An Independent Review of Football Policing in Scotland
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An Independent Review of Football Policing in Scotland
Since its inception, Police Scotland has successfully delivered policing at numerous high profile events including the Commonwealth Games 2014, the 2014 Ryder Cup, the European Athletics Championship 2018, the 2017 Scotland v. England football match and the visit of the President of the United States in 2018.

The UEFA European Championships 2020, will see the Hampden Park stadium in Glasgow host several matches. In advance of this, Police Scotland commissioned this independent assurance review of policing matches in Scotland to ensure that, five years after its inception, they listen to, and reflect on, the wider range of views from those involved with football. The review was intended to specifically include the perspective of Scottish clubs, leagues, fans and the media while focusing, in particular, on two principal thematic areas: how matches are operationally policed and, equally importantly, how those policing operations are perceived and experienced by supporters and relevant parties. The review aims to identify areas of good practice to ensure these are applied consistently, while identifying any areas for improvement. While the focus of the review is clearly the role of policing, it should be noted safety at events is the primary responsibility of the event organiser, supported by the police and other stakeholders. Consequently, where relevant, the review has commented on broader aspects of event management in Scotland.

The review was led by DCC Mark Roberts, the National Police Chiefs’ Council (NPCC’s) football policing lead and was supported by a range of relevant subject matter experts. Details of the review team and contributors to the review are included at the conclusion of this report.
The two thematic areas of the review are:

1. Operational planning for, and the management of, football matches including the approach to:
   - Risk identification, management and mitigation
   - Intelligence gathering and its efficacy
   - Information sharing with clubs and supporters’ groups
   - Resource deployment and flexibility, both within and outside football stadia
   - Command and control clarity and practices.

2. How the policing of football matches ‘feels’ to those involved including:
   - Presentation (i.e. operational demeanour and tone of operational deployments);
   - Stakeholder engagement and confidence;
   - Communication and media relations.

To be completed by: Christmas 2018.

Review Recipient:
Chief Constable Iain Livingstone QPM
Police Scotland commissioned this review to examine two fundamental issues:

- Is their football policing model fit for purpose and
- How does it feel to be policed at a football match by Police Scotland?

The review has drawn evidence from a wide range of individuals and organisations and it was encouraging that there was a genuine enthusiasm from all the contributors to work collaboratively to improve the experience of those attending football matches in Scotland. Views were taken from all who wished to contribute and when recommendations have been made, they are, wherever practical, based on submissions, which can be substantiated from a number of sources.

The findings of this review are that the chief constable and the Scottish public should be confident that Police Scotland has a proven track record of effectively delivering all manner of high-profile events, football included, and has the requisite capability to work with relevant stakeholders to discharge its responsibilities in keeping football fans safe. As such, its operational policing model for football is certainly fit for purpose. The policing of football in Scotland compares well to operations across other European countries and has some excellent examples of good practice, which others should seek to learn from. Police Scotland has experienced practitioners at all levels of operational delivery and benefits from working with professional, engaged and well-motivated stakeholders, notably the Scottish Football Association (SFA), Scottish Professional Football League (SPFL) and the Football Safety Officers Association (FSOA).

As with any review, there are areas highlighted where Police Scotland can build on its strengths; one such theme being a lack of consistency in delivery, while, it is accepted, this does not lead to a compromise in safety or operational activity. This was evident across the range of areas covered in the review and, as such, progress can be readily achieved. The review deals with each of these examples in detail. As Scotland, coupled with England, will be one of the host venues for EURO 2020, it is an opportune time to reflect on the degree to which forces within the UK are interoperable. The EURO 2020 fixtures will be held in Glasgow, which has a strong record of delivering high-profile and high-risk events. Given the ongoing strain on police resources, it is in the interests of all to ensure a consistent approach to training, tactics and policies while reflecting the local context of each nation. The review highlights opportunities to enhance the synergy in these areas, relating to football policing, between Police Scotland, the Police Service of Northern Ireland (PSNI), English and Welsh forces, and enhanced sharing of good practice and overall resilience.

In relation to engagement with supporters, there is particular inconsistency in the role of the dedicated football officer (DFO) who, ideally, should provide the local connection between Police Scotland, clubs and supporters. This is a strength where it works well, but, in some areas, there is a gap which risks undermining the relationship with supporters. Police Scotland would benefit from a structured and strategic force level engagement and media strategy, rather than relying on formulaic ‘be good or else’ messages prior to high profile matches, or being reactive...
to issues or events. From the focus group with the media, there appears to be an appetite for greater engagement and the review found a wealth of good initiatives in football policing that could offer a more rounded and positive perspective of Police Scotland’s approach. This area straddles both aspects of the review, impacting on the effective delivery of operational activity, but also very much linking to the question of ‘how does it feel to be policed at football?’

The review concludes Police Scotland would benefit from a fully integrated strategic engagement plan with supporters at its heart. During discussions with the media, it was clear they supported such a change in approach and are keen for a new narrative with the public about football policing in the wider sense. Such an approach could also address concerns raised by the Police Federation in relation to a perceived lack of appreciation of the hard and often challenging work done by frontline staff in policing football.

The review highlights the benefits of enhanced local engagement between Police Scotland, clubs and supporters that would require a degree of investment, as well as rebalancing the relationship between local delivery and central policing functions. If this were the chosen direction of travel, it would enable the Football Coordination Unit for Scotland (FoCUS) to concentrate on strategic delivery, achieving greater consistency and providing expert support while reducing its need to deploy operationally in an evidence-gathering role. Such an approach would be more consistent with the responsibilities undertaken by comparable units in Europe. From supporter feedback, FoCUS is still strongly associated with the (now repealed) Offensive Behaviour at Football legislation, with many supporters’ groups referring to them as ‘the sectarian unit’. This label is somewhat unwarranted and unfair, however, Police Scotland has to acknowledge the perception of supporters is their reality. It should be stressed FoCUS offer so much more to the policing of football, including acting as the central information point for the force with external countries. FoCUS has also led on innovative diversion initiatives and prevention operations. Reflecting this, the review recommends Police Scotland consider clearer terms of reference for FoCUS, which, not only build on its obvious strengths, but also addresses the perceptions of supporters and other stakeholders. This would facilitate the re-branding of the unit to better reflect its actual remit.

Although not within the strict remit of the review, one significant issue was repeatedly identified which, due to its potential implications, must be highlighted for further consideration. There is an inconsistent approach to the management and scrutiny of stadium safety certificates across Scotland. Considerable evidence was placed before the review team, which demonstrated serious breaches of stadium safety regulations. This issue was highlighted by several stakeholders, which shows everyone is aware of dangerous practice but seemingly feel powerless to do anything about it.
In addressing this issue, it is strongly recommended there are urgent multi-agency discussions to identify options for the Scottish Government in order to bring about greater consistency and standards in relation to stadium safety certification.

In its wider operational model, the review found Police Scotland is deploying significant numbers of officers to football and its associated issues. In one example, a neighbourhood policing team had accrued more than 200 rest days in lieu during 2018, due to it being deployed on parking and traffic duties associated with their local football operations. Such deployments are common practice across Scotland and represent a significant abstraction of both response and neighbourhood officers from their core duties.

Accordingly, Police Scotland should review their current operational deployment of resources to establish if they are proportionate and in keeping with the core duties of the police. Football is an industry and the police should not subsidise it to the detriment of local community policing.

The passion for football in Scotland, from all persons spoken to, was tangible. Everyone was clear in their desire to create a safe and positive environment for those attending, or working within, the unique world that is Scottish football. Police Scotland has all the elements in place to be at the forefront of football policing, but need to reap the benefits of consistency from being a single national force. There are opportunities that need to be taken in terms of supporter engagement but this will require all those invested in Scottish football to approach the issue positively, including supporters who need to be given greater opportunity for their voices to be heard. With the caveat that the issues around stadium safety certification and strategic governance need to be urgently addressed, this review highlights the many positives in Scottish football policing and details recommendations, which can further enhance that position.

