Contents

Establish – the rules of the game
08 Setting up a compliance programme
  09 Culture
  10 The three lines of defence
  11 Structuring your team
  12 The role of the compliance officer

Getting the tone right
13 Make it safe to speak up
14 Blow the whistle on wrongdoing

Embed – play by the rules
15 Do you understand the rules of the game?
  16 The rules of the game
  17 Policies – develop your own guidelines
  20 Data principles

Training, communication and support
  21 For the compliance community
  22 For your team members
  23 What is your training plan?

Evaluate – your post-match review
24 How do you know when it’s working?
  25 A game plan for monitoring and testing sharing best practice
  26 The Solidarity Grant – what does compliance need to do?
  29 Lessons learned on financial governance
Welcome to the Compliance Handbook

Wherever you are on your compliance journey, this handbook will give you the building blocks to develop or enhance a compliance programme that works for your member association.

It is full of practical resources including templates, checklists and decision-making strategies to share with your team members, as well as the latest thinking and best practice in organisational compliance.

Who is this handbook for?
It is for everyone involved in compliance in our member associations and the confederations, as well as other sporting bodies, as we continue to play our part to inspire the global sport compliance community.

What is this handbook for?
It is an interactive tool designed to support compliance in our member associations and the confederations. We want to help our compliance community with strategies, ideas and advice, sharing best practice to help you create a compliance programme that works for you.
If there are three words that capture FIFA’s transformation as an organisation since 2016, they are credibility, transparency and accountability.

These three key principles are absolutely central to the reforms that set FIFA on the right path to become the trustworthy, modern and professional organisation it is today, less than five years down the road. Rebuilding FIFA and its image has not been easy, but we stuck resolutely to our core principles and I am proud to say that we have developed a compliance culture that sets the standard for other organisations to follow.

In just under five years, we have learned many lessons from working with our member associations and other stakeholders as we have fostered our new culture and tried to lead by example. With this in mind, we have sought to simplify and streamline FIFA’s compliance information and processes for maximum accessibility.

Ultimately, a well-functioning compliance culture has to be inclusive and accessible to all, which is why our administration has put together this handbook to help everyone keep their affairs above board.

I am proud of the changes we have made together since 2016, and I am proud that FIFA is making it increasingly easier for everyone to play their part.

Yours in football,

Gianni Infantino
FIFA President
“Real change comes not from words, but from action.”

This has been FIFA’s unofficial motto since 2016, the year we created a dedicated Compliance Division to ensure that our institution and football administrations across the world would be reformed and stay reformed.

We have come a long way in these few years, having nurtured a thriving compliance culture throughout our organisation with the introduction of an array of tools, including a FIFA Code of Conduct, targeted compliance training, risk assessment, third-party due diligence and strict auditing requirements. We are now ready to embark on the next stage.

With Compliance 3.0, we have distilled our compliance culture into key tools and processes that everyone can apply as part of a winning game plan. This new approach is based on two pillars: the first is about making compliance resources available and accessible to all stakeholders. With the launch of this user-friendly Compliance Handbook, we want to drive compliance among our member associations by sharing best practice in an easy-to-use format. The second pillar focuses on the use of technology to ensure an effective and efficient compliance function. Through the creation of an internal compliance portal – a one-stop shop for all compliance-related topics – we are utilising technology to facilitate more awareness and a better understanding of compliance topics within the organisation. Reflecting the Compliance 3.0 approach, the Compliance Handbook is written with the reader in mind thanks to the complete absence of any technical or legal jargon and its presentation in an intuitive and user-friendly interface.

The bottom line is that compliance is embedded in the way we conduct our business. At FIFA, we have made it our priority to ensure that everyone can do so without getting lost in the small print.

We hope that this handbook will be a great support to you in your day-to-day operations.

Emilio García Silvero
FIFA Chief Legal & Compliance Officer

Patrick Trépanier
FIFA Director of Compliance
Compliance journey

2015
US Department of Justice unseals indictments on 27 May 2015 charging several FIFA officials with criminal offences. The organisation is under threat from corruption, misconduct and other high-profile risks.

