



AFC INTEGRITY ACTION PLAN

1. FOCUS

The AFC's focus is on upholding the core values of football such as Fair Play, achievement by merit and the uncertainty of the outcome of matches and competitions. Match fixing is a dangerous threat to the game of football. For purposes of this Integrity Action Plan (IAP), match fixing is defined as the manipulation of a football competition where players, coaches, match officials or any person subject to AFC's rules and regulations seeks to improperly alter the outcome of the football competition or a single aspect of the competition for financial or sporting gain. In the face of growing potential for match fixing, Asian football has come under increasing pressure to safeguard its integrity. As a result, this Integrity Action Plan has been devised which details the measures being implemented by AFC to successfully combat match fixing.

Similar to the FIFA – INTERPOL initiative which was launched in May 2011 in response to this worldwide complex problem, the overarching goal of the IAP is to enable targets of match fixing to recognize, reject and report any attempts to manipulate the outcome of matches in AFC competitions. The initiative can, however, only be a success if all AFC MAs actively work with AFC to combat match fixing and corruption.

2. OBJECTIVE

The objective of the Integrity Action Plan therefore is to **prevent, detect and respond** to match fixing in AFC competitions and encourage MAs to adopt a similar strategy domestically.



3. STRATEGY

The model depicted in Figure 1 provides an overview of AFC's strategy based on the three levels namely:

- Prevent
- Detect
- Respond

At the level of **Prevention** firstly it is essential that all stakeholders, including AFC and the MAs, adopt and uphold good governance principles including having a regulatory framework in place that acts to effectively prevent and respond to cases of match fixing. Secondly, at the same level, action must be taken to impart necessary knowledge and training to all potential targets of match fixing so that they are aware of the phenomenon itself and the regulations that are in place. At the level of **Detection**, mechanisms must be implemented for effective monitoring and reporting of information linked to allegations or suspicion of match fixing. Where an allegation or suspicion is detected, an effective **Response** process should exist involving investigations and ultimately the imposition of sanctions (if sufficient evidence is found) in accordance with stipulated regulations.

Adopting a broad spectrum of measures at each of the three levels is essential to implement this Action Plan and tackle the transnational nature of match fixing. MAs are expected to adopt these measures in ensuring the protection of integrity in their respective countries.



PROTECTION OF SPORT INTEGRITY

PREVENT

Governance

- Sporting Regulations
- National Legislation
- Integrity Officers Network
- Partnership with Key Stakeholders

Awareness Raising & Training

- Partnership Development Meetings
- Pre-Competition Briefings
- Media Utilization

DETECT

Monitoring

- Fraud Detection System

Reporting

- Reporting Mechanism



RESPOND

Investigation Process

- Standard Operating Procedures

Sanctions

- Imposition



4. PREVENT

4.1 GOVERNANCE

a) Regulations

The implementation of essential and effective sporting regulations is a critical requirement for any sport governing body considering they form the basis to deem unethical behavior illicit and thereby sanctionable. More so, the regulations explicitly define behavior which is prohibited and the consequences of violations.

There are provisions pertaining to match fixing and corruption in AFC rules and regulations namely:

- **AFC Statutes**
- **AFC Code of Ethics**
- **AFC Disciplinary Code**
- **AFC Code of Conduct**
- **AFC Competition Regulations**

In line with the above mentioned regulations that govern the legal framework within Asian football, AFC adopts a **Zero Tolerance Policy** on match fixing and imposes sanctions on persons involved (predominantly for financial gain through sports betting and match fixing for sporting advantage). In addition to establishing rules of conduct and special obligations, the regulations allow for the implementation of substantive law and the enforcement process for sanctioning such violations. The provisions in these regulations are constantly being updated and improved based on experience.

More so, through the implementation of the **AFC Integrity Declaration**, all players, coaches and officials are prohibited to take part, either directly or indirectly, in betting connected to football matches organized by AFC. Similarly they are required to not tolerate and immediately report any form of manipulation encountered.



