
5. Establish a specialized point of contact within every FIFA member association and NCB to facilitate the delivery of anti-match-fixing training.
6. Develop and deliver train-the-trainer courses for members of football associations and law enforcement to build training capacity at the national / regional level and ensure delivery of effective anti-match-fixing training to all key actors.
7. Continue outreach activities to form and maintain partnerships with relevant organizations in order to keep up to date on good practice initiatives and identify additional training opportunities.
8. Explore additional training strategies to assist countries in developing and implementing effective anti-match-fixing programmes. The focus of these strategies should be to provide ongoing support to key stakeholders within the established PICPP framework.
9. Develop and deliver face-to-face training specifically for investigators from law enforcement and football associations that includes training on specific investigative techniques, understanding illegal betting markets and coordinating with international partners.

⁴ FIFPro is a worldwide representative organization for professional football players

4 INTRODUCTION

In May 2011 ICPO – INTERPOL (INTERPOL) and Fédération Internationale de Football Association (FIFA) signed a General Conditions document governing “FIFA’s contribution to the benefit of ICPO – INTERPOL within the framework of the INTERPOL-FIFA anti-corruption initiative”.

Article 3 of the General Conditions document states that “*the overall objective of the INTERPOL-FIFA Anti-Corruption Training Initiative is the elimination of sports corruption in football, with a principal focus on illegal and irregular betting and match-fixing⁵, through providing various training programmes to improve key individuals’ awareness and understanding of corruption in football, of the strategies used by its perpetrators, and of methods to detect and counteract them*”.

It also states that “*in order to better tackle the problem of corruption in football, especially corruption linked to match-fixing and irregular and illegal betting, INTERPOL seeks to;*

1. Establish an Anti-Corruption Training Wing in the INTERPOL Global Complex in cooperation with FIFA.
2. This Training Wing will provide Anti-Corruption Training, Education and Prevention (TEP) Programmes to a variety of actors within the world of international football, which may later be extended to the amateur level.
3. INTERPOL’s Capacity Building and Training Directorate will develop a variety of training courses and modules, tailored to the individual learning needs of target groups, in order to provide a continuum of learning to prevent corruption in football before it can even start.

To assist in achieving the above noted overall and specific objectives a training needs assessment (TNA) was commissioned. The report, completed in December 2011, assessed the size and scope of the issue of match-fixing for the purposes of making profit from illegal gambling and identified the principle stakeholders and target groups that would benefit from training to identify, investigate and prevent match-fixing in football. The report also provided specific recommendations regarding the development and delivery methods of effective anti-match-fixing training programmes (Appendix A).

These recommendations were considered by the INTERPOL-FIFA initiative, in consultation with FIFA and external subject matter experts, in developing a curriculum for face-to-face workshops and e-learning modules targeting the identified target audiences within the football community, law enforcement and betting industry. From April 2012 to May 2013, INTERPOL has delivered integrity in sport training at six national workshops and three regional workshops plus two international conferences and additional FIFA and other football-related events.

This report reevaluates the training needs of the INTERPOL-FIFA initiative in consideration of recent developments in the fight against match-fixing and in review of our current training offerings.

5 METHODOLOGY

5.1 Approach

The reporting period for this TNA report is from January 2012 to May 2013. The key areas of this report follow from the structure presented in the TNA 2011:

- Those involved in match-fixing in football;
- The methods used to corrupt those involved in match-fixing;
- The training needs of the main target groups vulnerable to corruption to help fix matches in football.

To address these three issues the following methods were used:

⁵ The term ‘match-manipulation’ has been suggested as an alternative to ‘match-fixing’ to more accurately reflect the variety of ways in which the integrity of a match can be compromised. This report uses the term match-fixing as the more commonly understood term, with the understanding that it is inclusive of any attempt to alter the course or outcome of a sporting event for an advantage.

- The previous TNA was reviewed by subject matter experts from FIFA and INTERPOL to assess the continued validity of (and identify additional) key actors, modus operandi and training needs identified;
- Open source media was reviewed from news articles and reports collected in an established match-fixing subject matter database⁶ and additional research conducted to assess the scale of match-fixing globally and compile a number of recent case studies;
- Participant statistics and workshop evaluation forms were reviewed to assess training delivered within the INTERPOL-FIFA initiative;
- A training needs assessment survey was distributed to all 209 FIFA member association and all 190 INTERPOL National Central Bureaus to assess current training offerings and recommended training for these organizations;
- Training already deployed or in development for tackling match-fixing was identified.

This data forms the basis of an environmental scan to ascertain the existing and potential future threats to – and vulnerabilities of – professional association football to corruption designed to fix matches including: the main actors involved; vulnerable areas within football and the criminal modus operandi to achieve match-fixing.

A gap analysis maps the current training offerings of the INTERPOL-FIFA initiative and other outside providers against the current and potential future threats and vulnerabilities as identified by the assessment. Where gaps are identified recommendations will be given regarding the training subject matter and target groups for anti-match-fixing training.

5.2 Limitations

Due to the confidential nature of data obtained through the course of law enforcement investigations, the environmental scan contained in this report was compiled using open source information reported in the media to identify the size and scope of match-fixing. As such, it was not possible to determine definitively the total number of match-fixing cases, people arrested, or the exact amount of money spent on football betting annually. An additional limitation was the response rate to the TNA surveys sent, with 63 of 209 football associations responding and only 19 of 190 NCBs responding in time to be included in this report.

6 TRAINING STRATEGY

In developing a training strategy in response to the previous TNA report and other reports on match-fixing and sports betting⁷, the INTERPOL-FIFA initiative promotes a holistic approach to tackle match-fixing with a focus on Partnerships, Information, Coordination, Prevention and Proactivity (PICPP). The PICPP approach has been adopted as an organizing framework to achieve a continuum of learning as the initiative enters its third year in June 2013.

PICPP is a fully interdependent framework that identifies all of the considerations inherent in the training tools for the target audiences of the INTERPOL-FIFA initiative. Reading the framework reinforces the interdependencies. For example 'Coordination' includes the proactive coordination of the Partners, Information and Prevention activities. The scope of each of the themes of PICPP is identified and further expanded below.

6.1 Partnerships

There is general consensus that match-fixing cannot be successfully tackled by any single organization and that a combination of stakeholders representative of public authorities, sport governing bodies and betting organizations working in partnership is required. The global nature of match-fixing necessitates that these partnerships need to be effective at national, regional and international level.

⁶ The database was established and contains material dating from June 2012 to May 2013

⁷ Such as the Report of the Sports Betting Integrity Panel chaired by Rick Parry, 1 February 2010

6.2 Information

Each of the partners in the fight against match-fixing needs information. All partners, stakeholders, key actors and targets need general information about match-fixing such that there is a shared understanding of the problem. Beyond this general information, each group needs specific information that will directly assist them in their individual role in relation to match-fixing. For example players need information to assist them in recognising and resisting approaches to fix a match, whilst a Football Association needs information on good practice for the prevention of corruption and match-fixing.

6.3 Coordination

Given the number of stakeholders involved, it is imperative that the stakeholders operate in a coordinated manner to ensure a comprehensive approach to both the prevention of match-fixing and the response to an allegation of match-fixing.

6.4 Prevention

Prevention is the primary aim of the initiative to tackle match-fixing and corruption in football. Prevention measures include awareness raising, training and education. Equally, regulations in place that ensure a sanction for unprofessional behaviour act as a deterrent and therefore are a preventative measure. The application of Rational Choice Theory or similar models are often applied to the decision to engage in criminal activity and have been applied to match-fixing. The theory espouses that an actor will weigh up the benefits of engaging in match-fixing against the risk of being caught and the potential sanctions if caught. Thus a prevention strategy should ensure that the risk of being caught is significant and that the potential sanctions deter match-fixing behaviour.

6.5 Proactivity

Acting proactively is rarer than acting reactively as it carries a greater risk (an organization may do something that turns out to be unnecessary) and there is an absence of an 'event' or 'trigger' which acts as a motivator for action in reactivity. It is this reason that many organizations' immediate response in relation to match-fixing is that 'it doesn't affect us/there has been no case here' or in other words there has been no 'trigger' for us to respond/react to.

These principles are core to the content of all of our programme activities and will be considered in the identification of further training needs and development of future training interventions.

7 ENVIRONMENTAL SCAN

The information in this section was obtained from (primarily) English-language open-source media reports accessible online. The articles were compiled between 1 June 2012 and 31 May 2013. It should be noted that reports published during this period may refer to incidents that occurred before the reporting period. Also, an allegation of match-fixing made in the media may not indicate that a formal investigation has taken place.

7.1 Context

Match-fixing, for the purpose of this report, can be defined as the manipulation of the course or result of a sporting event for an advantage. This could be a competitive advantage such as avoiding relegation at the end of the season or gaining a favourable draw in a competition. Another advantage is to manipulate the match for the purposes of making a profit from gambling on the result. It is this type of advantage that is the main focus of the INTERPOL-FIFA initiative.

While match-fixing in sport is not a new phenomenon, there has been an increase in recent years in the amount of fixing for the purpose of gaining a profit from gambling. Factors contributing to this increase are the involvement of transnational organized crime groups and the growth and breadth of online sports betting markets – both legal and illegal.

