

Match-Fixing and Sports Integrity: Reconstructing Institutional Accountability for Manipulation of Professional Sporting Events in Indonesia

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Abstract

Match-fixing represents a significant threat to the integrity and credibility of professional sport. Although manipulation is commonly associated with individual athletes or officials, the phenomenon may also reveal weaknesses in organizational governance, monitoring systems, reporting mechanisms, and financial controls. This article examines institutional accountability for match-fixing within Indonesian professional sport. Using normative juridical research, the study analyzes sports governance, criminal and disciplinary responsibility, integrity frameworks, and institutional duties to prevent manipulation. The research argues that effective anti-match-fixing regulation must move beyond punishment of individual offenders and address structural conditions that facilitate corruption, including inadequate oversight, financial vulnerability, conflicts of interest, and weak whistleblower protection. The article proposes a multi-layered integrity framework incorporating risk assessment, monitoring, mandatory reporting, protection for whistleblowers, transparent disciplinary procedures, and cooperation between sports organizations and public authorities. Institutional responsibility should arise where organizations knowingly tolerate integrity risks or fail to implement reasonable preventive mechanisms. Such an approach would complement individual criminal and disciplinary sanctions while strengthening organizational accountability. A comprehensive integrity framework is essential to preserve public confidence, protect athletes from coercive manipulation, and ensure that sporting competition remains fair and credible within Indonesia's professional sports ecosystem.

[Pengaturan pertandingan merupakan ancaman signifikan terhadap integritas dan kredibilitas olahraga profesional. Meskipun manipulasi umumnya dikaitkan dengan atlet atau pejabat individu, fenomena ini juga dapat mengungkap kelemahan dalam tata kelola organisasi, sistem pemantauan, mekanisme pelaporan, dan pengendalian keuangan. Artikel ini mengkaji akuntabilitas institusional untuk pengaturan pertandingan dalam olahraga profesional Indonesia. Dengan menggunakan penelitian yuridis normatif,

studi ini menganalisis tata kelola olahraga, tanggung jawab pidana dan disiplin, kerangka integritas, dan kewajiban institusional untuk mencegah manipulasi. Penelitian ini berpendapat bahwa regulasi anti-pengaturan pertandingan yang efektif harus melampaui hukuman terhadap pelaku individu dan mengatasi kondisi struktural yang memfasilitasi korupsi, termasuk pengawasan yang tidak memadai, kerentanan keuangan, konflik kepentingan, dan perlindungan pelapor yang lemah. Artikel ini mengusulkan kerangka integritas berlapis yang mencakup penilaian risiko, pemantauan, pelaporan wajib, perlindungan bagi pelapor, prosedur disiplin yang transparan, dan kerja sama antara organisasi olahraga dan otoritas publik. Tanggung jawab institusional harus muncul ketika organisasi secara sadar mentolerir risiko integritas atau gagal menerapkan mekanisme pencegahan yang wajar. Pendekatan seperti itu akan melengkapi sanksi pidana dan disiplin individu sekaligus memperkuat akuntabilitas organisasi. Kerangka integritas yang komprehensif sangat penting untuk menjaga kepercayaan publik, melindungi atlet dari manipulasi yang bersifat memaksa, dan memastikan bahwa kompetisi olahraga tetap adil dan kredibel dalam ekosistem olahraga profesional Indonesia.]

Keywords: Match-fixing, sports integrity, institutional accountability, corruption, sports governance

Introduction

Match-fixing constitutes one of the most serious threats to the normative foundation of competitive sport because it transforms an ostensibly uncertain contest into a predetermined or improperly influenced event. The harm is not confined to the immediate manipulation of a score or particular sporting incident. Match-fixing can undermine the trust of spectators, distort betting markets, damage athletes' careers, reduce the legitimacy of sporting institutions, and create opportunities for broader forms of corruption. Masters characterizes the development of corruption in sport as part of a broader process in which commercialization and institutional complexity have expanded the opportunities for corrupt conduct (Masters 2015). Andreff similarly explains that sports corruption is closely associated with weak governance structures and economic incentives capable of transforming sporting organizations into vulnerable institutional environments (Andreff 2019). The problem therefore requires legal analysis beyond the question of whether an individual player accepted a bribe.

