

Legal Responses to Violence Against Football Referees: Criminal Liability and Disciplinary Measures

I Nyoman Aji Duranegara Payuse^{1*} | Amos Mokorross² | I Made Suwitra¹ | I Ketut Sukadana¹

1. Fakultas Hukum Universitas Warmadewa, Indonesia

2. Kenyan Magistrate Court

Correspondence:

I Nyoman Aji Duranegara Payuse, Fakultas Hukum Universitas Warmadewa, Indonesia
aji.duranegara@gmail.com

How to cite:

Payuse, I, N, A, D., Mokorross, A., Suwitra, I, M., Sukadana, I, K. (2025). Legal Responses to Violence Against Football Referees: Criminal Liability and Disciplinary Measures. *Sociological Jurisprudence Journal*. Volume 8(1), Page 19-26. <https://doi.org/10.22225/scj.8.1.2025.19-26>

Abstract—Physical attacks on football referees by players pose significant legal challenges that require analysis within both international and Indonesian legal frameworks. This study examines the legal consequences of such acts by reviewing applicable laws, regulations, and case precedents. The research employs a normative juridical method, focusing on legal norms through statutory and conceptual approaches. Primary data consists of legal regulations, including Indonesian criminal law and FIFA rules, while secondary data includes academic literature, legal doctrine, and case studies. This approach allows for an in-depth examination of the legal framework governing referee assaults. Findings reveal that although Indonesian law criminalizes physical attacks, enforcement is inconsistent due to limited awareness and reluctance to prosecute offenders. FIFA regulations impose disciplinary measures, but their implementation varies. The study concludes that strengthening legal frameworks, enhancing enforcement, and fostering cooperation between sports authorities and legal institutions are crucial to protecting referees and preserving the integrity of football.

Keywords: FIFA regulations; football referees; indonesian law; legal consequences; physical attacks

Introduction

In many sports, physical contact between players is an unavoidable aspect of the game. Football, in particular, involves frequent player-to-player contact due to its fast-paced and competitive nature. This level of physical engagement is an inherent part of the sport. However, when contact exceeds acceptable limits and violates match regulations, disciplinary actions are imposed based on established rules. Beyond player interactions, another concerning issue is the occurrence of violence against match officials. Referees and assistant referees often become targets of aggression, facing physical attacks from players, team officials, or even spectators. These violent incidents not only threaten the safety of referees but also undermine the integrity of the game. While sports authorities impose penalties for excessive physicality among players, addressing violent behavior towards match officials remains a critical challenge. Ensuring better protection and strict enforcement of regulations is essential to maintaining fairness and safety in competitive sports.

In the sport of football, there is a phenomenon where referees become the target of anger from players, club officials, and spectators who perceive them as unfair in officiating matches. This anger is expressed through physical attacks on field referees, assistant referees, or other officials. An incident of a referee being attacked by a club official has occurred in the Turkish football league. The president of MKE Ankaragücü club punched referee Halil Umut Meler directly in the face after his team was held to a 1-1 draw by the football club Caykur Rizespor. Not only in Turkey, but similar incidents have also occurred in countries with well-developed football leagues, such as Italy and Germany. In Italy, the Italian Referees' Association (AIA), led by Marcello Nicchi, protested against the high level of violence experienced by match officials, including referees, assistant referees, and other supporting officials, in the Italian league. In Germany, several amateur league matches had to be postponed due to the absence of referees. The referees went on strike in response to the high level of violence they experienced on the field.

Indonesian football is not exempt from similar phenomena. Several incidents of referees being assaulted have occurred across different seasons and competitions in Indonesian football. Such incidents took place in Indonesia's third-tier league in 2016, 2018, and 2024, as well as in Indonesia's top-tier Liga 1 in 2015 and the Governor's Cup in 2016. The penalties imposed on the offenders are sanctions as regulated by the world football association FIFA and the respective country's football association rules, such as bans from playing and fines for the offending club. However, on the other hand, these incidents can also be seen as acts of violence with legal consequences for the perpetrators. This study aims to examine the regulations on penalties for perpetrators of violence against referees and the legal consequences of violent acts against match officials within the framework of international law and Indonesian national law.

