



NPIA
National Policing
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PRACTICE
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Guidance on

POLICING FOOTBALL

2010

Produced on behalf of the Association of Chief Police Officers
by the National Policing Improvement Agency

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Introduction

This section gives an overview of the guidance and highlights the importance of partnership, cooperation and engagement in football policing.

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1.1 Overview of The Guidance

This guidance revises and replaces **ACPO (2002) Manual of Guidance on Policing Football Events**, which presented principles and good practice that have since been embedded into the policing of football.

This guidance presents a framework that police forces can use to help with the planning and implementation of football operations. The content of the guidance can, therefore, be used to develop and/or review existing policy and processes in relation to football policing.

Note: although this guidance is discretionary, adherence to it will encourage a consistent approach across forces.

This guidance focuses on:

- Key roles associated with football policing including
 - the police, eg, Football Intelligence Officer (FIO)
 - the club, eg, safety officer other relevant bodies, eg, United Kingdom Football Policing Unit (UKFPU), Football Licensing Authority (FLA)
 - British Transport Police (BTP);
- Key documentation, eg, the Statement of Intent;
- Strategic considerations, eg, match categories;
- Tactical considerations, eg, policing style, information and intelligence management.

The guidance references relevant additional sources of information, policy and guidance which should be consulted for further detail and will contribute to successful football policing operations.

1.2 Partnership and Cooperation Between The Police Service and Football Clubs

Effective partnership and cooperation between the Police Service and football clubs is the most important component in ensuring that football matches are safe events where the risk of disorder is minimised.

To achieve this, it is necessary to have a positive and constructive working relationship at all levels. For example, between local police commanders and the club's senior management, eg, the club's safety officer; and deployed officers supporting a stewarding operation.

The elements that constitute an effective working relationship include empathy, trust, honesty and clarity of roles and expectations. Compromise by one or both parties may also be required at times. The benefits of an effective working relationship will, however, demonstrate themselves when both parties are required to work together on potentially challenging strategic (eg, developing a Charging Agreement, see **3.2.2 Charging Agreement**) and tactical issues (eg, responding to an emergency).

Once established, partnership and cooperation will benefit the clubs and the Police Service in meeting their respective responsibilities for safety management and maintaining law and order, see **3.2.1 Statement of Intent**. Other benefits will include increased trust and confidence from supporters and the wider community in respect of increased safety and the reduced risk of disorder. For these reasons, the content of this guidance is underpinned by, and reliant on, this partnership and cooperation.

1.3 Police Service Engagement with Supporter Groups

The Police Service has an important role to play in the Government's strategy for tackling football disorder. This strategy is based on a multi-agency approach to reducing football-related disorder by:

- Excluding 'risk' supporters;
- Including and empowering 'non-risk' supporters, ie, demonstrating that the government and authorities are working on their behalf to ensure safety and security at football events;
- Influencing/controlling those supporters who are not currently understood to be 'risk' but who may, under specific circumstances, become involved in antisocial behaviour and/or spontaneous disorder.

The European Union provides the following definitions for risk and non-risk supporters (see Council Resolution OJC 322/1, 04.12.2006):

- Risk supporter – A person, known or not, who can be regarded as posing a possible risk to public order or antisocial behaviour, whether planned or spontaneous, at or in connection with a football event.
- Non-risk supporter – A person, known or not, who can be regarded as posing no risk to the cause of or contribution to violence or disorder, whether planned or spontaneous, at or in connection with a football event.

It is important that the risk in relation to individuals and groups is quantifiable and dynamically assessed. The checklist in Appendix 3 can help with this process.

Police engagement with non-risk and, where appropriate, risk supporters has numerous benefits. In the case of non-risk supporters (the majority of supporters), the police should try to resolve any concerns that this group may have regarding football policing operations. The mechanisms for formal engagement include the police attending supporter group meetings and forums and proactive engagement with supporters during football policing operations. The latter type of engagement may form part of the 'policing style' which will be

reflected in the Gold strategy, see **3.3.2 Developing a Strategy**. For more information on policing style and crowd management/crowd dynamic considerations, see ***ACPO (forthcoming) Manual of Guidance on Keeping the Peace***.

In addition to proactive engagement, the impact of the football policing operation (eg, type of resources used, tactics deployed) will be a variable in the ability and motivation of the majority of supporters to 'self police' and further exclude the influence and impact of risk supporters. Setting the right strategy and developing an appropriate tactical plan will increase such opportunities and contribute to increasing public confidence.

2

Key Roles

This section outlines key roles that contribute to reducing the risk of disorder and enhancing safety at football matches.

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2.1 Introduction

This section outlines key police and club roles that contribute to reducing the risk of disorder and enhancing safety at football matches. The section also presents an overview of the role and functions associated with the United Kingdom Football Policing Unit (UKFPU), Football Licensing Authority (FLA), the Football Association (FA) and the Premier League and Football League.

2.2 Police Roles

The following police roles are essential for planning and delivering successful football policing operations:

- Police Commander;
- Football Liaison Officer (FLO);
- Football Intelligence Officer (FIO);
- Police Football Spotter.

Forces will need to assess the following factors in conjunction with the requirements and skills associated with each of the above roles to ensure that they can be appropriately resourced:

- The number and status (eg, Premier League, Football League, Non-League) of clubs in their force area;
- The police's responsibilities as outlined in each club's Statement of Intent, see **3.2.1 Statement of Intent**;
- The history and reputation of club(s) with regards to actual and/or risk of disorder.

Following this assessment, forces must consider and decide:

- How to configure the roles, for example,
 - establishing a dedicated force football policing unit
 - assigning an individual full-time FLO and FIO for each club
 - assigning some or all of these roles for each club on a part-time basis (addressing any risks associated with this option)
 - combining roles, for example, a full time FIO who takes on the role of police football spotter during the staging of football policing operations in other force areas;
- Where the roles are located, for example,
 - in a dedicated football policing unit, ensuring appropriate links and accessibility to other departments
 - amalgamated into other departments (eg, events/operational planning teams, local/force intelligence departments), ensuring that mechanisms exist or are developed to allow effective liaison and working between different roles;
- The supervision arrangements for each role (noting that each role is not rank specific);

- The training and accreditation requirements for each role;
- The applicability of cadre principles, for example, identifying a small number of commanders to perform the Police Commander role thus contributing to a consistent working relationship with the club's safety officer.

The Gold strategy and tactical plan will identify other commander/general police roles required for successful football policing operations, see **3.4.4 Resourcing and Logistical Requirements**.

2.2.1 Police Commander

Command structures for football policing operations are presented in **3.4.2 Command Structures**. There is a specific requirement, however, for a tactical or operational police commander to have responsibility for policing the stadium and the agreed footprint. This command role has previously been referred to as the 'Match Commander' but the term 'Police Commander' should be used.

The role of the Police Commander is to:

- Maintain law and order;
- Assist the club with their responsibility for safety and crowd management where necessary.

This role will reflect the division of responsibilities (including when to take primacy, for example, during a major incident) outlined in the Statement of Intent. For further information see **3.2.1 Statement of Intent**.

In order to fulfil their role, the Police Commander will require experience of football policing and possess relevant training and accreditation.

The Police Commander will need to develop and maintain an effective working relationship with the club's safety officer, see **2.5.1 Safety Officer**, and the Safety Advisory Group (SAG). This will ensure that the responsibilities outlined in the Statement of Intent and that other police/club protocols (see **3.3.4 Police/Club Protocols**) are adhered to and issues raised by the SAG relating to football policing operations are addressed. For more information on SAGs see **ACPO (2009) Public Safety Policy**.

