INTEGRITY ACTION PLAN
(2021-2023)

1. FOCUS

The Football Kenya Federation (FKF) 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, match fixing is defined as the manipulation of a football competition where players, coaches, match officials or any person subject to FKF’s rules and regulations seeks to improperly alter the outcome of the football competition or a single aspect of the competition for financial gain, sporting advantage or any other reason. In the face of growing potential for match fixing and recent cases involving players in our top tier league (the Football Kenya Federation-Premier League), Football Kenya Federation feels its obliged to safeguard its integrity. As a result, this Integrity Action Plan that has been borrowed from world’s best practices is devised with details and the measures to be implemented by FKF to successfully combat the vice.

2. OBJECTIVE

The objective of the FKF Integrity Action Plan is to educate, prevent, detect and respond to match manipulations and inform its members of their duties and obligations towards protection of football competitions.

3. GOVERNANCE

3.1 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.

Football Kenya Federation commits itself to provisions pertaining to match fixing and corruption as envisaged in:
FKF Statutes  
FKF Rules and Regulations  
CAF Statutes  
FIFA Disciplinary Code  
FIFA Statutes

In line with the above-mentioned regulations that govern the legal framework within Kenyan football, FKF 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 local provisions in these regulations will constantly be updated and improved based on experience. More so, through the implementation of the FKF Integrity Declaration, all players, coaches and officials are prohibited to take part, either directly or indirectly, in betting related to football matches or competitions and/or any related football activities. Similarly, they are required to not only be intolerant to such actions, but immediately report any form of manipulation encountered.

3.2 National Legislation

FKF realizes the importance of national legislation and betting regulation in preserving sport integrity. In the absence of specific sports related crimes legislation in the country, Football Kenya Federation will use the existing laws under FKF Rules & Regulations, FIFA Statutes (in particular FIFA Disiplinary Code and FIFA Code of Ethics), Bribery Act (Kenya, 2016) and Witness Protection Act (Kenya) as it encourages the implementation of a national legislation that makes match fixing a crime under national law. Furthermore, FKF as a sport governing body can only impose sanctions on persons under its jurisdiction such as players, coaches or officials by barring them from participation in football activities. FKF has no powers to sanction persons external to football who offer money for manipulating matches as these persons are not under FKF’s jurisdiction. Such people can only be held accountable by respective national prosecuting authorities. In this regard, the FKF purports to collaborate with the government with a view to introduce legislations to initiate criminal proceeding against persons involved with sporting fraud that touch on its competitions.

3.3 Integrity Officer

Football Kenya Federation has recently appointed an Integrity Officer with a view of setting up an Integrity Department to act in accordance with the prescribed FKF, CAF and FIFA regulations and procedures in guiding the implementation of this Integrity Action Plan. The department through the Integrity Officer shall operate under the guidance of the herein mentioned pillars as well as oversee intelligence gathering and exchange of information and experience, all with the aim of ensuring that Kenyan football is best able to tackle the threat of match-fixing in an efficient, coordinated and professional manner.
4. STRATEGY

The Action Plan provides an overview of FKF’s strategy based on the following key pillars namely:
- Awareness Raising and Training
- Detection
- Response
- Media Strategy
- Partnerships
- Investigations

4.1 Awareness Raising and Training

Football Kenya Federation feels it is important to impact 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. With this in mind, the federation plans to educate its members through integrity workshops, media conferences, integrity fliers and posters. The target groups include:

- The federation’s members
- The federation’s staff
- League Officials
- Club Officials

Men’s Football
- Professional Players
- Non-professional Players
- Coaching Staff

Women’s Football
- Professional Players
- Non-professional Players
- Coaching Staff

Refereeing
- Top tier referees
- Second tier referees
- Lower leagues and grassroots referees

Grassroots & Youth
- Players
- Coaching Staff/Instructors
- Any other responsible individuals
4.2 Detection

FKF plans to put mechanisms alongside the already in place FIFA reporting mechanisms for effective monitoring and reporting of information linked to allegations or suspicion of match fixing as envisaged under Art. 18.3 and 19 of FIFA Disciplinary Code (2019), Chapter 10 of FKF Rules & Regulations and Part IV of the Bribery Act (Kenya, 2016) on duty to report. FKF plans to do this by creating several reporting channels of such allegations or suspicions. This includes:

- A dedicated area at the Federation’s website. [www.footballkenya.org/integrity](http://www.footballkenya.org/integrity)
- A dedicated email address. (integrity@footballkenya.org)
- A dedicated mailbox for letters.
- Develop an App for IOS & Android

FIFA reporting mechanisms:

- Online reporting platform: [www.fifa.com/bkms](http://www.fifa.com/bkms)
- Email: integrity@fifa.org
- FIFA Integrity App

4.3 Response

Where an allegation or suspicion is detected, an effective process would commence involving investigations by the relevant bodies and ultimately the imposition of sanctions (if sufficient evidence is found) in accordance with stipulated regulations. The process of investigations would be led by an independent arm of the federation consisting of people with legal and investigation background to ensure an impartial process.