2016
The turnaround begins – reform package and revised FIFA Statutes adopted. Gianni Infantino elected as FIFA President and Compliance Division created.

2017
New three-year compliance programme launched. First Compliance Summit.

2018
The 2018 FIFA World Cup™ has a stronger compliance framework than ever before. The United 2026 bid is the first FIFA World Cup™ bid to be chosen by the FIFA Congress. Second Compliance Summit. FIFA features in the top quarter of international federations in the governance review conducted by the Association of Summer Olympic International Federations (ASOIF).

2019
New compliance programme for the 2019 FIFA Women’s World Cup™. Chief Legal & Compliance Officer appointed to lead the Legal & Compliance Division.

2020
Compliance 3.0 and new Compliance Handbook launched. Third Compliance Summit, digital edition. FIFA is again ranked in the top quarter of international federations in the annual ASOIF governance review.

Need more information?
Click here to watch our compliance journey.
Setting up your programme

Establish
- Processes
- Tools
- Guidelines

Embed
- Leadership
- Training
- Objectives
- Decision-making

Evaluate
- Auditing
- Monitoring and reporting
- Testing

Checks and balances

Introduction
- Establish
- Embed
- Evaluate
- Checklist
- Tools
- Thank you
Establish
The rules of the game
A true compliance culture is about more than just policies and procedures. Compliance belongs to everyone: getting it right is about creating a culture so that everyone in your member association knows how to do the right thing. But that starts with you – as a member of our global compliance community, you are a role model for fair play and for living football every day.

Think of it this way: it is simply not possible to create rules and regulations for every single situation that might happen in today’s complex world. It is much more effective to empower your team members by creating a flexible, supportive compliance framework and culture.

We believe that there is always something new to learn from our passionate community, so whether you are just starting out or working with an established compliance culture, you have come to the right place.

If there is anyone who still thinks that he can enrich himself, that he can abuse football, I have one clear and strong message to tell him: leave. Leave football and leave football now – we don’t want you.

Gianni Infantino
FIFA President, 67th FIFA Congress, May 2017
Introduction

Establish

Embed

Evaluate

Checklist

Tools

Thank you

What are the three lines of defence?

No matter where you work, most modern approaches to compliance are based on the “three lines of defence” model. It is a simple way of implementing compliance controls at all levels of an organisation, with clear roles and responsibilities for players on every part of the pitch.

1. **First line of defence**
   Compliance is owned by everyone in the organisation, so the first line of defence is just that: everyone who works in your member association. It is down to everyone to do things the right way and to speak up if something is not working, supported by the right guidelines and processes. Some individuals in the first line, like team leaders, may also have extra compliance responsibilities. For example, they may have to explain compliance processes to their team, run reports or reach out to Compliance if they need support.

2. **Second line of defence**
   This is your Compliance team, who support the first line with things like compliance guidelines, controls and training. Your Compliance team needs to have access to the latest thinking and best practice in compliance. Specific functions of the second line can vary across member associations, but usually include risk management oversight and compliance responsibilities.

3. **Third line of defence**
   This is your assurance function – evaluating the organisation’s approach and providing assurance to senior leaders that compliance is working well. It can be carried out by a separate internal audit unit or an independent, objective individual, depending on the size of your member association.
Putting the right players on the pitch
– structuring your team

The three lines of defence model is flexible and you can make it work for your member association even if you do not have a dedicated Compliance team.

Compliance comes in many shapes and forms. Larger member associations may want to create specialist departments for specific areas – for example, you could have separate teams for ethics, anti-doping or sustainability.

To decide on your team structure, think about your priorities, the shape of your association, the expertise available and the gaps you need to fill. Consider the size of your member association and the resources you have. You may want to create a large stand-alone team or, instead, allocate compliance responsibilities to existing team members. Do not be afraid to take inspiration from other sporting bodies or even other industries with a strong track record in compliance.