2.2.2 Football Liaison Officer

The Football Liaison Officer (FLO) acts as a key link between the police and the club and other stakeholders. The role is important in developing and maintaining positive working relationships which will enhance spectator safety and minimise the risk of crime and disorder during

football policing operations. In order to fulfil this role, the FLO will act as a source of specialist advice on policing that the club and other stakeholders can draw on. They will also have a leading/contributing role in many of the activities outlined in this guidance, for example:

- Aiding in the negotiation and development of key documents, eg, Statement of Intent;
- Assisting with the process of allocating match categories to fixtures, see **3.3.1 Match Categories**;
- Assisting commanders with the development of appropriate strategy and tactical planning;
- Preparing the content for operational orders and conducting briefings.

Although responsibility for crowd safety at the stadium rests with the club, the FLO can contribute to it through their experience, knowledge and impartiality. In addition to FLOs possessing knowledge of the **DCMS (2008) Guide to Safety at Sports Grounds** and **FLA (2009) Safety Management**, they can at the discretion of the local command team and/or Police Commander:

- Represent the police at the SAG;
- Help the relevant local issuing authority with the content and formulation of the General Safety Certificate for the club's stadium;
- Monitor, through attendance and observation, the safety measures provided by the club (eg, stewarding effectiveness, provision of police services);
- Inform the club and/or the SAG of any issues relating to the architectural and structural suitability of the stadium;
- Provide safety advice from a police perspective during the development or redevelopment of any football stadium;
- Inform and advise on any aspect of crowd safety, as required;
- Communicate any issues relating to crowd safety to the local command team and/or Police Commander with overall responsibility for football policing in the force;
- Maintain an audit trail of issues relating to safety and a record of the club's response.

The FLO may also be responsible for ensuring that the appropriate logistical arrangements are provided for the football policing operation, see **3.4.4 Resourcing and Logistical Requirements**. Even if they are not directly responsible for making logistical arrangements, the FLO will need to have input into the process.

2.2.3 Football Intelligence Officer

The role of the Football Intelligence Officer (FIO) is to direct, collect, evaluate, analyse and disseminate intelligence products in order to minimise football-related crime and disorder. These products will also help determine the strategy, tactics, resource levels and support services required for the policing of any football event. Although the activity of the FIO is generally directed at minimising the impact of antisocial behaviour and criminality, they must also ensure that positive information/intelligence is disseminated as this will facilitate a balanced and proportionate response by police and club stewarding during a football policing operation.

In order to fulfil their role, the FIO:

- Provides a focal point for all information and intelligence relating to the club for which they have responsibility.
- Has a sound understanding of the principles and methods associated with intelligence-led policing, see
 - **ACPO (2005) *Guidance on the National Intelligence Model***;
 - **ACPO (2007) *Practice Advice: Introduction to Intelligence-Led Policing***;
 - **ACPO (2009) *Guidance on the Lawful and Effective Use of Covert Techniques***;
 - **ACPO (2010) *Guidance on the Management of Police Information, Second Edition***.
- Has access to the products, processes and systems used by the local/force intelligence unit.
- Develops relevant intelligence products, for example,
 - initial, interim and final assessments, see **3.5.1 Initial, Interim and Final Assessments**.
 - subject profiles, eg, in support of Football Banning Orders (FBOs) on conviction (section 14A Football Spectators Act 1989, as amended by Football (Disorder) Act 2000), or banning orders made on complaint (section 14B Football Spectators Act 1989, as amended by the Football (Disorder) Act 2000), for further information see **CPS (2010) *Guidance on Football Related Offences***. Where appropriate, a football banning order unit can assist with these activities.
 - commission and assist with the development of problem and/or criminal network profiles, eg, relating to ticket touting or racist chanting;

- Ensures that intelligence products are disseminated in accordance with legislation and local force policy; for further information see **ACPO (2010) Guidance on the Management of Police Information, Second Edition.**
- Coordinates and manages ‘spotters’ (home and away) and intelligence gathering teams. This includes conducting intelligence-specific briefings and debriefings.
- Promotes crime reduction strategies which involve other agencies or bodies, eg, partnership agreements between the police, football clubs and/or recognised supporter groups.
- Researches football-related arrests and ascertains how each matter was disposed of by a court or other means.
- Completes and submits match summary reports, items for inclusion in the UKFPU national disorder assessment and relevant graded intelligence reports to the UKFPU; for further information see **2.3 United Kingdom Football Policing Unit.**
- Attends regional and/or national intelligence workshops and conferences hosted by the UKFPU. These enable FIOs to remain up to date on current issues and share good practice, and leads to the promotion of consistency and national standards.

In addition to working closely with the FLO and police football spotters, the FIO will need to also liaise with:

- Other FIOs and local/force intelligence officers;
- Other law enforcement agencies;
- Crown Prosecution Service (CPS), eg, liaising with the lead football prosecutor on case preparation and disposal;
- Club safety officers and other club officials, eg, to exchange information/intelligence (in compliance with force policy).
- Other agencies, eg, the football authorities, local authorities, supporter groups, local travel companies.

2.2.4 Police Football Spotter(s)

The Police Football Spotter (spotter) has two main roles:

- To provide a football policing operation with live and relevant information and intelligence on supporter groups;
- To act as a link between the Police Service and a club’s supporter community.

These two roles complement each other. For example, a spotter will be required to communicate to commanders both positive and negative information and intelligence associated with supporter groups during

an operation. To provide the best quality information and intelligence, the spotter must develop a detailed knowledge of a club's supporter community. This will only be achieved if the spotter has developed and maintains links with the supporter community. This process provides the benefit of enhancing the general police/supporter community relationship at a club. An increased trust and confidence between the spotter and supporter community will increase opportunities for richer information and intelligence. This will help reduce the risk of disorder, thus further promoting trust and confidence.

To perform this role effectively, the spotters must:

- Possess experience of policing football operations;
- Possess extensive knowledge of the identities, tactics and strategies of persons who engage in violent disorder and other criminal activity associated with football, ie, risk supporters;
- Have a sound understanding of intelligence and the principles and methods associated with intelligence-led policing, see
 - ***ACPO (2005) Guidance on the National Intelligence Model***
 - ***ACPO (2007) Practice Advice: Introduction to Intelligence-Led Policing***
 - ***ACPO (2009) Guidance on the Lawful and Effective Use of Covert Techniques;***
- Be competent in the collection, evaluation and dissemination of intelligence products;
- Be competent in the use of technical equipment, eg, video camera;
- Engage with the supporter community to improve police understanding of their identities, sensitivities and expectations and to enhance the police/supporter relationships at a club, eg, through developing and maintaining links with local supporter groups.

Forces have the discretion to decide whether their spotters are Level 2 Public Order trained or Forward Intelligence Team trained. As a minimum, spotters should be aware of public order tactics and common minimum standards. They will be expected to withdraw during outbreaks of disorder, to be replaced with officers specifically trained and equipped to deal with those situations. This will enable the spotters to identify the groups or person(s) away from the seat of the disorder.

Spotters should be deployed for football operations when an assessment indicates that a risk of disorder is high (eg, based on intelligence, the history/profile associated with an individual fixture). In these circumstances, spotters will provide invaluable knowledge and context which will benefit command decision making (eg, how resources can be effectively deployed).

Consideration must also be given to deploying spotters to both home and away fixtures where, although the risk of disorder at an individual fixture is assessed to be low, there may be opportunities to, for example:

- Build links and increase trust and confidence between the supporter community and the Police Service;
- Collect intelligence which can be used to help obtain future FBOs.