Method

This study employs a normative juridical method. The normative juridical approach is a legal research method conducted by examining library materials or secondary data as the basis for analysis, through a review of regulations and literature related to the issue being studied.

The data collection technique is carried out through literature and document studies. The literature study involves primary data sources, such as regulations or provisions related to cases of violence in sports matches. Secondary data is obtained by analyzing explanations and scholarly works related to the regulations concerning the research object. Tertiary data sources consist of other supporting materials relevant to the research problem.

Discussion

Violent Conduct in FIFA Regulation and other Federation.

The Fédération Internationale de Football Association (FIFA) is the international football organization responsible for governing football worldwide. Regulations related to football matches refer to the rules established by FIFA, including those concerning acts of violence or attacks against match officials. FIFA Law 12 stipulates that “Violent conduct is when a player uses or attempts to use excessive force or brutality...against a team-mate, team official, match official, spectator or any other person, regardless of whether contact is made”. Furthermore, this law is also specifically stipulate regarding attack to face or head of “any person” also considered as violent conduct.

In England Football Association (FA), there are some situations that are considered as violent conduct. These actions could cause red card for the offender:

Using or attempting to use excessive force against anyone.

Striking an opponent or person on the head/face, unless with negligible force.

Headbutting or making head contact with force.

Grabbing the throat/neck or gouging the eye.

Forcefully pulling someone's hair.

Australian Football, through its National Disciplinary Regulation, distinguishes violent conduct from other physical offenses like biting, categorizing them as serious infringements. Although it does not provide a detailed definition of violent conduct, the Australian Football Association explicitly outlines specific offenses against match officials along with their potential sanctions:

Use of offensive, insulting or abusive language and/or gestures against a Match Official. (sanction: The Mandatory Match Suspension)

Unsporting conduct toward a Match Official. (3 additional matches plus the Mandatory Match Suspension).

Assault of a Match Official. (6 months including the Mandatory Match Suspension)

Spitting at a Match Official (12 months Including the Mandatory Match Suspension).

The regulations of the Australian Football Association do not provide a precise definition of violent conduct or assault. While the rules outline various offenses and their corresponding sanctions, they lack a clear explanation of what specifically constitutes violent conduct or assault. This absence of definition may create ambiguity in determining the severity of an offense and its appropriate punishment. Without a concrete framework, the interpretation of violent behavior remains open to discretion. Establishing a clear definition would help ensure consistency in disciplinary actions and provide better protection for players, officials, and other individuals involved in the sport.

In the United States of America, the football association regulates violent conduct and other offences. The actions are considered as sending off offences. The list of actions that included in the scope Violent Conduct are:

Uses or attempts to use excessive force or brutality against an opponent when not challenging for the ball, or against a teammate, match official, spectator, or any other person, regardless of whether contact is made

When not challenging for the ball deliberately strikes an opponent or any other person on the head or face with the hand or arm, unless the force used was negligible

Throws an object (or the ball) using excessive force.

The other types of attack towards match officials stipulated on this document are only biting and spitting.

Definition of Violent Conduct, Assault, or battery?

Violent conduct is when a player uses or attempts to use excessive force or brutality against an opponent when not challenging for the ball, or against a team-mate, team official, match official, spectator or any other person, regardless of whether contact is made. Sports violence refers to any hostile or aggressive behavior exhibited during or around sports activities. It can occur among athletes, coaches, fans, or officials, both on and off the field.

Battery in sports refers to the unlawful physical contact with another person without their consent. It's essentially an assault that results in physical harm. Key elements of battery in sports:

Unlawful contact: The contact must be outside the rules of the game.

Lack of consent: The injured player did not agree to the level of force used.

Physical harm: The contact resulted in injury.

An assault is a willful attempt or willful threat to inflict injury upon another person. It is also defined as intentionally placing someone in fear of imminent bodily harm. A battery is the actual intentional physical contact. It is sometimes referred to as a successful assault. assault and battery, related but distinct crimes, battery being the unlawful application of physical force to another and assault being an attempt to commit battery or an act that causes another reasonably to fear an imminent battery.

