

fraud in football

research into how well football protects itself
against fraud

jim gee, graham brooks and mark button



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// introduction

Fraud is a problem which undermines the credibility and integrity of sport. It affects us all – fans, owners, shareholders and players – and discredits our leagues and national sport.

Fraud is therefore not a victimless crime, it costs those involved in football and those who watch football. With the loss of revenue due to fraud, both football clubs, and local businesses that provide services to football clubs, are less financially stable, as invoices are left unpaid, the value of shares is reduced and it is difficult to attract all important external investment and sponsorship.

This Report covers football league clubs in England, Wales and Scotland and their efforts to protect themselves against fraud. Its scope is wide ranging and it highlights the variety of frauds that can affect a football club, as well as providing an unprecedented insight into the risk of fraud that football clubs face in the English Premier League (EPL), the English Football League Championship (ELFC), Football League One (FL1) and Football League Two (FL2) and the Scottish Premier League (SPL).

It is comprehensive in that it considers aspects of what a football club needs to do to be resilient to fraud:

- Understanding the cost of fraud as a business problem
- Designing and implementing a strategy to suit the business needs of the football sector
- Maintaining a structure that can implement this strategy
- A range of pre-emptive and reactive measures to reduce incident of fraud in football sector
- Measuring, identifying and delivering results

PKF have produced an annual survey of football club finance directors for 10 years now; this Report, though, is the first to examine our football leagues' understanding of, and strategy and protection to counter fraud. From a counter fraud perspective the results are worrying. Of the 13,000 + people who now hold Foundation, Advanced, Degree or Masters Level Counter Fraud Specialist or Certified Fraud Examiner qualifications in the UK, few, if any appear to work in the football sector.

Historically, the aspect of fraud in football that has been most prominently covered in the media has been match fixing. This, however, is only one area of fraud that is found in football as this report shows in Section 6. In terms of scope, while drawing on international examples where useful, the focus of this Report is primarily on the football leagues in England and Scotland.

This Report is, we hope, the first of many regarding fraud in the football sector; we also hope that football clubs can learn from other sectors that have improved their protection against fraud. We make some suggestions on how this can be achieved, but are aware that each business sector is different. Nevertheless, the authors of this report do believe that football and its national and international administrators can learn from public and private sector organisations that have developed sound counter fraud strategies.

The authors are also committed to research such as this making a real difference. By expanding the extent of knowledge concerning the present strategies football clubs have to counter fraud, we can help ensure that they are better protected regardless of the league in which they play.

PKF and the Centre for Counter Fraud Studies at the University of Portsmouth will repeat this research each year. Those who are passionate about football should be made aware of the potential losses to the football sector and the cost of fraud to football at a local, national and international level.

It is not the aim of this Report to explain or examine why a minority commit fraud, rather our aim is to highlight the lack of proper protection against fraud in football and the damage that it does.

Jim Gee
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and
Chair of the Centre for Counter Fraud Services,
University of Portsmouth

1 // executive summary

1 // executive summary

- 1.1 This Report is unique; it is the most comprehensive Report yet undertaken into the resilience of UK football clubs to fraud. As the first of its kind, this Report, offers a broad view of the heightened risk of fraud that football clubs are subject to.
- 1.2 PKF's Football Industry Group commissioned an independent research company, in April and May 2011, to undertake structured telephone interviews with finance directors of football clubs. Part of the survey focussed on football clubs' resilience to fraud. A total of 41 telephone interviews or online surveys were completed with finance directors in the English Premier League (EPL), the English Football League Championship (ELFC), Football League One (FL1) and Football League Two (FL2) and the Scottish Premier League (SPL).
- 1.3 The questions about fraud sought to discover if football clubs had:
- an internal audit function
 - a counter fraud strategy
 - an anti fraud statement
 - a fraud response plan
- 1.4 The Report found that football clubs are ill prepared to counter fraud. Regardless of the league, there is a low percentage of football clubs that have a plan to tackle fraud, in terms of identifying the risks and costs of fraud, providing a clear counter fraud strategy, dealing with the problem of fraud *within* and *against* the club and employing counter fraud specialists to address the problem.
- 1.5 The **key findings** of the survey showed that:
- 24% of all football clubs have an internal audit function
 - 5% of all football clubs have an agreed counter-fraud strategy
 - 5% of all football clubs have an anti-fraud statement
 - 7% of all football clubs have a fraud response plan
- 1.6 This should give rise to serious concern since it is surely right to expect all football clubs, regardless of their league, to have some kind of internal audit function and to protect themselves against a problem which, the most extensive global research shows, can cost between 3 and 9% of expenditure¹.
- 1.7 Of those that did have an internal audit function the Scottish Premier League (SPL) provided the best response with 50 percent of football clubs having such a function.
- 1.8 **Key areas where progress is needed**, across all leagues, include:
- A stronger internal audit function
 - More widespread adoption of strategies to counter fraud
 - Clearer statements by football clubs of their intention to stop fraud
 - More football clubs having clear plans in place to respond to fraud where it occurs
- 1.9 Reducing the cost of fraud, as with any business, is an important issue. The financial cost of fraud affects the financial health and stability of football clubs.
- 1.10 Regardless of their league, if football clubs want to provide the best deal for their fans, then they need to review current practice and ensure they are properly protected against fraud.