The contemporary understanding of match-fixing also recognizes that manipulation may concern more than the final result of a competition. FIFA defines match manipulation broadly to include unlawful influence over the course, result, or another aspect of a match or competition, whether motivated by financial gain, sporting advantage, or another improper benefit. The FIFA Integrity Handbook

further emphasizes education, integrity officers, reporting mechanisms, risk assessment, investigation, and disciplinary adjudication as components of an effective integrity system (FIFA 2024). These approaches demonstrate that prevention cannot be reduced to criminal punishment after manipulation has occurred. The legal problem is simultaneously preventive, organizational, contractual, financial, and disciplinary. A credible regulatory framework must therefore identify the institutional conditions that enable manipulation and assign responsibility where organizations fail to manage reasonably foreseeable integrity risks.

Indonesian law provides an important but incomplete foundation for responding to match-fixing. Law No. 11 of 2022 concerning Sports expressly regulates sports management, competition, sporting actors, sports industry, supervision, dispute resolution, and criminal provisions in the sports sector (Indonesia 2022). The statute therefore recognizes that sport requires governance and legal oversight rather than purely private self-regulation. Nevertheless, Indonesian legislation does not establish a comprehensive, sport-specific criminal offense expressly addressing manipulation of sporting competitions. Previous comparative research concludes that Indonesian match-fixing regulation remains relatively weak when compared with jurisdictions such as Australia and Germany (Taniady et al. 2022). This regulatory gap becomes particularly significant when manipulation occurs between private actors whose conduct may not fall neatly within conventional public-sector corruption offenses.

The difficulty is partly attributable to the fragmented character of Indonesian criminal law. Law No. 31 of 1999 concerning the Eradication of Corruption, as amended by Law No. 20 of 2001, provides a substantial anti-corruption framework, but its principal offenses are structured around particular forms of corruption involving public authority, state finances, or statutory categories of bribery. A professional football match, by contrast, may involve private clubs, athletes, referees, intermediaries, gamblers, agents, and commercial actors without a direct connection to public office. Silalahi's comparative analysis consequently argues that Indonesia requires more specific legislative treatment of match-fixing because reliance upon existing criminal provisions may produce uncertainty concerning legal subjects, prohibited conduct, and applicable sanctions (Silalahi 2020). The absence of a dedicated offense does not necessarily mean manipulation is lawful, but it creates uncertainty concerning the most appropriate legal basis for prosecution.

The problem becomes more complex because sports organizations exercise substantial disciplinary authority independently of public criminal law. International sporting organizations such as FIFA have established specialized integrity rules, including prohibitions on manipulation and betting-related conduct and mechanisms for reporting suspected approaches. FIFA's 2023 regulatory reforms strengthened the institutional response to match-fixing by introducing greater investigative independence and emphasizing cooperation with public

enforcement authorities (FIFA 2023). This illustrates a dual system of accountability in which the same conduct may generate sporting disciplinary consequences and, where the legal elements are satisfied, criminal consequences. The coexistence of these systems requires coordination because sporting bodies possess specialized knowledge and immediate regulatory authority, while public authorities possess coercive investigative and prosecutorial powers.

Previous studies have examined match-fixing through several disciplinary perspectives. Economic scholarship has analyzed incentives created by betting markets and the possibility that manipulation can arise when the expected financial benefit exceeds the perceived probability and severity of punishment (Bag and Saha 2011). Empirical studies have examined athlete vulnerability, including the influence of financial insecurity, social relationships, authority figures, and organizational culture (O'Shea et al. 2021). Research concerning referees has demonstrated that asymmetric relationships and organizational cultures can create structural opportunities for manipulation (Garcha-Garcha et al. 2021). Studies of European sport have also shown that internal stakeholders may be involved in manipulation, challenging the assumption that match-fixing is primarily the work of external criminal networks (Van der Hoeven et al. 2022).

A second body of scholarship examines institutional governance. Veuthey argues that sports governing bodies have developed important anti-match-fixing mechanisms but that these mechanisms require continued improvement and coordination (Veuthey 2014). Chappelet similarly contends that conventional sports governance requires stronger regulatory mechanisms and cooperation between sports organizations and public authorities, particularly in areas such as corruption and match-fixing (Chappelet 2018). Van Bottenburg's network-governance analysis further demonstrates that match-fixing crosses organizational boundaries and therefore cannot be effectively addressed by one institution acting independently (Van Bottenburg 2022). These studies establish an important theoretical foundation, but the Indonesian context requires a more explicit legal framework for determining when institutional failures should themselves produce accountability.

