Protocols on players reporting MATCH-FIXING CONCERNS
Introduction

This document provides guidance for Player Associations about how to put in place systems and protocols so that players can effectively and safely report any match-fixing concerns.

Whilst everyone will need to adapt the protocols for their sport rules, the development of their National Platform and national legal system, what follows is intended to be best practice for Player Associations on this important area.

Whilst Player Associations exist to protect their members, there is also an over-arching duty to protect the integrity of their sport, thereby looking after the interests of all current and future members.

This protocol follows on from EU Athletes’ 2014 publication and was reviewed following expert discussions with stakeholders during the PROtect Integrity Plus Erasmus+ project in 2018-19.
Introduction

There have been some important changes since our first Protocol was published, including the entry into force of the Council of Europe’s Macolin Convention on Manipulation of Sports Competitions. It recommends the setting up of National Platforms that bring together the key stakeholders in the fight against match-fixing - sports organizations, gambling regulators, betting operators, government and the police as well as Player Associations.

National Platforms are an important new development and all Player Associations need to develop a relationship with their National Platform. Well-developed National Platforms should provide the point of contact and advice for Player Associations on all issues to do with betting integrity and match-fixing.
The first step is for players to be educated about sports betting integrity. They need to know that they must report any suspicious approaches and why it is important. Players should also be given education on their sports betting rules, the importance of sports integrity, what a corrupt approach can look like, the penalties for breaching the rules and how betting operators detect and report suspicious activities.

Player Associations should start educating athletes as soon as they join the professional game. Education should be age-specific and should be repeated regularly, at least once every other season but ideally more.

Education works best when it is delivered face-to-face by people the players know and trust. Match-fixing education is best delivered by the Player Associations, either alone or ideally in partnership with the clubs, sports federation and leagues.
Most sports now have specific rules on match-fixing, betting and inside information. In many countries there are national laws on match-fixing and players can be charged with criminal offenses and face long jail terms if found guilty.

Player Associations need to know whether there is a positive duty to report any suspicious approaches or knowledge of wrongdoing. They also need to know whether their staff are covered by these rules.

If there is a duty to report, then there needs to be a trusted method to do so, as well as an agreed timeline in which to make reports.

These should ideally be agreed with the Player Association in conjunction with the National Platform.
If this is done during an informal chat, it may not have satisfied the sports rules on reporting. As such, all Player Association staff need to be aware of what the rules say and what to do when someone tells them about something.

Player Associations should monitor how reporting mechanisms are working and ask for appropriate information to ensure that they are effective and operate in a way which protects the welfare of whistle-blowers. It can be good for players to learn the outcome of any reports so that they see it is making a difference.

There are several ways that sports and government agencies might have for players to report suspicious approaches. These can include telephone lines, apps, websites and e-mails. It is essential that the players and especially their Player Associations *know and trust* what will happen to any information supplied via these methods. This will require discussions with the relevant authorities.

*Players may choose to report suspicions face-to-face to their club or association.*
The Red Button App

EU Athletes preferred reporting mechanism is the Red Button App which was developed by FIFPro and the Finnish Professional Footballers Union (JPY). The system has been certified according to the legal framework in Finland and approved for security.

Red Button App needs to be downloaded on to players phones. One of the major advantages of the Red Button is that it is given only to players, so any information is considered of high intelligence value yet is truly anonymous if players choose so.
The Red Button App

The Player Association decides, after consultation with stakeholders, which entity will handle the reports coming through the App. This can be important if there are concerns about a federation or government’s willingness to act. Player Associations may choose that any reports go straight to the National Platform, police, national sports federations and/or international sports federations.

The App needs to be rolled out to all players through face-to-face visits where players are educated about sports betting integrity threats as well as how to download and operate the App. This can be resource intensive for the associations but provides the best results.

Players should be informed about what to include in any reports so that the information supplied is useful. A checklist should be developed with the recipients to maximise the benefits of reports by including all relevant details.
Player Associations also need to make sure that the Red Button is accepted by their sports federations as fulfilling any reporting obligations, especially if the reports are anonymous.

Player Associations must choose which organisation receives the reports from the Red Button. This will usually be the National Platform if it is functioning but, in any case, the reports recipient should ideally be independent of the sport.

It is important that whoever receives the reports is educated about how the Red Button is rolled out and how it works. In summary, EU Athletes is strongly of the opinion that provided it is supported by a proper education campaign and rolled out effectively, the Red Button App is our preferred whistleblowing mechanism that can be trusted by the players.
The national federation will often be the organisation to which any issues need to be reported. Player Associations therefore need to know in advance to whom they need to speak and what is the approved reporting method. Before there are any issues, it is advisable to meet with the relevant people and try to agree some broad protocols with the federation.

These should be written down and include:

- Confidentiality requirements for whistle blowers.
- When can reports be anonymous?
- Potential immunity for minor breaches of sports rules and/or reduction for self-reporting.
- Job protection for whistle blowers.
- Safety of players and police protection procedures

The federations should ideally work with the Player Association to ensure that clubs support education for their players about match-fixing. It is best when match-fixing education is mandatory, and time is allocated by all clubs for Player Associations to deliver education to players.
Each National Platform will differ in its composition, status and how it operates. All Player Associations should take time to understand their relevant National Platform (or its equivalent) and meet with the people responsible for sports integrity. Player Associations should have an important role to play in the National Platform’s priorities.