¹ The Financial Cost of Fraud Report – Jim Gee, Mark Button and Graham Brooks – 2009

2 // background

2 // background

- 2.1 Even though this is the first Report concerning football, the Centre for Counter Fraud Studies (CCFS) has published numerous reports on the resilience to fraud of other sectors. The first two were *The Resilience to Fraud of UK Plc* in 2009 and *The Resilience to Fraud of UK Plc: comparing the private, public and voluntary sectors* in 2010.
- 2.2 PKF has produced the *Annual Survey of Football Clubs Finance Directors Report* for 10 years, and, for 2011, it was decided to extend the survey to consider fraud. In the economic climate of recent years, with the first Premiership Club, Portsmouth FC, going into administration, and the development of the UEFA Fair Play Financial Rules for 2012 season, football clubs now, more than ever, need to 'balance the books'. There are many aspects to maintaining a successful club, but, with limited finances available for most clubs, losses to fraud are a cost they can ill afford.
- 2.3 A total of 41 telephone interviews or online surveys were completed with finance directors in the in the English Premier League (EPL), the English Football League Championship (ELFC), Football League One (FL1) and Football League Two (FL2) and the Scottish Premier League (SPL). The respondents' percentage by league is below.
- 2.4 The results presented in this Report are the most accurate assessment, so far, of the extent to which football clubs are properly protected against fraud. They illustrate the substantial work that is needed to counter fraud in football. This is particularly the case when the English Premier League (EPL), the most commercially successful league in the world, is open to potential fraud.
- 2.5 The professional standards for counter fraud work set out what an organisation – public or private – needs to do to counter fraud successfully. These are:
- Adopting the right strategy
 - Accurately identifying the risks and costs
 - Creating and maintaining a strong structure
 - Taking action to tackle the problem of fraud
 - Defining success and delivering results
- 2.6 To conduct the research, finance directors were asked, as part of the *Annual Survey of Football Clubs Finance Directors Report*, four additional questions concerning:
- an internal audit function
 - a counter fraud strategy
 - an anti fraud statement
 - a fraud response plan
- 2.7 The research included a total of 41 telephone interviews or online surveys with finance directors.
- 2.8 The distribution of the respondents to the survey included:
- 22 percent from the English Premier League
 - 24 percent from English Football League Championship
 - 24 percent from Football League One
 - 20 percent from Football League Two
 - 10 percent from Scottish Premier League
- 2.9 These results are presented as column percentages, rounded to the nearest whole number.

3 //

detailed analysis of the data

3 // detailed analysis of the data

3.1 This section of the Report reviews the responses to the four fraud related issues that financial directors were asked about, as part of the survey. These concerned whether their club have any of the following in place:

