

## **Written evidence submitted by the Department for Digital, Culture, Media and Sport**

### Written evidence from the Department for Digital, Culture, Media and Sport (DCMS) to the DCMS Select Committee's inquiry into Safety at Major Sporting Events

#### **Introduction/Executive Summary**

1. The safety of spectators at major sporting events, and more widely, is of the utmost importance to the government and we remain confident that safety standards for spectators are high.
2. The government works closely with a range of partners, which includes the Sports Grounds Safety Authority (SGSA), National Sporting Governing Bodies/Sporting Authorities and international partners, to ensure that major sporting events are delivered safely.
3. However, despite these high standards, there is no room for complacency and government must continue to adapt to the ever-changing risks posed to spectator safety. This is clearly highlighted by high profile incidents which have included the disorder which took place at the rescheduled UEFA EURO 2020 Final on 11 July 2021 and the scenes which took place in Paris during the Champions League Final on 28 May 2022. In addition, there are challenges which continue to emerge and evolve which include increases in persistent standing at football matches, the threat of terrorism at sports grounds, reported increases in Anti-Social Behaviour (ASB) and poor fan behaviour following the re-admittance of spectators to sports grounds after the Covid-19 pandemic and growing concerns around ensuring the long-term sustainability of the stewarding sector to ensure there are sufficient numbers of competent stewards to meet the safety, security and customer care requirements of the sports sector.
4. In 2022, HMG has successfully delivered two mega sporting events, the Commonwealth Games and the UEFA Women's European Championships. The demographic for the UEFA Women's Euros crowd was different to the typical 'men's football' crowd, however the entire tournament was delivered successfully and with minimal disruption. Since the UEFA Men's Euros, the government has taken seriously the reflections from Baroness Casey's review and continues to improve the support given to major sporting events being hosted in the UK.
5. The regulations which govern the safety of spectators remain world-leading, as they have continued to evolve over time to keep pace with developments within sport and any associated risks. However, it is incumbent on government to continue to review whether further regulatory change is required to ensure these standards remain high.
6. This written evidence should be read in conjunction with the evidence provided to the DCMS Select Committee Inquiry into Safety at Major Sporting Events by the SGSA.

## **Are UK stadiums and crowd management policies sufficient to maintain the safety of large volumes of fans at major events?**

7. The safety of spectators at major and mega sporting events, and more widely football matches, is of the utmost importance to the government and we remain confident that safety standards for spectators are high. It is important to remain aware of the fact that there is significant diversity between different sporting events.
8. The definition for a mega sporting event is outlined in the Gold Framework, the joint DCMS and UK Sport document which outlined the support given in bidding for and hosting major and mega sporting events. This does not include typical 'elite' sporting fixtures, regardless of their size or importance, which are the responsibility of the relevant sporting body.
9. A key way in which the government seeks to ensure the safety of spectators is through our sponsorship of and relationship with the Sports Grounds Safety Authority (SGSA), which operates at arm's length from the government allowing them to fully utilise their technical expertise.<sup>1</sup>
10. The SGSA acts as the safety regulator for football grounds in England and Wales, as well as the UK government's independent advisor on safety at sports grounds (providing safety advice and support to other sports both in the UK and internationally). It is recognised both nationally and internationally as a centre of excellence/world-leader on the safety of sports grounds.
  - a. The SGSA regularly publishes guidance that is widely recognised across football, sport and the events industry as 'best practice' in the safety management of events. This includes their Guide to Safety at Sports Grounds ('Green Guide'), which is now in its sixth edition, and the recent publication, in 2021, of Supplementary Guidance (SG)03: Event Safety Management, which provides further support for venues on key elements of event safety management.
11. The policing of football matches is an operational decision made by the local police commander based upon a risk assessment. Decisions on the match day operation are taken in conjunction with the local multi-agency Safety Advisory Group and resourced accordingly.
12. In addition to the SGSA, who are seen as international leading experts; our police and events sector are consulted the world over on security and policing provisions for major sporting events. When hosting major events, the UK will frequently host international delegations to observe the delivery and operations of events. For example, during UEFA Women's Euros 2022, we had requests from Qatari delegations to come and observe the match day safety operations. Moreover, our policing colleague leads are consulted for all major football tournaments across the world.

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<sup>1</sup> The SGSA have provided further information on the nature and role of their organisation as well as their legislative basis in their written evidence.