AFC will strive for a regulatory framework for itself and among its MAs that responds to a number of minimal requirements and that will be harmonized across the Confederation including analyzing the possibility of formulating an **Anti-Manipulation Code**. More specifically, the MAs will have to adapt their relevant regulations with rules regarding match-fixing (including: no betting on own competitions, obligation to report all attempts or contacts, no statute of limitations, appropriate sanctions, etc.)

b) National Legislation

AFC realizes the importance of national legislation and betting regulation in preserving sport integrity. Therefore it would encourage the implementation of national legislation that makes match fixing a crime under national penal law because in turn this would aid AFC and the MAs to pursue such cases in coordination with the prosecuting authorities. Such coordination cannot be expected in the absence of supportive legislation. Furthermore, AFC as a sport governing body can only impose sanctions on persons under its jurisdiction such as players, coaches or officials by barring them from the participation in football. AFC has no powers to sanction persons external to football who offer money for manipulating matches as these persons are not under AFC's jurisdiction. Such people can only be held accountable by respective national prosecuting authorities. In this regard, the MAs must collaborate with their respective governments with a view to introduce legislations to initiate criminal proceeding against persons involved with sporting fraud and similarly initiate action against unregulated or illegal betting operators.

c) Integrity Officers Network

AFC has recently set up an Integrity Department to act in accordance with the prescribed AFC regulations and procedures in guiding the implementation of this Integrity Action Plan. In order to build an efficient network to coordinate all measures against match fixing within the AFC region, the Integrity Department shall be directing each MA to appoint an Integrity Officer as the responsible person who will act for all matters pertaining to match fixing within the MA and be the direct contact person for AFC's own Integrity Officers. AFC Integrity Officers will work



alongside his or her national counterpart in a mutually supportive manner. The AFC Integrity Officers will support the operation of the network as well as oversee intelligence gathering and exchange of information and experience, all with the aim of ensuring that Asian football is best able to tackle the threat of match-fixing in an efficient, coordinated and professional manner.

The Integrity Officers at the MAs will receive training by AFC as well as INTERPOL and FIFA to develop the knowledge and skills to effectively conduct an enquiry and establish the facts relating to a report or suspicion of match fixing as well as present the findings for the purposes of disciplinary proceedings.

d) Partnership with Key Stakeholders

Due to its transnational nature, match fixing requires a coordinated response. The AFC needs to forge strong links with various national and international authorities, including INTERPOL and other stakeholders as well as FIFA, other Confederations and AFC MAs, in order to combat threats to the integrity of Asian football. Sports organizations cannot fight the phenomena of match-fixing related to betting on their own, therefore the MAs also need to establish strong cooperation with relevant national governments and law enforcement agencies. AFC is also seeking a cooperation agreement with INTERPOL to effectively combat match fixing in Asia.



4.2 AWARENESS RAISING AND TRAINING

A key factor in combating match fixing is to implement comprehensive awareness raising and training measures for all primary target groups vulnerable to match fixing. Training activities should incorporate information on the precise mechanism of match fixing including the utilized terminology and types as well as real-life cases where players, coaches and officials have been found guilty and sanctioned. Furthermore, training should cover how to handle exposure to potential match fixers including the obligation to report such incidents immediately to the Integrity Officers at their football association or the AFC Integrity Department. The MAs will be required to adopt a similar awareness raising and training strategy.

a) Partnership Development Meetings

Cooperation and coordination with other stakeholders in the prevention of match-fixing is integral to AFC's Integrity Action Plan. AFC intends to cooperate with all MAs in strategic prevention activities and actively seeks to engage with countries that are considered to be most at risk of match fixing, in terms of national and international betting markets. Partnership Development Meetings (PDMs), which bring together all stakeholders with the aim of strategically enhancing integrity measures will be organized at the MA and Confederation level.

b) Pre-Competition Briefings

Before every AFC tournament, integrity briefings will be held for players and match officials to raise their awareness of the phenomenon of match fixing and its dangers for the integrity of sports and their playing careers. They will be provided with information, material and contact details pertaining to the reporting of any leads on match fixing. AFC will provide its MAs with support to implement this initiative by making Integrity Declaration forms and integrity briefings templates available for national tournaments.

c) Media Utilization

Effectively utilizing media aids in ensuring a collaborative, effective and dynamic exchange of information among all stakeholder groups in protecting football's integrity. The new AFC



Integrity Action Plan and adopted measures including the zero tolerance policy against match fixing shall be communicated within AFC and across the MAs. The most important information for the target groups, including details on reporting mechanisms, shall also be provided on the AFC website. Furthermore, information about the collaboration with central partners, that is, FIFA and INTERPOL, shall be communicated on the AFC website to have a discouraging effect on potential match fixers.