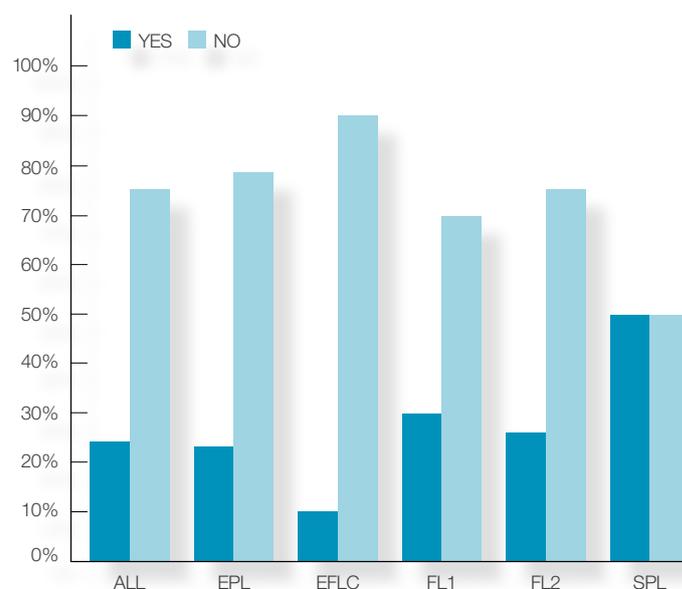
- an internal audit function
- a counter fraud strategy
- an anti fraud statement
- a fraud response plan

3.2 There are some interesting results. For example:

- Scottish Premier League clubs are the best prepared in respect of their answers to three out of the four questions.
- Some English Premier League clubs have an internal audit function and an agreed counter fraud strategy but none have an anti-fraud statement or fraud response plan in place. We would suggest that both an anti-fraud statement and fraud response plan should be part of an effective strategy, and yet these are absent.
- Some Football Championship clubs, like in the Premier League, have an internal audit function and an agreed counter fraud strategy, but none have an anti-fraud statement or fraud response plan.
- Across all the leagues, the percentage of clubs which were surveyed which have some type of internal audit function varied between 10 to 50 per cent.
- At least some football clubs in 3 out of the 5 leagues have a counter fraud strategy; these are English Premier League, Football League One and the Scottish Premier League.
- At least some football clubs in 3 out of the 5 leagues have an anti-fraud statement; these are the Football Championship, Football League Two and the Scottish Premier League.
- At least some football clubs in 3 out of the 5 leagues have a fraud response plan; these are the Football Championship, Football League Two and the Scottish Premier League.
- **Overall, 24 per cent of football clubs have an internal audit function; 5 per cent have an agreed counter-fraud strategy; 5 per cent have an anti-fraud statement; and 7 per cent have a fraud response plan.**

3.3 Question 1 – Does your club have an internal audit function?

Table 1: An internal audit function



3.4 An effective internal audit function, particularly when running a football club, which has many different aspects to it – paying players, paying for catering, purchasing/ordering the manufacture of merchandise, selling merchandise in club shop and online, paying for security and stewards, procurement of buildings/stadia and external services – is important.

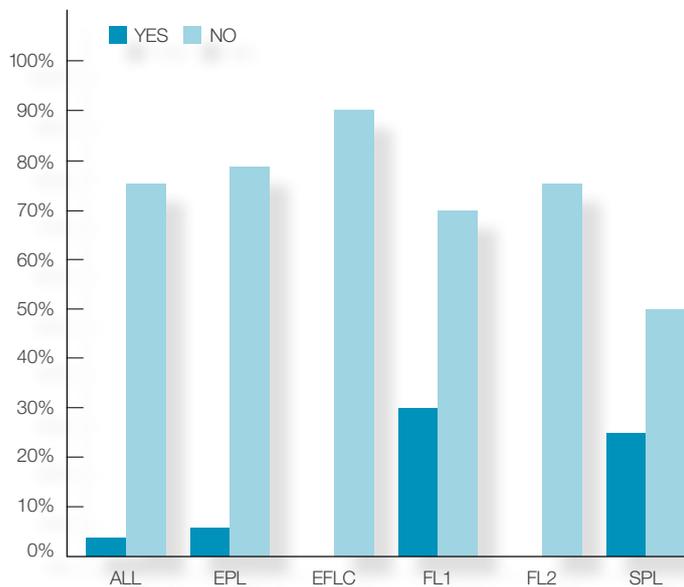
3.5 It is of some concern that only 24 per cent of those finance directors responding to the survey claimed to have an internal audit function. This, we would argue, is a basic requirement for any business. The league with the highest percentage of clubs with such a function is the Scottish Premier League (SPL) with 50 per cent, followed by Football League One (FL1) at 30 per cent, Football League Two (FL2) with 25 per cent, the English Premier League (EPL) with 22 percent and last of all the English Football League Championship (EFLC) at only 10 per cent.