13. Since 2000 football banning orders (FBOs) have been the cornerstone of the government's measures to prevent football-related disorder. Court imposed FBOs have been successful in reducing disorder (alongside other measures such as CCTV and intelligence-led policing), preventing known troublemakers from attending matches and associating with other risk fans, and deterring offending behaviour. This model of preventative behavioural order has been adopted by many other European nations.
14. As such, the UK's safety and security structures and policies are highly regarded across the world - and for the vast majority of sporting events, the security provisions in place are not only sufficient, but of a higher standard than likely needed - this includes gold-plating at the biggest events with support from the armed services. However, it is clear that men's football is an outlier - not only in the UK, but internationally, which presents its own unique challenges in ensuring the highest levels of safety.

#### **What steps can be taken to protect UK fans abroad at major events?**

15. The primary responsibility for the safety of British nationals at major sporting events overseas lies with host authorities and event organisers.
16. The Foreign, Commonwealth and Development Office (FCDO), and its overseas network, does nonetheless have established procedures for handling such events. These have been iteratively developed, on the basis of lessons learned and good practice from previous events<sup>2</sup>, and can include:
  - a. **Stakeholder Coordination:** Convening representatives from across the UK government and the Police to discuss preparations; appointing dedicated leads to liaise with partners and host authorities;
  - b. **Travel Advice and Prevention Comms:** Encouraging fans to read FCDO country Travel Advice as part of their preparations; undertaking targeted prevention comms, to minimise risk of fans needing consular assistance;
  - c. **Readiness and Consular Assistance:** Ensuring tested FCDO crisis and staffing plans are in place in conjunction with stakeholders; providing consular assistance<sup>3</sup> and support to visiting British nationals, in line with the FCDO guidance<sup>4</sup>.
17. Every event is unique, with the scale of preparations reflective of several factors. This includes the number of British nationals, length of event, local context, and the overall risk and threat level.

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<sup>2</sup> See [the FCO's preparations for the 2018 World Cup in Russia: Government response to the Committee's 9th Report - Foreign Affairs Committee - House of Commons \(parliament.uk\)](#)

<sup>3</sup> See: [Consular assistance: how the Foreign, Commonwealth and Development Office provides support - GOV.UK \(www.gov.uk\)](#).

<sup>4</sup> See: [Support the British nationals abroad - GOV.UK \(www.gov.uk\)](#)

### *Stakeholder Coordination*

18. Lead officials in the FCDO will typically be appointed ahead of major sporting events. They will seek to develop an accurate picture of local preparations and risks, building (or strengthening) relationships with host authorities as required. For some events, bilateral discussions on safety and security issues will likewise take place at expert-to-expert and ministerial levels.
19. Subject to the scale of the event, a cross-government working group will be established, bringing together officials from all relevant departments (including FCDO, DCMS, Home Office, Cabinet Office) to monitor risks and delivery. UK Police may form part of these structures to assist preparations.
20. In tandem, officials will also typically engage with other UK-based partners in the run up to events, including relevant sports bodies such as the football associations or British Olympic Association, and fan supporters' groups. This approach can facilitate valuable join-up and information exchange on the status of host preparations.

### *Travel Advice and Prevention Comms*

21. Travel advice aims to provide objective information and advice to enable British nationals to make better-informed decisions about international travel and plan for trouble-free travel. It is for individuals to decide whether to travel or not, based on their own circumstances.
22. The safety of British Nationals is always the main concern in determining FCDO travel advice. Travel advice for each country or territory is constantly reviewed to ensure it includes up-to-date information and advice on the most relevant issues for British people visiting or living there, and is based on a number of sources<sup>5</sup>.
23. It is recognised that aspects of major sporting events can pose particular problems for fans unfamiliar with their surroundings, from local laws and customs, to geography and travel restrictions. The FCDO will therefore often implement tailored communications activities ahead of an event, to provide fans and other British nationals in the vicinity with practical advice and tips – to help keep problems to a minimum, and enhance their enjoyment.
24. Such activities are undertaken with the support of key partners, who will typically have the most effective channels to fans. This can include, but is not limited to, the sports federations, UK Police, tour operators, airlines and fan supporters' groups.

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<sup>5</sup> See: [About Foreign, Commonwealth & Development Office travel advice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/about-foreign-commonwealth-development-office-travel-advice)

25. Examples of this approach include the *Be On The Ball* campaigns that have run at every major men's football tournament since the 2010 World Cup in South Africa. Similar targeted activities were also run for the 2019 Rugby World Cup in Japan.