Battery is a term used in the law to describe the intentional and unlawful touching of another person without their consent. It is considered a form of assault and can result in criminal charges, as well as civil liability for the person who committed the battery. In the context of physical contact sports, battery may occur when a player intentionally touches another player in a way that goes beyond the accepted norms of the sport.

Law on Assault, Battery, And Violent Conduct

there are both formal and unspoken rules as to what is considered appropriate in terms of the use of force. Any conduct outside these rules can be considered sports violence, especially if it is done with the intent to injure or eliminate a player from a game. A civil lawsuit for a sports violence injury can result in a damages award to compensate the victim for their losses. In serious cases, criminal assault charges may also result.

Australia

If a player is found liable for battery in a physical contact sport, they may be subject to criminal charges. Additionally, there may be civil liability for any injuries or harm that they cause.

Under NSW law, battery can be a criminal offence.

Section 61 of the Crimes Act 1900 (NSW) defines assault as an act that causes another person to fear immediate and unlawful violence

Section 59 defines the related offence of battery as the intentional and unlawful touching of another person without their consent.

In physical contact sports, a player who intentionally and unlawfully touches another player in a way that goes beyond the accepted norms of the sport may face charges of assault or battery.

The severity of the offence and the resulting penalties will depend on the circumstances of the case, including the level of harm caused and the intention of the player.

Apart from criminal consequences, a player who engages in battery during a contact sport may also be held liable in civil court. An injured opponent has the right to file a lawsuit seeking compensation for medical expenses, lost wages, and pain and suffering. Civil liability adds another layer of accountability, ensuring that those harmed receive financial restitution. In addition to legal repercussions, sports governing bodies may impose disciplinary sanctions, including fines, suspensions, or even permanent bans. These measures reinforce the importance of fair play and maintaining a safe environment for all participants. Addressing violent conduct through both legal action and sports regulations helps deter future incidents and upholds the integrity of the game. The combination of criminal, civil, and disciplinary consequences highlights the seriousness of battery in sports, emphasizing the need for strict enforcement of rules to protect players, officials, and the overall fairness of competitive sports..

United Kingdom

In UK law, assault and battery are both forms of common assault as defined by the Criminal Justice Act 1988, Section 39. The term “assault” generally includes both:

Assault: An act causing another person to fear immediate unlawful violence.

Battery: The actual infliction of unlawful force upon another person.

When courts have spoken on the issue, they state that a player gives their implied consent to the bodily contact that is a necessary, integral part of playing a particular game. However, the player does not consent to acts that are overtly violent and not part of the game. Whether any given act is one or the other should be determined according to objective criteria.

Athletes do not enjoy blanket immunity from criminal liability or civil liability for their actions while participating in sport. Under English law, a sportsperson's conduct will only be criminal where it is "sufficiently grave" to be properly so categorised. The law also recognises varying degrees of assault, which could escalate a pushing incident to a more serious charge:

Common Assault: Involves minimal or no visible harm.

Assault Occasioning Actual Bodily Harm (ABH): If the push causes injuries, such as bruising or cuts.

Grievous Bodily Harm (GBH): Severe assaults that result in significant physical harm.

In football and other contact sports, violent conduct is generally categorized based on when and how the offense occurs. There are two primary types: "on-the-ball" and "off-the-ball" offenses.

On-the-ball offenses happen when a player is actively engaged in play or directly involved in the action. These include reckless, dangerous, or mistimed tackles that could cause injury, excessive force during collisions, and leading with the forearm when jumping. Such incidents are often viewed as part of the game's natural intensity, though they can result in serious harm if not controlled. While referees may penalize these actions with yellow or red cards, they can sometimes be overlooked due to the high-speed nature of the sport.

Off-the-ball offenses, on the other hand, occur when the ball is not in play or when the action is far from the central focus of the game. These acts are more deliberate and often classified as violent misconduct. Examples include punching, head-butting, kicking an opponent's head, eye-gouging, or other forms of intentional aggression. Unlike on-the-ball offenses, these actions are not accidental and typically indicate malicious intent, leading to harsher disciplinary measures such as match bans, fines, or legal consequences.