4.4 Media Strategy

Football Kenya Federation plans to engage the media with an intention to:

- Educate and inform members, stakeholders and the general public about match manipulations,
- Enhance the credibility of the federation,
- Create trust in football governance structures and the integrity of football matches and competitions,
- Promote integrity action plan and initiatives in place.

4.4.1 Key Principles

- To develop a targeted media and communication strategy for integrity and a plan to inform internal and external stakeholders and the media themselves.
- Identify and develop professional working relationships with relevant journalists and local national and international news organizations to work in the field of integrity.
- Aim to regularly inform and educate key media about integrity and anti-match manipulation measures that are in place,
- Ensure that the principles of due process and confidentiality as well as relevant rules and regulations are followed during any communication or media activity.
4.5 Partnerships

Due to its transnational nature, match fixing requires a coordinated response. The FKF plans to forge strong links with various national and international authorities, including FIFA, CAF, Betting Industry, Media, Interpol, Local law enforcement agencies and Judicial bodies in order to combat threats to the integrity of Kenyan football.

4.6 Investigations

A comprehensive investigation strategy will be devised, including ‘Standard Operating Procedures’ and applied where there are suspicions of fixed or otherwise manipulated matches at FKF level. As already mentioned earlier, the close cooperation and coordination with local law enforcement agencies is essential in order to ensure that the FKF disciplinary process and any criminal investigation can be conducted simultaneously and effectively. Such investigations at the federation level will be conducted by the Integrity Office at FKF in coordination with relevant bodies.

IMPLEMENTATION MECHANISMS

1. Pre-Competition Briefings

Before the commencement of each and every FKF season and tournaments, 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 sports careers. They will be provided with information, material and contact details pertaining to the reporting of any leads on match fixing. FKF will provide its clubs with support to implement this initiative by making Integrity Declaration forms and integrity briefings templates available for national leagues and tournaments.

2. Partnership Development Meetings

Cooperation and coordination with other stakeholders in the prevention of match-fixing is integral to FKF’s Integrity Action Plan. Football Kenya Federation intends to cooperate with all stakeholders in strategic prevention activities and actively seeks to engage with its members 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 federation level.
3. 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 FKF Integrity Action Plan and adopted measures including the zero-tolerance policy against match fixing shall be communicated within FKF and across its members. The most important information for the target groups, including details on reporting mechanisms, shall also be provided on the FKF website. Furthermore, information about the collaboration with central partners, that is, CAF, FIFA, Government of Kenya (GOK) and INTERPOL, shall be communicated on the FKF website to have a discouraging effect on potential match fixers.

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 FKF’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. Members should only reveal any such information to media after consultation with FKF.

4. Monitoring, Detection & Reporting

Monitoring the betting market during pre-match and live betting for all FKF 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. FKF will source for a partner for betting monitoring who will collect information, investigate suspicious matches and provide FKF with alerts and reports. The Members should ideally install a trustworthy and confidential system to monitor domestic matches in order to investigate suspicious actions and report the information to FKF. A database for information received through the fraud detection system involving suspicious matches will be established at FKF 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.

A secure and confidential reporting mechanism that is available 24 hours / 7 days a week will be established to allow players, coaches and officials to report any information to FKF’s Integrity Office pertaining to match fixing. FKF respects the right to confidentiality and protection of witness and whistleblowers as envisaged under Part VI of the Bribery Act (Kenya, 2016) and the Witness Protection Act (Kenya) and shall do all that is within its powers to ensure adherence to the same.
5. Sanctions

In case of evidence pointing towards involvement in match fixing, sanctions reflecting the seriousness of match fixing and unethical actions through the FKF regulatory framework shall be imposed. FKF’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 FKF on match manipulation can only be appealed before the Court of Arbitration for Sport (CAS) and therefore the requirements established by FIFA and CAS must be strictly adhered to (e.g., standards of proof) to ensure that FKF imposed sanctions are upheld. FKF Integrity Office is the responsible authority to conducts all integrity related matters of its Members before FIFA, including conducting all investigations related to match manipulation.

Key Note

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

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