Even if your team is well-established, it is always worthwhile checking that you still have the right players on the pitch. Things change quickly in our world – are you still focusing on what really matters to your players, officials, fans and regulators? It is worth making sure that you have the right expertise in place to meet your area’s unique challenges.

If you just do one thing

Use your resources wisely, implement the three lines of defence, and do not hesitate to contact us on compliance@fifa.org if you need support.
Here is what our team looks like at FIFA. Of course, it is only an example: your structure might look completely different based on your member association’s needs. You can find out more about our structure, team and approach here.

**Find a compliance captain**

Your compliance officer leads the team and supports the right tone for the compliance culture. This does not need to be a full-time, dedicated member of staff, but you do need a figurehead with the right experience and skills to lead out the team.

**Data goals**

Data protection has never been more important. There is a lot of external focus on how organisations look after the information people share with them. It is heavily regulated and the consequences for getting it wrong can be serious.

We strongly recommend appointing a skilled data protection officer for your member association. Again, this does not have to be a full-time role – in many organisations, the compliance officer and data protection officer are the same person. But you do need someone with the right knowledge, skills and experience to carry out this important job.

**If you just do one thing**

**Support the tone**

FIFA supports a culture of compliance with regular communication from the President and Secretary General. As compliance leaders, you must play your part by showing the highest standards of personal behaviour at all times. Work with other leaders in your organisation to put the right compliance framework in place, creating a culture where there is zero tolerance for wrongdoing. Be visible and communicate clearly about what is expected from every member of your team.
No matter how comprehensive your compliance framework, things sometimes do go wrong. Luckily, in football we are surrounded by people who care about the game.

Our global community of employees, fans, officials and players want to tell us if they see something that is not right. They are your eyes and ears: it is your job to set up easily accessible communication channels so they can report any wrongdoing or concerns.

But people will not speak up unless they feel it is safe to do so – that is human nature. To create a culture where it is safe to speak up, you need to create a non-retaliation policy for the public and your team members – the Raising Concerns Pocket Guide can help.

Make it safe to speak up

Treat every report in good faith. Reassure those who submit reports that they will never be penalised for raising a concern that they believe to be true.

Respond promptly, saying what action you plan to take. If a report or complaint is true, consider telling the individual what you have done to fix it (if you can do so without breaching confidentiality).

Listening is an important part of your compliance culture. Honest, open compliance leaders who are prepared to listen are vital to create a space where it is safe to speak up.

Learn to listen

Need more information?
Click here for the FIFA Pocket Guide – Raising Concerns
Blow the whistle on wrongdoing

First, help people feel that it is safe to speak up. Then, make it easy for them to contact you by creating reliable, accessible confidential reporting channels that you promote to your team members and the football community.

Here are some ideas:

Email
A dedicated, confidential email address is one of the simplest channels to set up. Promote it widely in your communications.

Letter
Some people still prefer to send letters, especially where internet access is difficult. Consider setting up a “freepost” system so that it does not cost anything to make a report. You could also set up postboxes at your most popular stadiums or your head office.

Homepage reporting
These days, when people want to talk to you, they usually head to your website. Setting up a hot link allows people to submit reports safely and simply.

External hotline
Setting up an externally run reporting hotline is a good way to promote trust, but it is expensive. It is not essential if you do not have the resources to manage it properly.
Creating a compliance framework

The rules of the game

When your team is in place, the next job is to create a compliance framework that works for your member association.

Again, there are no hard and fast rules here – the idea is to create guidelines that cover the high-risk areas with associated processes for your team members to follow in their daily work.

Remember, even if you have a mature framework in place, it is always worth making sure that it still fits the needs of your organisation.

Start at the top

As a member association, you are bound by FIFA’s Code of Ethics. We believe this is one of the most important documents in football because it sets out our shared standards. It shows us all how to “live football”.

We strongly recommend creating or adopting an overarching document agreed at local level (like a Code of Ethics or Code of Conduct) to sit at the very top of your compliance framework. This document sets out the standards you expect, with the rest of the compliance framework flowing from it. For example, if your code sets out principles for gifts and hospitality, you should also have gifts and hospitality guidelines with simple tools and processes for your team members and stakeholders to use.