In rugby, several cases involve severe physical attacks. For instance, *R v Billingham* (1978) and *R v Gingell* (1980) resulted in fractured jaws, leading to imprisonment. *R v Johnson* (1986) involved biting off an opponent's ear, which led to six months of imprisonment for wounding with intent. The most severe punishments were seen in *R v Lloyd* (1989) and *R v Jones* (2019), where players were convicted of GBH with intent and received 18-month sentences, though Jones' was suspended.

In football, violence is also present but appears less frequent in the table. *R v Kamara* (1988) involved a post-match assault with unclear sentencing. *R v Cantona* (1995), a famous case, resulted in 120 hours of community service for assaulting a spectator.

Indonesia

The offense of "penganiayaan" (or assault/battery/violent) is outlined in Article 351 of the Indonesian Criminal Code. However, the article itself does not specify the elements that constitute the offense, providing only its name. The definition and essential elements of "penganiayaan" are instead derived from case law, as established through court decisions, and interpretations by legal experts. These sources help clarify what actions qualify as "penganiayaan" under Indonesian law, guiding legal practitioners in applying the offense in criminal cases. The reliance on judicial precedents and expert opinions plays a crucial role in shaping the legal understanding of this offense.

Based on case law, battery or mistreatment involves intentional or reckless actions that result in suffering, pain, injury, or illness. These elements establish whether an act qualifies as mistreatment under legal frameworks.

Suffering refers to actions that cause discomfort or distress without necessarily resulting in physical harm. Examples include pushing someone into a river, leaving them wet and cold, or forcing someone to stand for hours under intense heat, leading to exhaustion and distress. These acts create psychological or physical strain, making them legally punishable.

Pain is caused through direct physical aggression, such as biting, kicking, punching, or slapping. These actions inflict immediate harm and can escalate into more serious offenses depending on their severity. Cases involving repeated or extreme violence often lead to higher legal consequences, such as assault or grievous bodily harm (GBH).

Injury involves actions that result in physical wounds or long-term damage. Acts like cutting, stabbing, or using sharp objects to inflict harm fall under this category. Such offenses are typically treated with more severe legal consequences due to their potential to cause lasting physical impairment.

Illness refers to actions that indirectly lead to a person falling sick. Examples include deliberately exposing someone to cold air by opening windows at night or forcing them to consume excessive alcohol, leading to sickness. These cases demonstrate that mistreatment is not limited to visible physical harm but includes indirect and psychological suffering.

Conclusion

Physical attacks on football referees by players are a serious violation of both sportsmanship and legal principles. These incidents not only disrupt the integrity of the game but also have significant legal consequences under both international and Indonesian law. The legal framework governing such acts includes FIFA regulations, national sports laws, and criminal laws that classify physical attacks as offenses ranging from assault to more severe criminal charges. In the Indonesian legal context, physical attacks on referees may lead to sanctions under the Criminal Code (KUHP), as well as disciplinary actions by the national football governing body. However, enforcement remains a challenge due to the need for stronger legal mechanisms and awareness among stakeholders. Comparative analysis with international legal frameworks reveals that stricter enforcement and legal protection for referees can help deter violence on the field. To address this issue, a multi-faceted approach is required, including legal reform, stricter enforcement of disciplinary measures, and educational programs for players and officials. Strengthening the protection of referees is essential to ensuring fairness in the game and upholding the rule of law in sports. Future research should focus on evaluating the effectiveness of legal frameworks and exploring additional preventive measures.