DCC Mark Roberts
NPCC Football Policing Lead

December 2018
### Governance

Safety at football stadia in Scotland falls under a number of pieces of legislation, primarily the Safety of Sports Ground Act (1975), which also covers stadia in England and Wales. In addition to this act, legislation such as the Fire Safety and Safety of Places of Sport Act (1987), again similarly applies to England, Wales and Scotland.

In England and Wales, the responsibility for the oversight of safety at football stadia rests with the Sports Ground Safety Authority (SGSA) who has a statutory role in regulating local authorities in their responsibilities for safety at all football grounds in the Premier League and English Football League (EFL), as well as Wembley and Cardiff’s Principality Stadiums. SGSA also issue licences to these stadia to enable them to admit spectators.

In Northern Ireland, the Safety of Sports Grounds (Northern Ireland) Order (2006) set out a safety certification system to be implemented by local councils and overseen by Sport Northern Ireland, on behalf of the Department of Culture, Arts and Leisure. The Guide to Safety at Sports Grounds, otherwise known as the ‘Red Guide’, set out the standards, to which certified sports grounds should adhere. Following the recent publication of the sixth edition of the Green Guide by the SGSA, consultation was undertaken as to what the Northern Ireland position should be in respect of their own ‘Red Guide’. As a result of this consultation, Northern Ireland’s Permanent Secretary has written to all clubs and stakeholders advising, henceforth, they should use the Green Guide as their point of reference for all stadia safety matters. This brings welcome consistency for all concerned.

During focus groups, there was consistent feedback that the governance of safety at football stadia across Scotland lacks cohesion and too often falls upon the professionalism of individuals or agencies to try and ensure an appropriate approach. It was apparent that key stakeholders, such as the Football Safety Officers’ Association of Scotland (FSOAS) subscribe to the Green Guide and quite clearly use the document to inform their safety management strategies, models and processes. Strong evidence was seen of how deeply embedded the Green Guide is within safety management at all major football stadia. Similarly, the Scottish Football Association (SFA) and the Scottish Professional Football League (SPFL) are strong advocates of the Green Guide and utilise it extensively within their daily operational planning and decision-making. While this is reassuring, voluntary adherence to the Green Guide means the extent and stringency of compliance lacks rigour. Mandatory adherence to the Green Guide would necessitate greater consistency across stadia in Scotland and provide a standard against which inspections could be applied.

All of the above Scottish football stakeholders made significant contributions during the consultation phase of the development of the sixth edition of the Green Guide, underlining how important this critical piece of safety guidance is viewed by these associations. In addition, they have engaged heavily with the SGSA for several years, ensuring best practice is adopted within the main football stadia across Scotland.
However, the inconsistent management of safety certification across Scotland is, nonetheless, a significant concern. A worrying catalogue of poor instances counterbalanced numerous excellent examples of strong management by local Safety Advisory Groups (SAGs). In particular, the review heard triangulated evidence of the following:

- Safety certificates being sent to clubs through the post by local authorities without any site visits being made
- Some clubs were not required to submit operational plans of any description in order to receive safety certificates
- Some clubs did not receive a new safety certificate but were told their old one was continuing into the new season.

This practice is of such concern to the FSOAS, they have commissioned their own review to establish the disparate safety certification management picture across Scotland. This review, supported by the SFA and the SPFL, highlights a lack of strategic oversight and co-ordination to ensure a corporate approach to safety certification. The review takes the view this gap should be seen as a significant risk to the safety of spectators and be addressed with the utmost priority.

The review was alarmed to learn of serious safety issues, which were evident at a number of Rangers matches across the years they spent climbing from the third division back to the top flight. These issues included (but are not limited to):

- Deliberately selling more tickets than their stadium capacity
- Erecting unsafe scaffolding as terracing for the large numbers of away fans
- Old safety certificates being altered to increase stadium capacity
- Safety certificates where approved stand capacities did not add up
- Tickets sold for areas of a ground that did not exist or were inaccessible.

In addition, the review heard evidence from many sources that these issues are not confined to Rangers league matches but extend to Scottish Cup matches where teams with large travelling support are drawn away to smaller clubs who occupy small stadia and lack appropriate infrastructural support.

Following Glasgow Rangers FC entering administration and their subsequent liquidation, the club re-entered Scottish football in the fourth tier (third division) for the 2012/13 season. This served to shine a spotlight on safety practices down the leagues and in different localities. The potential issues this experience highlighted caused concern among a number of Scottish football stakeholders including Police Scotland (from 2013), FSOAS and SPFL who recognised the vast majority of football stadiums Rangers would play at were small and not used to receiving the huge numbers of fans Rangers invariably attracted.
It is only right the review should highlight the professionalism and tenacity of individuals stepping beyond their strict remit in challenging and addressing these issues, most notably within the SPFL. It is assessed the safety of spectators has been placed at risk and without the intervention of committed professionals within the agencies’ safety regimes, there could have been a critical safety incident at any of the grounds cited in the examples heard by the review team.

The review takes the view there is a clear lack of oversight and grip by some local authorities and SAGs in discharging their duties relating to ground safety management. This lack of oversight should be seen as a significant risk to the safety of spectators, which needs to be addressed with the utmost priority. Ample evidence exists, which shows an inconsistent approach to the management of safety certification across Scotland. This inconsistent approach is compounded by the inability to hold individual local authorities to account. Both of these issues have manifested themselves in the widespread compromise of spectator safety.

These issues are widely acknowledged and are of serious concern to those charged with administering Scottish football and spectator safety. These key stakeholders are heavily invested in the Green Guide as their doctrine for addressing these issues, coupled with extensive engagement with the SGSA. There is currently a gap above SAGs for a body that mandates and inspects to a set, consistent safety regime while also acting as a vehicle to support practitioners and promulgate good practice and emerging issues. The SFA, in its submissions to the review, stated, “The SGSA does not currently have any authority in Scotland, however the Scottish FA would welcome an appropriate and proportionate inspection regime at licensed sports stadia in Scotland, which would hopefully ensure consistency in the approach of issuing safety certificates at sports grounds”.

It is certainly not the intention, or within the remit, of this review to seek to advocate the nature of the resolution to this issue, which needs to be addressed at a strategic level in the Scottish context. However, it is an unequivocal recommendation of the review and it is an issue that needs to be urgently addressed. As has been seen in Northern Ireland, it is possible to blend strong local oversight of safety certification and its associated management, supported by the SGSA in an advisory capacity, thereby not undermining local ownership. The review recommends key Scottish football stakeholders and government undertake further detailed work to ascertain the optimum safety governance model for Scotland.

**Recommendation:** An urgent multi-agency review is conducted to establish an appropriate governance, consultation and inspection regime for Scottish venues, used for football and other events.
Operational Planning and Delivery of Football Policing

Operational Deployments

Across a force that has a third of the United Kingdom’s land mass, it is only to be expected there will be operational differences in the policing of so many differing football stadiums. Indeed a ‘one size fits all’ approach would not be appropriate given the very different character and scale of Scottish football clubs. However, while some local nuances are desirable there are key operational elements that would benefit from clearer guidelines and policy to achieve consistency.

A case in point is traffic management around the footprint of stadiums where there are wide differences in how, and who, manages the activity.

For example, at one venue traffic management is administered entirely by the club. It applies to the local authority for a Temporary Traffic Regulation Order (TTRO), has trained its own stewards in the application of TTROs and deploys them to implement the traffic management plan. Conversely, at another club, the traffic management and TTROs are all implemented and enforced by Police Scotland. Across the country, there is an inconsistent approach to how this issue is managed between the police, clubs and local authorities. At one match viewed, police traffic officers operated the traffic lights to regulate traffic flow, yet on police-free fixtures, no-one carried out this role. At another stadium, duty officers were deployed on traffic and parking management duties.

In the rest of the UK TTROs are managed entirely by traffic management companies. This has the benefit of significantly reducing costs for clubs while removing the need for the deployment of police officers to conduct traffic duties. At a time when police resources are stretched, with officers being stripped from core duties to support football operations, this would minimise such abstractions. By reducing the number of officers on or around the footprint of stadiums, it would also assist in reducing the impression there is a heavy, and unnecessary, police presence.