Indonesian scholarship has begun to address this institutional dimension. Syah, Suryanto, and Nugroho identify corruption, including match-fixing, as a governance problem affecting sporting events, public confidence, and athlete welfare (Syah, Suryanto, and Nugroho 2024). Utari, Arifin, and Maskur emphasize transparency, independent auditing, and public oversight as important responses to corruption within Indonesian sporting events (Utari, Arifin, and Maskur 2024). Widodo and Wirawan similarly connect sports governance with fairness, transparency, ethical decision-making, and accountability (Widodo and Wirawan 2024). More recent Indonesian research has considered sports corruption as a problem affecting justice rather than merely sporting ethics (Kusuma, Flores, and Sombat 2025). These contributions provide valuable context but leave unresolved

the precise doctrinal basis upon which a club, federation, or competition organizer should be held institutionally accountable for failing to prevent manipulation.

This article employs normative juridical research using statutory, conceptual, and comparative approaches. The statutory approach examines Indonesian sports legislation, anti-corruption legislation, gambling regulation, money-laundering law, contractual principles, and relevant provisions concerning institutional governance. The conceptual approach analyzes corruption, institutional responsibility, corporate accountability, due diligence, duty to report, conflict of interest, whistleblower protection, and proportionality. The comparative approach considers the Macolin Convention, FIFA integrity regulations, Olympic Movement standards, and international scholarship on sports manipulation. International instruments are not treated as automatically binding Indonesian law. Instead, they are used to identify regulatory principles that may inform Indonesian legislative reform and the interpretation of reasonable institutional governance.

The contribution of this article is to reconstruct match-fixing as a problem of **institutional** accountability rather than exclusively individual criminality. Individual athletes, referees, officials, intermediaries, and external manipulators must remain accountable for deliberate participation. However, organizations should also bear responsibility when they knowingly tolerate substantial integrity risks, fail to establish reasonable monitoring and reporting mechanisms, permit conflicts of interest, ignore credible warnings, or create financial conditions that predictably increase vulnerability to manipulation. The proposed model therefore distinguishes individual responsibility from institutional responsibility while allowing them to coexist. Such a framework is particularly important in Indonesia because the existing legal system contains relevant but fragmented provisions and lacks a comprehensive sport-specific integrity architecture.

Match-Fixing as a Legal and Institutional Integrity Problem

Match-fixing should first be understood as a form of corruption that attacks the institutional function of sport. The defining characteristic of competitive sport is uncertainty: participants and spectators expect the outcome to be determined by legitimate sporting performance rather than private arrangements. Once that uncertainty is intentionally distorted, the competition becomes economically and socially deceptive. UNODC and the International Olympic Committee identify competition manipulation as a major threat because it eliminates the unpredictability that constitutes a fundamental characteristic of fair competition (UNODC and IOC 2016). This conceptualization is legally important because the victim is not necessarily limited to the person who loses money or suffers direct financial damage. The manipulated competition can injure athletes, clubs, spectators, legitimate bettors, sponsors, broadcasters, and the public interest in credible sporting institutions.

The economic dimension explains why match-fixing is particularly difficult to regulate through traditional sporting discipline. Betting markets create an opportunity to convert manipulated sporting information into financial gain, and technological developments have expanded opportunities for in-play betting and sophisticated manipulation. Forrest and McHale demonstrate that statistical monitoring can identify suspicious divergences between expected sporting outcomes and betting-market movements, providing potentially valuable evidence in integrity investigations (Forrest and McHale 2019). Bag and Saha similarly show that betting structures can create incentives for bribery where powerful bettors or syndicates can influence sporting participants (Bag and Saha 2011). Consequently, anti-match-fixing regulation should incorporate financial surveillance and data-based detection rather than relying exclusively upon complaints after an athlete has been approached.