References

- Anggarawati, N. D., Setyaning, F. N., & Wibisono, R. B. (2024). The role of law in handling violence in football games in Indonesia: A regulation and enforcement perspective. *Indonesian Journal of Sport Law*, 1(1), 1–9. <https://journal.unesa.ac.id/index.php/ijsl/article/download/35740/12346/117446>
- Australian Football Association. (2023). *National disciplinary regulations 2023* (p. 27). [https://www.footballaustralia.com.au/sites/ffa/files/2024-02/National%20Disciplinary%20Regulations%202024%20\(Final\).pdf](https://www.footballaustralia.com.au/sites/ffa/files/2024-02/National%20Disciplinary%20Regulations%202024%20(Final).pdf)
- BBC Indonesia. (2024, February 10). Tindak kekerasan terhadap wasit sepak bola meningkat. <https://www.bbc.com/indonesia/articles/c29yg34ky0eo>
- Britannica. (2024). Assault and battery. <https://www.britannica.com/topic/assault-and-battery>
- Czernuszka v. King, [2023] EWHC 380 (KB).
- DW. (2019, November 10). German football referees strike over player violence. <https://www.dw.com/en/german->

-
- football-referees-strike-over-player-violence/a-51287190
- ESPN. (2023, October 5). Serie A officials strike over rise in violence in Italian amateur game. https://www.espn.com/football/story/_/id/37389347/serie-officials-strike-rise-violence-italian-amateur-game
- Fédération Internationale de Football Association (FIFA). (2024). *Laws of the game 2024/25: Law 12—Fouls and misconduct* (pp. 114–115).
- Fuente, D., Cantón, E., Montes, F., & Sanruperio Abella, M. Á. (2019). Aggression towards referees in amateur football in Spain: A loglinear approach. *Universitas Psychologica*, 18(3), 1–13. <https://www.redalyc.org/journal/647/64760701020/html/>
- Garling & Co. (2023). Assault and battery in the sporting context. <https://www.garlingandco.com.au/blog/assault-and-battery-in-the-sporting-context/>
- Haris, H., & Ilham Arif Budiman. (2023). Juridical analysis of player abuse of referees in soccer matches. *Indonesia Law Reform Journal*, 3(2), 243–254. <https://doi.org/10.22219/ilrej.v3i2.30350>
- Ilhami, F., Amiq, F., Wardani, H. E., & Hariyanto, E. (2023). Survei pemahaman peraturan permainan sepakbola (Pasal 11, 12) pada tim Porprov Kota Batu dan Kota Malang. *Sport Science and Health*, 5(5), 551–561. <https://doi.org/10.17977/um062v5i52023p551-561>
- Indonesian Criminal Code.
- Irianto, B. (2020). Tinjauan yuridis tindak pidana penganiayaan oleh pemain sepakbola di dalam kompetisi regional PSSI ditinjau dari KUHP. *Jurnal Justiciabelen*, 2(2), 1–18. <https://doi.org/10.30587/justiciabelen.v2i2.1631>
- Irianto, B., Prasetyo, A., & Suwarno. (2023). Criminal offense persecution by football players in the PSSI regional competition: Juridical review. *Equalegum*, 1(1), 94–109. <https://syntificpublisher.com/index.php/equalegum/article/download/8/8>
- Kang & Co. (2024, November 8). Is pushing someone assault under UK law? <https://kangandco.co.uk/2024/11/08/is-pushing-someone-assault-under-uk-law/>
- Kiflu, A. (2020). Soccer violence: Factor and tackling mechanism in the case of Ethiopia Premier League (EPL). *Ethiopian Journal of Sport Science*, 1(1), 1–11.
- Kincir. (2023). Insiden wasit dalam persepakbolaan Indonesia. <https://kincir.com/sports/insiden-wasit-dalam-persepakbolaan-indonesia/>
- Lamintang, P. A. F., & Lamintang, T. (2010). *Delik-delik khusus, kejahatan terhadap nyawa, tubuh, & kesehatan*. Sinar Grafika.
- LegalMatch. (2024). Sports violence lawsuits. <https://www.legalmatch.com/law-library/article/sports-violence-lawsuits.html>
- Marwat, P. D. M. K., Nizami, R., Muhammad, N., Ismatullah, I., Latif, A., Iqbal, Y., Mehmood, K., & Saman, S. (2022). Aggression and violence in sports, its effects on sports performance. *Journal of Positive School Psychology*, 6(9), 4961–4969. <http://journalppw.com>
- Muazu Musa, R., Abdul Majeed, A. P. P., Abdullah, M. R., Kuan, G., & Mohd Razman, M. A. (2022). Tactical and misconduct actions leading to VAR interventions in top-flight European soccer leagues. In *Data mining and machine learning in high-performance sport*. SpringerBriefs in Applied Sciences and Technology. Springer. https://doi.org/10.1007/978-981-19-7049-8_3
- Muh. Said Hasan, A. R. B., Mahyuddin, R., Jamaluddin, & Ikadarny. (2024). Pemanfaatan pelatihan dasar dalam permainan futsal pada masyarakat di Kabupaten Sidrap. *Jurnal Bina Pengabdian Kepada Masyarakat*, 5(1), 29–39. <https://doi.org/10.55081/jbpkm.v5i1.3401>
- Mulyo, A. E., & Soegiyanto. (n.d.). Analisis kekerasan dalam cabang olahraga sepak bola pada Liga Nusantara tahun 2016. *Journal of Sport Sciences and Fitness*, 40. <http://journal.unnes.ac.id/sju/index.php/jssf>
- Mummendey, A., & Mummendey, H. D. (1983). Aggressive behavior of soccer players as social interaction. In J. H. Goldstein (Ed.), *Sports violence* (pp. xx–xx). Springer. https://doi.org/10.1007/978-1-4612-5530-7_7
- O'Brien Solicitors. (2024). Tackling the law: Battery in physical contact sports. <https://obriensolicitors.com.au/tackling-the-law-battery-in-physical-contact-sports/>
- Premier League. (2024). Official ruling on violent conduct in football. <https://www.premierleague.com/news/4079974>
- Ramadhan, B. A., & Rusli, A. S. (2023). Kekerasan dalam sepakbola. *Journal Evidence of Law*, 2(2), 34. <https://jurnal.erapublikasi.id/index.php/JEL>
- Sahrianoor, I. H., Andrian, M., & Rezal, M. Z. (2023). Pemahaman wasit dalam peraturan sepak bola perspektif Islam. *Journal Islamic Education*, 1(1), 1–9. <https://maryamsejahtera.com/index.php/Education/index>
-