A further example of the inconsistent application of TTROs is the differing costs paid by clubs to local authorities. Some clubs are paying thousands of pounds for one match, while others are paying several hundred pounds for a season long TTRO. During focus groups, it was clear that a wide range of stakeholders were keen to see a consistent, transparent and fair cost recovery model. Such a model, supported by an agreed corporate police implementation policy, would give clarity as to the role of each stakeholder, as well as a consistent costs structure to all regardless of location or size.

Recommendation: Police Scotland should issue / reissue clear guidance to all divisions as to the roles, responsibilities and policies relating to football policing to ensure a corporate approach, supported by an internal inspection regime to monitor compliance.

Recommendation: Police Scotland should agree with partners a single national approach to the management and charging of TTROs.
This reflects a broader need for clarity as to primacy of command at football matches. The review sought the views of supporters as to who they believed was responsible for safety and it was apparent there is commonplace confusion regarding roles of the clubs, the leagues and the police. During one live operational observation, members of the public were observed speaking with police constables about a stewarding safety issue, completely ignoring the very identifiable supervisory steward standing next to the officers. Clubs also suggested that, on occasion, police match commanders did not understand the initial primacy of the safety officer. Similarly, there was a lack of clear understanding among the media as to who holds ultimate responsibility for safety. Among safety officers and experienced police commanders there is absolute clarity as to their respective responsibilities, but recent examples have seen the media and supporters direct criticism towards Police Scotland, which should in part, or entirely, have been directed elsewhere.

When all of the above is considered, it would appear there is a gap in the knowledge of a wide range of supporters and stakeholders as to the roles and responsibilities in respect of safety at football stadia. In addressing this issue, Police Scotland may wish to consider the benefits of setting out an engagement plan, supported by key messages, to help educate both externally and internally in order to bridge the gap outlined above.

**Recommendation:** The Police Scotland media plan should engage supporters and the media to explain the force’s responsibilities and what sits with others.

The review found inconsistent police resourcing and cost recovery practices across the country. The review team heard evidence from stakeholders about differing assessment models being utilised to support resourcing decisions by police commanders. One match was agreed between the commander and safety officer as a category ‘B+’, which does not exist in policy. There were numerous examples of inconsistencies in match categorisation, which are causing increasing frustration on the part of clubs when they exchange experiences. There seems to be confusion as to the purpose of categorisation; it is a risk assessment that classifies the nature of the threat associated to a fixture. It does not follow that the police and club are tied to rigid resourcing levels for each category. A category ‘B’ fixture at Aberdeen will have different resourcing levels to a category ‘B’ fixture at Elgin. Two games of the same category at the same club may have slightly different resourcing levels dependent on the specific factors of the fixtures.

The current situation in respect of cost recovery lacks consistency with differing interpretations of what will be charged for, and where, and when they will be charged. Some of these interpretations are founded on historic agreements between local officers and clubs, while others are designed to achieve the best operational outcome and avoid conflict and dispute.
In respect of uniformed operational deployments to football matches, the Police Scotland model has clear lines of demarcation. Match resources are deployed into the stadium to support the stewarding operation. Where there is a higher level of threat, either inside or outside the stadium, the match resources are supported by disorder patrols. When the threat is considered exceptionally high these resources will be supplemented by a public order operation with relevant assets, such as Police Support Units (PSUs).

The review team examined the levels of police resourcing for a number of matches and considered them resource intensive. For one category ‘A’ match, over 80 officers were deployed both inside and outside the stadium. On a category ‘B’ fixture with 4,000 supporters attending, the police deployed 50 officers. When compared with the average police deployments to similar scale and risk matches, the levels of officers deployed appears to be high.

A further consideration in respect of such levels of resourcing is the majority of officers deployed to football policing are duty time officers and are being drawn from response and neighbourhood teams, undermining the capacity for core policing. Often these staff are travelling significant distances and having shift timings altered, which has also resulted in an adverse personal impact for the officers.

There is a double impact for the public as not only are they losing duty time officers to police football matches, officers who are on rest day are, in the main, being compensated by the receipt of a rest day in lieu. This then means the officer is lost from local policing when they take the rest day owed to them. On one neighbourhood team alone, 225 rest days in lieu had been accrued by a relatively small team of officers through working parking duties at the local football stadium.

The review team fully understands the need for Police Scotland to make best use of the financial income available from football clubs. However, the force is taking on roles at football that, quite clearly, are not their responsibility, which adds to officer abstractions. Clubs and local authorities are often happy for Police Scotland to undertake these roles (particularly when they are not charged), but ultimately they need to recognise...
Police Scotland is going above and beyond their responsibilities in order to facilitate the needs of stakeholders for football.

The questionable quality of some of the stewarding at matches observed will undoubtedly make it harder for Police Scotland to reduce its own resourcing on the footprint of stadiums. Poor examples of stewarding practice witnessed by the review team include stewards on a segregation line at a high-risk fixture celebrating a goal. This visibly aggravated away supporters and necessitated the intervention of officers to reposition stewards and prevent the situation deteriorating. At the same fixture, a police officer intervened on three occasions to inform a fan to moderate their behaviour. This marked a proactive intervention by the officer, however the fan in question was standing next to a security steward who had taken no action and was seen laughing with the errant supporter as the officer walked away. Until stewards are adequately trained, supervised, and capable of properly discharging their functions, there will continue to be an over-reliance on Police Scotland to use officers in stadia.

The issue of command training is addressed elsewhere in this report, however, it is important to ensure in the operations where public order assets form part of the plan, an enhanced command model is put in place with clear lines or responsibility and associated command protocols.

The review heard concerns from the Police Federation in relation to the safety of officers deployed at football matches, in particular at high-risk fixtures. The federation reported growing concerns among members that commanders were reluctant to deploy public order assets into stadiums and that there was a desire to avoid potential adverse public images and associated negative media reporting.

The federation is in the process of collating statistics to support their view, claiming incidents currently go unreported due to the culture among staff. While there may be a difference of opinion as to the scale of the issue, all agree that officer safety is paramount. Police Scotland may wish to consider how they can convey to the public the reality of policing high-risk football fixtures, while demonstrating to their staff they understand their concerns and is actively addressing them. This speaks to a lack of a proactive media strategy for football policing in Scotland.
During several match observations, review team members observed positive, proactive engagement by DFOs who were clearly recognised by supporters. The balance between friendly engagement and more authoritative enforcement was observed to be appropriate, and in line with what would be expected from DFOs. The review team also observed the deployment of police liaison teams (PLTs) at the Rangers v Spartak Moscow match as part of an enhanced engagement operation. The deployment of PLT within the football arena is a recognised concept but could be more widely adopted throughout the UK. It certainly features in some current academic thinking and research into crowd engagement methodology. One of Police Scotland's most experienced match commanders is actively engaged with academic research in this area throughout the UK. Such an approach from Police Scotland is positive and demonstrates the force is not only seeking to learn from experiences wider afield, but also taking the significant experience of Police Scotland to other areas and stakeholders across Britain.

Police Scotland do not consider the vast majority of football matches to be a public order operation per se, rather it is an event to be policed by everyday officers in an everyday mind set. This approach is embedded in the culture of the force and is a good foundation upon which to build a refined engagement model. This model can be structured around clear roles and responsibility for local officers, while also accommodating the evidence gathering requirements to manage football-related antisocial behaviour and disorder.

Such a model would benefit from central oversight of all three elements of policing football, namely, engagement, diversion and enforcement (including investigation). Given the strong local football policing experience and the expertise developed by FoCUS over the past few years, the opportunity exists to enhance the current operating model and develop a sharper structure with improved oversight that places engagement and prevention at its heart.

Police Scotland may wish to further consider the development of their existing football policing model, taking into consideration the various examples of good practice contained within this report. There is a clear opportunity for Police Scotland to consider how it can cement existing, but inconsistent, best practice throughout the force, incorporating supporters and stakeholders as contributors.