Regardless of the assessment for individual fixtures, forces are encouraged to develop protocols that include, for example:

- The establishment of reciprocal arrangements for spotter deployment between forces;
- A mechanism for recording the decision and rationale behind spotter deployment to football policing operations;
- A mechanism which enables spotters to feedback the outcomes of their activity to supervisors/commanders to ensure that they continue to be deployed effectively.

For more detail on the deployment of spotters during a football policing operation, see **3.5.2 Deployment of Spotters**.

2.3 United Kingdom Football Policing Unit

The UKFPU, established in 2005, is funded by the Home Office and is accountable to both the Home Office and ACPO. It is responsible for:

- Developing national policy on policing domestic football;
- National coordination of policing preparations and operations (including local force input) for overseas tournaments;
- Development and delivery of national strategies for policing international and club matches overseas;
- Coordination of the national football intelligence network;
- Providing leadership, training and guidance to FIOs (including the dissemination and sharing of knowledge and good practice);
- Assisting forces in the proactive targeting and development of intelligence in relation to active risk supporters through the allocation of additional funding to secure FBOs;
- Managing the statutory Football Banning Orders Authority (FBOA);
- Acting as the UK National Football Information Point (NFIP), ie, providing a central and single point for the exchange of police information, intelligence and risk assessments relating to any football match with an international dimension.

Additionally, the UKFPU has accessible information, intelligence and guidance which can be used to support all aspects of football policing operations, for example:

- A database of football related legislation;
- Policy advice and guidance originating from the NPIA, Home Office and ACPO relating to football, for example, **ACPO/CPS (2009) Prosecution Policy for Football Related Offences, Home Office (2009) Guidance on Football-Related Ticket Touting Legislation, ACPO (2009) Guidance on Command and Control;**
- Football policing-related news articles;
- Disorder assessments/reports.

The UKFPU can also be contacted for advice regarding football policing operations with an international dimension, eg, international fixtures involving the English and Welsh national teams, English or Welsh teams participating in European tournaments/pre-season friendlies. For further information see Appendix 4.

2.4 British Transport Police

British Transport Police (BTP) are responsible for policing football supporters who use the rail network across England, Wales and Scotland. Their capability includes staff who are experienced in policing football supporters, for example, FIOs and spotters. When planning a football operation, forces should consider inviting BTP to be part of the planning and resourcing process. This is particularly important for football policing operations which involve supporters entering, leaving and/or travelling around a force area by rail. If forces are planning to use powers under section 27 of the Violent Crime Reduction Act 2006 as part of a football policing operation (ie, giving directions to individuals to leave a locality), consultation with BTP is required if it is anticipated that the convergence of a crowd at a railway or underground station could occur. For further information see **Home Office (2007) Giving Directions to Individuals to Leave a Locality (Section 27 of the Violent Crime Reduction Act 2006) – Practical Advice.**

BTP focuses on monitoring and engaging with supporters who are using the rail network during football policing operations. They are also actively engaged in tackling any antisocial behaviour (eg, involving alcohol), especially on late trains, which causes disruption and impacts negatively on members of the public and rail staff. Forces should also be aware that BTP liaises with train operators on football-related issues. More information on the role of the BTP is available from <http://www.btp.police.uk>

2.5 Club Roles

The responsibility for safety management rests with the club safety officer. Both the safety officer (and possibly a deputy and chief steward) and stewards will work closely with the police during a football policing operation. It is important, therefore, for the club and the police to discuss and share constructive advice or criticism relating to safety management, eg, through the SAG.

2.5.1 Safety Officer

A club is responsible for appointing an occupationally competent safety officer. The club's safety officer will:

- Hold overall control of operational safety management during an event;
- Be easily identifiable and contactable throughout the event;
- Have the authority to make safety-related decisions without having to refer to senior management or a board member;
- Possess detailed knowledge of stadium regulations and contingency plans.

During an operation, the safety officer will be in command of a control point (sometimes referred to as the 'stadium control room' or 'ground operations centre'). The control point acts as a hub for communications and monitoring (eg, to monitor safety and public order, to coordinate responses to incidents and emergencies). It is, therefore, the location where the Police Commander, as outlined in **2.2.1 Police Commander**, should be located during an operation. For further information on the control point, see FLA and Football Stadia Improvement Fund (2005) Control Rooms. This close proximity of the commander to the safety officer will facilitate communication and, if required, any decision making regarding variation of responsibilities and primacy as outlined in the Statement of Intent.

Further information on safety officers is available from the Football Safety Officers Association (FSOA), see <http://www.fsoa.org.uk>, and **DCMS (2008) Guide to Safety at Sports Grounds**.

2.5.2 Stewards

Stewards have an important role in ensuring crowd safety during a football operation and thus fulfilling the club's responsibilities as outlined in the Statement of Intent. Stewarding duties include:

- Assisting with the circulation of spectators;
- Preventing overcrowding;

- Reducing the likelihood and incidence of disorder, eg, by searching spectators (with police support if necessary);
- Providing the means to investigate, report and take early action in an emergency (eg, in accordance with a stadium evacuation plan);
- Ensuring supporters comply with ground regulations.

Further information on stewarding, including training requirements, is available in **DCMS (2008) Guide to Safety at Sports Grounds**.

2.6 Football Licensing Authority

The FLA is an independent public body established under the Football Spectators Act 1989 and funded by the Department for Culture, Media and Sport (DCMS).

The FLA's mission statement is to ensure that all spectators, regardless of age, gender, ethnic origin, disability, or the team that they support, are able to attend sports stadia in safety, comfort and security.

To achieve this, the FLA is responsible for licensing all league and international stadia in England and Wales and overseeing the local authority control of safety at these stadia.

The FLA also promotes the adoption and maintenance of a safety culture and is a source of advice and good practice.

For further information on the FLA (including publications relevant to safety certification and general safety management), see <http://www.flaweb.org.uk>

2.7 Football Association

The FA is the governing body responsible for all regulatory aspects of the game of football in England. Its activities include promoting the development of the game, sanctioning all matches, leagues and competitions played in England and overseeing the administration of the game's disciplinary system (which applies to all participants in the game – each club, player, competition, match official and any other person involved in the game in England is bound by the FA Rules).

The FA organises the FA Cup, FA Trophy competitions and all international matches played by England national representative teams, most notably the men's senior team in the FIFA World Championships and the UEFA European Championships and friendly fixtures.

For further information on the FA, see <http://www.thefa.com>

2.8 Premier League and Football League

The Premier League and The Football League are the two senior leagues and, as such, have an important role to play in the management of football in England and Wales. Both leagues have a number of representatives who sit on the Board of the Football Association.

Both leagues are responsible for managing their respective league football competitions and acting in the best interests of their member clubs. They have their own rules and regulations, which their member clubs have to follow.

As well as managing the Championship, League One and League Two competitions, the Football League is also responsible for the end-of season play-off matches, as well as the League Cup and the Football League Trophy competitions.

For further information on the Premier League and the Football League, see <http://www.premierleague.com> and <http://www.football-league.co.uk>

3

Football Policing Operations

This section details the key activities that the police will be involved in to ensure that they plan and implement successful football policing operations.

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3.1 Introduction

There are key activities that the police will be involved in to ensure that they plan and implement successful football policing operations. The requirement for effective participation and cooperation between the force and club underpins all of this activity, see **1.2 Partnership and Cooperation between the Police Service and Football Clubs**.

3.2 Key Documents

The following three documents provide the framework which will dictate both strategic and tactical planning for football policing operations:

- Statement of Intent;
- Charging Agreement;
- Information Sharing Agreement.