- Santoso, T. (2011). Prosecuting sports violence: The Indonesian football case (Working Paper Series No. 019). Asian Law Institute, National University of Singapore.
- Soekanto, S., & Mamudja, S. (2001). *Penelitian hukum normatif (suatu tinjauan singkat)*. Rajawali Pers.
- Soesilo, R. (1984). *Pokok-pokok hukum pidana peraturan umum dan delik-delik khusus*. Politeia.
- Sports.Legal. (2023, October 15). Crossing the line: Criminal liability on the field of play. https://www.sports.legal/2023/10/crossing-the-line-criminal-liability-on-the-field-of-play/#_ftn4
- Squire Patton Boggs. (2023). Henry Goldschmidt: Legal expertise in sports law. <https://www.squirepattonboggs.com/en/professionals/g/goldschmidt-henry>
- StudySmarter. (2024). Sports violence: Sociology and sports. <https://www.studysmarter.co.uk/explanations/sports-science/sociology-and-sports/sports-violence/>
- The Football Association (FA). (2024). Law 12 - Fouls and misconduct. <https://www.thefa.com/football-rules-governance/lawsandrules/laws/football-11-11/law-12---fouls-and-misconduct#:~:text=serious%20foul%20play-,VIOLENT%20CONDUCT,of%20whether%20contact%20is%20made>
- Tylicki v. Gibbons, [2021] EWHC 3470 (QB).
- US Soccer Federation. (2020). 2020-2021 USSF report codes for cautionable and sending-off offenses. https://ayso1ref.com/expo2024/officiating/2020-2021_USSF_Report_Codes_for_Cautionable_and_Sending-Off_Offenses.pdf
- Vučković, I., & Gadžić, A. (2023). Guarding a perimeter player: How to draw an offensive foul/take a charge. *International Journal of Basketball Studies*, 2(1), 1–8. <https://doi.org/10.31949/ijobs.v2i1.4604>