3 // detailed analysis of the data

3.6 While 50 percent of Scottish Premier League (SPL) clubs claimed to have an internal audit function, only 10 percent of the clubs responded to the survey, and previous research indicates that it is likely that a higher proportion of non-respondents did not have such a function. From this data, those clubs which play in the most commercially successful league in the world – The English Premier League (EPL) – are actually less well developed than Football League One (FL1) and Football League Two (FL2) clubs when it comes to having an internal audit function. This is more than an oversight. With substantial commercial revenue, numerous employees and external contractors, many different functions and (sometimes) major capital projects, the possibility of irregularities arising from weak systems and processes is a very real one. The nature and extent of that risk is enhanced by the absence of an internal audit function.

3.7 Question 2 – Does your club have an agreed counter fraud strategy?

Table 2: An agreed counter fraud strategy



3.8 To increase resilience to fraud and minimise the related fraud costs, it is necessary to have a clear counter fraud strategy. The best response to this question was from Football League One (FL1) clubs with 30 per cent of financial directors stating they had an agreed counter fraud strategy. The second best was the Scottish Premier League (SPL) clubs with a 25 per cent response and then the English Premier League (EPL) clubs with 11 per cent; none of the English Football

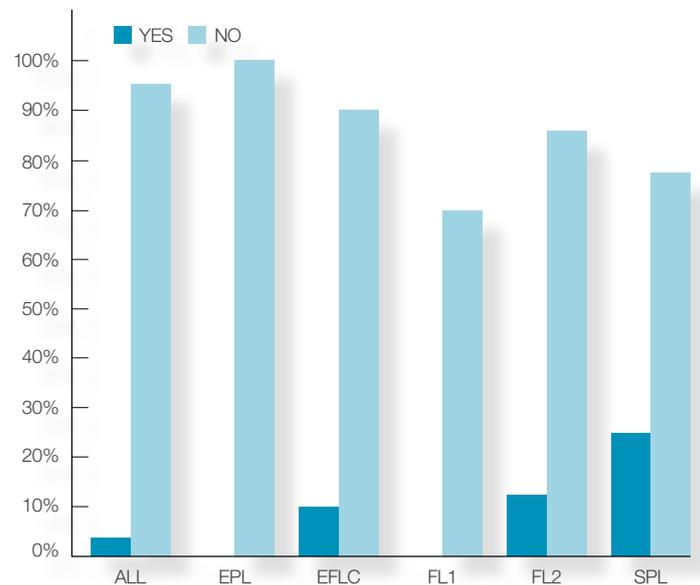
League Championship (EFLC) and Football League Two (FL2) clubs, who responded to the survey, have a counter fraud strategy in place.

3.9 The percentage is low in the English Premier League (EPL) with 11 per cent, particularly as they tend to be the largest and most commercial active football clubs, attempting to raise their profile and revenue with international tours, and undertaking capital projects to extend, renovate or build new stadia. **It is worrying that such a large percentage of English Premier League clubs are not taking the cost of fraud seriously.**

3.10 However, **the most worrying response is from those clubs in the English Football League Championship (EFLC) where none of those surveyed had a counter fraud strategy in place.** Clear, intended outcomes are important if the risk of fraud and commercial success of club is to be protected.

3.11 Question 3 – Does your club have an anti-fraud statement?

Table 3: An anti-fraud statement



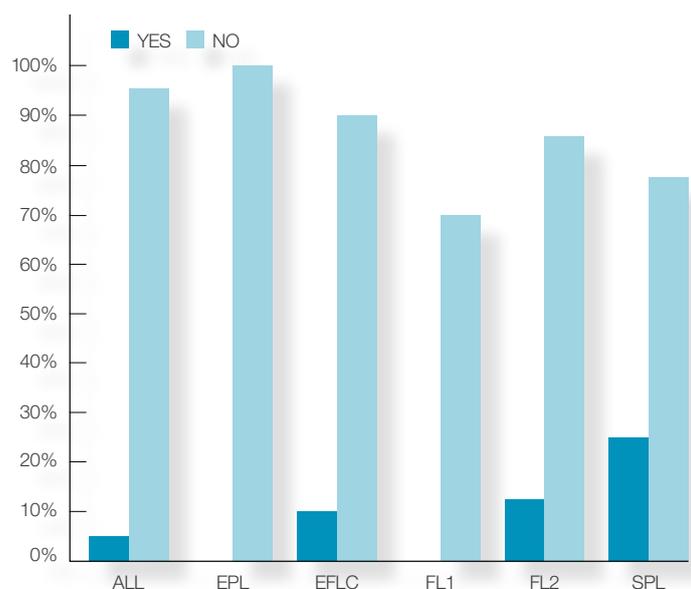
3.12 The best response to this question was from the Scottish Premier League (SPL) clubs, with 25 per cent having an anti-fraud statement in place. This was followed by Football League Two (FL2) clubs, with 13 per cent, and English Football League Championship (EFLC) clubs, with 10 per cent; none of the the English Premier League (EPL) or Football League One (FL1) clubs indicated that they have anti-fraud statements in place.