Developing and agreeing the content of these documents will require the force and club to work together. The FLO and FIO must be available to assist with preparing these documents even if they do not ultimately sign them off on behalf of the force.

3.2.1 Statement of Intent

The purpose of the Statement of Intent is to outline the division of safety-related responsibilities and functions between the police and the club. The content for the Statement of Intent must, therefore, be discussed and agreed by the local force and club. Although the content will need to be tailored to meet local requirements, the Statement of Intent should cover the following:

- A section stating that it is not a legally binding contract or agreement;
- The club's responsibilities for overall safety of the event, for example, stewarding of the event and adherence to conditions identified in the safety certificate;
- The local force's responsibilities for dealing with crime and disorder in relation to the event, eg, prevention and detection of crime;
- Primacy issues, eg, the circumstances during which the police will move from a supporting role to taking primacy for decision making/intervention during an incident at the event;
- Variation, ie, how any amendments to the Statement of Intent will be agreed and recorded.

Once agreed, a written version of the Statement of Intent must be signed by relevant representatives from both the club and the force, for

example, the club's safety officer and local commander. The Statement of Intent should be reviewed, updated (if necessary) and signed by the club and the force on an annual basis.

For further information on the Statement of Intent, see **FLA (2009) Safety Management**. See **ACPO (2009) Guidance for Football Deployment and Cost Recovery** for a template Statement of Intent.

3.2.2 Charging Agreement

An annual Charging Agreement needs to be agreed by the club and the police to cover the costs of football policing operations. When negotiating and developing a Charging Agreement, forces should make reference to **ACPO (2009) Guidance for Football Deployment and Cost Recovery**.

A key component will be an agreed footprint (land in the vicinity of the stadium which is under the control of the club and/or where the police presence is for the benefit of the club and purposes of the match. Agreeing both the footprint and Charging Agreement will require open and honest negotiation between the police and the club. The focus during these negotiations must remain on reaching an agreement that ensures safety and reduces the risk of disorder. Agreement will be facilitated by effective working relationships that are developed between the club and the force, see **1.2 Partnership and Cooperation between the Police Service and Football Clubs**. Football policing practitioners (eg, FLO) should be involved in this process with, if necessary, support from the local/force senior management team and force finance department.

The content of the Charging Agreement should cover:

- A request for special police services under section 25 of the Police Act 1996;
- The fixture list of matches for the season;
- An identified plan of the ground with the footprint of controlled areas clearly identified;
- A schedule of planned deployments for each category of match (see **3.3.1 Match Categories**) for the ground, with standard charges for the categories;
- A schedule of chargeable rates for the season;
- A variation statement to include variations to categories and additional matches;
- A set of key contacts for both the police and the club who are authorised to deal with urgent items.

A template Charging Agreement is available from **ACPO (2009) Guidance for Football Deployment and Cost Recovery**.

3.2.3 Information Sharing Agreement

An Information Sharing Agreement (ISA) is a formal arrangement between organisations which wish to share personal information held and managed centrally within force. In the context of football policing operations, an ISA between a club and the force provides the basis for sharing information on, for example, details relating to individuals who are subject to an FBO.

An ISA is based on an identified statutory or common law (policing purpose) requirement for information to be shared and identifies:

- The partners the information will be shared with;
- The process for sharing information, covering
 - access and usage
 - accuracy
 - necessity
 - recording
 - security
 - accountability
 - authorisation
 - approval.

Once completed and agreed, an ISA will be held centrally and reviewed on an annual basis.

For further information on the process for developing an ISA (including a template ISA), see **ACPO (2010) Guidance on the Management of Police Information, Second Edition**.

3.3 Strategic Considerations

A number of interlinking strategic planning issues will need to be addressed in parallel with the development and agreement of key documents. The following areas, therefore, need to be developed by the force and club during the pre-season:

- Force/club agreement on match categories;
- An overarching Gold strategy for football policing operations;
- Contingency planning;
- Police/club protocols.

Forces should consider using the Conflict Management Model (CMM) as a tool for strategic planning especially in relation to developing an overarching Gold strategy. For further information see **ACPO (2009) Guidance on Command and Control**. Decision making in relation to these areas must be documented for the audit process, and reviewed as the season progresses and also at its close, see **3.6 Debriefing and Review**.

3.3.1 Match Categories

A standardised set of categories is used to highlight the risk of disorder associated with individual football fixtures. These categories are:

- Category CS – Club Security Only (ie, Police Free Fixture, noting that a limited number of football policing practitioners may be deployed, eg, Police Commander, spotters);
- Category A – Low Risk of Disorder;
- Category B – Medium Risk of Disorder;
- Category C – High Risk of Disorder;
- Category C-IR – Category C with Increased Risk of Disorder.

Forces should use match categories as a planning tool to ensure that the appropriate number of policing resources can be deployed to minimise the risk of disorder at individual fixtures. To achieve this, the police (including either the presence or advice of the FIO and FLO) and club should meet during the pre-season to:

- Agree the policing resources that are required to minimise the risk of disorder associated with each match category;
- Agree the initial match category allocation for all known fixtures for the forthcoming season.

There is no prescriptive method for calculating the policing resource requirements that should be assigned to each match category. The proposed requirements should, however, reflect an objective and justifiable assessment of the resources required to minimise the risk of disorder. To achieve this, a variety of factors will need to be considered, for example:

- The resources allocated to each match category during the previous season (taking account of the impact of relegation or promotion if applicable);
- An assessment of whether the number of police resources used was appropriate for the previous season's fixture involving the same teams;
- The anticipated attendance – but only insofar as it affects potential disorder;
- The significance of a fixture, eg, local derby or cup fixture;
- The division of responsibilities outlined in the Statement of Intent;
- Any other issues as raised by the force or club, for example, from the SAG relating to the club's stewarding resources or ground infrastructure.

An initial assessment produced by the FIO can also be used to help calculate the resource requirement against each match category, see **3.5.1 Initial, Interim and Final Assessments**. This initial assessment can also be used as the basis for allocating a match category against each individual fixture.

There are a number of benefits associated with closely involving the club during this process, for example, the Football Safety Officers Association keep records which can add value to the process. Firstly, it should help progress the development of a Charging Agreement as the costs associated with the match categories can, in conjunction with the initial allocation for each fixture, be calculated for the season. Secondly, it enables the club and other stakeholders (eg, local authority, other emergency services) to plan for their own resource requirements.

The policing resource requirement for each match category should be reviewed in conjunction with the club as the season progresses. The initial match category allocation for fixtures will also need to be reviewed as each fixture draws closer. This is achieved through the interim and final assessments, see **3.5.1 Initial, Interim and Final Assessments**.

3.3.2 Developing a Strategy

There is a requirement to develop a Gold strategy. This needs to set out the purpose, rationale and parameters in which others within the command structure must operate during football policing operations. Although the strategy may be developed at the start of a season, it must be dynamic and capable of revision in light of any amended threat analysis and assessment. It must enable Silver (Tactical) commanders to make justifiable decisions and implement tactical options that meet the strategy.

The Police Service should engage with other stakeholders in the development of the strategy, for example, the club, local authority and supporter groups. In the context of football policing, the development of the strategy will be influenced by a number of factors which need to be reflected in the strategy:

- The responsibilities of the police as outlined in the Statement of Intent.
- The intended policing style, for example,
 - normal policing
 - unobtrusive/low key policing
 - firm but fair
 - proactive engagement with supporters
 - high visibility
 - respectful of human rights and proportionate;

For further information on the relationships between policing style and crowd management/crowd dynamics considerations, see **ACPO (forthcoming) Manual of Guidance on Keeping the Peace**;

- Intervention/arrest/investigation strategy.