It should be noted Police Scotland does have both considerable capability, in terms of its resources, and the quality of its experienced commanders, who routinely deal with high-end, major events in an impressive fashion. From the review’s observations there is a well-rehearsed and extremely effective operational approach from the force that withstands any level of scrutiny and provides a clear demonstration of the benefit of operating as a single strategic entity.
Counter Terrorism and Hostile Vehicle Mitigation

During several operational deployments the review team noted, cognisant of the ongoing terrorist threat, the significant resources Police Scotland deployed to football matches in respect of hostile vehicle mitigation (HVM). Such deployments are now an understandable response to deter and mitigate the threat posed to crowded places by a variety of terrorist attack methodologies, including the use of vehicles as weapons. The latest (6th.) edition of the Green Guide specifically reflects the current context and highlights the responsibility of event organisers, venues and certifying authorities to ensure appropriate counter terrorism plans and contingencies in place. It was apparent that Police Scotland have significant capability in this area, reflecting its size as a national force, and level of niche expertise both in its own right and as an integral part of the counter terrorism network.

This is a further area where a national function, similar to the SGSA, would assist all concerned to ensure that appropriate measures are in place at venues and that SAG’s are consistently and effectively discharging their function. The Police, whilst having clear counter terrorism responsibilities should be relied upon for their specific and unique capabilities, not as the catch all option to pick up roles that can be properly managed by event organisers. Venues should identify and implement measures to mitigate terrorist threats, whether that be appropriately trained and managed stewards to conduct searches, or the construction of bollards / street furniture to deter attacks. However, given the fact that the operational requirement placed upon Police Scotland in respect of safeguarding the public at mass events is not limited to just football matches, Police Scotland may wish to consider other options to maximise public safety whilst reducing the pull on its resources. Specifically, as a single strategic force, reporting directly to its government, Police Scotland may wish to examine the viability of developing a national hostile vehicle strategy which incorporates the procurement of both permanent and portable assets. These assets could be utilised at events other than football, such as Hogmanay celebrations, golf, international rugby and music festivals. Procurement, ownership and deployment of such assets would require a detailed partnership approach from many stakeholders. These assets would release thousands of police officer hours per annum which would enhance the resilience of local policing across Scotland, whilst enhancing the protection of the public at high profile events.

Recommendation: Police Scotland should consider, with partners, the options for developing a national approach to HVM at events, incorporating fixed and mobile barrier assets. Police Scotland should also satisfy itself, via its CTSA’s, that all venues have undertaken thorough reviews of their security measures and that identified actions have been undertaken.
Training and Continuous Professional Development (CPD)

Background

The definition of what constitutes public order policing within the UK is detailed in various editions of ‘Keeping the Peace’ and highlighted:

“This type of policing is centred on the management of crowds and includes the policing of planned and spontaneous public events, including protest, and the policing of any events which result in, or may result in, public disorder.”

The Association of Chief Police Officers Scotland (ACPOS) at the time endorsed this guidance with some limited caveats relating to Scottish legislation and authorisation levels with their chief officers adding further restrictions.

This interpretation was reaffirmed by the national lead for public order in 2008 when she identified:

“The definition of what constitutes public order policing is quite clear and is not restricted to combating public disorder; it includes the policing of lawful public events such as sporting events and concerts…”

ACPO then applied this broad definition of occasions that constitute public order events to a requirement for those commanding such events to be appropriately trained:

“...the guidance highlighted in ‘Keeping the Peace’, reinforced by the Command and Control doctrine being developed for the Service, makes it quite clear that Commanders must be appropriately trained and accredited to carry out the role and responsibilities demanded of them when commanding an event where there is a risk to public safety.”

This interpretation recognises that while, thankfully, high-end public order tactics are rarely deployed anywhere in the UK, much of the learning contained within the Public Order Command Programme has evolved to become highly relevant to public safety events also.

In 2010, the ACPO lead for football policing identified that appropriate training for both tactical and operational commanders of football policing must include Public Order Command and Events Training. At that time, this was to include training and accreditation under the Advanced Public Order Command Course (APOC) and Initial Public Order Command Course (IPOC) respectively, and completion of the Policing Events Course (PEC).

In 2017, the NPCC Tactics Training Equipment Working Group (TTWEG) for the first time mandated the completion of the new ‘Events’ module by all new public order commanders and advisors, in addition to first completing their initial Public Order Command course. This now means all new tactical commanders (silver) in England, Wales and Northern Ireland complete a total of 12 days classroom-based training across the ‘Silver’ and ‘Events’ modules.
Existing tactical commanders will now also have to complete the ‘Events’ module, if they have not already completed its predecessor, the Policing Events course, since 2010.

This means, in 2018, although roughly half of all football matches in England, Wales and Northern Ireland are police-free, those that are policed are done so, in the vast majority of cases, with trained and accredited public order / public safety commanders at strategic, tactical and operational level.

More broadly this means by 1 April 2019 any commander in strategic, tactical or operational command of a public order public safety event will be currently accredited under a core command module; C1 (Gold), C2 (Silver), C3 (Bronze) and the C4 (Events Module). They will, in most cases, be supported by public order public safety advisors (POPSAs) who are currently accredited under module F4 (Public Order Public Safety Advisor) and C4.

Police forces in England, Wales and Northern Ireland in recent years have adopted the term ‘public order / public safety’. This reflects the broader definition of Public Order Events (1.1) and nature of events public order commanders, and their officers, are policing in these forces.

Those officers trained and accredited as public order tactical advisors (POTACs) are now referred to as public order public safety advisors (POPSA). This change acknowledges both the breadth of events they are used at and POPSAs were regularly advising on non-tactical issues, very often centring on public safety.

This change in focus is also reflected in the College of Policing’s Public Order Command Programme. Following the 2009 HMIC reports, ‘Adapting to Protest’ and ‘Nurturing the British Model of Policing’, significant updates were made to the existing Advanced Public Order Command Course (APOC) and Initial Public Order Command Course (IPOC). The new content was centred on Human Rights Act compliance and included learning on the core principles of public order policing, use of force principles, crowd science as well as content supporting the planning of operations at strategic, tactical and operational levels to mitigate the likelihood of disorder. Much of the revised content has clear relevance for event policing. This represents a critical change in recognising the likelihood of public disorder can often be mitigated during the planning process, rather than the historic approach of seeing public order policing as merely reactive.

The Current Situation in Scotland

Since the formation of Police Scotland in 2013, the force has drawn a clear distinction between public order policing and non-public order policing. Those interviewed for the review indicate that, in particular, football matches are not generally regarded as public order operations and are policed by conventional resources, unless intelligence indicates there exists, or is likely to be, a threat of public disorder. This means, for the most part, football is policed by non-public order commanders and officers, albeit Police Scotland now train all front-line officers in Level 3 Public Order Tactics (cordons) during their annual Officer Safety Training.
Police Scotland train and accredit match commanders under their own Events Command Course.

In understanding the command structures employed by Police Scotland, it is first important to understand the role of match commander as defined there. Following the formation of Police Scotland in 2013, the decision was taken for divisions to retain football-policing operations locally, rather than to draw in police commanders from outside the division.

Match commanders are, in most instances, functioning at the tactical level and, therefore, have responsibilities that are broadly commensurate with those of a silver public order commander, extending both inside and outside the ground. Match commanders are deployed within the ground, typically co-located with the club’s safety officer. In contrast, most police forces in England, Wales and Northern Ireland now locate tactical command away from the ground, or in the case of events, away from the venue. In those forces the move recognises the scope of tactical command extending beyond the football ground and takes account of reasonably foreseeable circumstances where the ability to discharge tactical command, the need to assume primacy and coordinate a wider service response could be impeded by co-location. Indeed, in some scenarios, a command location in the stadium could be compromised by the incident itself.

In Scotland, the majority of match commanders are not public order silver commanders. Match commanders must have completed the five day ‘Police Scotland Event Command Course’, or have claimed “grandparent rights” from attendance on the course’s predecessor.

Match commanders will only command “conventional policing resources” (Level 3) or specialist resources such as mounted officers within a “conventional deployment” (fig ii).

For all matches where there is no identified threat of disorder the match commander will be working at a tactical level.

Typically, where threat and risk assessments identify disorder may occur at an event, Police Scotland will augment the command structure with public order trained commanders (fig iii). In such cases, tactical command will sit with a remote public order silver, who has also completed the Event Command Course. The match commander will function in an operational command role (brass level).