Historically the corruption of players and match officials was done almost entirely within the local environment. Local gamblers would use local contacts to corrupt local players or officials and place

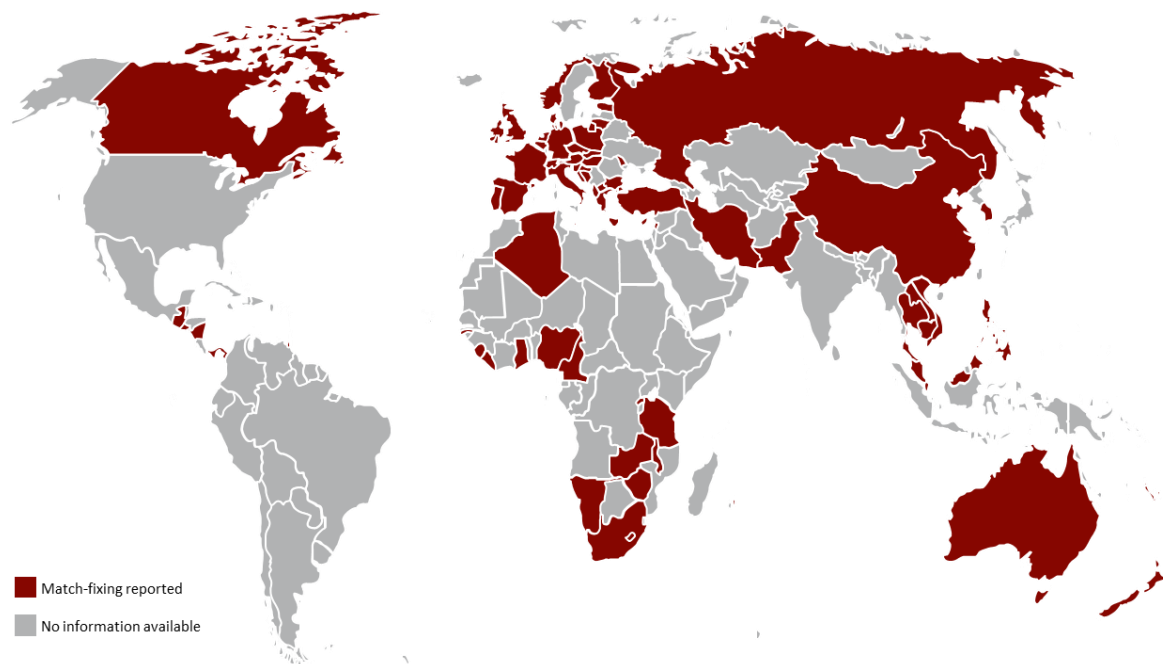
modest stakes for modest gains with local bookmakers. With the global growth of football and developments in the use of modern communication technology, another modus operandi has emerged. This involves criminals, often members of international crime groups, accessing players and match officials from around the world to fix matches in many different leagues, to quickly place large sums of money in international (and often illegal) betting markets to make massive profits.

This international aspect is confirmed by identifying that match-fixing is not confined to any one particular geographical location. It has been uncovered in virtually every geographic area where football is played. With the vast amounts of money being bet on football – and with the majority of that money being bet in Asia – the modern origins for match-fixing to make a profit from illegal gambling had its epicenter in Asia.

However, although the vast amount of unregulated gambling emanates from Asia the specific matches being fixed are not confined to that geographical region. The corrupters and match-fixers have widened their net with regard to the geographical location of the matches they attempt to fix.

7.2 Scale of Match-fixing

The following map represents countries where allegations, investigations or imposed penalties for match-fixing or illegal betting related to match-fixing in football have been reported in the media between 1 June 2012 and 31 May 2013:



Match-fixing has been reported in over 70 countries across six continents in the last twelve months alone.⁸ It should be noted that this is a conservative estimate given the above-mentioned limitations in the data set. FIFA Director of Security Ralf Mutschke estimates “about 50 national leagues outside of Europe are being targeted by organized crime figures in the betting market” in January of this year.⁹

It is likewise difficult to ascertain how many individuals worldwide are involved in match-fixing, though recent investigations have shown that a single case may involve hundreds of actors. A joint European investigation coordinated by Europol implicated 425 suspects in a vast network to conduct match-fixing in over 15 European countries and several other countries worldwide.¹⁰ As described further in this report, a case of match-fixing in Zimbabwe involved nearly 100 members of the local

⁸ From 1 June 2012 to 31 May 2013

⁹ “Mutschke: The key to success is prevention,” FIFA.com, 16 January 2013.

<http://www.fifa.com/aboutfifa/organisation/footballgovernance/news/newsid=1986525/>

¹⁰ “Update - Results from the largest football match-fixing investigation in Europe,” Europol, 6 February 2013.

<https://www.europol.europa.eu/content/results-largest-football-match-fixing-investigation-europe>

football community and involved a transnational organized crime group that was active on five continents.

While there are no widely agreed-upon figures for the amount of money involved in the sports betting market, the World Lottery Association, an organization of state-authorized lotteries, estimates that 90 billion Euros are spent each year in legitimate wagers on soccer games.¹¹ However, with a large amount – or even the majority – of the sports betting market centred in illegal markets, the actual amount spent annually on sports betting is probably double that amount.¹² INTERPOL's four project SOGA operations, which will be discussed below, resulted in the seizure of nearly 27 million US Dollars from illegal gambling dens in Asia.¹³

7.3 Case Studies

The following case studies present recent investigations in which elements or the outcome of football matches were alleged to have been fixed in order to make money in sports betting markets or other illegal benefit.

7.3.1 Case Study #1: Bochum

In May 2011 in Bochum, north-western Germany, Ante Sapina was being sent to prison – again – on football corruption charges. In 2005 the Croatian was jailed for three years, along with his brother, for masterminding the scandal that engulfed Robert Hoyzer, the disgraced referee who was banned for life in Germany. On his release from prison Sapina, restarted his criminal network with links to illegal gambling rings in Asia. But whereas the Hoyzer scandal centred on lower leagues in Germany, Sapina's new network was far more ambitious. Sapina was jailed after confessing to a role in fixing around 20 matches between 2008 and 2009. He targeted leagues outside Germany where players were modestly paid and where large bets from Asia would go unnoticed. Sapina revealed in court that they used a rating system to analyze matches, with five stars ensuring that the result was almost certain thanks to payments to players and officials. Crucially, they did not try to fix the final result of matches. Instead, they concentrated on the "in-play" betting market, where internet bets can be placed in real time on events such as the number of goals scored in injury time.

Sapina admitted to manipulating more than 20 games, including the 2010 World Cup qualifier between Liechtenstein and Finland in September 2009. Sapina testified that he had met Bosnian referee Novo Panic in a Sarajevo car park. He agreed to pay Panic 40,000 Euros to fix the result of the otherwise meaningless World Cup qualifier by ensuring that two goals would be scored in the second half. The match ended in a 1-1 draw with both goals indeed coming in the second half – one the result of a clearly questionable penalty decision.¹⁴

Sapina was a member of a sophisticated network of transnational crime groups were running a substantial match-fixing operation.¹⁵ Wire-tapping was employed by the police during the investigation, and gave investigators insight into modus operandi and illegal betting patterns.¹⁶ Modus operandi was found to be highly methodical and greatly varied, involving the purchasing of individual actors or entire clubs, the financing of criminal betting syndicates in Asia, and the organization of ghost friendly matches. Tens of millions of Euros were bet, with profits for criminal

¹¹ Klein, Jeff. "Game Fixing Rattles Soccer Around World," The New York Times, 18 July 2011.
http://www.nytimes.com/2011/07/19/sports/soccer/widespread-match-fixing-cases-rattle-soccer.html?_r=2&

¹² Ibid.

¹³ "Arrests across Asia in INTERPOL-led operation targeting illegal soccer gambling networks," INTERPOL, 18 July 2012 <http://www.interpol.int/News-and-media/News-media-releases/2012/N20120718>

¹⁴ "Match-fixing: a threat to the integrity of the game," World Soccer Today, 4 July 2011.
<http://www.worldsoccer.com/news/match-fixing-a-threat-to-the-integrity-of-the-game#1ToG2BoSDiUGbsPI.99>

¹⁵ "Sports betting and corruption: How to preserve the integrity of sport," Institute of International and Strategic Relations (IRIS), February 2012.