While the strategy and the rationale behind it should be recorded as part of an audit trail, so should any revisions or amendments.

3.3.3 Contingency Planning

The club is responsible for developing contingency plans as part of its safety management responsibilities. These are likely to cover areas such as:

- Fire;
- Bomb threat, suspect package, terrorist attack (including chemical, biological, radiological or nuclear);
- Buildings and services
 - damage to structures
 - power cut or failure
 - passenger lift or escalator failure
 - gas leak or chemical incident;
- Safety equipment failure
 - turnstile counting mechanism
 - closed circuit television
 - public address system
 - electronic information boards
 - stewards' radio system
 - internal telephone systems
 - fire warning and other fire safety systems;
- Crowd control
 - surging or crushing
 - pitch incursion
 - late arrivals or delayed start
 - lock outs including progressive turnstile closure
 - disorder inside the ground
 - large scale ticket forgery;
- Emergency evacuation;
- Severe adverse weather;
- Ticketing strategy in the event of an abandoned fixture;
- Features/considerations specific to the location.

The police, through the SAG, should ensure that relevant advice and support is provided for the development of these contingency plans. This could include assisting with the development of a suitable exercise regime, for example, arranging and/or participating in table top or live exercises. This process will also help ensure that the club's contingency plans are aligned to the police contingency plans and are compatible with them (eg, a major incident plan).

The contingency plans and police role in them, must be incorporated into tactical plans and the operational order/briefing. It may also be beneficial to test some aspects of the contingency plans in partnership with the club's safety officer and stewards during a football policing operation, eg, during low-risk and non-eventful operations.

3.3.4 Police/Club Protocols

The local force and club should agree and document any protocols which will influence and impact on the development of a Gold strategy and/or tactical planning for policing football operations.

The following issues may be addressed through appropriate police/club protocols (not exhaustive):

- Identifying discrete phases for the football policing operation and club safety management operation, eg, pre-match, during the match, closing stages of the match, post match;
- Agreeing how incidents of racism will be dealt with at the ground, see **ACPO, Premier League, FA & FSOA (2004) Tackling Racism in English and Welsh Football**;
- Identifying mechanism for half-time briefings, for example, location and roles required to attend;
- Any requirement for a joint media strategy;
- Decision on who will brief match officials;
- Methods for communicating ground regulations to deployed police resources;
- Policy on police/club role in removing spectators from seated areas;
- Policy on police/club role in protecting the playing surface;
- Policy on licensing issues within the stadium.

3.4 Tactical Considerations

Addressing and implementing the following tactical considerations will provide a framework for the delivery of a successful football policing operation:

- Tactical planning;
- Command structures;
- Command support;
- Resourcing and logistical requirements;
- Briefing (and subsequent debriefing, see **3.6 Debriefing and Review**).

3.4.1 Tactical Planning

There is a requirement for the Silver (Tactical) commander to develop and coordinate a tactical plan to achieve the Gold strategy. To achieve this, a tactical planning meeting should be convened to help develop the tactical plan in advance of a football policing operation. The development of relevant risk-assessed and proportionate tactical options will also feed into the tactical plan. In addition to using the CMM as a planning tool, IIMARCH (Information, Intention, Method(s), Administration, Risk Assessment, Communication, Human Rights) can be used as a structure for populating the tactical plan. Consideration should also be given to:

- The potential impact of police tactics on crowd dynamics, as set out in **ACPO (forthcoming) Manual of Guidance on Keeping the Peace**;
- The potential impact of supporters' travelling arrangements. If it is anticipated that supporters will be travelling by rail, contact should be made with BTP so that they can be involved in tactical planning, see **2.4 British Transport Police**. If supporters are expected to travel by coach, the Traffic Commissioners issue guidelines to operators which will help the police with the administration of them and ensure that operators are not, by their conduct, causing spectators to commit offences particularly in relation to the Sporting Events (Control of Alcohol Act 1985). The guidelines can be obtained from the Traffic Commissioners, see <http://www.dft.gov.uk/pgr/roads/tpm/trafficcommissioners> for further information and contact details.

The meeting should be chaired by the Silver (Tactical) commander and may require input from the following individuals/functions to develop relevant tactical options and the tactical plan (not exhaustive):

- FLO;
- FIO;
- Police Commander;
- Other commanders;
- Local policing representation;
- Planning;
- Crime;
- Intelligence;
- Logistics;
- Public Order;
- BTP;
- Roads Policing;
- Partners, eg, club's safety officer, other emergency services, Traffic Commissioners.

The tactical planning meeting will need to assess any relevant information and intelligence which may impact on the ability to achieve the Gold strategy. Relevant issues may arise from, for example:

- The force/local Tactical Tasking and Co-ordination Group meeting;
- The interim assessment, see **3.5.1 Initial, Interim and Final Assessments**;
- The SAG;
- A community impact assessment, taking into account local/national supporter groups and organisations;
- The club's risk assessment.

This assessment process may also impact on the tactical planning in the following ways:

- Identifying a requirement to amend the original match category for a fixture, if a higher or lower risk of disorder has been identified. If the match category is amended, it is essential that this is communicated along with the rationale to the club to ensure appropriate amendment regarding cost recovery under the Charging Agreement.
- Identifying other factors/events which may impact on the football policing operation, for example, if protest is planned or there is an increased chance of city centre disorder.

The tactical planning will also have to consider the potential or actual investigative requirements for a football policing operation, for example, the availability/deployment of a senior investigating officer

(SIO), exhibits officer or disclosure officer. The availability/deployment of these investigative staff will help the development of relevant scene, victim/witness, and suspect strategies if they are required. For further information see **ACPO (2005) Practice Advice on Core Investigative Doctrine**.

Forces may wish to explore developing a suite of tactical plans which can be applied to each match category, eg, a tactical plan which is applicable to Match Category 'C' and so on. Although this 'off-the-shelf' option would reduce cost and avoid duplication of effort, the tactical plan will still need to be reviewed and, if necessary, amended to ensure it is relevant and applicable to the football policing operation that is being planned.

As with the development of the Gold strategy, a clear audit trail of decision making should be kept.

3.4.2 Command Structures

As with other types of policing operations, effective football policing relies on the establishment of a clear command structure. There is a requirement, therefore, for football policing to adopt a formal command structure incorporating Gold (Strategic), Silver (Tactical) and Bronze (Operational) levels of command. For further information on the roles and responsibilities associated with each of these command levels, see **ACPO (2009) Guidance on Command and Control**.

Forces are encouraged to develop and implement a set of command structures which reflect the risk of disorder associated with the match categories assigned to fixtures (see **3.3.1 Match Categories**) and meet the Gold strategy (see **3.3.2 Developing a Strategy**). These command structures will form one component of the tactical plan. The precise configuration of commanders may vary, depending on the match category applied to the fixture. For example, a fixture with a low risk of disorder may have the Silver (Tactical) commander fulfilling the role of the Police Commander, see **2.2.1 Police Commander**, and there may only be a requirement to deploy one or two Bronze (Operational) commanders with geographic responsibilities. For a fixture where there is a high risk of disorder (eg, where there is an additional risk of football-related city centre disorder), the Silver (Tactical) commander may be based at a force control room and the Police Commander role is conducted by a Bronze (Operational) commander supplemented by additional Bronze (Operational) commanders with geographic or functional (eg, intelligence, crime) responsibilities.