The legal characterization of match-fixing should also recognize the difference between manipulation for betting profit and manipulation for sporting advantage. A club or individual may attempt to influence a competition to avoid relegation, secure qualification, alter tournament positioning, or obtain another sporting benefit without placing a conventional bet. FIFA expressly recognizes these different motivations in its definition of match manipulation (FIFA 2024). The legal wrong therefore cannot be defined solely through gambling. A narrow betting-centered offense would leave significant forms of manipulation outside the regulatory framework. Indonesian legislation should instead focus on the intentional and improper influence of the course, result, or material aspect of a sporting competition, while treating betting-related financial gain as one aggravating circumstance rather than the exclusive basis of criminality.

The distinction between sporting rules and public law is equally significant. A disciplinary code may prohibit conduct more broadly than criminal legislation because sporting organizations regulate participation through contractual and associative relationships. A player may therefore violate an integrity rule by failing to report an approach even if criminal liability cannot be established. This distinction is legitimate because the purposes of disciplinary and criminal law are different. Criminal law expresses public condemnation and imposes state punishment, whereas disciplinary law protects the integrity of a particular sporting system. However, disciplinary authority should not be treated as a substitute for criminal justice where conduct satisfies the elements of a criminal offense. UNODC and IOC emphasize cooperation between sports organizations and law enforcement because competition manipulation frequently involves cross-border financial networks and investigative techniques unavailable to sporting bodies (UNODC and IOC 2016).

The Limits of Indonesian Criminal Law

The central doctrinal problem in Indonesia is the absence of a comprehensive sport-specific criminal offense directed at competition manipulation. Law No. 11 of 2022 provides a modern statutory framework for sport and contains provisions concerning governance, supervision, and criminal matters, but it does not create a detailed offense equivalent to the competition-manipulation provisions found in some foreign jurisdictions. Taniady et al. conclude that Indonesian regulation remains comparatively weak and argue that foreign models, particularly those of Australia and Germany, provide useful guidance for future legislative development (Taniady et al. 2022). Silalahi reaches a similar conclusion, emphasizing the need for future legislation capable of identifying the relevant legal subjects, prohibited conduct, evidentiary requirements, and sanctions associated with match-fixing (Silalahi 2020). This legislative gap should be addressed without creating unnecessary duplication with existing criminal law.

The Anti-Corruption Law illustrates the difficulty of applying general criminal provisions to private sporting manipulation. Law No. 31 of 1999, as amended by Law No. 20 of 2001, is designed primarily around legally defined corruption offenses, including bribery and abuse involving public authority and other statutory circumstances (Indonesia 1999; Indonesia 2001). A match-fixing arrangement involving a private athlete, private club executive, and private bettor may therefore fall outside the clearest applications of the statute unless additional circumstances connect the conduct to a covered offense. This does not imply that such conduct should be exempt from criminal regulation. Rather, it demonstrates the inadequacy of assuming that general anti-corruption legislation can comprehensively address corruption in professional sport.

The historical bribery framework presents a related issue. Law No. 11 of 1980 concerning bribery is relevant to Indonesia's broader legal architecture against corrupt exchanges, but its statutory construction and historical context do not provide a complete modern solution to the diverse forms of manipulation found in professional sport (Indonesia 1980). The problem is particularly apparent where a manipulation arrangement involves non-public actors and sophisticated intermediaries. A contemporary sports-integrity offense should therefore be formulated independently enough to capture private-sector manipulation while maintaining clear principles of legality, culpability, and proportionality. Criminalization should not depend upon stretching existing provisions beyond their intended meaning because excessive interpretive expansion can undermine legal certainty.

The Indonesian gambling framework also cannot independently solve the match-fixing problem. Regulation concerning gambling addresses unlawful gambling activity, but manipulation and gambling are conceptually distinct. A person may manipulate a match for sporting advantage without gambling, while a gambler may participate in unlawful betting without manipulating a competition.

Consequently, relying exclusively upon gambling offenses would fail to capture the integrity harm generated by deliberate manipulation. The distinction is consistent with international regulatory practice. The Macolin Convention treats manipulation of sports competitions as a broader phenomenon involving sporting actors, betting operators, competition organizers, and public authorities, rather than reducing it to illegal betting alone (Council of Europe 2014). Indonesia can adopt the same conceptual separation.