(Note: FIFA has two separate documents – one for team members and another for the third parties we work with. You can adopt this approach or choose to create one code that applies to everyone.)

What is a pocket guide?

We have developed short guides to each of our most important policies and processes which are easy to use and to understand. We call them pocket guides because they fit in your pocket – but they are much bigger than that. They are the key to compliance at FIFA.

Develop your guidelines

Creating guidelines can seem intimidating but we are happy to share our experience. You can freely adapt or adopt our pocket guides for your member association.

Gifts and Hospitality

Anti-Bribery and Corruption

Conflict of Interest

Reputational Risk

Data Protection

Raising Concerns
Develop your guidelines

Gifts and hospitality

Giving gifts and going to events is part of business life in many cultures, but giving and receiving gifts and hospitality should never influence business decisions.

We have zero tolerance for bribery and corruption at FIFA, so your policy should set clear limits and give team members the tools they need to make good decisions. For example, our “FIT” test asks our team members to think about the Frequency, Intent and Timing of any offer of gifts or hospitality – a simple tool that really works.

Need more information?
Click here for the FIFA Pocket Guide – Gifts and Hospitality
Click here to access your tools on gifts/hospitality received and provided
Click here to access your tools on the gifts and hospitality FIT test

Anti-bribery and corruption

A bribe is the giving or receiving of anything which aims to gain a business advantage.

At FIFA, we do not tolerate corruption, which means we do not give or receive payments or goods to gain a business advantage. We steer clear of political contributions too and screen potential business partners very carefully. As well as FIFA’s rules, stakeholders will also be responsible for complying with the law in your country, so your policy needs to reflect both.

Need more information?
Click here for the FIFA Pocket Guide – Anti-Bribery and Corruption
They can be real or perceived – both matter. While conflicts of interest may sometimes seem trivial, they can have a big impact on the reputation of the game. It is important to have guidelines and mechanisms in place to encourage team members to speak up, such as FIFA’s disclosure form. It is always better to raise the matter, discuss the risks and put safeguards in place than to let situations get out of control or go under the radar.

Conflicts of interest can happen when individuals have interests, activities or relationships that could affect their responsibility to football. They can be real or perceived – both matter. While conflicts of interest may sometimes seem trivial, they can have a big impact on the reputation of the game. It is important to have guidelines and mechanisms in place to encourage team members to speak up, such as FIFA’s disclosure form. It is always better to raise the matter, discuss the risks and put safeguards in place than to let situations get out of control or go under the radar.

Compliance belongs to everyone. Ultimately, every team member is responsible for making sure that his or her member association does not become involved in criminal activity by carrying out careful due diligence on potential business partners and third parties.

The stakes are high: there is always a risk of exposing the organisation to reputational damage or breaking international sanctions or embargoes, so everyone in your organisation needs to know what to do and how to understand the constantly changing picture.
Develop your guidelines

Data protection

Processing personal data is heavily regulated. Team members handling data need clear policies and procedures to help them comply with all relevant laws, regulations and guidelines.

Because regulations change from time to time, it is a good idea to build flexibility into your approach by basing it on clear principles of data management.

Meeting your data goals
Fans and players trust us to look after their data properly. It is a heavily regulated area and, while laws vary from country to country, they all aim to make sure organisations treat data in the right way. Getting it wrong can carry stiff penalties, so it is vital to develop the right data protection policy for your member organisation based on common principles.
When it comes to data protection, there is no one-size-fits-all approach – in fact, there is often more than one way to comply with the law.

So thinking about key principles is a good approach. Use these principles to work through your understanding of the data you collect, the risks, and the controls you need to put in place.

1. **Record what you have**
   Assess all the data you hold: what do you have, how did you collect it, why do you have it, what do you want to do with it, is it being shared with a third party and how long do you want to keep it for? This will help you prioritise.

2. **Communicate with data subjects**
   Create a data protection notice that tells data subjects why you process their data, who you share it with and how long you keep it. Include a contact mechanism for your data protection officer, with clear instructions on how to request access or deletion of data.