3 // detailed analysis of the data

3.13 There is some interesting data here when it is considered with that relating to combined with Question 2 above. 11 per cent of English Premier League (EPL) clubs indicated that they have a counter fraud strategy in place, while at the same time not having made a public anti-fraud statement. The authors of this report would suggest that the two are inseparable. To be effective, a football club's counter fraud strategy should involve a clear statement of intent concerning how fraud is viewed by that club. This helps to pre-empt fraud by developing an anti-fraud culture, which is central to success in reducing the risk of fraud.

3.14 Question 4 – Does your club have a fraud response plan?

Table 4 : A fraud response plan



3.15 The best response to this question was from the Scottish Premier League (SPL) clubs with 25 per cent of them having a fraud response plan. This was followed by Football League Two (FL2) clubs with 13 per cent having such a plan, and English Football League Championship (EFLC) clubs with 10 per cent. Overall, the response showed 7 per cent of clubs have such a plan, however, none of the surveyed English Premier League (EPL) and Football League One (FL1) clubs indicated that they did.

3.16 A fraud response plan is part of an effective counter fraud strategy. As indicated above, the authors of this Report would suggest that the two are inseparable. Developing a strong anti-fraud culture goes hand in hand with responding to fraud where it is believed to have taken place.

3.17 In the next section, we give a few examples of the types of fraud that have occurred in the world of football that need some attention if football is to reduce the incidence of fraud.

4 //

types of fraud in football

4 // types of fraud in football

4.1 The largest global research study estimated – from reviewing a massive dataset across 32 types of expenditure and £3 trillion sterling equivalent – that losses to fraud and error average 4.57% in most business sectors². Some of the examples of fraud in football, that are described below, are generic frauds impacting on other business sectors as well, while some are specific to football. These frauds affect many of those involved with football clubs as well as the fans. This section makes clear why all football clubs need a clear counter fraud strategy and response plan.

4.2 Ticket sales

- Ticket sales are considered the most important income stream for the financial performance of all football clubs. Protecting this valuable income is therefore of paramount importance. Football match tickets, as with tickets for other events, can and are illegally manufactured, sold illegally, dispensed in return for business favours in the name of 'entertainment' and sold incorrectly by players and officials.
- A football club should be confident that the tickets to attend its matches are 'real' rather than fake. The loss of revenue is important to the football club, but fans, who unknowingly purchase fraudulent tickets and are turned away at the stadium, are victims of the fraud as well. It is obviously in the interests of all football clubs to maximise this central source of revenue.
- Furthermore, some tickets that are given to officials and players for high profile matches, have been found to have been sold when they should not have been. There are cases where these tickets have been sold for a substantial profit through a registered company. This type of behaviour can also deprive fans of the chance to watch their club in a major tournament or match.
- Finally, football clubs lose income as fans are let into the stadiums by people operating the turnstiles for a cash payment. This money is not recorded and therefore lost to the club.

4.3 Merchandising

- In the Annual Survey of Football Clubs Finance Directors Report for 2011, the sales of football club merchandise continued to be affected by the economic downturn, with 54% of finance directors saying that revenue fell in 2011. The purchase and wearing of football clubs colours is popular, as is the purchase of sports apparel; counterfeit items such as football kits, posters, etc. damage the income stream of a football club. In particular, the problem affects those football teams in the English and Scottish Premier Leagues, where the purchase of a star player can increase shirt-related revenue substantially. As not all fans will buy the items directly from the club's own shop, football clubs need to take care that they maximise the commercial revenue from their team's image, as well as from international tours.

4.4 Payroll

- While there are a variety of ways in which generic payroll fraud can be committed, the payment of cash for a football player's image rights is one which is particular to football.