Money-laundering law may become relevant when match-fixing generates proceeds that are subsequently concealed or integrated into legitimate financial transactions. Law No. 8 of 2010 provides a framework for preventing and combating money laundering and may become relevant where manipulation proceeds constitute criminal proceeds under the statutory framework (Indonesia 2010). However, money laundering remains derivative of an underlying predicate offense and therefore cannot independently resolve the foundational problem of defining competition manipulation. A coherent Indonesian system should consequently establish a specific offense while preserving the availability of existing financial-crime legislation where the factual circumstances satisfy its elements.

The better legislative approach would be to create an offense of manipulation of sporting competitions applicable to any person who intentionally, directly or indirectly, improperly influences the course, result, or material aspect of a sporting event for an unlawful benefit. The offense should cover bribery, coercion, solicitation, deliberate underperformance, manipulation of officiating decisions, misuse of confidential sporting information, and coordinated interference with competition conditions. The law should distinguish completed manipulation from attempted manipulation and from mere approaches that are promptly rejected and reported. Sanctions should reflect culpability, benefit obtained, role within the sporting organization, repeated conduct, and whether vulnerable athletes were coerced. Such differentiation would better satisfy proportionality than a uniform punitive model.

Institutional Accountability and Organizational Failure

Individual punishment is necessary but insufficient because match-fixing frequently depends upon institutional weaknesses. A player may accept a bribe, but the opportunity to approach that player may be facilitated by unpaid salaries, inadequate supervision, weak integrity education, uncontrolled access to athletes, conflicts of interest, or ineffective reporting mechanisms. Vandercruysse et al. demonstrate the connection between overdue athlete salaries and increased vulnerability to match-fixing, arguing that delayed or absent remuneration can create conditions in which athletes become more susceptible to manipulation (Vandercruysse et al. 2024). The legal significance is substantial: an institution that systematically fails to pay athletes while simultaneously demanding strict integrity compliance may contribute to the vulnerability it later seeks to punish.

Institutional accountability should not, however, become automatic organizational liability for every act committed by an individual. The existence of an employee or athlete who independently fixes a match does not necessarily establish that the club itself participated in or caused the manipulation. Organizational responsibility should instead depend upon the existence of a legally relevant failure, such as inadequate supervision, failure to implement mandatory integrity policies, deliberate disregard of credible warnings, unmanaged conflicts of interest, or failure to maintain appropriate financial controls. This approach parallels contemporary corporate-accountability theory, which distinguishes direct organizational participation from failures of systems, supervision, and governance. The same distinction is essential in sport because organizations require sufficient legal certainty to know what preventive measures are expected of them.

Sports governance literature supports the proposition that institutional structures can generate opportunity for corruption. Research on football referees demonstrates that governance failures, asymmetric relationships, and normalized informal practices can create conditions in which manipulation becomes a rational career strategy for some actors (Garcha-Garcha et al. 2021). Chappelet likewise argues that governance reforms must extend beyond formal codes and address the structural weaknesses of international sport organizations (Chappelet 2018). The implication for Indonesia is that an integrity code without institutional monitoring may create merely symbolic compliance. Legal responsibility should therefore evaluate whether an organization actually implemented its integrity framework rather than merely possessing a written policy.

A club's first institutional obligation should be integrity risk assessment. Risk assessment requires identifying sporting competitions, personnel, financial circumstances, betting exposure, and organizational relationships that create heightened manipulation risks. FIFA's 2024 Integrity Handbook emphasizes the development of integrity initiatives, appointment of responsible officers, reporting systems, education, investigation, and adjudication (FIFA 2024). These mechanisms can be adapted to Indonesian professional sport without requiring identical institutional structures. Clubs participating in competitions with substantial betting exposure should be expected to implement more sophisticated controls than organizations operating at lower-risk levels. Proportionality is therefore essential: the legal standard should require reasonable controls appropriate to the size, resources, and risk profile of the organization.

Financial governance is particularly important because economic vulnerability can operate both as a cause and an indicator of match-fixing risk. An organization that consistently delays salaries, conceals financial obligations, or permits unexplained payments creates conditions conducive to corruption. Research on athlete vulnerability has shown that financial strain may increase susceptibility to approaches from persons seeking to manipulate sporting outcomes (Vandercruysse et al. 2024; O'Shea et al. 2021). Consequently, integrity regulation should not be limited to prohibiting athletes from accepting bribes. It should also

require clubs to maintain transparent remuneration systems, document extraordinary payments, regulate intermediaries, and establish internal mechanisms through which athletes can report financial pressure without fear of retaliation.