Level 3 resources would be supplemented with trained public order resources but these are considered a contingency and if deployed would be commanded by a trained public order bronze commander.

This approach is also adopted for the force’s highest risk fixtures however additional provision is then made for the match commander being a senior police commander (typically superintendent) who is dual-qualified and accredited through the Event Command Course and Silver Public Order Course.

The command structures in fig i - iii are subject to individual variance, dependent upon the scale and unique requirements identified during each tactical planning process.
**Fig 1**

POPS Command Structure England, Wales, NI

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**Note:** This diagram is illustrative of the command structure and requisite levels of training where police resources are deployed at public order / public safety events (including football fixtures). Individual events may require additional operational commanders but requisite training levels for those in command at this type of event will remain the same. Exceptions to this structure may occur when employing a sub-bronze structure however all those in strategic, tactical and operational command will be trained and accredited to do so.
Note: This diagram is illustrative of the command structure and requisite levels of training where police resources are deployed at events in Scotland (including football fixtures). The scale of individual events may require additional operational commanders but requisite training levels for those in command at events will remain the same.

* not required to be public order trained but will have previously attended the events course
Note: This diagram is illustrative of the command structure and requisite levels of training where police resources are deployed at events in Scotland (including football fixtures).

* where a public order risk is identified the commander will be public order trained

The scale of individual events may require additional operational commanders but requisite training levels for those in command at events will remain the same.
The Leadership and Professional Development Division of the Scottish Police College has historically delivered match commander training in its own right. The updated ‘Event Commander’ course uses organisational learning from the Olympic and Commonwealth Games and aims to ensure that Police Scotland is able to meet its commitment to deliver effective, safe command at significant public events.

Although the course is delivered at the Scottish Police College, ownership of the course and content is the responsibility of Emergencies, Events and Resilience Planning (EERP). Any changes or amendments to course content or structure require authorisation from the superintendent, EERP East. This governance aims to ensure the course is structured to reflect best practice and consistency within Event Command across Scotland.

The Event Command Course is a five-day course delivered at the Scottish Police College. Students are nominated by divisional commanders to ensure there is a sufficient geographic spread of qualified event commanders to meet operational demand across Scotland.

When considering potential nominees, divisional commanders will assess if the applicant is in a position to fulfil the following responsibilities:

- Required to carry out the role of match commander
- Silver or gold commander for a large march or rally, where public order assets are not being deployed
- Silver or gold commander at an outdoor music festival
- Silver or gold commander at a stadium / castle concert
- Silver or gold commander for a royal / protected person visit
- Gold or silver commander for a large event or a smaller event where this is increased risk or reputational consideration.

Student nominations will also be referred to respective chief superintendents representing the Football Working Group to ensure there are sufficient numbers of qualified match commanders nationally.

The course is also accessible to other Category 1 responders (local authority, police, fire and rescue, ambulance, health boards, Scottish Environment Protection Agency, Maritime and Coastguard Agency) and representatives from private industry who may also have a command structure in place at significant public events.

Six weeks prior to attendance on the course, students are forwarded the following pre-reads:
Knowledge of pre-identified selected sections of their content are then tested in a summative assessment.

Having passed the summative entrance assessment, learners attend the five-day course. It is intended for learners to develop the required knowledge, skills and behaviours from a blend of self-directed study, classroom-based presentations, formative syndicate exercises followed by observations of live events.

Two trainers facilitate the course, both of whom meet and exceed the identified trainer standard detailed within the Programme Specification:

- Required to have completed, as the basic minimum, the foundation course in training and development, or already hold an equivalent level of qualification
- Must have extensive experience in command and control of critical incidents
- Must be an effective communicator

All five modules make extensive use of ‘subject experts’ in addition to trainer delivery.

Other than two identified occasions where formative assessment is identified, the course is ‘attendance only’ and occupational competence is assumed upon completion of the course.

The final stage of the programme is referred to in the programme specification under ‘skills development’ and takes place in the workplace. This involves both shadowing operations and event / match observational assessment that must be completed within 12 months of concluding the course.

In common with the CoP Public Order Command Programme, the Event Command Course assesses the learners to establish both occupational and operational competence (fig iv).
Event Command Course at Scottish Police College
Summative Assessment: Pre-course multi choice examination (Course Day 1)
Formative Assessment: Hydra simulated exercise (Course Day 5)

Operational Assessments
Contact Divisional DCU - Ops Planning
Request available Event & Match Command Shadow & Assessment Opportunities
Request availability of Event/Football Assessor

Event Command
Shadow: 1 x Event
Assessed Command: 1 x Event
- Completed Observational Assessment Grid
- Completed Tactical Plan (Event)
- Completed Policy/Decision Log (Event)
- Operational Order (National Template)

Football Match Command
Shadow: 1 x Match
Assessed Command: 1 x Football Match
- Completed Observational Assessment Grid
- Completed Tactical Plan (Football)
- Completed Policy/Decision Log (Football)
- Operational Order

Submit completed assessment portfolio to:
LPDdelivery@scotland.pnn.police.uk
and
OSDEventsEast@scotland.pnn.police.uk

Academic recognition of learning - Awarded Certificate of Completion
(Scottish Police College)

Final Sign off - Occupational Competence - ACC Operations and Justice Division
Event Command ‘Skill’ added to personal SCOPE record.
The programme specification details that occupational competence is assessed at three points prior to the operational assessment phase of training.

Initially, a summative assessment is completed by learners prior to attending the course. This takes the form of a multiple-choice examination based on key areas of the identified pre-reads. Learners must achieve 70% in order to progress onto the course but, if initially unsuccessful, may retake the examination on a single occasion.

The course trainers and director confirmed that no student has, ultimately, failed to achieve the 70% pass mark. To their recollection, only one student has needed to retake the examination before achieving the pass mark on the second attempt.

Originally the examination was conducted on the first day of the course (fig iv) but now is completed on-line, using the ‘Moodle’ learning management system, two weeks in advance.

The programme specification also identifies occupational competence assessments during ‘Exercise 1’ and ‘Exercise 2’. This amounts to informal formative assessment by the course trainers, subject matter experts and peers. Those interviewed acknowledge that neither process has ever resulted in individual learners failing to complete the course.

When considered holistically, the success rate and nature of the three identified forms of occupational assessment mean the Event Command Course is in effect an ‘attendance-only course’. This is in contrast with both the core modules of the Public Order Command Programme; C1-C3 and the Event Module C4 all of which are ‘pass / fail’ assessments. The assessment of the Public Order Command Programme includes pre-course and in-course summative assessments. The Events Module includes in-course summative assessment.

The Event Command Course has a clear operational assessment phase (referred to as event / match observational assessment), which must be completed within 12 months of completing the course.

The operational assessment phase requires that learners undertake two ‘shadow’ events; one event and one football match before progressing onto two assessed events; one event and one football match.

Shadow events involve learners observing an experienced event and match commander before assuming command themselves. Members of the review team observed this shadowing process in the live environment during operational field observations.

Experienced event or match commanders, as appropriate, who must be at least the rank of chief inspector, conduct assessments. They must also have completed the assessors training provided by EERP. Members of the review team observed this assessment process in the live environment during operational field observations.

Interviewees indicate that training provided to these assessors consists of standardisation updates. When questioned why more formal training
was not in place to support assessors, interviewees stated the current process of updates was “deemed to be sufficient” for the course to be accredited and credit rated by the Scottish Police College through the Scottish Credit and Qualifications Framework (SCQF).

**Accreditation process**

All completed portfolios of evidence are submitted through the Police College, which act as internal verifiers to check there is sufficient evidence of each learner meeting the identified performance criteria. In all cases, the portfolios are forwarded to the course director, who if necessary, will return portfolios for follow up actions or, when complete, will forward the portfolio onto ACC Operations and Justice Division for sign-off as being operationally competent.

Suitably trained staff within EERP East who dip sample a minimum 10% of assessments from each assessor undertake internal verification. Feedback is provided to the assessor as required.