¹⁶ Ibid.

syndicates estimated to be 8.5 million Euros.¹⁷ Assets and money seized as a result of the inquiry reached 2 million Euros.¹⁸

7.3.2 Case Study #2: Wilson Raj Perumal

In January 2010, authorities in Zimbabwe opened an investigation into a series of international friendly matches that the national football team played in Asia between 2007-2009.¹⁹ The matches, in which Zimbabwe players were given money to lose, were organized by a Singaporean named Wilson Raj Perumal working with the then-CEO of the Zimbabwe Football Association and other top officials. As a result of the investigation, 93 players and officials received suspensions ranging from six months to lifetime bans.²⁰

In September 2010, a friendly match was played between Togo and Bahrain. The Bahrain team, which won the match 3-0, questioned the quality of the Togo squad with the coach even remarking that "They were not fit enough to play 90 minutes."²¹ When the Togo Football Federation confirmed that the national team had not travelled to Bahrain, it was discovered that imposters were used in the match. The former coach of the Togo national team admitted that he was involved in setting up the match and a similar one in Egypt, though Perumal was the match agent – spending 60,000 US Dollars on flights, hotels and other expenses.²²

In interviews given after his eventual arrest, Perumal claims to have worked for an alleged Singaporean crime syndicate. The syndicate used front companies with names like Football4U and FootyMedia to sign agreements with football federations in need of money to organize international friendly matches on their behalf. Perumal would often select the match officials and also bribe members of the team. Because friendlies did not have to be sanctioned through FIFA, they were vulnerable to fixing in this regard.²³

In October 2010 for example, the Bolivian Football Federation signed an agreement with FootyMedia - which they believed to be a legitimate company - that gave the company sponsorship rights to arrange international friendly competitions. In February 2011, an associate of Perumal named Anthony Raj Santia arranged two international friendly matches in Antalya, Turkey: Bolivia vs. Latvia and Estonia vs. Bulgaria. FootyMedia supplied all match officials, from Bulgaria and Hungary.²⁴

The friendly matches raised the suspicions of FIFA and UEFA even before the event took place as the games were not televised and there was no promotion of the matches. In fact, there were only about 100 spectators at the games. After the matches were played, an investigation was launched given that all seven goals scored in the two matches were penalties. Reports indicate that one of the spot-kicks was re-taken after the initial penalty had been missed. Irregular betting patterns were also

¹⁷ "Match-fixing Joint Investigation Team JIT Veto," Europol, Presentation delivered at The Hague, 4 February 2013.

¹⁸ Ibid.

¹⁹ Smith, David, "Zimbabwe suspends 80 footballers as part of 'Asiagate' match-fixing probe." The Guardian 1 February 2012. <http://www.guardian.co.uk/world/2012/feb/01/zimbabwe-footballers-suspended-asiagate-match-fixing>

²⁰ "93 players and officials in Zimbabwe face bans after year-long probe into soccer match-fixing," Associated Press, 16 October 2012. <http://www.foxnews.com/sports/2012/10/16/3-players-and-officials-in-zimbabwe-face-bans-after-year-long-probe-into-soccer/>

²¹ "'Fake' Togo football team at Bahrain match being investigated," BBC, 14 September 2010. <http://www.bbc.co.uk/news/world-middle-east-11304208>

²² Gauthier Villars, David, "When Togo Played Bahrain, the Whole Match Was a Fake," The Wall Street Journal, 3 October 2010. <http://online.wsj.com/article/SB10001424052748703384204575509830139498188.html>

²³ Forrest, Brett, "All the world is staged," ESPN The Magazine, 15 August 2012. http://espn.go.com/sports/soccer/story/_/id/7927946/soccer-wilson-raj-perumal-world-most-prolific-criminal-match-fixer-espn-magazine

²⁴ Kelso, Paul and Rory Smith, "Match fixing: how Bolivia was dragged into scandal," The Telegraph, 10 May 2011. <http://www.telegraph.co.uk/sport/football/international/8504061/Match-fixing-how-Bolivia-was-dragged-into-scandal.html>

detected by monitoring agencies. FIFA banned all six match officials for life for manipulating the results.²⁵

The syndicate has also been implicated in a match-fixing scandal in South Africa, where Perumal and Santia's Football4U company signed an agreement with the South African Football Association (SAFA) to organize four international matches for the South African squad in the lead-up to the 2010 World Cup. Perumal arranged the referees for all four matches – against Thailand, Bulgaria, Colombia and Guatemala, with the outcomes benefitting the Singaporean syndicate.²⁶ A number of SAFA officials have been implicated in the scandal which is currently under a judicial review.

In addition to bribing players and match officials to fix matches, the syndicate was also involved in staging "ghost matches," where no match was ever played despite bookies making offerings such as in the friendly advertised between the U21 teams from Turkmenistan and Maldives. In order to find out about upcoming friendlies, bookies use local spotters to look out for information. "The spotters are corrupted by the syndicate to con bookies into listing fabricated matches. The spotters then supply the bookies with in-game dispatches -- on matches that aren't actually happening."²⁷

Perumal was eventually arrested in Finland for fixing matches in the Finnish League where he confessed to his crimes. After serving a two year sentence in Finland, he was extradited to Hungary where he was also wanted in connection to match-fixing.²⁸

7.3.3 Case Study #3: Turkey

In July 2011 police arrested 61 people, including the chairman of Turkey's top team Fenerbahce, as part of an investigation into allegations of match-fixing in 19 matches in Turkey's top league. Some of the speculations offered in the media at the time as to how the matches were fixed included bribing players not to score or deliberately not saving a goal and referee selection. Suspicions were raised when Fenerbahce, far back in the league standings, had managed to climb its way to an 18th consecutive league title by winning 16 out of its last 17 matches played to stay in the Champions League.²⁹ The financial benefit for Fenerbahce to remain in the UEFA Champions League was estimated at 58.5 million US Dollars a year.³⁰

At the trial in 2012, wire taps revealed that officials of Fenerbahce employed an elaborate code to discuss their match-fixing activities: "'Buildings under construction' referred to games in the process of being fixed. 'Goats in the field' referred to players, 'crops being watered' were match-fixing payments, and 'ploughing, planting and sowing' were efforts to fix games. The agricultural terms used by the city-dwelling soccer officials often did not correspond with the actual farming seasons, prosecutors noted."³¹ Fenerbahce were also alleged to have made large transfer payments to players that were actually bribes to fix matches.

²⁵ "FIFA ban six Eastern European match officials over match-fixing in internationals," The Daily Mail, 10 August 2011. <http://www.dailymail.co.uk/sport/football/article-2024572/FIFA-ban-Eastern-European-match-officials-match-fixing.html#ixzz2Un0LEOhG>

²⁶ "South African FA president suspended over match-fixing," BBC, 17 December 2012. <http://www.bbc.co.uk/sport/0/football/20755894>

²⁷ Forrest, Brett, "All the world is staged," ESPN The Magazine, 15 August 2012. http://espn.go.com/sports/soccer/story/_/id/7927946/soccer-wilson-raj-perumal-world-most-prolific-criminal-match-fixer-espn-magazine

²⁸ Ibid.

²⁹ "Turkey: Fenerbahce boss remanded on match-fix charge," BBC News, 10 July 2011. <http://www.bbc.co.uk/news/world-europe-14100659>

³⁰ "In Turkey, trial of Fenerbach owner Aziz Yildirim shows that soccer's match-fixing scandal goes all the way to the top." Associated Press, 13 February 2013. <http://www.nydailynews.com/sports/more-sports/fenerbach-scandal-shows-match-fixing-straight-top-article-1.1263144>

³¹ Ibid.

7.3.4 Case Study #4: Republic of Korea

In May 2011 arrest warrants were issued for current and former players and brokers operating in Korea's K League, the top league in the country. The investigation centered on 15 matches played in which it was discovered that players were bribed to manipulate matches by brokers making illegal gains through both legal and illegal betting channels. One goalkeeper received over 100,000 US Dollars for fixing four matches in a domestic cup competition where he intentionally allowed 11 goals to be scored against him.³²

By February 2012, more than 80 current and former football players were charged with or convicted of match-fixing with about 50 players receiving lifetime bans. One coach was also charged with blackmailing a player to share his match-fixing profit with him.³³ As a result of the investigation, a wide-spread match-fixing epidemic was uncovered affecting not only football, but volleyball, motorboat racing, and allegedly baseball, Korea's most popular sport. The government responded by issuing stiff penalties: from heavy fines to long-term prison sentences of up to seven years in prison. Tragically, three players and one coach involved in the scandal died by suicide.³⁴

7.3.5 Case Study #5: Operation SOGA

INTERPOL, in conjunction with the INTERPOL Asia-Pacific Expert Group on Organized Crime, initiated a tactical operation codenamed SOGA (short for Soccer Gambling) in June 2007. The objective of Operation SOGA, which has carried out four operations to date, is to interdict the illegal soccer gambling activities in Asia organized by the Asian organized crime groups by way of arrest, prosecution and other proactive means. The operation is coordinated by INTERPOL with eight countries in the Asian region.

The first wave of Operation SOGA occurred in 2007 and targeted illegal gambling activities on several major national leagues in Europe as well the group stage of UEFA Champions and EUROPA leagues. Wave 2 was held in 2008 during the final stage of these competitions and EURO 2008, whereas Wave 3 in 2010 focused on the World Cup 2010 and Wave 4 in 2012 on Euro 2012. Each wave resulted in arrests, the closing of illegal gambling dens and the seizure of nearly 27 million US Dollars in cash.³⁵

In Malaysia - where all gambling is illegal - during wave 4 of operation SOGA police arrested over 100 individuals from five syndicates that were involved in betting worth more than 16 million US Dollars.³⁶ Reports indicate that over 4.6 million US Dollars in bets were placed in one night of the tournament alone.³⁷

7.3.6 Evaluation

The case studies demonstrate a number of key elements in match-fixing linked to criminal activity:

7.3.6.1 The types of matches targeted by match-fixers

Matches in lower or semi-amateur leagues are attractive to criminals as they are less likely to be monitored, as evidenced in the Bochum case. However, the amount of money to be made in betting on top level competitions – consider the amount bet on one night of the Euro 2012 competition in Malaysia alone – also make them vulnerable to fixing. Friendly matches, often international, are

³² Lee Hyo-sik, "Over 10 footballers under probe for match-rigging scam," The Korea Times, 26 May 2011.

http://www.koreatimes.co.kr/www/news/nation/2012/12/117_87763.html

³³ Choe Sang-Hun, "South Korea Cracks Down on Match-Fixing Epidemic," The New York Times, 21 February 2012. http://www.nytimes.com/2012/02/22/sports/22iht-fixing22.html?_r=0