#### *Readiness and Consular Assistance*

26. The FCDO has established procedures for testing and preparing responses to a range of risks and incidents. Ahead of large-scale events, specific crisis exercises and training are often conducted to ensure teams are well prepared to respond to a major incident, as well as provide support to British nationals in the event of individual difficulties.
27. It is common for the FCDO to enhance its consular presence in-country during a major sporting event, with staff deployed from elsewhere. Crisis best practice may also be adopted, including the establishment of operations centres, and assigning specific staff roles.
28. British nationals needing help or advice are able to contact the FCDO by phone 24/7. The support the FCDO can provide is set out in our online guidance.<sup>6</sup>
29. **2018 FIFA World Cup Case Study<sup>7</sup>**: Mobile Embassy and police teams were deployed to every city that England played in for match day, and the days before and after. There was an Operations Centre in Moscow for the duration of the tournament. In parallel, the FCO rostered staff at an operations centre in London as a precaution for every England match.

#### *Upcoming Events*

30. The FIFA World Cup will take place in Qatar from 20 November to 18 December 2022. The UK government is working with Qatar to support their delivery of a safe and secure tournament for all British Nationals who will be attending.
31. Cross-Whitehall and British Embassy Doha planning structures are well established, with the FCDO Minister for the Middle East the appointed ministerial lead.
32. Officials are in regular dialogue with Qatari authorities on various aspects of their security preparations. This includes UK Police offering support and advice on engaging with fans attending from the UK. Officers have previously travelled to Qatar to build relationships and share experiences ahead of the tournament.
33. This work is being undertaken in lockstep with FCDO's consular preparations. At present any fans considering attendance are encouraged to read the dedicated World Cup section of the Qatar Travel Advice<sup>8</sup>, and sign up for email alerts to stay up

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<sup>6</sup> See: [Support for British nationals abroad - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>7</sup> Taken from: [The FCO's preparations for the 2018 World Cup in Russia: Government response to the Committee's 9th Report - Foreign Affairs Committee - House of Commons \(parliament.uk\)](https://www.parliament.uk)

<sup>8</sup> See: [www.gov.uk/foreign-travel-advice/qatar/qatar-world-cup-2022](https://www.gov.uk/foreign-travel-advice/qatar/qatar-world-cup-2022)

to date on developments. Key messaging has been successfully amplified through partners, and targeted comms activities will be ramped up as the tournament nears.

34. Ministers and officials are also engaging regularly with Qatari authorities on topics relating to the fan experience, including LGBTQ+ rights and wider issues such as alcohol and road traffic safety, and will continue to do so between now and the tournament itself.
35. Other upcoming events that will involve specific preparations include the 2023 Men's Rugby World Cup in France, the 2024 Paris Olympics and Paralympics, and 2024 Men's European Football Championships in Germany. There will likely also be high-profile matches involving UK club teams in European football competitions.

#### *UK Policing Abroad and Wider SGSA Work*

36. In addition to the work of the FCDO, UK policing delegations have been deployed to all major overseas football tournaments and matches that Home Nation national teams have participated in. UK police undertake a range of liaison, intelligence and spotting roles alongside host authorities, providing advice to host police and visible reassurance to travelling UK fans. This has the dual objective of reducing the risk of UK fans being involved in football-related disorder, and reducing the risk of UK fans being the victims of crime.
37. The SGSA also plays an active role in promoting safety abroad and raising standards through its advisory work with organisations globally (which has included FIFA), its promotion of the world-leading 'Green Guide' which is widely used (as above) and its representation on the Council of Europe's Standing Committee on the development of the European Convention on Integrated Safety, Security and Service (the 'Saint-Denis Convention') at football matches and other sports events to ensure the safety of spectators at sports events.
  - a. The Saint Denis Convention entered into force on 3rd July 2016. It broadly covers all sports, however, is particularly focused on football. The Convention not only takes practical measures to prevent and control safety, security and service but also sets out a series of measures for identifying and prosecuting offenders. Its Standing Committee is intended to manage the implementation of the Convention and includes representatives of each government alongside key partners, which include UEFA and FIFA.
  - b. The UK became a signatory to the Convention in May 2019, however, it has not yet been ratified.

#### *Champions League Final*

38. The 2022 Champions League final was played on 28 May. Kick off was delayed by over 30 minutes after significant issues at the entrances to the Stade de France prior to the beginning of the match. Supporters of both teams were subjected to tear gas and pepper spray from French Police and thousands of Liverpool fans were unable to take their seats for the match.