Player Associations should ask National Platforms what level of involvement they want to have with reports from players. Depending upon the resources of the Platform it may be that they operate a triage system so that most cases of sporting fraud are dealt with by the federations and criminal matters are dealt with by the platform and/or the police.
Players’ safety is our first concern – more so than the sport or the match. It is important to assess if the player’s safety, or that of their family, is likely to be at risk. When criminal elements are involved, players may prefer the anonymity of the Red Button App.

Player Associations should look to agree a safety protocol with their federations and National Platforms. In addition, they should work with federations and the platform to identify a police contact. As a general rule, Player Associations should not be getting involved in security or police matters.
One size does not fit all. How Player Associations act depends on the sports rules, how seriously the federation and government take this issue and the threat of match-fixing.

Reporting mechanisms are one important part of the fight against match-fixing.

They need to be part of a range of policies that are supported by education campaigns to raise awareness amongst players, starting as soon as they join the professional game.

It is important that Player Associations are ready to help members if they approach them with concerns.

This will require planning in advance and agreeing protocols with colleagues in the sport federation and National Platforms.
Conclusions

EU Athletes’ favoured mechanism for reporting any suspicious approaches is the Red Button App. This is because it is led by the Player Associations themselves and can protect anonymity, thereby helping to protect players safety, whilst also fulfilling any regulatory requirements to report approaches.

However, Player Associations need to make sure that the Red Button fulfils any reporting requirements within their sports regulations.

Finally, it is recommended to plan ahead and keep the protocol updated at least once a year. It can be helpful for Player Associations to act through a couple of scenarios with staff to make sure that the association is prepared and has thought through some of the issues.
When a match-fixing scandal happens, it can escalate quickly into a high-profile media story. Player Associations need to be prepared to protect their own reputation and ensure that they look after the interests of their players effectively.

Have one designated expert for handling match-fixing issues. Everyone should have some knowledge but it's best to have a lead member of staff.

The lead officer should establish contacts with the National Platform, betting regulator, betting companies and the federations so that you develop a relationship with relevant stakeholders. You should also think about developing a contact with the police force and you must speak to a lawyer who you have identified as someone to put players in contact with.
First contact

Everyone (including the receptionist) in your association needs to know what to do if a player reports a concern about match-fixing to them. The following are some key areas to consider:

- **Whatever you do, do not ignore it or dismiss anything.**

- **Tell the player that if they may have broken the law it will be safest for them to speak directly to a lawyer, as these conversations are protected by legal privilege. It is possible, but unlikely, that the Player Association staff could be compelled to give evidence against a player in court. Ask for their phone number and get a lawyer to call them straight back.**

- **Be aware that phone calls may be being tapped or listened to by the police if a player is already under investigation.**
First contact

If you feel the player has not broken the law, try to get as much information as you can from the initial discussion (players may change their mind afterwards). Try to find out who (and what they looked like), what, where, when and how?

Assess the initial tip. Is it from a believable person, is there likely to be any ulterior motive and is there any supporting evidence?

As soon as you can afterwards make a (hand) written note of the discussion and any other relevant points and pass it on to the designated lead member of staff.

As general rule it is better to act calmly. Keep the information confidential until you are ready to tell external agencies. Considering it may be a delicate issue, is normally best to have as few people as possible in the know.
Experience suggests that it can be a player or ex-player who makes a suspicious approach to another player. This raises difficulties for Player Associations especially when it is one current member against another.

It is essential that you do not jeopardise an investigation by alerting the other player involved. This could result in serious criminal charges in perverting the course of justice.

Realistically, an association cannot act for both parties. It is normal to provide a lawyer for the accused party or at very least recommend a lawyer when they contact you and ask for help.

If you have a federation that you trust and has an effective match-fixing policy, it may be best to encourage the player to report straight to the federation rather than through the Player Association in cases when it is one of your members under suspicion.
Dealing with the media

Consider having only one point of media contact to ensure a consistent message.

Leaks happen in all organisations, so try to keep number of staff who know about the issue small in the first instance and ensure that any media contacts are referred to the lead staff member with nobody else commenting.

Once journalists ask about the story you need to respond. Do not lie to the media – it is acceptable to say “no comment” or “I will get back to you” but lying creates problems later on.
Dealing with the media

As a general rule, it is better to prepare a simple statement along the following lines:

- say what work you have done in the past, for example education programmes
- according to sports rules there has been a report of an approach which
  - is being analysed
  - or has been passed on to the authorities.
- Issue is under investigation and due process will be followed.

It would be inappropriate to make any further comment at this time.

Alternatively, it may be that you want to put a story into the media as the federation and/or government is not doing anything. This again needs to be handled carefully and should probably just be the last resort. We would strongly suggest that the anonymity of players is protected. You need to make sure that you do nothing that could jeopardise any ongoing investigations.