³⁴ Dan Orlovitz, "Former K-League player Lee Kyung-Hwan commits suicide after match-fixing involvement," Goal.com, 16 April 2012. <http://www.goal.com/en/news/3800/korea/2012/04/16/3039296/former-k-league-player-lee-kyung-hwan-commits-suicide-after>

³⁵ "Arrests across Asia in INTERPOL-led operation targeting illegal soccer gambling networks," INTERPOL, 18 July 2012 <http://www.interpol.int/News-and-media/News-media-releases/2012/N20120718>

³⁶ "Malaysia detains 100 in football gambling raids," AFP, 7 July 2012. <http://sg.news.yahoo.com/malaysia-detains-100-football-gambling-raids-072520806.html>

³⁷ Sharif, Aizat. "RM14m bets in one day of Euro 2012," The Malay Mail, 5 July 2012. <http://www.mmail.com.my/story/rm14m-bets-one-day-euro-2012>

particularly vulnerable as they are less regulated than FIFA-sanctioned competitions. As evidenced in the Perumal example, friendlies are vulnerable to match-fixers controlling every aspect of the match – from the venue selection to match officials. As evidenced in the Turkey example, matches at the end of a season are also vulnerable to fixing as they might affect the relegation of a team. While this type of fixing may not be related to sports betting, the large financial implications of relegation may lead members of football organizations to incite their players to fix.

7.3.6.2 The key target groups

Players and / or match officials are the key individuals who can directly influence the outcome of a match and are – therefore – a prime target for match fixers. Often particular players such as goalkeepers, defenders or the team captain will be singled out by the corruptors. Players and match officials in lower leagues or from developing countries are particularly vulnerable as they may be compelled to participate in match-fixing for relatively small sums of money. It should also be noted, from the presented case studies, that fixers also target management and administrators at football leagues. Perumal, for example, signed agreements with the Head of national football associations in order to gain control over entire teams and organizations. The key actors involved in match-fixing will be expanded upon in the following section.

7.3.6.3 The ‘globalization’ of match-fixing

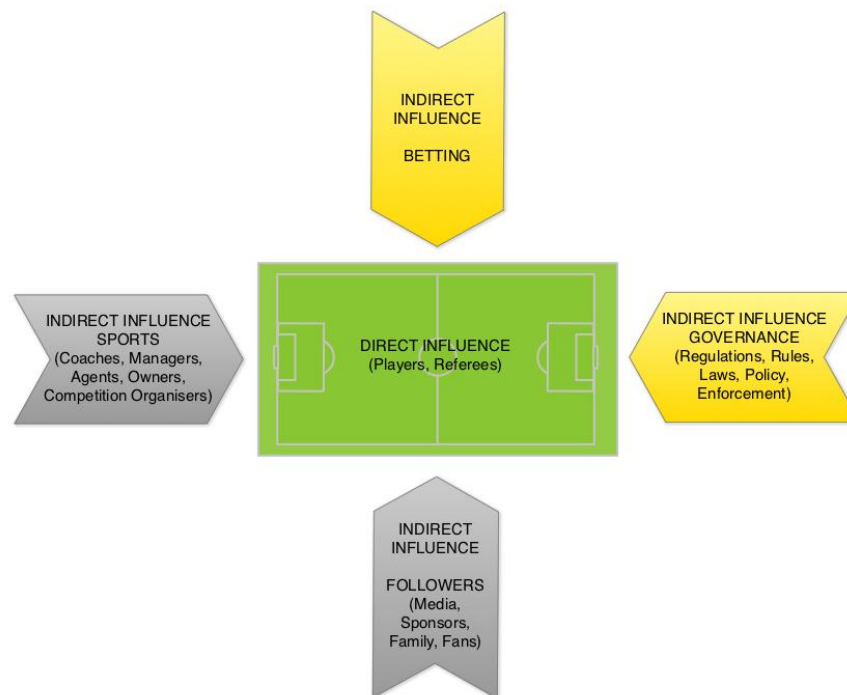
Criminals are able to utilize advancements in communication technology to operate globally. With many betting markets – both legal and illegal – now operating online and in real time, fixers are able to bet on and manipulate matches regardless of their geographic location. Criminals also work in highly organized and highly mobile networks, and are able to use agents to act as middlemen to manipulate members of the football community globally. The modus operandi employed by criminals will be examined further in this report.

7.3.6.4 Legal and illegal betting markets

The increasing use of the internet as a medium for placing bets and the proliferation of betting agents operating primarily – but not exclusively – in Asia make it possible for large sums of money to be placed on the outcome of the match before or during the match itself. The unregulated Asian betting markets still account for the majority of illicit funds being gambled on the outcome of football matches.

7.4 The Actors

As reported in the previous TNA, within the world of football there are a number of different groups of people involved. Most of these groups – and the individuals within those groups – have the ability to influence the outcome of a match, or series of matches, dependent upon their role, as indicated in the diagram below:



The actors in green (those actually on the pitch during a match) have a direct influence on the outcome of the match and are thus necessary actors for match-fixing to occur. Those in grey, because of their influence, can be vulnerable to acting as 'intermediaries' in the match-fixing process. Those in 'sports' may influence to fix for sporting gain. Those in yellow have the capacity to inhibit or facilitate match-fixing.

In order for match-fixing to occur, criminals must act upon either those with direct influence or those acting as intermediaries, as described below:

7.4.1 Players

Because of the direct influence over the course of a match, players have an important role within football. Without players there is no game. Given their pivotal role it is of little surprise that those who might want to influence the outcome of a game will pick the player as a possible target for corruption. Goalkeepers and defenders are approached more often than forwards as they are in a better position to let in goals on purpose. There are a number of ways that criminals will use to try and corrupt a player. To date the most prevalent approach is to offer money in return for a player to attempt to fix a match. The sums involved will generally be determined by market value and the degree of risk being undertaken to fix the match. Thus a player whose wages are relatively low and who is playing in a minor league would be paid less than a player in a major league involved in higher profile games.

7.4.2 Match Officials

Apart from the players, the match officials – in particular the referee – are the only individuals whose actions can directly affect the outcome of a match. It is to the credit of football in general that the pivotal role of match referee has been identified. However, with the resources available to organized crime, there will be a temptation for match officials to help fix a match with the promise of a large financial reward. As a result criminals continue to consider how they can corrupt that particular individual. Again money is a key tool in tempting the match official to consider illegally influencing the outcome of a game. However it is not the only method and there are recorded cases of match officials being offered hospitality in various forms in exchange for a favourable refereeing performance. This hospitality could be in the form of offers of sexual favours or expensive merchandise.

7.4.3 Criminals

Where there is a possibility and opportunity of making money illegally then criminality will appear. The world of football has seen a massive growth in the amount of money invested in – and generated by – the sport. This has attracted the attention of many wealthy, legitimate business people as well as those for whom football is simply another vehicle to make money illegally. One of the key ways to make money from football is through gambling on football matches. If effort has gone into trying to predetermine the result or an element of the match – and the person betting knows this to be the case – then this substantially reduces the risk of losing the bet. As a result many criminals are keen to involve themselves in match-fixing attempts. This form of criminality however requires quite a lot of planning, patience and resources. It therefore tends to be the domain of organized crime. There are many other individuals within other groups who can be corrupted and who can then act as intermediaries to use their influence to assist in match-fixing. Some of those key groups are as follows:

7.4.4 Senior or Retired Players

As seen in the Republic of Korea case, there are instances where the influence of a senior or retired player has been crucial in gaining access to players that others may want to corrupt. The senior or retired player's role may be simply to obtain that introduction but in some instances they play a much greater role. Often the senior or retired player will act as a link between the corrupter and the player and may even vouch for the corrupter. If that senior or retired player had a reasonable reputation in the game then this could influence a young player and give the impression that corruption is 'not that bad'.

7.4.5 Coaches and Managers

Although there are some instances of coaches and managers being involved in match-fixing corruption it is usually to gain competitive advantage rather than profiting from betting on the result. However they do have regular access to the players and have the ability to influence how a match is played. As such they are directly targeted on occasion by corrupters or brought under pressure from within the club, primarily by the club executives. With the advent and increase of 'in game' betting and the different types of bets available coaches could be used, for example, to substitute key players during a game or make late changes to the team that could influence the outcome of the match.

7.4.6 Club Executives

Football generates and consumes large amounts of cash. Where large sums of money are involved you will find crime and corruption. In many of the large scale corruption cases some of the key figures involved have been those at the very top of the club hierarchy; the club executive. Again many of the cases involving club executive corruption have been match fixing for competitive advantage. However there are examples, some highlighted in this report, of club executives fixing matches to make money from gambling on the result. Given their power within a club the pressure on coaches / managers and players should 'the boss' ask you to help fix a match must be considerable.

7.4.7 Member Association Officials

MA Officials have been known to be bribed by corruptors to influence and fix assigned referees to specific matches for the outcome of manipulation and match-fixing. The corruptor acts as a financially influencing business organization which aims to influence the assigned 'favourable' officials which have been pre-corrupted.

7.4.8 Players Agents

The player's agent has excellent access to certain players and – therefore – is of interest to corruptors. The agent's role in football over the years has evolved to have tremendous influence over the actions of the players whom they represent, which in itself makes them a potential target for corruptors. Another factor that works in the corruptor's favour when using agents to get

introductions to players is the agent's focus on money making and profit. They talk the same language. A match-fixer may also pose as an agent to approach very young players and their families with the purpose of grooming them to fix matches rather than furthering their career.