39. The French Senate published a report on 13 July which outlined dangerous failures in planning and delivery. The report primarily considered:
  - a. Failures in ticketing and the fan mobility plan;
  - b. Security organisation by the public authorities that neglected the fans;
  - c. A rigid and fragile system that resulted in a use of force that shocked French and international public opinion; and
  - d. Errors were insufficiently recognised and analysed by the public authorities.
40. UEFA have separately launched an independent investigation into the events surrounding the Champions League final.
41. UK government Ministers have met with their French counterparts to highlight the shocking and dangerous experiences of fans on the night of the final. Furthermore, Ministers have repeatedly emphasised the need for a transparent investigation with conclusions that tally with what fans experienced on the ground, including directly to French Ministerial counterparts.
42. It is clear that lessons need to be learnt and changes made before France hosts future major events, including the Rugby World Cup next year and the Paris Olympics in 2024, and we have offered to provide support on this.
43. Given the critical nature of the French Senate report, we would expect the French government to publish a response outlining how they will improve the planning and delivery of future major sporting events. UEFA's independent investigation will also publicise their conclusions into the events of 28 May in due course.

#### **Should regulations governing fans attending football matches be reviewed?**

44. There is already a significant number of existing regulations which govern the safety of spectators, which have evolved over time. These include, but are not limited to, the Safety at Sports Grounds Act 1975, the Football Spectators Act 1989 and the Sports Grounds Safety Act 2011.
45. The current legal framework for spectator safety is subject to regular monitoring and review to ensure that it continues to maintain the highest levels of public/spectator safety.
46. In July 2022, for example, the government announced the wider implementation/introduction of licensed standing in seated areas at football stadia.
  - a. Throughout this policy change, the government's approach was driven by safety considerations due to growing concerns around the safety risks to spectators posed by widespread issues of persistent standing at football matches.
  - b. It followed an Early Adopter Programme which tested the practicalities of licensed standing areas as a persistent standing management strategy at five football grounds/clubs (Cardiff City, Chelsea, Manchester City, Manchester United and Tottenham Hotspur).

- c. The EAP was subject to an independent evaluation, conducted by CFE Research, and the final report concluded that 'the trial of licensed standing areas had been a success in both home and away sections'. The report also noted 'the positive impact upon the safety of fans and the lack of any evidence that it increases disorder or anti-social behaviour' as well as a number of other positive impacts which include, but are not limited to: celebrations are more orderly; the risk of injury, and the danger posed to others by fans from spectators standing on seats or on the backs of seats, should they fall forwards or back has been severely reduced; egress is more uniform; barriers make it harder for spectators to move towards segregation lines.
- d. The government worked in partnership with the SGSA to update both the legislation and associated guidance as well as ensure that the necessary safety criteria were in place.

47. Following the events which took place at Wembley Stadium during the rescheduled UEFA EURO 2020 Final on 11 July 2021, the Football Association (FA) launched an independent review, conducted by Baroness Casey. Although the Casey Review was not strictly or formally for the government, DCMS has continued to work closely with key stakeholders, including the Home Office, UK Football Policing Unit, the FA and SGSA amongst others, to ensure that the recommendations from the final report were carefully considered and, where appropriate, acted upon. Where the government has an interest in an event or they have deemed it necessary, they can put in place additional governance structures in place to monitor the delivery of an event. For all footballing fixtures the risk profile is determined by policing authorities from a policing perspective is determined by policing authorities. The football authorities and clubs are responsible for the in-stadia safety operation.

48. Within the Casey Review, there were four recommendations which directly referenced the government. These recommendations, and the current government position on them, are as follows:
- a. **'The Government should designate a new category for football matches of national significance'**: DCMS believes that this is largely an operational matter, given that the current designation of risk levels for football matches is determined by the police. In addition, the Major Sporting Events Unit in DCMS provides governance and oversight for major sporting events where the government has contributed funds or the additional oversight from the government would benefit the event which will be outlined in the refreshed Gold Framework document that will be published later this year.
  - b. **'Government should task SGSA to work with the FA and the event industry to undertake a review of stewarding'**: The SGSA commissioned, on behalf of DCMS, research into the long-term sustainability of stewarding in the live events sector. This research was conducted in two phases, with the first phase aimed at gaining an understanding of the labour market for stewarding, and the second phase of research examining the structural issues contributing to the current challenges (i.e. the sustainability of the stewarding function including on roles, responsibilities, recruitment and retention issues) across the sports and live events sector. The SGSA is now



working with football's governing bodies and others to address the challenges identified in the research. The government also continues to review known challenges in the stewarding sector in light of a successful summer of sport.