**Reaccreditation process**

No reaccreditation process is detailed within the programme specification. Those interviewed indicate some choose to maintain a record of the events they have commanded in their portfolios, which they retain once initial operational competence has been awarded. This is reliant on personal choice and there appears to be an absence of formal processes and / or systems to support ongoing reaccreditation. Training records only record initial occupational and operational competence.

**Provision of continual professional development**

No continual professional development process is detailed within the programme specification. Those interviewed indicate the force has previously put seminars on from time-to-time but these are not mandatory. It was clear some of those interviewed had gained exposure to events outside Police Scotland, which will provide valuable CPD, but these occasions were ad hoc in nature and infrequent. The majority of those interviewed indicated they would welcome more regular CPD events.

**Conclusion**

The Police Scotland approach to the policing of football as a ‘non-public order event’ is founded in their belief that football, in the main, is normal business for local divisional officers.

Police Scotland recognises there are occasions where threat and risk require additional public order assets and when this is the case then an appropriate public order command model is inserted into the operation. This model was observed live operationally by the review team and assessed as a mature and effective model.

There are anomalies between Police Scotland and the rest of the United Kingdom in respect of policy concerning event commander training / deployment and the requirement for public order operational competence. As mentioned elsewhere in this report, some of the perceived lower risk matches can throw up significant safety challenges. Police Scotland event commanders’ operational capability would be enhanced if they were to receive additional public order training and accreditation.
The review team observed accreditation procedures were tightly gripped at local level. A strategic oversight model which enables more cross-country deployment of commanders to garner and share experience could further enhance this local ownership. Police Scotland commanders could also further enhance this continuous professional development (CPD) with greater exposure to other areas of the United Kingdom. This would not only enable Police Scotland commanders to develop best practice, but also enable them to share their own experience to the rest of the country – the Police Scotland briefing and familiarisation processes at Livingston FC being one such example.

Increasingly, as police resources across the UK are stretched, the likelihood and frequency of cross-border mutual aid has increased. The ability to deploy, for example, PSNI officers to Scotland adds to the operational capacity and capability of all, as well as engendering the sharing of experience and emerging practice. While it has been demonstrated this can already work effectively, greater synergy between all parties is always desirable for interoperability. With the approach of EURO 2020, the opportunity to achieve this around football policing would benefit all. This applies within the UK, but also when countries from the British Isles compete abroad and the respective policing delegations can be mutually supportive. For example, during EURO 2016 in France, the English and Welsh silver commanders led combined teams of Welsh and English spotters at various points.

**Recommendation:** Police Scotland should review their training, accreditation and CPD of football commanders (and other football roles), including opportunities for greater interoperability with other United Kingdom police forces.

**The following specific points should feature in any such review:**

a) The adoption of a set of definitive lesson plans on the Event Command Course to better ensure the consistency of delivery and minimise variance on those occasions when alternative SMEs are used.

b) Provision of assessor training to better support assessors in developing an understanding of the process and the different forms of evidence to draw from.

c) Regular standardisation meetings of trained assessors to better ensure standards are applied consistently.

d) The mandatory completion of annual CPD to provide Police Scotland with the opportunity to update all commanders and advisors promoting a consistent ‘standard’ in terms of knowledge and understanding. This is considered critical to ensure commanders and their advisors are cognisant of current operational learning and best practice as well as changes to legislation and policy. In addition to updates, mandatory CPD provides a valuable opportunity to evidence ongoing occupational competence each year.
Completion of mandatory CPD will go some way to meeting the annual requirements for reaccreditation of public order / public safety (POPS) commanders, which are currently not met and therefore represent a departure from the 'standard' in England, Wales and Northern Ireland.

e) Development of force-wide processes governing the reaccreditation of commanders and advisors will serve to support individuals in evidencing ongoing competence and allow Police Scotland to ensure only those currently accredited are put in command of operations.

f) The requirement for existing and future match / event commanders to complete additional training commensurate with their command function. Completing learning, broadly in line with the C2 Silver Public Order Command Course and / or C3 Bronze Public Order Command Course, would more closely align Police Scotland with standards in other forces in England, Wales and Northern Ireland. The additional content complements existing knowledge and understanding and would better inform the tactical and operational planning process by ensuring understanding of a full range of public order / public safety considerations and contingencies. It is considered such additional learning better supports commanders in reducing the recourse to use of force. Importantly the additional learning should not conflict with maintaining a conventional policing style favoured by Police Scotland; instead, it supports that approach in such a way it avoids exposing communities and officers to unnecessary risk.

g) Operational commanders at football matches and events to be appropriately trained and accredited. This training to be broadly in line with that of the C3 Bronze Public Order Command module.

h) Gold commanders for football matches and events to be appropriately trained and accredited. This training to be broadly in line with that of the C1 Gold Public Order Command module.
Preventative Measures in Football Policing

Some views were expressed concerning the use of police powers on football supporters and that they unnecessarily ‘criminalise’ fans in a disproportionate way to other members of the public. This is a view echoed in other parts of the UK (the FSF campaign ‘Watching Football Isn’t a Crime’) and indeed in the broader policing of protest and public order. This tends to revolve around what the police manuals would consider lower-end tactics, in terms of the use of force; such as videoing poor or pre-cursor behaviour, containment and preventative arrest. Undoubtedly, in a democratic society, this type of challenge is healthy and has led, in part, to positive introspection and refinement of police tactics. There is a balance to be struck, which requires an understanding of the overall policing approach in the UK.

In reviewing the policing approach to public order and events, but specifically football as a sub-set, it is worthwhile comparing and contrasting the approaches of various countries. While it is undoubtedly a significant simplification, it is nonetheless valid to identify two broad approaches to football policing, which are apparent in Europe. There is one model, generally associated with policing systems with a national force responsible for public order, in which there is little scaled intervention or use of preventative measures. Typically, these rely on an overwhelming show of force and are characterised by a rapid escalation to a significant level of force involving baton strikes and the liberal use of dispersal agents or water cannon. Certainly, for visiting supporters there appears little in the way of means of redress for the perceived excessive use of force. Equally, this policing style is accepted in the host country and, as such, visiting fans need to adapt to the environment. There is little challenge around the use of powers as, by the time the tipping point has been reached, it is apparent police intervention is required.

By way of contrast, based on the Peelian principle that the measure of an effective police service is not the ability to detect crime, but its prevention in the first place, the UK context and legislative framework drives a different approach. The most contentious tactic of its type in Scotland is the videoing of supporters by the police. Fans can be videoed to secure evidence for a subsequent arrest (which can negate the need for tensions to arise as immediate arrests are made) and the act of videoing can actually cause supporters to desist from poor behaviour on its own. Other preventative measures can include dispersal notices, containment and banning orders. The timing of these tactics is self-evidently prior to the commission of offences (and certainly serious ones) hence they are dubbed “preventative “measures. While this may have the clear benefit of de-escalating offending, minimising the use of force and reducing the risk of injury, they create greater scope for the police to face legal challenge, as it is often difficult to prove the action definitively averted violence. While the use of preventative measures has significant benefits, it is also clear the police could better communicate the circumstances in which the tactics are used, the policies governing its use, the outcome and, where possible, the alternatives that were discounted.
The review team heard very strong opinion on the contentious subject of police videoing supporters. There is a clear gap in both the understanding of this tactic by supporters and communication by the police to inform supporters of the rationale for such deployments. The review team noted the efforts of the current FoCUS management team to engage with supporter groups, particularly ‘Ultras’ and Fans Against Criminalisation (FAC).

As mentioned in other parts of this report, one of the apparent missing ingredients for Police Scotland is a structured engagement strategy, supported by a proactive and transparent media strategy. These two key pieces of work would enable a two-way flow of communication between Police Scotland and all supporter groups.

It is important for Police Scotland to listen to the concerns of hard-to-reach groups and address them. It is acknowledged this will present challenges for both sides, but until respective parties appreciate the views of the other then the impasse will remain. However, given the refusal of FAC to engage with this review, there is a concern they, and others, are so entrenched in their opinions they will not entertain such a dialogue. While that is unfortunate, it should not dissuade Police Scotland from broader engagement with fans groups, which will undoubtedly increase confidence in the police and enhance their legitimacy in the eyes of the majority.