7.4.9 Match Agents / Event Organizers

As described in the case studies, International friendly matches and even entire Friendly Cup or Tournament events have been organized for the sole purpose of match-fixing. The match agent or event organizer acts as the corruptor to stage an international friendly staged with favourable referees, players, or entire teams for the purposes of generating illegal betting on in-play results or fixed outcomes.

7.4.10 The Bookmakers

Legitimate bookmakers are seldom implicated in match-fixing. Indeed they are – understandably – keen to try and ensure that the matches where bets are being placed are honest. However illegitimate, unregulated and smaller bookmakers have, on occasion, been involved in match-fixing for the purposes of profit. Their ability to directly influence players and referees is relatively limited unless the player owes money to the bookmaker from previous gambling.

7.4.11 Evaluation

The interaction between the criminal element and players and match officials is fundamental to the ability to fix matches. How the criminal element gain access to – and then attempt to corrupt – players and referees must be understood in order to provide appropriate training for players and referees to recognise the warning signs.

The corruptor needs to gain access to the player or the referee (or gain access to someone they trust who can act as their middleman) in order to bring about their match-fixing objective. The football community has a number of individuals that have access to the players and some of those key groups of individuals are detailed above. Of those groups the use of senior or retired players, players agents and club executives to help fix matches for the purpose of gaining financial reward from betting on the result appear to be the most important. It is possible that player's agents will be utilised more in the future to gain access to players for corruption purposes.

The role of the senior or retired player should not be underestimated. They can hold a lot of influence within their current or ex-clubs, and in particular with young players at those clubs who may be in awe of these individuals. They can use this reputation to their advantage when attempting to corrupt players.

In order to properly train the above-identified groups, training, education and awareness needs to be designed in accordance with their type and level of influence. Groups with direct influence on the outcome and course of the match should receive face-to-face training, while groups with indirect influence on the outcome and course of the match may require other awareness raising interventions.

7.5 Modus Operandi

This section describes a generic modus operandi for match-fixing and highlights some of the key elements in this process.

In order to fix a match someone, somewhere has to be corrupted, ideally the match official and / or key players. It is therefore worth considering some of the methods used to corrupt these key stakeholders.

The fixer will scout particular players, as described in previous sections. The players targeted may earn modest salaries and be either young and at the start of their career or older and nearing the end of their career. Fixers usually use a third party to get close to the official or player and to establish a relationship. These third parties could be former players, senior players coming to the end of their careers, player agents or criminals posing as 'fans'. Once this relationship is formed the third party will then determine the best method to corrupt their target. It could be;

- a request to the player or official to perform some act that is outside normal practice. Initially it may seem a rather trivial request, some information on an injury to a team-mate for example, in exchange for cash.
- paying cash to a young player, or buying gifts for him / her or their family members. The payment or gifts need not be for anything specific however at some point in the future the third party will ask for a 'favour' in return for the unasked for – but still accepted – money or gifts.
- offers of sexual favours, drugs or the purchase of goods in return for fixing a match.
- identifying and creating opportunities to blackmail players and officials e.g. drug or alcohol abuse, gambling debts, extra-marital affairs etc.
- use of violence, or the threat of violence, against the player or his / her family.

Regardless of the method(s) used once the player or official takes the active step of accepting the cash, gifts etc. and / or accedes to the request of the third party then all the power in that relationship transfers to the third party.

There have also been cases however where match-fixers have not used a third party to corrupt players. Criminals may purchase a football club that is struggling financially in order to compel players, coaches and managers to fix matches.

In order to get the money to the members of the team conducting the fix, criminals frequently use cash couriers – individuals working for the crime group who physically carry large sums of money into the country where the fix will take place – to avoid transferring money through traceable electronic wire transfers.

With the third party controlling the players or officials the fixer can now set up a match or matches on which to bet and make money. Some leagues may be viewed as more corrupted than others and recent history shows that matches in minor leagues have been targeted but individual matches in any league or competition could be subject to match-fixing. It can be argued that top-level competitions (such as the Champions League or the World Cup) would be a more effective match to fix given the volume of gambling that is associated with these matches. These high profile games would make placing large bets less suspicious and therefore give the match-fixers a greater chance to make large financial gains.

Having identified the match to fix, the fixer must now get the bet placed in such a manner that does not arouse suspicion. The most effective way to do that is through the use of unregulated betting markets. Few sophisticated fixers ever work directly in the European gambling market. The amounts they can place with those bookmakers are too small and regulated to make it worth their while.

To place large bets, or a large number of smaller bets, requires the knowledge and connections of Asian based agents (of which there are many) who will collect and place bets through a hierarchical system of agents, super agents and quasi-legal betting organizations. Much of this unregulated betting is done on trust and on credit. Often the fixers will be known within the betting community so they may have difficulty placing the bets themselves. In this instance they will use individuals whom they trust and who are not known to the agents as associates of the fixers.

The types of bets that will be placed depend on the type of fix that has been arranged. The traditional fix was to have a particular team lose a particular game by a predetermined score, and this is still used today. However, the expansion of the different types of bet that can be placed on a game of football has increased dramatically. You can now bet on many different options such as the number of goals scored, number of bookings / sending offs, number of corners awarded, time of goals being scored etc. This, along with the advent of in-game betting, has given the fixer far more options regarding what to fix and, therefore, what to bet on. The fixer now needs only to corrupt one player and instruct him to get himself sent off in the last 20 minutes of a game to make money from match-fixing. The final act is then to collect their winnings and move on to fixing their next match.

7.5.1 Evaluation

Compared to the initial TNA report, we have identified new modus operandi employed by criminals to fix matches. This highlights the importance of continuing to monitor the tactics used by criminals in order to effectively train our target audiences.

The MO described confirms that players and match officials seem to be the most vulnerable to be approached by fixers. They therefore need to be trained on how to recognize and resist potential match-fixing approaches.

Because match-fixers operate within both the football community and betting markets – often internationally – there is a need for a coordinated, multi-agency effort in keeping with INTERPOL's PICPP approach.

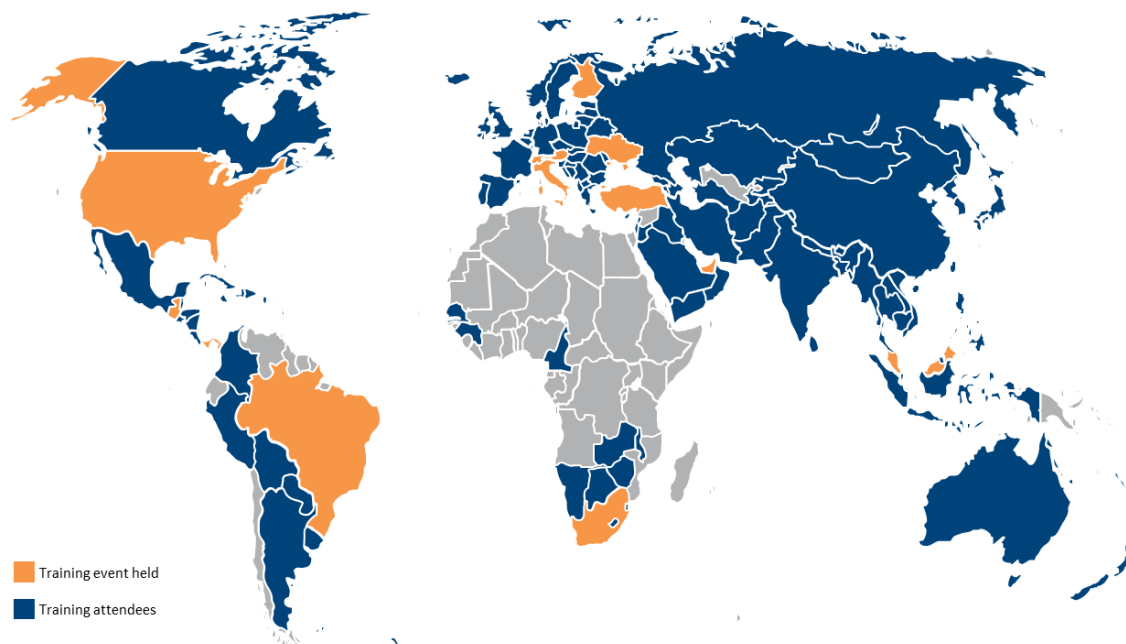
The MO also demonstrates the need for law enforcement to have a thorough understanding of the sports betting market – both regulated and unregulated – in order to effectively investigate match-fixing. Training for investigators should therefore include modules on this topic.

8 TRAINING NEEDS ASSESSMENT

The following assessment reviews the training delivered as part of the INTERPOL-FIFA Initiative and evaluates the results of a training needs survey sent out to football associations and law enforcement agencies. An evaluation of training delivered and the surveys distributed provides the foundation for recommendations for future training to be developed.

8.1 Training Delivered

The following section reviews INTERPOL's training activities to date. Note that all training sessions except one occurred in year two of the initiative.



Between April 2012 and May 2013, INTERPOL has delivered integrity in sport training at six national workshops, three regional workshops, two international conferences, eight FIFA training events and two specialized training events. The above map shows countries where INTERPOL has organized training sessions (in yellow) and countries who have sent representatives to attend training (in blue). Over 1200 individuals have been trained, from 149 countries.