Whatever the configuration of the command structure, it is important that it is documented, communicated and understood by all participants in the football policing operation.

3.4.3 Command Support

Appropriate support structures will help effective command decision making. Although influenced by the size, complexity and risk of disorder, the following should be considered to provide adequate support to all elements of the football policing operation:

- Tactical and specialist advisers, eg, public order, legal;
- The establishment of a dedicated intelligence cell, see **ACPO (forthcoming) Manual of Guidance on Keeping the Peace**;
- The establishment of a dedicated resources/logistics cell, for example,
 - to facilitate the activation of any force major incident plans
 - if mobilisation of mutual aid is planned and/or required, see **ACPO (2006) Guidance on the Police National Mobilisation Plan**.

In addition, the Police Commander will require support at the stadium control point, for example, the FLO as an adviser and support staff. This will also help ensure resilience, ie, there is a police presence at all times in the control point that the club's safety officer and other officials can consult if required.

3.4.4 Resourcing and Logistical Requirements

The tactical plan will outline the resourcing and logistical requirement for a football policing operation. A logistics and/or operations planning department is likely to be responsible for making the appropriate resourcing and logistical arrangements. The FLO should, however, quality assure this process if the department/staff are not routinely involved in resourcing or making logistical arrangements for football policing operations.

To resource a football policing operation and in addition to commanders and specialists (ie, FLO, FIO, spotters, tactical advisers), the following may be required (not exhaustive):

- Level 3 public order trained staff;
- Level 2/Level 1 public order staff;
- Roads policing staff;
- Prisoner processing staff;
- Mounted branch;
- Dog handlers;
- Intelligence staff;
- Investigative staff;

- Specials;
- PCSOs;
- Air support staff;
- Support staff, eg, loggists, dispatchers.

The logistical requirements that need to be addressed include:

- Provision of equipment (seek advice if specialist equipment required);
- Communications, eg, establishing appropriate airwave channels;
- Briefing facilities, see **3.4.5 Briefing**;
- Relevant documentation, eg, operational order, briefings, policy logs;
- Transport arrangements for staff and equipment;
- Staff welfare arrangements, eg, refreshments;
- Liaison with coach operators.

It may be prudent for forces to consider developing a resourcing and logistical package for each of the match categories, eg, by combining resources into serials/police support unit (PSU) structures. This process would aid the development of a suitable Charging Agreement, although such packages would need to be reviewed and, if necessary, amended to meet the requirements of the tactical plan.

3.4.5. Briefing

Briefing and debriefing, see **3.6 Debriefing and Review**, is essential to successful operational deployment. There must be a command team briefing on the day of the football policing operation. This should include all commanders, the FIO, the FLO and any other staff deemed necessary. This briefing provides the opportunity to communicate and clarify roles, responsibilities and deployments, especially in light of the final assessment provided by the FIO, see **3.5.1 Initial, Interim and Final Assessments**.

All staff involved in the football policing operation must then be briefed. This may be achieved through commanders briefing their own resources or an all staff briefing at one venue. All briefings should follow the IIMARCH format and be conducted at suitable locations. For further information on briefing, see **ACPO (2006) Guidance on the National Briefing Model**. The club safety officer should also be briefed to help identify and communicate the impact that the police and club plans will have on each other.

Consideration should also be given to commanders and key staff holding a briefing at half-time, to revisit and assess the tactical plan in light of the developing nature of the event.

3.5 Information and Intelligence Management

The FIO and spotters will be engaged in information and intelligence management before, during and after a football policing operation. They must, therefore, have a general understanding of the processes associated with information and intelligence management contained in **ACPO (2010) Guidance on the Management of Police Information, Second Edition**, for example:

- Types of sources;
- Collection methods for information (ie, routine, volunteered, tasked);
- The evaluation and handling process (5x5x5), ie, when to use and how to use the 5x5x5;
- Awareness of Covert Human Intelligence Sources (CHIS) issues.

To help the successful policing of football operations, the following are also applicable to information and intelligence management:

- Initial, interim and final assessments;
- Deployment of spotters.

3.5.1 Initial, Interim and Final Assessments

The FIO is responsible for developing initial, interim and final assessments to help with the planning of a football policing operation. The initial assessment presents the opportunity to assign match categories against individual fixtures during the pre-season. This process will help with the establishment of an appropriate Charging Agreement with the club, see **3.2.2 Charging Agreement**. The initial assessment may be determined by:

- Anticipated attendance for a fixture;
- Significance of the fixture, eg, local derby;
- Any previous history of disorder;
- Previous behaviour of each supporter group;
- Date, day and time of the fixture;
- Any other known events which may coincide with the fixture;
- Other relevant graded intelligence relating to risk or non-risk supporter groups.

The interim assessment is required for the tactical planning phase of a football policing operation. It will require the input of both the home and away team FIOs. It should be disseminated prior to any tactical planning meetings. The content of the interim assessment should be based on the initial assessment but will include more up-to-date information/intelligence, for example:

- Information regarding ticket sales;
- Known travel arrangements for visiting supporters (eg, coach or train details);
- Any relevant previous history concerning the fixture (eg, antisocial behaviour/disorder);
- Any other relevant graded intelligence.

The purpose of the final assessment is to ensure commanders are aware of any information/intelligence which may impact on the football policing operation but which has not been captured by the interim assessment, for example, notification from a spotter that risk supporters have changed their mode of travel on the day of the fixture.

The combined contents of the interim and final assessment should be used to develop an intelligence briefing document for relevant staff (eg, FIO, FLO, commanders, spotters) and form part of the briefing process for commanders and staff deployed for the football policing operation. See **3.4.5 Briefing**.

3.5.2 Deployment of Spotters

The effective deployment of both home and away team spotters during a football policing operation will reduce the risk of disorder, increase opportunities for intelligence gathering and help develop links with football supporter groups.

The tactical plan should identify:

- The number of spotters required for the operation;
- How they will be briefed, tasked and supervised, eg, by the FIO and/or through a dedicated intelligence cell;
- Where and when they will be deployed, eg, at points along the route travelling supporters are taking, at known locations where risk supporters congregate;
- If there is any requirement for additional personal protective equipment;
- The requirement for technical equipment, eg, cameras, and the parameters associated with their use;
- Dress state (uniformed deployment as a default although they should be distinguishable from colleagues via insignia or uniform markings).

When deployed during a football policing operation, the spotters will:

- Collect, record and disseminate intelligence;
- Engage with supporters to help develop links and build trust and confidence;

- Help with the identification of known or suspected persons or groups involved in disorder or crime;
- Help with the identification of persons subject to FBOs;
- Provide information on the behavioural patterns of supporters;
- Identify potential individuals who may be suitable for recruitment as CHIS;
- Identify potential flash points/hot spots for disorder;
- Prevent the infiltration of visiting supporters into home areas of the ground and identify those visiting supporters who gain access to such areas.

Due to their knowledge and links with supporter groups (including risk supporters), spotters should be deployed to areas where there is the potential for either spontaneous or pre-planned disorder. Although this particular type of deployment will need to be dynamically risk assessed and approved by/communicated to commanders, the spotters' knowledge and links could prevent and/or reduce any disorder from actually occurring. Where disorder occurs, spotters should revert to their role as intelligence gatherers as this will enhance both the opportunities for obtaining future FBOs and/or assisting any post-match investigation.