3. **Limit how much and how long**
   Limit the data you collect and how long you keep it for – excessive collection or storage adds more risk. Document retention periods then securely delete or destroy data that you no longer need.

4. **Accurate and up to date**
   Develop processes to regularly update the data you hold to avoid intrusive processing. For example, if a player changes his or her name, he or she should be able to self-update the information easily and quickly.

5. **Keep it safe**
   Develop policies to suit your needs. For example, if you use a lot of paper, you will want to implement a clear-desk policy and rules for locking paperwork away. Equally, making sure team members log off when they leave their desk helps keep data secure. Put the right processes in place for the data you handle and the way you work with it.

6. **Respect data subjects**
   Everyone has the right to request the data you hold on them, so make it easy for the public to contact you. Train your team to treat data requests as routine matters, respecting the law – for example, it is common to only have 30 days to respond to a data subject request, and this must be free of charge.

   Consider:
   a) how the team will recognise and receive requests
   b) how to answer and document requests
   c) what information needs to be provided, by when
   d) using clear, simple language in data request responses

7. **Give your team the tools for the job**
   Processes are only ever as good as the people involved, so train team members regularly and talk to them about the risks.

8. **Be prepared for issues**
   Data breaches, or potential data breaches, can lead to accidental or unlawful destruction, loss, alteration, disclosure or access to any personal data that you hold. Examples are viruses, attacks or hacks, lost devices or documents, and storing or disposing of documents in the wrong way.

Need support? Contact dataprotection@fifa.org
#squadgoals – training and support

Supporting the global compliance community

The FIFA Compliance team works closely with member associations to offer support and training at all levels. We are always looking for new ways to enhance the skills and knowledge of our global community.

Our annual Compliance Summit (held online in 2020) is one of the highlights of the FIFA Compliance programme. It is a platform to discuss concerns and challenges and share knowledge, insights and best practice with colleagues from across football.

We would love to hear from you. We can help you develop and adapt training for your member association as well as advise on all things compliance. You can contact us on compliance@fifa.org

Need more information?
Click here to access your checklist for compliance training
Developing a compliance communication and training programme will help your team understand the rules, guidelines, external regulations and laws that apply to their work.

Base your training approach on the number of people who work for your association and the different policies and procedures in place. Whatever methods you use, remember that training is always more effective if it is based on real-life examples. Asking questions builds accountability, and if you really want to change attitudes and behaviour, make sure compliance is built into performance reviews to create ownership. Also, just like getting ready for an important match, training regularly is usually better than trying to cover everything at once.

Here are some common training approaches and tools – remember that FIFA has lots of content you can adopt and adapt:

**Awareness-building**
Create awareness of important topics using accessible, easy-to-use formats. Video is particularly good for this, and it does not have to be expensive. You can share FIFA’s materials, or you could even create your own videos on your mobile phones – any training that comes directly from colleagues is a powerful tool.

**Face-to-face training**
Nothing beats face-to-face training, but it does take time and planning. We recommend using it for key topics at certain times in the employee lifecycle, such as annual performance reviews or when team members join the organisation. Face-to-face compliance induction training sets new employees up for success (although it is better to spread this out over the first few weeks rather than delivering it all on the first day). Remember that face-to-face training gives team members a great insight into how things really work on the ground, which is a huge benefit.

**Online training**
Online training helps you reach a large audience, so it is particularly good for member associations with a wide geographical spread.
The next step is to create a flexible communication and training plan to fit your needs.

At member association level, annual training is the goal – but if processes change or you are responding to something like new legislation, you will need to react more quickly. Spread communications through the year and take advantage of any calendar triggers – for example, you could send out a reminder about gifts and hospitality just before major cultural holidays.

Get ready to kick off: what is your training plan?

Annual training is the goal.
Your post-match review
How do you know when it is working?

The only way to know if your framework is working is to evaluate it. We suggest a two-phased approach to monitor performance and test your systems.

**Monitoring** means the ongoing review of key performance and risk indicators, allowing you to identify patterns and issues. This is usually part of your regular reporting cycle.