Below is a description of INTERPOL's delivered training:

8.1.1 National and Regional Workshops

The objectives of the National and Regional workshops are to improve knowledge and understanding of the global threat from match-fixing and irregular/illegal betting, and its impact; identify current good practice and ways to prevent match-fixing and corruption in football; and to further encourage global, regional and national bodies associated with football to work together more effectively in partnerships, regularly sharing information and taking action to prevent match-fixing. The workshops were planned in coordination with FIFA, and assisted by local football associations and law enforcement to ensure all relevant stakeholders from the football community, law enforcement, government and betting operators and regulators were invited to attend.

The workshops each have between 30-60 participants and, on average, 62% of participants come from football associations, 20% from law enforcement, 7% from government, 4% from the betting industry and 2% from players'/referees' associations. The remaining 5% are members of other non-governmental organizations.

The general format of the workshop is a two-day session covering the following topics:

- What match-fixing is and the size/scope of the problem
- Who are match-fixers and how they operate

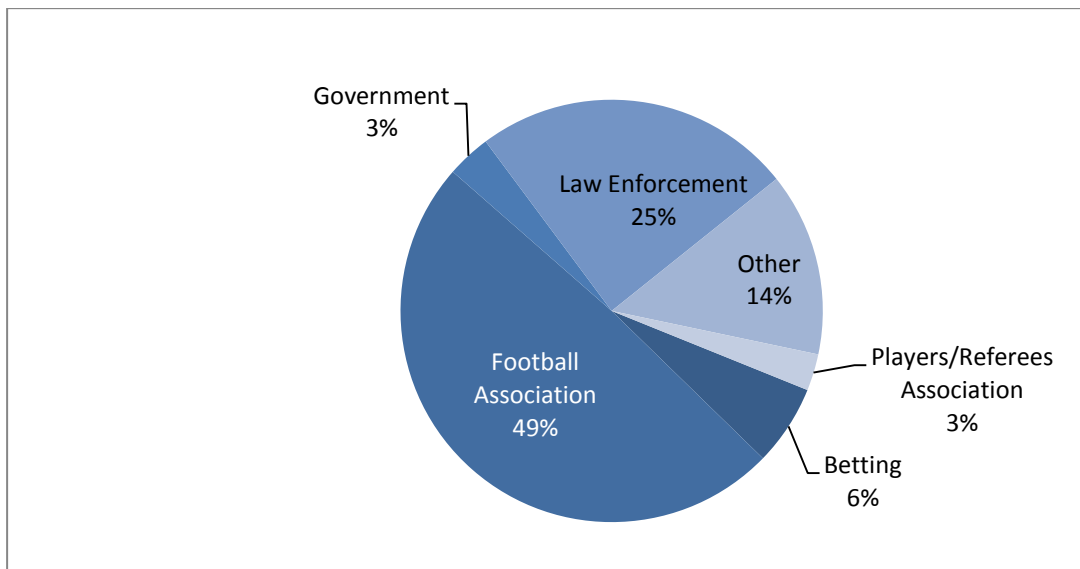
- What groups are vulnerable to match-fixing and why
- Understanding the sports betting market
- Local/regional experiences of match-fixing
- Developing good governance in sports organizations
- Effective training methods
- Developing match-fixing prevention programmes

Training delivery methods include lectures, group brainstorming sessions and small group activities.

Feedback received from participants at the conclusion of the workshop has been exceedingly positive, with over 80% of participants rating the events “excellent” or “very good” in terms of their usefulness in developing effective anti-match-fixing programmes.

8.1.2 International Conferences

In year 2 of the initiative, INTERPOL held two international Conferences on Integrity in Sport: for UEFA member associations and for AFC member associations. A total of 356 delegates attended the conferences representing 97 countries: 49.2% from football associations, 24.4% from law enforcement and 6.2% from the betting industry as shown below:



The conferences aimed at enhancing prevention methods and the investigation of match-fixing and featured presentations from subject-matter experts on the future of the fight against match-fixing; sports betting and monitoring initiatives and the importance of good governance in sports organizations.

The key messages delivered were:

- The need to continue building effective partnerships between all stakeholders to develop effective procedures at international and national levels;
- The importance of establishing information-sharing mechanisms to identify the necessary information and how it can best be stored, analyzed and disseminated;
- The necessity of coordination between stakeholders to ensure the best decisions can be made concerning match-fixing prevention and investigation activities;
- The need to develop and implement a broad range of prevention activities through education, training and support to football players, officials and administrators;
- The importance of being proactive in the prevention and investigation of match-fixing and irregular betting associated with football.

8.1.3 FIFA events

INTERPOL was invited by FIFA to provide training for key actors in the football community at the following FIFA training events:

- U20 and U17 Women's World Cup Draw team workshops for team managers and coaches
- U20 Men's World Cup Draw team workshops for team managers and coaches
- Referees and Assistant referees shortlisted for World Cup 2014 seminars
- Referees shortlisted for Women's World Cup 2015 seminar
- FIFA Development officers' training

Over 400 individuals were trained: 61% referees, 34% coaches/managers, and 5% development officers.

The training sessions were tailored to the specific audience, with the aim to give participants the tools to better recognize, resist and report on issues that may be related to match-fixing and to act as change agents in strengthening the integrity of football. Topics included:

- Scale and Expansion of Match-Fixing
- Who Are the Targets of Match-Fixing?
- Consequences of Match-Fixing
- How to recognize and resist potential match-fixing situations
- FIFA Reporting Procedures
- FIFA governance and disciplinary processes

8.1.4 Specialized Training Seminars

INTERPOL was invited to provide training for additional members of the football community from the following organizations:

8.1.4.1 Caribbean Football Union

Members from each of the 25 member associations of the Caribbean Football Union attended a seminar delivered by INTERPOL on the problem of match-fixing. Participants were encouraged to combat and prevent the problem holistically, by forming partnerships and sharing information with all stakeholder groups including local law enforcement and government. The one day seminar featured lectures and group brainstorming activities on the following topics:

- Scale and Expansion of Match-Fixing
- Who Are the Targets of Match-Fixing?
- Consequences of Match-Fixing
- How to recognize and resist potential match-fixing situations
- Reporting match-fixing

8.1.4.2 UAE Professional Football League

INTERPOL and FIFA delivered a joint training session to players in the United Arab Emirates' Pro-League during a Professional Players Seminar. This was an opportunity to pilot training materials directly with players. Topics included:

- Scale and Expansion of Match-Fixing
- Who Are the Targets of Match-Fixing?
- Consequences of Match-Fixing

- How to recognize and resist potential match-fixing situations
- AFC and FIFA Reporting Procedures

8.1.5 E-learning

In May 2012, INTERPOL published a generic e-learning module for players³⁸ on its website. While the number of monthly users of the e-learning has increased since August 2012, there is a need to investigate alternative methods to market and distribute e-learning to increase the number of people completing the e-learning training. An updated version of the e-learning module was made available to the public in March 2013. The module is now available in the following languages: English, French, Spanish, Arabic and German.

INTERPOL is currently developing three additional e-learning modules for: young players; referees and coaches/managers. The modules will give these key target groups the tools to recognize, resist and report on issues related to match-fixing in a visually stimulating format (Figure 4b). All three modules include a direct link to the FIFA reporting mechanism and the match-fixing hotline to empower actors to report suspicious activity to FIFA.

The modules will be completed and translated into the official INTERPOL and FIFA languages in 2013. Consideration of the marketing and distribution of the modules will be addressed through consultation with subject matter experts prior to their launch to ensure they reach the widest audience possible.

8.1.6 Evaluation

The model for INTERPOL's Integrity in sport workshops addresses recommendation #8 of the previous TNA which states: agree how the interface between FIFA, The Confederations and the National Associations will operate with national and international law enforcement when investigating allegations of corruption and match-fixing (appendix A). Participants at the workshops include key stakeholders from football, law enforcement, the betting industry and government who are in a position to develop and implement anti-match-fixing programmes at the national, if not regional, level. The format, especially the interactive sessions, allows for discussion and collaboration between participants to begin to assess what is needed in their country / region and how it could be implemented. However, while participants receive a summary document of what was learned during the workshop, it would be beneficial to implement a formal follow-up process to properly assess the extent to which participants have implemented what they have learned.

As legislation and structures of law enforcement and sporting organizations vary from country to country, there is also a need to customize the content of the workshop to match the knowledge level of the audience. Logistically, this is not possible for INTERPOL to do for all FIFA and INTERPOL members. Instead, alternative methods of assisting countries in developing coordinated anti-match-fixing programmes are needed. The development of a comprehensive set of guidance documents, for example, could provide a framework for stakeholders to follow in establishing a coordinated response to allegations of match-fixing.

Recommendations #1 and #2 of the previous TNA concern the development and delivery of targeted training for young players and match officials. Classroom training curricula have been developed and delivered for referees shortlisted for FIFA competitions and coaches and managers of teams competing in FIFA competitions, offering INTERPOL an opportunity to deliver direct face-to-face training for key target groups at high-profile international competitions. Further opportunities to deliver training to these groups – and especially players – should be explored, such as the training delivered to players in the UAE. This could include partnering with external partners that have access to players, such as FIFPro and youth academies.