Conflict-of-interest regulation is another essential component. Individuals occupying multiple positions within clubs, federations, betting-related businesses, agencies, or commercial entities may possess information or influence capable of facilitating manipulation. The Macolin Convention identifies conflicts of interest as part of the broader integrity risks associated with competition manipulation (Council of Europe 2014). Indonesian sports organizations should therefore require disclosure of relevant financial and professional interests, establish recusal mechanisms, and prohibit undisclosed relationships that compromise independent decision-making. A conflict-of-interest framework would be particularly important for referees, integrity officers, disciplinary officials, club executives, and persons involved in athlete selection.

Institutional responsibility should also extend to the preservation of evidence. Match-fixing investigations increasingly depend upon electronic communications, betting patterns, financial transfers, access records, and other forms of digital information. Indonesian law recognizes electronic information and documents as important forms of evidence within the modern criminal justice framework, while the Anti-Corruption Law's development has also acknowledged the evidentiary significance of electronic information (Indonesia 2001). Sports organizations should therefore adopt evidence-preservation protocols when credible integrity concerns arise. Destroying, concealing, or negligently losing relevant evidence should itself constitute a serious governance violation because it directly undermines subsequent disciplinary and criminal investigations.

Whistleblower Protection, Monitoring, and an Indonesian Integrity Framework

Whistleblower protection should form the institutional core of any effective anti-match-fixing regime because insiders are frequently the first persons to receive approaches or observe suspicious conduct. Research on whistleblowing in international sport demonstrates that organizational culture and reporting structures strongly influence whether individuals are willing to report wrongdoing (Manoli and Hodgkinson 2020). A formal reporting channel is therefore insufficient if athletes reasonably believe that reporting may result in loss of selection, contract termination, social exclusion, or retaliation. The law should establish confidentiality, protection against adverse treatment, and accessible reporting mechanisms capable of receiving anonymous or protected disclosures.

The duty to report should be carefully designed. FIFA's integrity framework places reporting obligations upon players, clubs, officials, referees, intermediaries, and other persons subject to its regulations, particularly where they receive approaches concerning manipulation (FIFA 2024). Such a duty is defensible

because silence can permit manipulation to develop from an initial approach into a completed offense. Nevertheless, mandatory reporting must be accompanied by procedural protections. An athlete should not be punished merely because a report was made in good faith but later proved incorrect. The legal system should distinguish between intentional concealment, reckless disregard, and honest reporting based on reasonable suspicion. Otherwise, mandatory reporting could discourage rather than encourage cooperation.

Monitoring betting markets provides a complementary preventive mechanism. Statistical monitoring can identify unusual betting patterns that may warrant further investigation, although abnormal betting activity cannot by itself prove manipulation. Forrest and McHale demonstrate the usefulness of forensic statistical techniques in identifying discrepancies between expected outcomes and market behavior (Forrest and McHale 2019). Such information should therefore be treated as an integrity alert rather than conclusive proof. Indonesian competition organizers could establish agreements with lawful betting-monitoring entities, where applicable, and create procedures for transmitting suspicious patterns to integrity officers and public authorities. The use of monitoring technology must also comply with Indonesian data-protection principles where personal information is processed.

Education is equally important because athletes and officials may encounter manipulation attempts without recognizing their legal significance. FIFA's integrity materials emphasize the principles of recognizing, resisting, and reporting manipulation approaches (FIFA 2024). Education should explain prohibited conduct, betting restrictions, conflicts of interest, approaches by third parties, financial vulnerabilities, reporting channels, and potential sanctions. The educational obligation should apply not only to athletes but also to coaches, referees, club executives, medical personnel, agents, and administrative staff. This is particularly important for younger and lower-paid athletes, who may have less bargaining power and fewer alternative income sources.

The institutional framework should further establish independent integrity officers. An integrity officer located entirely within the club's executive hierarchy may face conflicts when investigating conduct involving senior officials. Independence does not necessarily require complete institutional separation, but it should include protected tenure, direct reporting to an independent governance body, access to relevant records, and protection from retaliation. FIFA's 2023 reforms provide a useful comparative example because they strengthened match-fixing investigations through an independent integrity expert and cooperation with public enforcement authorities (FIFA 2023). Indonesia could adapt this model through independent integrity units at federation or league level.