The review team would urge FAC to review their position of non-engagement with Police Scotland and seize the opportunity of real and mindful dialogue as a driver for change. It could be easy to criticise the status quo, and can be harder, but ultimately more successful, when all parties engage and offer positive options.

Whether FAC, and others, acknowledge it or not, the existence of football hooliganism in Scotland is a fact. The review team saw video footage of serious disorder between ‘risk’ supporters in a busy city centre. Other compelling evidence was seen, which unequivocally demonstrates the issue of planned football violence still exists in Scotland. It is conceivable the ‘noise’ relating to the Offensive Behaviour at Football legislation has led to the focus on football violence being diluted. Of concern, the review team saw evidence of growing numbers of ‘youth risk’ groups within Scottish football.

Everyone spoken to, or has made a written submission to the review, has stressed the vast majority of football supporters are genuine. This point is not disputed but is not currently reflected in the national strategy or media approach. The current football policing strategy for England and Wales is very clear about the drive to engage with genuine supporters, while at the same time excluding risk supporters. That strategy, which is reflected in both operational practice and the media plan, is to:

**Empower** the majority of fans through effective communication and engagement

**Influence** those fans who generally behave but who through alcohol or emotion can act in an antisocial or disorderly manner

**Exclude** those who seek to cause or engage in disorder
While the football policing strategy is a matter for Police Scotland, each of these strands and relevant activity are already in practice, being applied in Scotland, but are not reflected and adhered to in a consistent and coordinated fashion.

The below case study outlines how the application of a proactive approach in Scotland has diverted impressionable young people away from organised football violence through both enforcement and engagement tactics.

**Case Study**

In season 2011-12, a lower league football club in Scotland had an active risk group who were willing to engage in pre-planned and spontaneous disorder both at home and away. This group could muster strong numbers, had access to alcohol and controlled substances, and presented a significant challenge to policing.

The approach taken can be broken down into several key areas:

1. **Dynamic dedicated football officer**

   The local DFO had knowledge of the risk group, undertook regular operational deployments and provided local colleagues with the briefing and support necessary to be effective. This officer also had the respect of senior management and was, therefore, able to influence decision-making at event commander level. Crucially he also gained the respect of some of the risk group and was able to build upon this to influence behaviour.

2. **Integration of central specialist resources with local resources**

   The DFO deployed alongside FoCUS officers. The FoCUS national remit meant these deployments could take place anywhere in Scotland, providing a consistent message to the risk group their activities were subject to police scrutiny at home and away. Crucially, this involved the risk group regularly seeing the same police officers wherever they went.

3. **Proactive engagement based upon effective use of intelligence**

   Police proactively engaged with the risk group at every opportunity to disrupt their activities, using intelligence to place resources in appropriate locations. For example, intelligence that the risk group were attending a particular fixture by train resulted in the DFO / FoCUS team meeting them as they arrived at the station, conducting a full engagement operation and escorting them to the stadium.

   This proactive approach also allowed police to reinforce club messaging to the risk group around their illicit use of pyrotechnics. On another occasion, the DFO / FoCUS team intercepted the risk group pre-match, leading to recovery of a number of pyrotechnics.
4. Effective retrospective enquiry and use of bail / undertaking conditions

The central resources and growing expertise in undertaking retrospective enquiries allowed operational resources to concentrate on match-day operational activity, with follow-up enquiries being conducted for them.

One example of this followed a disorder incident on 5 January 2013 involving the risk group, during which evidential footage was obtained by the DFO / FoCUS team. Five arrests from the risk group were made on the day but after FoCUS retrospective enquiries, a further nine males were arrested on Friday 11 January 2013 (a further two were traced later).

This swift enquiry provided a strong enforcement message as well as opportunities to impose conditions through police undertaking to appear at court at a later date. At subsequent fixtures, the DFO was able to ensure a strict governance regime of these conditions, which included a requirement for some individuals to ‘sign on’ at their local police station.

Outcome

The enforcement removed some key individuals from the risk group’s match day activities. In addition, the engagement element of the operation enabled officers to demonstrate a clear link to the wider members of the group that engaging in disorder will lead to exclusion from football.

As a result of the police tactics, the risk group became increasingly inactive, with a number turning away from disorder to attend matches as genuine supporters. From a fan safeguarding perspective the risk group, aside from their local derby fixture, ceased to present a significant threat of violence and disorder at football matches.

The template used for dealing with the risk group has been adopted to address several similar groups over the past five years and remains a live option in respect of risk group activity during season 2018-19.
An Independent Review of Football Policing in Scotland
National Co-ordination and the Role of FoCUS

**FoCUS / Intelligence**

The review looked specifically at the role of the FoCUS team, benchmarking it with similar units across Europe. It is a team that attracts significant attention and is often negatively perceived by some supporter groups. Regardless of any observations about the function of FoCUS, it is important to state the review team were hugely impressed with its members. Their positive and professional attitude was palpable, as was their honesty during several interviews and focus groups, which is testament to the unit’s leadership.

**Intelligence**

Currently consisting of seven officers, the intelligence function within the unit operates similar practice to that of the UKFPU in England; collating and disseminating intelligence via the MINERVA information system, supported by a national intelligence database. This is the core role, common to all such national units and should be seen as an essential business function.

End-of-year trend statistics are produced from MINERVA by the unit and shared with key partners in forums such as the bi-annual Football Events Working Group, offering the opportunity for key stakeholders (such as the Scottish FA, Scottish Government and British Transport Police) to discuss emerging threats. This should then provide the evidence base for coordinated activity.

Some Scottish fans have expressed concerns Police Scotland uses disproportionate, intrusive methods in gathering intelligence related to organised football violence. The review team examined a wide range of material made available to them and concluded the intelligence activity is proportionate, well managed and complies with legal, and ethical, policies. Covert policing activity relating to football is governed by the same strict guidelines and authorisation levels as all other policing spheres.
Operations

The operations element can number as many as nine officers and includes a team of skilled evidence gatherers (EGT’s) who are deployed at matches, in support of local policing plans. These ‘operational’ officers are tasked through a ‘bid’ system, whereby any divisional match commander can request their services should he or she consider it appropriate due to the risk assessment for a specific fixture. This scale of operational deployment is somewhat out of step with the practice in other national units, who outside of overseas international fixtures would not routinely deploy spotters or EGTs domestically. On occasions in England or Wales, the UKFPU may deploy one of its experienced police officers to an event, generally to gain a first-hand view of a developing club issue, or to mentor less experienced local officers.

All bids for operational support from FoCUS are considered within the unit (normally at inspector level) and successful applications will result in officers deploying alongside local, trained officers (where they exist), within the match commanders operational plan, generally under the sub-command of a FoCUS supervisor.

Somewhat surprisingly, there appears to be no formal tasking meeting for this process leading to a lack of transparency. On occasions, particular divisions are proactively approached by the team, to establish if a bid was likely to be forthcoming, before a decision could be made on others that had been received. Such practice could represent a waste of resource and be seen as ‘self-deployment’; it should be the local match commander driving the requirement, not a central function.

At a local level, each club in the top two divisions has at least one DFO and has resilience provided by at least one further officer. Not all DFOs are physically deployed at each fixture. This is dependent on the DFO’s ‘core’ role at the respective division. In some divisions, the DFO is based within divisional intelligence while others have them based in an operational planning environment. This raises the issue of resilience for the role, which while understandable given the stretch on police resources, creates an inherent vulnerability.

When the FoCUS operational team and divisional evidence gatherers are deployed alongside each other, there was no evidence of conflict in command and control, or confusion around deployments and responsibilities. Live field observations noted that all teams were given both the FoCUS intelligence briefing and the divisional match briefing and clarity of command was established prior to the deployment. The FoCUS supervisor frequently took leadership responsibility and worked to the match commander within the command structure. At the conclusion of a deployment, any decision
around the requirement for a post-match investigation and FoCUS involvement was made after a discussion between the FoCUS chief inspector and the match commander.

With regard to the general relationship between FoCUS officers and those on division, many of those interviewed reflected on a distinct shift away from the ‘parochialism’ of old, as Police Scotland continues to embed over time. Many officers commented on the positive effect on such relationships because of the ‘Secondee Programme’ practised by FoCUS, whereby six officers are seconded from divisional policing per season.