3.6 Debriefing and Review

Once the football policing operation has ended, a debriefing should then be conducted to identify opportunities for organisational and operational learning (eg, an assessment of whether the level of police resources used was appropriate, effective and efficient). Debriefing will also help support intelligence and evidence gathering, for example, to secure FBOs, and identify/address any welfare, partner and community issues that may require action. For these reasons, a debrief with the club safety officer should part of the process for debriefing the football policing operation.

If significant issues are raised during a football policing operation, advice on the management and support services to conduct a structured debrief can be obtained from the NPIA Uniform Operational Support Team. This team can be contacted via the NPIA Specialist Operations Centre, telephone: **0845 000 5463** or email: soc@npia.pnn.police.uk

The outcomes of debriefing should link into reviews of strategy and tactical planning that are conducted during and at the close of the season, for example, reviewing the policing resource requirements against the match categories.

The debriefing and review process should capture good practice and highlight areas for improvement. The implementation of any recommendations should be monitored as these can be used as the basis for future planning.

Further information on debriefing is available from **ACPO (2006)** *Guidance on the National Briefing Model*.

Appendix 1

Abbreviations and Acronyms

ACPO	Association of Chief Police Officers
BTP	British Transport Police
CHIS	Covert Human Intelligence Source
CMM	Conflict Management Model
CPS	Crown Prosecution Service
DCMS	Department for Culture, Media and Sport
FA	Football Association
FBO	Football Banning Order
FBOA	Football Banning Orders Authority
FIO	Football Intelligence Officer
FLA	Football Licensing Authority
FLO	Football Liaison Officer
FSOA	Football Safety Officers Association
IIMARCH	Information, Intention, Method(s), Administration, Risk Assessment, Communication, Human Rights
ISA	Information Sharing Agreement
NFIP	National Football Information Point
NPIA	National Policing Improvement Agency
PCSO	Police Community Support Officer
PSU	Police Support Unit
SAG	Safety Advisory Group
SIO	Senior Investigating Officer
UKFPU	United Kingdom Football Policing Unit

Appendix 2

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Appendix 3

Risk Supporter Checklist

Risk Supporter Checklist

ELEMENTS	SUPPORTING COMMENTS
Public Order	
Historical rivalry between clubs	
Expected violence	
Racist behaviour	
Away supporters likely in home sector	
Pitch invasion	
Alcohol-related problems	
Use of weapons	
Knowledge of police tactics	
Other	
Public Safety	
Terrorist threat	
Political tension/use of banners	
Use of flares/fireworks likely	
Travelling supporters without tickets	
Ticket touting	
Other	
Criminal Activity	
Counterfeit tickets	
Sale/use of illegal drugs	
Other	

Appendix 4

Guidelines for Cooperation on Policing Football Matches with an International Dimension

Guidelines for Cooperation on Policing Football Matches with an International Dimension

Introduction

These guidelines outline the procedures to be followed in securing effective cooperation in the policing of football matches with an international dimension. The guidelines follow, as far as practicable, those accepted and agreed by the European Union (EU) in Council Resolutions, which are detailed in the EU Football Handbook (hereafter referred to as the Handbook).

UK police officers should not perform operational police duties abroad unless a specific request has been received from the host Policing Authorities, or appropriate Government Department in accordance with the Handbook and authority has been granted by an ACPO officer and the Home Office under section 26 Police Act 1996.

Role of the UKFPU

Each EU Member State is required to establish a National Football Information Point (NFIP). The UKFPU is the designated UK NFIP. The role of an NFIP is to act as the single point of contact for the receipt and transmission of football information/intelligence through a network of (EU and non-EU) counterparts. This role relates to **all** international matches involving the English and Welsh national teams and club matches which are played abroad (eg, pre-season friendly matches and matches in the UEFA Champions and Europa Leagues).

To assist Police Commanders in planning for a football match with an international dimension the UKFPU has access to the EU NFIP website. Once a draw is made in any of the international football competitions, the UKFPU will forward information to the force involved to assist with planning and the completion of the risk assessment for the match.

Assessing the Risk

UK Health and Safety legislation requires forces to complete a comprehensive risk assessment process in order to ensure the safety of police officers who are to be deployed abroad.

It is recommended that all police forces involved in policing operations at football matches with an international dimension complete a generic risk assessment prior to any matches being played abroad; this will normally be at the beginning of the football season.

In addition to the above, a specific risk assessment should also be undertaken prior to each match which is to be played abroad – once the location and other relevant circumstances are known.

The away-leg assessment should include:

- The number of UK supporters likely to travel, divided into risk and non-risk categories;

- Likely modes of travel, including any overnight stops;
- Whether supporters of different clubs travelling to separate fixtures in Europe are likely to use the same transport arrangements;
- The potential for disorder by the travelling supporters, both en route (including transit countries) and at the football stadium concerned;
- The attitude of home supporters and their recent record of behaviour;
- Any additional factors which may provide an increased level of apprehension such as the venue itself, previous encounters between the teams or the current political situation.

Liaison with the football club management staff and/or safety officer, travel organisers and the FA may prove helpful when preparing both risk and intelligence assessments.

Policy Books

Maintaining a Policy Book in all but the most simple cases is recommended by ACPO as good practice. Previous history connected with football matches with an international dimension (both in the UK and abroad) highlights the value of this practice being adopted in connection with every international football match – whether played in the UK or abroad.

Pre-Event Visit

For matches played abroad, it is advisable for the Police Commander (or nominee, normally of the rank of chief inspector or above) to make a pre-event visit to the country concerned. This should be several weeks in advance of the planned football match whenever practicable. It cannot be stressed too strongly the importance that this visit may have to the eventual success of the operation, for both the home and away legs.

When arrangements are made to travel abroad for a pre-event visit, the Consular Department at the Foreign and Commonwealth Office (in London) should be informed. This will enable them to arrange for Consular representation at the meeting. The UKFPU has the necessary contacts and will perform this function on request.

The pre-event visit does not require a formal request from the host Policing Authorities or appropriate Government Department. The Police Commander (or nominee) will normally visit representatives of the club and the FA in an advisory capacity and will liaise with their counterpart in the host country. In most cases it is envisaged that visits will be of a short duration (normally 24–48 hours). Travel and accommodation costs need to be agreed in advance between the Police Commander and the club. Such visits and authority to accept a club's offer to pay any expenses require prior approval from an officer of ACPO rank.

When planning operational strategies it is important that police officers are seen to be acting independently from the representatives of the club and the FA. This is especially important where the officers may have flown with, and/or are staying in the same hotel as the football officials.

Where practicable, an initial intelligence assessment should be completed by the FIO for the information of the UK Police Commander before any pre-event visit. This need not contain detailed information or travel arrangements. A more **detailed** intelligence assessment should then be completed after the pre-event visit.

The purpose of a pre-event visit is to:

- Establish personal contact between the senior police officers in charge of the respective football matches;
- Outline and agree the intended role of the visiting police officers in the host country and whether the host country wishes UK officers to be deployed in uniform or plain clothes;
- Explain and discuss the policing strategy and tactics to be employed in each country, eg, to seek authority for UK police officers to be able to use video cameras for evidence/intelligence gathering purposes while deployed abroad;
- Identify and resolve other difficulties involved in policing the matches, eg, ticket distribution and segregation;
- Arrange accommodation, meals, transportation and other facilities (eg, telephone) and, if appropriate, establish responsibility for payment;
- Arrange the provision of a liaison officer and, if required, an interpreter.

An important objective of the pre-event meeting is to discuss the requirement for an official invitation from the host Policing Authorities or appropriate Government Department to be forwarded via their NFIP to the UK NFIP.