The proposed system should also create a clear division between investigation and adjudication. The organization responsible for collecting evidence should not have unrestricted authority to determine guilt without procedural safeguards. Alleged offenders should receive notice, access to relevant evidence subject to

legitimate confidentiality limitations, an opportunity to respond, and a reasoned decision. Proportional sanctions should reflect the seriousness of the conduct and the respondent's degree of responsibility. FIFA's contemporary disciplinary framework demonstrates the increasing importance of procedural guarantees within sports justice (FIFA 2023). Indonesian sporting organizations should similarly ensure that integrity enforcement does not become arbitrary or purely reputational.

Cooperation between sports organizations and public authorities is indispensable because match-fixing can cross institutional and national boundaries. The Macolin Convention establishes a model based upon cooperation among public authorities, sports organizations, competition organizers, and betting operators (Council of Europe 2014). UNODC and IOC similarly emphasize that effective prosecution may require police expertise, financial investigation, international cooperation, and coordination with sports organizations (UNODC and IOC 2016). Indonesia should therefore establish a formal cooperation mechanism involving relevant sports authorities, law enforcement agencies, financial-intelligence institutions, and competition organizers. Such cooperation should preserve the autonomy of sports disciplinary proceedings while ensuring that serious criminal conduct is promptly referred to competent state authorities.

The final component should be organizational sanctions. Where a club or federation deliberately tolerates manipulation or fails to implement required integrity controls, sanctions should be available against the institution itself. Possible consequences include fines, exclusion from competitions, loss of licensing privileges, suspension of officials, mandatory compliance programs, or enhanced monitoring. Institutional sanctions should be proportionate and linked to the organization's degree of responsibility. A club whose employee independently manipulates a match despite robust compliance measures should not receive the same sanction as a club whose executives orchestrated or knowingly tolerated manipulation. Such differentiation would create incentives for genuine compliance rather than merely encouraging organizations to conceal misconduct.

Indonesia should ultimately adopt a dedicated national sports-integrity framework that integrates criminal, administrative, disciplinary, contractual, and preventive mechanisms. The framework should define manipulation broadly enough to capture non-betting forms of corruption while maintaining clear elements of intent and improper influence. It should impose organizational duties concerning risk assessment, integrity education, financial controls, conflict-of-interest management, reporting, evidence preservation, and cooperation with investigations. Institutional sanctions should be based upon culpable organizational failure rather than automatic attribution. This model would address the central weakness identified in Indonesian scholarship: the tendency to approach match-fixing as an isolated offense committed by individual actors rather than as a governance problem capable of being produced or facilitated by institutional conditions (Silalahi 2020; Taniady et al. 2022).

Conclusion

Match-fixing represents a legal problem that extends substantially beyond the misconduct of individual athletes, referees, or officials. It compromises the fundamental uncertainty of sporting competition and can generate economic, social, contractual, and institutional harms. Indonesian law already contains several relevant components, including Law No. 11 of 2022 concerning Sports, anti-corruption legislation, gambling regulation, and money-laundering law, but these instruments do not yet form a sufficiently coherent system for addressing competition manipulation across the private and institutional dimensions of professional sport. The principal difficulty lies in the absence of a comprehensive sport-specific offense and the limited capacity of conventional corruption law to address manipulation involving exclusively private actors. A modern framework should therefore distinguish criminal liability from sporting discipline while facilitating cooperation between sports organizations and public authorities.

Institutional accountability should become the central principle of Indonesia's future sports-integrity policy. Clubs and federations should not be automatically liable whenever an individual participant commits match-fixing, but they should bear responsibility where they knowingly tolerate integrity risks or fail to implement reasonable preventive systems. Risk assessment, financial transparency, conflict-of-interest controls, integrity education, confidential reporting, whistleblower protection, betting-market monitoring, evidence preservation, independent investigation, and proportionate institutional sanctions should form an integrated regulatory framework. Such an approach would shift Indonesian sports governance from reactive punishment toward preventive accountability. It would also recognize that protecting the integrity of professional sport requires protecting athletes from financial coercion, institutional pressure, and exploitative manipulation. Reconstructing accountability in this manner would strengthen public confidence, improve legal certainty, and preserve the legitimacy of professional sport as a system governed by fairness rather than private manipulation.

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