**Testing** means periodically selecting and reviewing your products, services, training and communication to report on their effectiveness. Testing is usually carried out by the second line of defence – the Compliance team. It is impossible to test everything at once, so set up an annual schedule. After testing, validate any changes to make sure they are working.

At FIFA Compliance, our monitoring and testing framework follows a risk-based approach, particularly around economic sanctions and operational risk. We have recently enhanced the way we handle conflicts of interest and all team members now complete annual declarations that are reviewed and assessed.
2020 has been an unprecedented year for both football and the world.

Working with our member associations to safeguard the public, players, officials and every member of our global community has been FIFA’s priority, which meant suspending football in almost every country across the globe.

To support its member associations, FIFA has launched the FIFA COVID-19 Relief Plan. If your member association has benefited from it, the Compliance team has specific responsibilities.

**FIFA COVID-19 Relief Plan**

2020 has been an unprecedented year for both football and the world.

Working with our member associations to safeguard the public, players, officials and every member of our global community has been FIFA’s priority, which meant suspending football in almost every country across the globe.

To support its member associations, FIFA has launched the FIFA COVID-19 Relief Plan. If your member association has benefited from it, the Compliance team has specific responsibilities.

**What does compliance need to do?**

All COVID-19 funding grants are governed by the COVID-19 regulations, which means that you have to report on how they were used as part of an expanded central review. If your member association plans to apply for Tranche 2 funding, you need to tell FIFA how the Tranche 1 grant was used as part of the application process.

Any leftover funds will be monitored through the year-end central audit review process, with unspent amounts remaining in the dedicated Forward bank account.
Your grant must be used to support football during and after the pandemic.

**That means you can use it to:**
- resume competitions, where conditions permit;
- develop and implement safe return-to-play protocols;
- support national teams at all levels to take part in competitions that have resumed;
- pay staff, administration and operating costs, and maintain football’s infrastructure in your area;
- cover the costs of contractual breaches and any other additional costs as a result of the pandemic;
- help the wider football community to cover their costs and get back on track.

**This means you cannot use it:**
- for speculative investments or discretionary bonuses. If you grant funds to clubs, they cannot be used to finance player trading or increases in player salaries.
The Women’s Football Grant can only be used for women’s football, i.e. women’s leagues, clubs, player associations, registered female players or people directly linked to women’s football.

This will be verified during the review. Submitting a report on the use of the women’s grant is mandatory.

Grants may be used by a member association or confederation or the wider football community.

If you want to award a Solidarity Grant to a second recipient, we recommend using transparent, non-discriminatory criteria to assess applications. For example, if you awarded grant money to lower-division clubs, all clubs in that category should have had the same opportunity to access the funds. Awards should be split equally or based on objective factors such as club revenue. Payments must be transferred to bank accounts in the recipient’s name. Note that onward funding is covered by article 7.4 par. 5 of the FIFA COVID-19 Relief Plan Stage 3 Regulations.

Reporting
You must publish a summary of your annual financial statements and activity on your website or other public platform.

Reporting on the use of grants is mandatory.
Lessons learned – financial governance

Sharing best practice is one of the biggest benefits of being part of our global compliance community. We have compiled some of the most important lessons learned by our member associations when it comes to getting financial governance right.

1. Keep the right records
   You must keep supporting documentation to prove that expenses claimed were actually incurred. All claims must be based on actual expenses incurred rather than estimated amounts from the original application forms. Only use authorised bank accounts to pay claims in order to help track payments and documentation. Link this to your project reports and keep all supporting documentation – for example, you need to keep both invoices and receipts. Things like travel costs should include travel dates, passenger lists and destinations as well as receipts. Remember that simple measures can make a big difference – like stamping invoices as "PAID" once you have settled them, which is an easy way of avoiding duplicate payments.

2. Restrict cash payments
   Many payments relating to funding are made in cash. Using cash makes it harder to keep accurate records and increases the risk of inaccurate reporting, so restrict the amount of cash payment and petty cash balances you hold. If you do have to use cash, document the purpose and retain all supporting information (full audit trail).