4.5 Match fixing

- It is often thought that only players can be involved in match fixing; this is incorrect. Players are often needed to fix a match, but not always. Referees, club officials, owners and players have all been involved. There are many international examples of referees being bribed or working with criminal elements to defraud bookmakers, and of club owners bribing officials to place a referee that will look upon their team 'favourably', in a forthcoming match. The purchase of expensive watches, holidays and female company have also been used to influence referees. In some matches, players have conspired to lose a football match in order to gain from gambling. Losing the match, scoring the right number of goals, missing a penalty, getting booked and/or sent off, have all been found to be the subject of improper betting.

² The Financial Cost of Fraud Report – Jim Gee, Mark Button and Graham Brooks – 2009

4 // types of fraud in football

4.6 Money laundering

- Money laundering is nothing new to the world of football. There are instances involving the sale and purchase of players, as well as major building projects, sometimes with related tax evasion.
- Footballers are bought and sold for a set price, but this information does not always reach the public domain. The actual fee paid can be different to that quoted, as 'extra' money is paid in cash to the selling club. This could be either to the manager, player, owner(s) or agent(s). Such 'extra' money is difficult to trace and a total of 14 English Premier League (ELP) clubs, five in the English Football League Championship (EFLC), one in Football League One (FL1) and two in the Scottish Premier League (SPL) are based offshore. In some cases it is also difficult to determine who the actual owners of a football club are.
- In addition, players have been bought and sold for vast sums of money, without ever playing for either football team in any competition. Such players are sometimes over-valued with payments made into off-shore bank accounts or in cash – both of which are difficult to discover and assess.

4.7 Agents' fees

- Football agents represent their clients in transfer deals, negotiating new contracts of employment including payments for image rights. In all of these transactions there is the potential for fraud. For example, part of the players' transfer fee may be paid in cash or in kind and agent(s) may fail to declare, for tax purposes, the 'correct' percentage of payments received from players or the football club, either in respect of a transfer or on an ongoing basis.

4.8 Procurement

- The procurement of capital projects, particularly those that run substantially over budget, and/or services that do not materialise, is a generic problem across many sectors of the economy. This is an area of concern in football, as capital projects are expensive and affect a football club's ability to purchase new players, if such projects run over budget. Furthermore, all external, contracted organisations and employees need to be properly checked before engaging with them.

4.9 Tax Avoidance and Evasion

- Several of the examples given in this report could lead to tax avoidance and/or evasion. This could be with the tacit approval or knowledge of football club owners, major shareholders, managers and players. While this area of fraud is one that supposedly benefits football, or those involved in football, it has a much wider detrimental effect on society. It can also undermine the reputations of the clubs concerned and the integrity of the individuals, both of which can have damaging financial consequences for football.

5 // conclusion

5 // conclusion

- 5.1 This Report provides new information on the extent to which football clubs are resilient to fraud. No individual clubs are identified but the analysis helps provide a 'map' of the counter fraud landscape of football in the English Premier League (EPL), the English Football League Championship (ELFC), Football League One (FL1) and Football League Two (FL2) and the Scottish Premier League (SPL).
- 5.2 The Report shows that much needs to be done in a business that appears to have little understanding of the damage fraud can do to it. Key areas for progress are:
- Clubs developing a clear counter fraud strategies
 - Clubs making clear statements concerning their awareness of and opposition to, fraud
 - Clubs having a fraud response plan in place, should possible fraud come to light
 - Clubs establishing effective internal audit functions.
- 5.3 It is the view of this Report that all football clubs should seriously consider the cost of fraud to their club, and the impact of this on their ability to fulfil their ambitions on the pitch. By failing to counter fraud effectively, clubs are undermining their chances of success, diminishing the quality of the entertainment that they provide and charging fans more than they would otherwise need to.

appendix 1

fraud resilience checks

how resilient is your football club to fraud?



Fraud is a problem which undermines the stability and financial health of organisations from across the economy. It is not a victimless crime, but one which piles additional costs on us as football fans, denies us the quality of public services which we pay for as taxpayers, undermines our job security as employees, reduces the value of companies for us as shareholders and, even denies the beneficiaries of charities the full benefit of the donations which we make.

Global research shows that fraud costs organisations an average of 4.6% of expenditure but also that this figure varies considerably according to how resilient to fraud they are.

PKF (UK) LLP and the Centre for Counter Fraud Studies (CCFS) at University of Portsmouth have jointly undertaken the most extensive and most comprehensive research yet in this area and now have Europe's largest fraud resilience database with information from football clubs, as well as public and private sector organisations.