There is a further need to provide training to players and match-officials in lower levels of competition as they have also been identified as vulnerable to match-fixing. Given the large numbers

³⁸ SportAccord developed an e-learning module for all sports which was then adapted for INTERPOL to focus on football

of individuals within this target group, it is necessary to build training capacity at the national level and seek alternative methods to deliver training. The e-learning modules developed present an excellent opportunity to reach this group. Therefore, careful consideration should be given to the distribution and marketing of e-learning modules to ensure they reach the widest audience possible.

In recognition of the specific training needs of those investigating allegations of match-fixing, recommendation #9 of the previous TNA states: “develop in conjunction with the appropriate law enforcement agencies a training programme on how to identify, investigate and prosecute match-fixing corruption in football. Those officers trained in this area could form the basis of a global LEA expert’s network to assist in these global investigations.” While existing workshops recognize the importance of law enforcement as a key stakeholder in the fight against match-fixing, additional training programmes should be developed that focus on specific investigative requirements. Also, as the need for information sharing between stakeholders has been identified, there is an additional training need for members of football associations (such as integrity officers) tasked with collecting information regarding allegations of match-fixing within their organization and liaising with law enforcement officials. Finally, while current training offerings are conducted at the national and regional level, there is a need to train investigators – from both law enforcement and the football community – on how to improve coordination of international investigations, given the scale and mobility of crime groups engaged in match-fixing.

8.2 Other Integrity in Sport Training providers

The following section reviews a number of training programmes already in existence that focus on training members of sporting organizations on match-fixing related issues. The first five programmes are funded by the European Union. This list is not exhaustive, and highlights those initiatives beyond those at the national level:

8.2.1 FIFPro: Don’t fix it! An education & prevention programme

This initiative aims to raise awareness of the dangers of match-fixing among players, referees, officials and administrators in Scotland, Slovenia, Greece, Romania, United Kingdom, Norway, Finland and Italy. It includes an online anonymous reporting mechanism for players, referees, officials and administrators to report match-fixing related cases or concerns and an online questionnaire and education module available to all professional players, referees, officials and administrators, available in local languages. It also includes two-day transnational training courses for former players and key staff in referees, officials and administrators associations who will become ‘focal points’ to lead national training for players, referees, officials and administrators with at least one representative from the national government or public authority.

8.2.2 European Elite Athletes Association: Educating European elite athletes

This programme has been in place since 2012 as a partnership between the European Elite Athletes Association and European Betting and Gambling Association and the European Sports Security Association and the Remote Gambling Association. It targets more than 16,000 professional and young or in-training elite European athletes through face-to-face education delivered by their player association at athletes’ place of work. Each player association will deliver face-to-face education to professional and young athletes on match-fixing and share best practice that has been developed by player associations as well as hearing from bookmakers, gambling regulators and players who have been banned for match-fixing.

8.2.3 International Rugby Board: Keep rugby outside

The education of actors within the rugby community including elite and youth players, coaches, referees, match officials and administrators is the goal of this EU funded initiative. Training is delivered both online and face-to-face and topics include the threats posed by match-fixing, how to recognize reports, reporting mechanisms, disciplinary procedures, actions underway by relevant authorities and how to get help if you are affected by match-fixing or suspect the integrity of a match.

8.2.4 Transparency International: Staying on side - How to stop match-fixing

The objectives of this initiative are to raise awareness among key stakeholders through provision of information and training for officials, football players, coaches, heads of youth academies, technical staff, referees and sports officials in the football family. Information will be delivered through websites, blog posts and media outreach as well as public events. Training, education and outreach material will be built with national football leagues and developed in respective languages.

8.2.5 Institut de Relations Internationales et Stratégiques (IRIS): What national networks in the EU to fight match-fixing?

The target audience of this initiative is sporting administrators and public authorities. It aims to mobilize sporting authorities (Ministers, Olympic committees, sporting federations) and public authorities (police, intelligence, justice departments and regulators) to facilitate the exchange of information and good practice by raising awareness with involved parties about match-fixing related issues, establishing a national point of contact, and establishing a network of experts represented by partner institutions. Seminars are planned for 20 EU member states.

8.2.6 SportAccord: Global Programme to Stop Match-Fixing in Sport

SportAccord has developed a programme to raise awareness on issues related to match-fixing and sports betting. It includes guidance documents for sports organizations to integrate sports integrity rules into a code of conduct and a guide for organizations to follow when confronted with an allegation of match-fixing. The programme also includes a database on legislation related to betting and an e-learning tool for players called “how to prevent match-fixing from destroying your career”.

8.2.7 Evaluation

The existing programmes described above are, by and large, focused on a European audience. There is therefore an opportunity to develop training for other geographic regions or expand these programmes globally.

While the programmes share similar objectives to the INTERPOL-FIFA initiative, no single programme covers all of our target groups. Specific elements from each project should be considered – such as the guidance documents from SportAccord and the networks of experts described in the IRIS project – to enhance our programme and ensure that our efforts are not duplicated. INTERPOL has already coordinated with SportAccord, for example, on e-learning modules directed at players. Training programmes developed by INTERPOL should seek to complement, rather than compete with, existing training efforts.

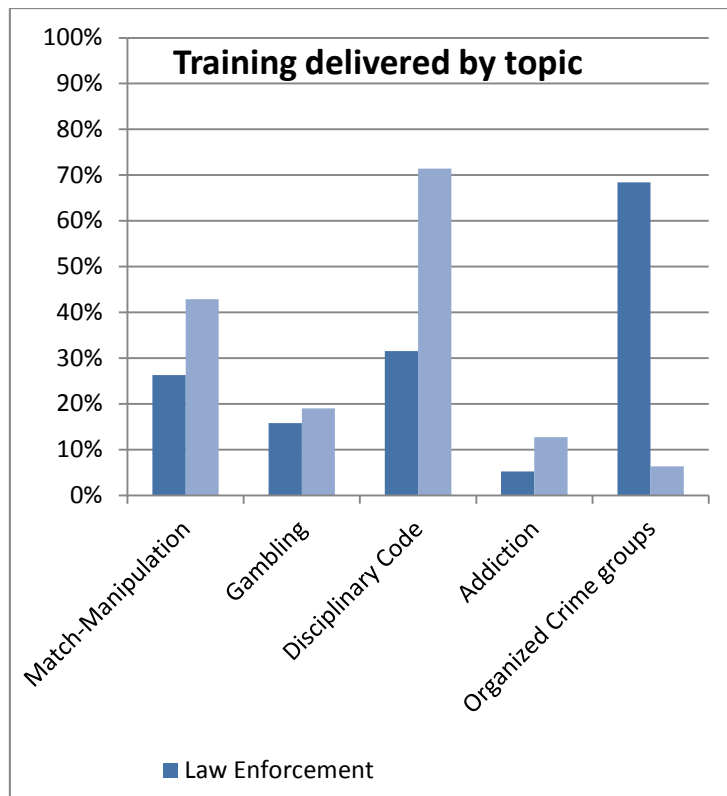
8.3 Training Needs Assessment Survey

In February 2013, a survey was sent to all 190 INTERPOL National Central Bureaus (NCB) and 209 FIFA member associations (MA) to assess their current training delivery on match-fixing and integrity in sport issues (Appendix B). Responses were received from 63 MAs and 19 NCBs. The results are summarized below:

8.3.1 Training Delivery by Topic

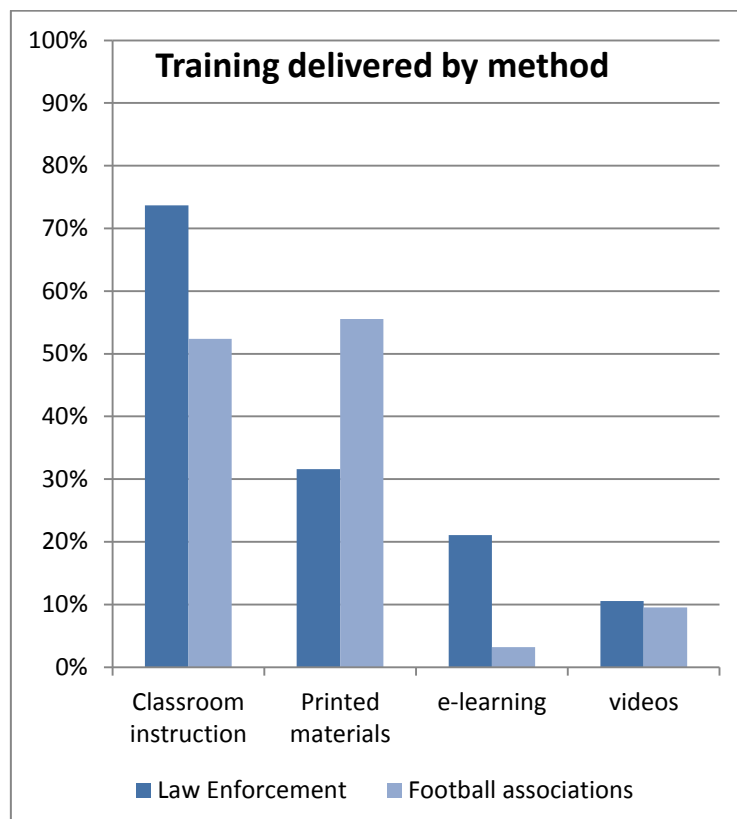
Respondents were asked to select which topics were covered in training already delivered to members of their organizations. As indicated in the chart below, the majority (71.4%) of respondents from MAs train their members on disciplinary codes, while less than half of respondents (42.8%) train members on match-manipulation (match-fixing). By contrast, the majority of respondents from NCBs (68.4%) provide training to members about organized crime groups while only 26.3% of respondents train their members on match-fixing.