- c. **'The SGSA, the events industry, the police and local government agree on a way forward on who is accountable for Zone Ex'**: Zone Ex (the External Zone - sometimes referred to as the 'Last Mile') is in the public domain and will encompass the main pedestrian and vehicle routes leading from the venue to public car parks, local train stations, bus stops and so on. It is therefore not possible to adopt a one-size-fits-all approach to accountability for Zone Ex, as in every location its extent and character will differ; however, SGSA provides guidance that venue management or event organisers should follow to help ensure public safety. Consultation with stakeholders suggests that, for the majority of stadia, the existing measures for the control and management of Zone Ex work successfully. In the case of Wembley Stadium, which presents a number of unique challenges, there has been significant work undertaken by the FA and its key partners since Baroness Casey's report, as evidenced during the UEFA Women's Euros and other high profile events.
- d. **'Government should strengthen the penalties for football-related disorder, particularly behaviours which recklessly endanger lives and these penalties should be well understood and robustly enforced.'** The Home Office has already implemented a series of changes in relation to the existing Football Banning Order (FBO) legislation. These include: adding football-related online hate crime to the list of offences for which an FBO can be imposed on conviction amending the threshold for the imposition of a FBO; extending the legislation to the women's domestic game; and committing to adding football-related Class A drugs crimes to the list of offences (the order will be laid on 5 September).

49. In conjunction with the government's wider focus on supporting the capacity of the stewarding and event staff sector (above), we have been working closely with the SGSA and Securities Industry Association (SIA) to explore our assurance that the sports grounds exemption (introduced in 2006) from the Private Security Industry Act 2001 (PSIA) continues to operate as it is intended. The PSIA requires individuals engaging in licensable activity to hold an SIA licence. However, the existing exemption is in place for individuals operating security in-house that are engaging in licensable conduct at certified sports grounds (i.e. those with an active safety certificate) and exempts them from these licensing requirements on the basis that suitable alternative arrangements are in place. These should include training to a nationally accredited standard; suitable vetting; and suitable regulation and monitoring.

- a. The SGSA have recently launched a consultation on proposed policy guidance, which would seek to encourage a common understanding by local authorities, sports grounds and other interested parties about the existing exemption and ensure a consistent approach to its future application. Pending the outcome of this consultation, the government intends to review the operation of sports against it.

50. Furthermore, following reports of increased ASB at football matches last season, the government also convened a ministerial roundtable with the relevant footballing bodies (SGSA, Premier League, English Football League, Football Association, Football Supporters Association, Professional Footballers' Association and the UKFPU) to discuss additional measures to be introduced prior to the 2022/23 football season.
51. In addition to the changes to FBO legislation (above), the FA, Premier League and EFL have announced that anyone participating in anti-social and/ or criminal behaviour will be reported by clubs to the police and prosecution could result in a permanent criminal record, which may affect their employment and education, and could result in a prison sentence. The FA will also be enforcing a tougher charging and sanctioning policy for clubs, which will reinforce these measures. Furthermore, anyone who enters the pitch and those carrying or using pyrotechnics or smoke bombs will now receive an automatic club ban. These bans could also be extended to accompanying parents or guardians of children who take part in these activities.
52. The government will continue to work with police and the football bodies to review disorder at football matches and consider the effectiveness of the new sanctions now in place, and whether further measures are necessary.
53. In line with best practice, the government has also recently conducted an organisational review of the SGSA. This formed part of the pilot process for the Cabinet Office's new public bodies review programme, which is delivering against commitments to increase the effectiveness of arm's length bodies. The review considered issues such as the size of the SGSA, its role and scope, function and funding model, and concluded that despite the small size of the SGSA, it plays an important and eminent role in the safety of sports grounds which it fulfils well. The government is currently developing its response to the final report of the review.
54. The government will continue to closely monitor whether there are further areas of the existing regulatory framework that would benefit from updating and we remain committed to appropriate evolution in this space. Our consideration in this space is likely to be informed by the wider work on football governance and our response to the recent SGSA organisational review (above).
  - a. This could include a review of the existing regulatory framework for women's football to ensure it remains fit for purpose, as the game continues to grow dramatically and will only continue to do so following the success of the England Women's national football team in the UEFA European Championships 2022.
55. We are confident that the regulatory landscape governing the safety of spectators at sporting events remains world-leading. However, as above, there is no room for complacency and government needs to remain aware of the ever-changing risks posed to safety and security. As such, government should continue to closely monitor the existing regulations to ensure they remain relevant and are updated when required. Whilst being conscious of the budgetary implications, our general approach to safety and security for participants and fans, particularly at higher risk events, is -

as far as is possible - to plan with the reasonable worst case scenario in mind. This allows us and security partners to have the flexibility to take a reasoned, evidenced and risk based approach closer to the time of the event.

**October 2022**