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// about the authors

Jim Gee is Director of Counter Fraud Services at PKF (UK) LLP, the top ten accountancy and business services firm and Chair of the Centre for Counter Fraud Studies at University of Portsmouth.

During more than 25 years as a counter fraud specialist, he led the team which cleaned up one of the most corrupt local authorities in the UK – London Borough of Lambeth – in the late 1990s; he advised the House of Commons Social Security Select Committee on fraud and Rt. Hon. Frank Field M.P. during his time as Minister of State for Welfare Reform; between 1998 and 2006 he was Director of Counter Fraud Services for the Department of Health and CEO of the NHS Counter Fraud Service, achieving reductions in losses of up to 60% and financial benefits equivalent to a 12 : 1 return on the costs of the work.

Between 2004 and 2006 he was the founding Director-General of the European Healthcare Fraud and Corruption Network; and he has since worked as a senior advisor to the UK Attorney-General on the UK Government's Fraud Review as well as delivering counter fraud and regulatory services to public bodies and private companies both in this country and internationally. He has worked with organisations from more than 30 countries to counter fraud and is currently working with the EU – China Social Security Reform Cooperation Project to advise the Chinese Government about how to measure, pre-empt and reduce the financial cost of fraud.

Graham Brooks is Course Leader for the Counter Fraud and Corruption MSc. at the University of Portsmouth. He was previously the Course Leader for the Counter Fraud and Criminal Justice Studies BA from June 2007 to March 2009, and Head of Secretariat for the Counter Fraud Professional Accreditation Board from September 2007 to March 2009. He is also a member of the Centre for Counter Fraud Studies at the University of Portsmouth.

Graham has published papers on many aspects of fraud and corruption. However, he has a special interest in fraud and corruption in sport and the effect gambling has on the integrity of all sports. A book on *Fraud and Corruption in Sport*, (published by Palgrave in 2012) is forthcoming which addresses these issues.

Graham completed his undergraduate degree at Leeds Metropolitan University in Social Policy, and has a MPhil in Criminology from Cambridge University.

Dr Mark Button is a Reader at University of Portsmouth and Director of the Centre for Counter Fraud Studies.

Mark Button is a Reader in Criminology and Associate Head Curriculum at the Institute of Criminal Justice Studies, University of Portsmouth. He has also recently founded the Centre for Counter Fraud Studies of which he is Director.

He has written extensively on counter fraud and private policing issues, publishing many articles, chapters and completing four books with one forthcoming: *Private Security* (published by Perpetuity Press and co-authored with the Rt. Hon. Bruce George MP), *Private Policing* (published by Willan), *Security Officers and Policing* (Published by Ashgate), *Doing Security* (Published by Palgrave), and *Understanding Fraud: Issues in White Collar Crime* (to be published by Palgrave in early 2010 and co-authored). He is also a Director of the Security Institute, and Chairs its Academic Board, and a member of the editorial advisory board of 'Security Journal'.

Mark founded the BSc (Hons) in Risk and Security Management, the BSc (Hons) in Counter Fraud and Criminal Justice Studies and the MSc in Counter Fraud and Counter Corruption Studies at Portsmouth University and is Head of Secretariat of the Counter Fraud Professional Accreditation Board (CFPAB). Before joining the University of Portsmouth he worked as a Research Assistant to the Rt. Hon. Bruce George MP specialising in policing, security and home affairs issues.

He completed his undergraduate studies at the University of Exeter, his Masters at the University of Warwick and his Doctorate at the London School of Economics. Mark has recently been working on a research project funded by the National Fraud Authority and ACPO looking at victims of fraud.

// about the publishing organisations



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The Centre for Counter Fraud Studies at University of Portsmouth

The University of Portsmouth's Centre for Counter Fraud Studies (CCFS) was founded in June 2009 and is one of the specialist research centres in the University's Institute of Criminal Justice Studies.

It was founded to establish better understanding of fraud and how to combat it through rigorous research. The Institute of Criminal Justice Studies is home to researchers from a wide cross-section of disciplines and provides a clear focus for research, knowledge transfer and educational provision to the counter fraud community.

The Centre for Counter Fraud Studies makes its independent research findings available to support those working in counter fraud by providing the latest and best information on the effectiveness of counter fraud strategies.

www.port.ac.uk/departments/academic/icjs/CentreforCounterFraudStudies

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