3. End the year right
   Only record the current year’s payments on the reporting forms. For example, if an expense was paid in 2019, you must record it on the 2019 form. This will avoid cut-off errors at the end of the year. Cash-accounting reporting principles apply.

4. Adhere to procurement policies
   Procurement policies should be in place, and adhered to, for any expenditure over USD 50,000. Always carry out a full bid evaluation, which includes checking for conflicts of interest – see the Annexe for sample forms.
Lessons learned – financial governance

Continued

Set the right controls
Every member association is unique, with its own approach to financial controls. However, we do have a minimum standard for financial management that every organisation is expected to have in place:

An accounting system, trained accounting staff and a periodic review of financial policies or guidelines
- Ensure that your accounts team is properly resourced and funded and that it complies with accounting principles and requirements that are generally accepted in the member association’s country.

Suitable policies or guidelines covering:
- Segregation of duties – who is responsible for what activities
- Daily allowances – approved, disclosed and managed
- Travel – approved by the executive committee and covering travel class, distance, duration, who can travel and approval levels

Budget
- Approved by the finance and executive committees with short-term (one year) and long-term (five years) goals

Compensation policies or guidelines for:
- General compensation, daily and other allowances, prize money, payments to match officials

Disclosure requirements, annual accounts and financial transparency
- Annual financial report and audit report

Cash management policies or guidelines
- Implement a maximum threshold for the cash-in-hand balance, set an upper limit for cash payments and issue guidelines detailing the evidence required for cash payments and cash cheques

Approval thresholds for signing revenue and expense contracts, approval process for expense claims and budgets

Ticketing management policies or guidelines including appropriate processes and controls
Compliance checklist

Feeling confident about your compliance set-up? Or are there a few areas you want to brush up on?

Use this checklist to make sure you’ve established, embedded and evaluated a compliance set-up that’s right for your member association.

Establish – the rules of the game
Setting up a compliance programme
- Culture
- The three lines of defence
- Understanding compliance culture
- Structuring your team
- The role of the compliance officer
- The role of the data protection officer

Getting the tone right
- Make it safe to speak up
- Blow the whistle on wrongdoing
- Learn to listen

Embed – play by the rules
Do you understand the rules of the game?
- The importance of a code of conduct
- Policies – FIFA’s pocket guides
- Developing your own guidelines
- Due diligence checklist
- Principles of data management

Training, communication and support
- For the compliance community
- For your team members

Evaluate – your post-match review
How do you know when it’s working?
- A game plan for monitoring, testing and sharing best practices
- The solidarity grant – what does Compliance need to do?
- Lessons learned on financial governance
Wherever you are on your compliance journey, these tools will give you the building blocks to develop or enhance a compliance programme that works for your member association.

These resources can be edited and shared with your team members to help you create the best compliance programme for your association.

Click to download the tools:

- **Know who’s on the pitch – a checklist for due diligence**
  This simple checklist can help you protect your member association’s reputation by understanding how to carry out practical due diligence.

- **Preparation checklist for compliance training**
  Use this checklist to make sure you are fully prepared for your training sessions.

- **Reporting form**
  No matter how comprehensive your compliance framework, things sometimes do go wrong. Use this form as a safe way to speak up and report any wrongdoing or concerns.

- **Conflicts of interest and secondary employment declaration form**
  Conflicts of interest can happen when individuals have interests, activities or relationships that could affect their responsibility to football. Use this form to record details of any conflicts of interest or secondary employment.

- **Gifts/hospitality received and provided form**
  Use this form to record details of actual or proposed gifts or hospitality, received from or provided to third parties.

- **Gifts and hospitality FIT test – to accept or not accept, that is the question...**
  Use this assessment tool to establish if you can accept a gift or hospitality offer from a third party.
Thank you

We would be happy to talk you through our ongoing compliance initiatives as well as any recent changes – get in touch on compliance@fifa.org.

We will continually review and update this handbook – please ensure you are referring to the most up-to-date version.