The pre-event visit presents the opportunity for Police Commanders, representatives from the football club, the FA and Consular Officers to liaise and form a partnership approach to dealing with the arrangement for both home and away legs. This should help to ensure that no area of potential difficulty is overlooked.

A pre-event visit will not necessarily infer that UK police spotters need to travel abroad to the fixture. The risk and intelligence assessments, and personal contact between the respective Police Commanders, will assist in the decision as to the value, or otherwise, of exchanging spotters. Where, for example, travel difficulties, lack of interest or other factors indicate that very few supporters are likely to travel, there may be no need to progress the contact any further.

Sending Police Officers Abroad

The ability to influence the behaviour of supporters when abroad may reflect on the behaviour of both sets of supporters when fixtures are played in the UK.

Disorder abroad may directly require a substantial increase in the policing resources for UK fixtures. The prevention of such disorder by attendance of UK officers could result in savings far in excess of the costs of both a pre-event and operational visit. In addition to the return match, disorder at an away leg could have substantial resource implications for other future matches held in the same country.

Officers travelling abroad will undertake a number of important functions to assist with the policing operation. These include the provision of:

- **Travel information** – numbers of supporters, dates, routes and means of travel and accommodation arrangements;
- **Intelligence** – on known criminals and/or risk supporters, their associates and methods of operation;
- **Information** – observing groups of supporters to detect unruly behaviour or changes in mood which might indicate an intention to cause disorder; how supporters are policed when attending matches in the UK and how they are likely to react to certain police actions when abroad;
- **Liaison** – with the media (if considered appropriate), with Consular Officials and with visiting supporters, both at the stadium and in the city/town, if requested to do so by the host Police. It may be advantageous to explain to supporters the possible tactics likely to be adopted by the host force (eg, the use of batons or tear gas) to deal with a threatened or actual outbreak of disorder.
- **Assistance** – to the host force in their identification and processing of prisoners, including contact through the UKFPU with other agencies/ departments in the UK, eg, SOCA – INTERPOL;
- **Collation** – of travel information and relevant intelligence for forwarding back to the UKFPU to assist with both the policing of returning supporters and longer-term intelligence gathering; of all relevant evidential material, where appropriate, on individuals to facilitate the application for a Football Banning Order in the UK under section 14B of the Football Spectators Act 1989 (as amended by the Football (Disorder) Act 2000).

Policing Complement

The intelligence and risk assessments for the event (including the number of travelling supporters and the current intelligence) will, to a large extent, determine the number of officers required to travel abroad. The minimum number should normally be three: A Head of Delegation (normally a Police Commander of the rank of chief inspector or above) who will be responsible for the strategic liaison functions, and two of sergeant/constable rank (FIO/ spotters) with knowledge of the team's supporter base.

Dress Code/Protective Clothing/Means of Identification

Whether UK police officers are to be deployed in uniform or plain clothes while abroad, and what protective clothing and/or means of identification (eg, the EU approved identification vest) will be provided or required should be discussed during the pre-event visit and clarified by the host police in their official request.

Finance

The Handbook recommends that the host country should pay for accommodation and other facilities provided locally. The issue of 'who will be responsible for paying for what' should also be detailed in the official request from the host police. A cash advance may be required if the accommodation and subsistence costs are not initially met by the host country or the UK football club.

Countries that are not members of the EU may decline to provide accommodation and food. Agreement will then need to be reached with the UK football club as to who will be responsible for meeting these costs.

When negotiating with the football club regarding travel and accommodation arrangements, it should be borne in mind that many club teams travel out on the day of the match and return home immediately after the game. Although there is no objection to police officers travelling with the club team/ management there may be a need for officers to travel in the country where the match takes place for operational and/or debriefing purposes. The potential extra costs for separate travel arrangements should be discussed and agreed beforehand with football club management.

Supporter Information/Intelligence

A club overview document, using the agreed EU template, should be completed at the beginning of each season and updated throughout the season where there is a change to any of the details recorded. The UKFPU will retain a copy and ensure that the latest version is available to relevant foreign law enforcement agencies via the EU NFIP website.

Regardless of whether UK police officers travel to an away fixture, it is important that at the earliest opportunity (ideally at least ten days prior

to a match) all relevant travel details and an intelligence summary are forwarded for the benefit of all agencies which are likely to come in contact with travelling supporters, for example:

- Police forces in the UK;
- Police units at air and seaports;
- Police forces in transit countries;
- Police forces in the host country.

The standardised EU template should be used for the travel details and intelligence summary. It is available from the UKFPU. Details of all persons who are subject to a Football Banning Order (FBO) and who have been served with a requirement to report to police on the occasion of an international football match abroad, can be confirmed via the UKFPU extranet.

Authority

The appropriate chief officer's authority is required for officers to travel abroad to attend a pre-event or operational visit in connection with an international football match.

A report by the Police Commander seeking authority to deploy officers abroad in connection with a football match with an international dimension should include:

- A risk assessment;
- Proposed flight details, including times and cost.
- Proposed accommodation arrangements including type and cost;
- Duration of visit;
- A summary of who will be paying for travel, accommodation, overtime and other expenses and the expected cost to the force.

Before such authority is given, the appropriate chief officer should ensure that the force insurance is appropriate to cover any officers while abroad, and that the officer's conditions of service are protected while so engaged.

Once the chief officer's authority has been granted then the Police Commander should, in consultation with the UKFPU, submit a request to the Home Office under section 26 Police Act 1996

Section 26 of the 1996 Police Act applies to all visits that are predominantly for the purpose of providing police assistance to a foreign country/police force. There is no distinction in the legislation between operational and non-operational assistance. The Home Office has confirmed that a section 26 authority is required for pre-event visits as well as deployments in connection with any football match with an international dimension.

Failure to obtain a section 26 authority when necessary could have serious consequences for the officers concerned since this would mean they are working outside their normal terms and conditions of service and, therefore, (in the event of death or injury while deployed overseas) would forfeit their rights to pensions for their families, including death in service benefits.

Receiving Police Officers From Abroad

Where it is decided that officers from abroad are to be invited to assist a UK police force, then the request for this assistance should be routed through the UKFPU. The UKFPU will be responsible for forwarding that request to the NFIP or other contact point.

Arrangements for receiving officers from abroad will be the responsibility of the force concerned. Following consultation with his/her opposite number, the Police Commander must arrange appropriate accommodation for, and reception of, the officers. Where appropriate, the services of an interpreter should be obtained for the duration of the visit.

Use of Covert Human Intelligence Sources (CHIS) Abroad

The use and conduct of a CHIS outside the UK requires the authority or consent of the State in which the use and conduct takes place. The nature and extent of such an authority will vary from country to country. Some will require a full letter of request, others a request through formal police channels. The authority granted might require the CHIS to be handled by the local authorities, or they may allow UK officers to handle on site or remotely. The Regulation of Investigatory Powers Act 2002, Part II deals with the authorisation of Directed Surveillance and Human Intelligence Sources. Section 27(3) extends the lawfulness of authorisation of conduct to conduct outside the UK. A use and conduct authority is, therefore, required for any CHIS activity that takes place outside the UK. Guidance must be obtained from the Serious Organised Crime Agency (SOCA) in all cases and before any CHIS deployment abroad is authorised.

Conclusions

The professional image of the UK Police Service will be enhanced through ensuring that every effort is made to minimise the possibility of public disorder at both home and away matches. This, in turn, may be seen as supporting the national interests of British football and reducing the possibility of political embarrassment for the Government.

Working in partnership with representatives of the UK football authorities (the FA, and the clubs as well as with foreign police force(s) and UK Consular Officials will reduce the opportunity for football-related incidents of disorder.