AFC also plans to utilize eLearning Tools for educating primary targets with essential information regarding match fixing. The completion of eLearning initiatives by all targets of match fixing under AFC will be overseen by the AFC Integrity Department. In the long term perspective, such eLearning programs should also be implemented by the MAs where AFC will support the MAs in the provision of the eLearning Tools and oversee implementation.

The application of an appropriate media strategy is essential in raising public awareness concerning match fixing and corruption as well as to ensure the media are kept aware of the AFC's fight against match fixing. The media strategy therefore will also include an Escalation Routine Plan to ensure the media is provided with clear and concise information relating to any match-fixing scandal that may arise. However, it is important to have a media policy in place to ensure that control is maintained over all information related to match fixing in the region and decide which information on potential match fixing cases and the associated suspects shall be revealed to the media at which point, in order to avoid situations where other investigations are negatively impacted. MAs should only reveal any such information to media after consultation with AFC.



5. DETECT

5.1 MONITORING

Monitoring the betting market during pre-match and live betting for all AFC competitions is essential in identifying suspicious irregularities which could be linked to, or be indicative of, match fixing. Therefore, it is useful to work together with fraud detection systems on the market. AFC's main partner for betting monitoring is Sportradar which collects information, investigates suspicious matches and provides AFC with alerts and reports. The MAs should ideally install a trustworthy and confidential system to monitor domestic matches in order to investigate suspicious actions and report the information to AFC. A database for information received through the fraud detection system involving suspicious matches will be established at AFC in order to store information, thereby making it easier to conduct investigations in future based on suspicious history of a team, player, coach or official. Similarly, any information related to non-betting related match fixing (for sporting gains) will also be maintained in the database.

5.2 REPORTING

A secure and confidential reporting mechanism (*integrity@the-afc.com*) that is available 24 hours / 7 days a week has been established to allow players, coaches and officials to report any information to AFC's Integrity Department pertaining to match fixing. Alternately, they can also report any such information to the appointed Integrity Officer at their football association. The MAs are also encouraged to ensure the implementation of a similar reporting mechanism and share any leads they receive with AFC. Any information received by AFC via this mechanism or from the MAs will also be stored in a database for reference purposes to aid investigations in future based on suspicious history.



6. RESPOND

6.1 INVESTIGATION

A comprehensive investigation strategy has been devised, including 'Standard Operating Procedures' applicable where there are suspicions of fixed or otherwise manipulated matches at AFC level. As already mentioned earlier, the close cooperation and coordination with local law enforcement agencies is essential in order to ensure that the AFC disciplinary process and any criminal investigation can be conducted simultaneously and effectively. Such investigations at MA level will be conducted by the Integrity Officer at the MA in coordination with local authorities.

6.2 SANCTIONS

In case of evidence pointing towards involvement in match fixing, sanctions reflecting the seriousness of match fixing and unethical actions through the AFC regulatory framework shall be imposed. AFC's zero tolerance policy in such cases shall be relevantly applied and FIFA which adopts a similar zero tolerance approach towards match fixing shall be informed of the details of the evidence and imposed sanctions for purposes of ensuring worldwide effect. It must be considered that decisions of AFC can be appealed before the Court of Arbitration for Sport (CAS) and therefore the requirements established by CAS must be strictly adhered to (e.g. standards of proof) to ensure that AFC imposed sanctions are upheld. The MAs which have the right to conduct their own investigations and impose sanctions must also be aware of the requirements established by CAS. Similarly, they should always keep AFC updated and informed in regard to any such decisions.