A small number of respondents from both NCBs and MAs also train their members on gambling and/or addiction. It should be noted that 14 out of the 63 (22.2%) MAs do not provide training on any of the above-mentioned topics, compared to 3 of the 19 NCBs (15.8%).



8.3.2 Training Delivery Methods

Respondents were also asked to select the methods for delivering training currently used within their organizations. Classroom instruction is the most frequently used method by NCB's (73.7% of respondents), followed by printed materials (31.6%) and e-learning (21.1%). For football associations, slightly more than half of the responding MAs deliver training via printed material and classroom instruction (55.6% and 52.4% respectively) as indicated in the chart below.



8.3.3 Content of Suggested Training

Survey respondents were asked to provide suggestions about how training on the topics of match-manipulation and corruption in sport could be improved. Many of the comments spoke to the need to develop training specific to their organizations and provided examples of what this training should include. The comments are summarized below:

Football Associations (MAs)

Training materials for football associations should:

- Target specific groups including young players and match officials;
- Provide a framework that can be customized at the National level;
- Provide model regulations that associations can implement;
- Include information about how players are targeted, modus operandi;
- Include videos and online, interactive materials.

Law Enforcement (NCBs)

Training materials for law enforcement should:

- Target law enforcement officers specifically;
- Provide examples and case studies from experienced investigators;
- Include information about the problem in general, and how to investigate it;
- Include information about transnational organized crime groups ;
- Identify "ethical standards and human behaviour" regarding gambling, addiction and motivations of match-fixers;
- Explain financial flows/infrastructure of criminal organizations involved in match-fixing;
- Involve perspectives from academics and sport representatives;
- Provide information on international cooperation.

8.3.4 Evaluation

Based on the survey responses received, it is evident that there is a continued need to train football associations and law enforcement on the subject on match-fixing and other issues related to corruption in sport. There is an opportunity however, to add to existing training already being delivered. In training on disciplinary codes, for example, members of football associations could be educated on why match-fixing and gambling are prohibited and explain the consequences of engaging in these activities. Police agencies could also add information about criminal involvement in match-fixing and sports betting to existing training provided on organized crime groups.

The training content and delivery method of additional training programmes should be specific to the needs of each target audience. While football associations would benefit from training geared towards players and match officials that focuses on the risks and consequences of involvement in match-fixing, training for law enforcement requires specific information on the modus operandi of criminals and good practice in investigating match-fixing.

There was a further need identified by respondents for guidance on how to develop anti-match-fixing programmes at an organizational level. For example, several respondents from MAs requested models of legislation and governance that could then be customized for implementation at the national level.

Training developed should also recognize the most frequent methods of delivery employed – classroom instruction and printed materials. Capacity building in the form of train-the-trainer courses would allow for a greater number of actors to be educated in a classroom setting, while providing

additional materials in printed (and other) formats would allow for an even greater distribution of information.

9 CONCLUSIONS AND RECOMMENDATIONS

9.1 Conclusions

Match-fixing continues to pose a threat to the integrity of football worldwide. With the global growth of football and developments in the use of modern communication technology, match-fixers are able to work internationally –accessing players and match officials from around the world to fix matches. Advancements in sports betting markets have contributed to a huge betting industry that is difficult to monitor and even more difficult to regulate.

Players and match officials continue to be the primary targets of match-fixers. Direct face-to-face training for these groups should continue to be delivered, with the goal of building training capacity at the national and regional level and development of alternative methods of instruction to ensure all members of these groups are educated.

News articles related to match-fixing frequently appear in major publications, reporting on allegations of corruption in all levels of competition including the 2012 Olympic games in London. The increased media attention is also indicative of an increased understanding among sporting organizations, law enforcement agencies, governments, and betting regulators of the need to actively combat the problem.

Since April 2012, the INTERPOL-FIFA initiative has delivered training to over 1200 individuals from 149 countries representing the above-mentioned stakeholder groups, raising their awareness of the risks related to match-fixing and providing examples of good practice that can be utilized to develop an effective anti-match-fixing programme. This work should be continued and expanded upon to provide further support ensure programmes are both developed and implemented successfully.

Ultimately, combatting match-fixing effectively requires a holistic approach with stakeholders from public authorities, sports and betting organizations working in partnership, and in a coordinated manner, to ensure a comprehensive approach to both the prevention of match-fixing and the response to an allegation of match-fixing.

9.2 Recommendations for INTERPOL

1. Continue to deliver face-to-face training to the key target groups identified – players and match officials involved in international competitions. Training should be delivered at FIFA events and additional training opportunities explored with other external partners with direct access to these target groups such as FIFPro³⁹ and football youth academies.
2. Develop a variety of training tools, in various formats, that can be distributed to identified additional target groups – such as players and match officials in lower leagues – where face-to-face training delivered by INTERPOL is not feasible.
3. Distribute developed e-learning modules in conjunction with FIFA to ensure they are accessible to key target groups. Consideration should also be given to making modules accessible to players / match officials in lower leagues and in developing countries.
4. Develop tools, in consultation with FIFA, to monitor and record the completion of training and to assess that the objectives of training have been achieved.
5. Establish a specialized point of contact within every FIFA member association and NCB to facilitate the delivery of anti-match-fixing training.
6. Develop and deliver train-the-trainer courses for members of football associations and law enforcement to build training capacity at the national / regional level and ensure delivery of effective anti-match-fixing training to all key actors.

³⁹ FIFPro is a worldwide representative organization for professional football players

7. Continue outreach activities to form and maintain partnerships with relevant organizations in order to keep up to date on good practice initiatives and identify additional training opportunities.
8. Explore additional training strategies to assist countries in developing and implementing effective anti-match-fixing programmes. The focus of these strategies should be to provide ongoing support to key stakeholders within the established PICPP framework.
9. Develop and deliver face-to-face training specifically for investigators from law enforcement and football associations that includes training on specific investigative techniques, understanding illegal betting markets and coordinating with international partners.

10 APPENDIX A – RECOMMENDATIONS FROM TNA 2011

1. Develop and deliver face-to-face and E-Learning training packages aimed at young, professional footballers which highlights the dangers of corruption and the consequences should corruption be proven. Ensure these packages are tailored for the local environment by engaging the national football associations at an early stage.
2. Develop and deliver face-to-face and E-Learning training packages aimed at match officials which highlights the dangers of corruption and the consequences should corruption be proven. Ensure these packages are tailored for the local environment by engaging the national football associations at an early stage.
3. Ensure that completion of the training explicitly commits the participant to be bound by the rules and regulations of being found guilty of match-fixing. This could include a lifetime ban from participation in the sport at any level.
4. Agree with FIFA the mechanism by which the details of those players, match officials and other stakeholders that have completed their anti-corruption training is recorded.
5. Examine the merits and demerits of working in partnership with companies, organizations and academic institutions that already deliver, or would be interested in developing, some form of anti-corruption training for sportsmen and women.
6. Establish a mechanism to engage fully and completely with the 208 national football associations. This should include a Single Point of Contact (SPOC) within each national association with responsibility for driving forward the anti-corruption message. This will further include the liaison function to ensure the global anti-corruption training materials and delivery methods reflect and are tailored to the local environment.
7. Establish a robust, trusted and well publicised reporting mechanism for individuals to report approaches made to them for corruption purposes. This could involve quasi-independent organizations such as Players' Unions or an internationally recognised reporting hotline.
8. Finally, although outside the strict terms of reference of this training needs assessment, some issues were highlighted during the research process and in particular in discussion with some of the Subject Matter Experts. As a result included below are further suggested recommendations for consideration when taking the global and holistic approach to tackling match-fixing as referred to in this report within the section on threats, vulnerabilities and facilitating factors (see p.19 - 24).
9. Agree how the interface between FIFA, The Confederations and the National Associations will operate with national and international law enforcement when investigating allegations of corruption and match-fixing.
10. Develop in conjunction with the appropriate law enforcement agencies a training programme on how to identify, investigate and prosecute match-fixing corruption in football. Those officers trained in this area could form the basis of a global LEA expert's network to assist in these global investigations.

11 APPENDIX B – TRAINING NEEDS ASSESSMENT SURVEY



INTERPOL

INTEGRITY IN SPORT

Training Needs Assessment Survey

Thank you for taking time to complete this questionnaire that will enable the INTERPOL Integrity in Sport Unit to continuously enhance the quality of its training. Your results will be considered in the preparation and delivery of future training opportunities. Once complete, please return this form as an attachment to: integrityinsports@INTERPOL.int by 28 February 2013.

Organisation: Football Association Referee's Association Law Enforcement
 Players Association Betting Organisation Government
 Other: _____

1. Does your organisation provide training to its members on any of the following topics?
(check all that apply)

- match-fixing gambling disciplinary codes/code of conduct
 addiction organized crime groups

2. If training is provided on one or more of the above-mentioned topics, what methods of instruction are used?

- classroom instruction printed materials e-learning videos

Other: _____

3. Have you received training on any of the topics listed in question #1 from a training provider outside of your organisation?

- Yes No

If yes, please specify: _____

4. Do you have any suggestions on how training programmes for combatting match-fixing and corruption in sport could be improved?