However, it would be remiss not to challenge the necessity for a national evidence-gathering asset sited within the FoCUS Unit. Clearly, there are benefits in being able to draw upon a cadre of skilled individuals, who can be tasked to support divisional assets where the risk dictates. It could be argued it offers an economy of scale, as most matches on divisions do not require enhanced resourcing. The challenge, however, would be to suggest that provided divisions have the capacity to call upon a cadre of local, trained evidence gatherers with strong knowledge of their club fans, there would be less need for the reassurance of a national evidence gathering asset. By way of reassurance, a pair of experienced dedicated football officers (DFOs) and / or EGs sited in FoCUS could offer a flexible option that could be utilised to carry out a number of tasks in support of the national football strategy. Free of the commitment to regularly deploy operationally, these officers could progress ‘spotter / EG’ training and provide initial support to divisions where post-match investigations are being considered.

To progress this approach, there will need to be an investment within divisions to ensure they have suitably trained, committed football officers and the correct level of investment for post-match incident investigations. The re-profiling of FoCUS’ role and structure would then create the capacity for them to undertake the type of work necessary to support the continuous professional development of DFOs and engender greater national consistency.

The continued professional development of spotters and DFOs / EG’s is crucial in order to maintain consistency and currency of football policing across the country. Among other benefits, it offers an opportunity to quality assure and for such officers to receive support where required. The current situation in Scotland is that, while spotters receive a one-day training course (delivered by FoCUS) on selection, DFO training is limited to peer guidance and support.
Policy

The policy function within the FoCUS Unit appears to be similar to that of the UKFPU in England, in so much as it acts as a driver for the national football policing strategy on behalf of the assistant chief constable lead.

Of note, there are some excellent innovations currently being driven by FoCUS. The ‘Changing Behaviours Programme’, encourages football clubs to engage with the subjects of banning orders as they approach the end of their ban. Simultaneously, ‘Pitchin In’, a multi-agency approach to youth interventions, which has won strong praise from supporters’ groups who have witnessed the positive outcomes of its work at first hand, is utilised from a diversionary perspective.

Police Scotland should highlight the diversion work undertaken by FoCUS as excellent practice. Not only is this work addressing football disorder from a prevention point of view, it is also assisting in addressing underlying causes for individuals who are vulnerable to being enticed into such groups. FoCUS should be supported to develop the approach consistently across Scotland and to share details of its work across the UK and Europe for the benefit of others.

Recommendation: Police Scotland to consider extending nationally the current diversionary schemes such as the ‘Changing Behaviours Programme’ and ‘Pitchin’ In’ project.

Football Banning Orders

Current Police Scotland policy requires the chief constable to approve any summary banning order applications and there is a perception (not shared or endorsed by chief officers) the force is reluctant to make the financial investment to pursue them and as a consequence very few are progressed. While the competing demands for funding and legal services is widely appreciated, the current approach to summary applications represent a significant missed opportunity in tackling football-related crime and disorder. There appears to be little doubt among all of the officers, and clubs, spoken to that even if a small number of individuals known to them were targeted by summary applications, this would have a significant effect on football-related violence and send a clear message to those who seek to engage in such activity. The current number of banning orders in Scotland appears low, which raises questions as to the effectiveness of the evidence-gathering activities of FoCUS, and others, in filming fans. There would also appear to be inconsistencies in the manner in which the courts take police evidence, issue banning orders and the nature of the conditions applied.

Increasing directed police enforcement in respect of banning orders, coupled with the very effective diversion projects, provides Police Scotland with a menu of tactical options to address issues based on their individual needs.

Recommendation: Police Scotland to review its policy and funding for seeking summary football banning orders.
International Comparison

The review team undertook a benchmarking exercise in respect of Police Scotland alongside seven other major European football policing countries namely:

- Germany
- The Netherlands
- Denmark
- Switzerland
- Austria
- England and Wales
- Belgium

The comparison focused on the role of the National Football Information Point (NFIP), which is crucial in collaborative working across Europe and, indeed, the world. The results of this exercise highlighted a number of areas where Scotland is currently out of step with its European colleagues. The key identified areas of difference are the local deployment of FoCUS staff to divisional operations and the lack of DFO management, training and CPD by the unit. As attention turns to the EURO 2020, Police Scotland should revisit their current NFIP operating model in order to ensure they are fully interoperable with other European countries.

External Perceptions of FoCUS

There was a clear and consistent theme from supporters that FoCUS are inextricably linked with the now repealed Offensive Behaviour at Football Act. Supporters often referred to them as ‘the sectarian unit’, reflecting their very visible, overt evidence gathering tactics.

A wide supporter base, not just those that could reasonably be expected to hold particular views on sectarianism, held this view. Of additional concern was other stakeholders held this view by virtue of the unit’s actions, which were perceived and characterised as the aggressive overt filming of supporters. It was alleged there was never an explanation from officers as to why such filming was taking place. The lack of effective messaging in relation to football policing in Scotland is referenced elsewhere and, while it has become apparent that many supporters do understand the benefits of filming in appropriate and justified circumstances, it is clear the police message is not getting traction.

It is acknowledged FoCUS leadership have met with several supporter groups and associated stakeholders in order to outline their role and explain the rationale related to overt filming. While these presentations and engagements have been positive, there remains a strong mistrust of FoCUS. This mistrust based on misperceptions is, unfortunately, shielding some of the more innovative diversion work being carried out by FoCUS. Given the strength of feeling articulated to the review it became increasingly apparent that despite best efforts, FoCUS are facing a significant challenge to shake off the perceptions and
mistrust associated with their name. It is not uncommon for national intelligence units, particularly where they have an overt operational presence, to attract mistrust and hostility. The negative perception of the Scottish fans spoken to in relation to FoCUS was in stark contrast to the affinity and regard expressed to locally based officers.

In addressing the issues outlined in this section Police Scotland may wish to review the name, branding, roles and position of FoCUS within the wider football-policing model.

The excellent diversionary work carried out by FoCUS sits well with the recommendation elsewhere in this report relating to the development of a holistic engagement model.

Looking forward to EURO 2020 there is a window of opportunity for Police Scotland to review their current practices concerning the deployment of FoCUS to local operations. Police Scotland may wish to consider investing in the roles of local DFOs coupled with enhancing their training, CPD and operational direction, allowing FoCUS a more strategic national role.

Based on good practice from around Europe, one potential option is for FoCUS to be re-shaped around the following functions:

- The collation, assessment and dissemination of intelligence (current role)
- The production of trend data and thematic reports for the football policing lead (current role)
- Support the deployment of policing delegations for the Scottish national team (current role)
- Develop specialist football policing training for DFO’s, continuous professional development and accreditation (extended role)
- Provide limited support to local DFO’s through operational deployments (reduced role)
- Develop national good practice around diversionary activity (extended role)
- Develop greater support (possibly manage an enhanced budget) for football banning orders (extended role)

To facilitate the extended responsibilities, FoCUS would no longer deploy operationally in an evidence gathering function, provided an appropriate local capability had been developed.

Given a fresh mandate, and the negative perception of the FoCUS ‘brand’, Police Scotland may wish to create a new identity for the unit reflective of its function.

**Recommendation:** Police Scotland should review the function, composition and branding of FoCUS.
Case Study – Pitchin’ In

The ‘Pitchin’ In’ programme was conceived following an incident of youth disorder associated with the Hamilton v. Motherwell fixture in September 2014.

Following the incident, a number of youths were identified and arrested but there was no further action taken via the criminal justice system in respect of their actions. This left these young people with neither sanction nor guidance in relation to engaging in disorder.

It was identified that engaging in disorder created risks to the personal safety of young people. The decision not to prosecute presented an opportunity to address this offending by providing a new diversionary programme, which harnessed youth offenders’ affiliation to their chosen football club, directly addressed their offending and provided them with essential life skills in respect of decision making.

The programme was created by FoCUS with expert educational input from Glasgow City Council Education Department and is intended to be delivered in three contexts:

* A school-based prevention programme
* An Early and Effective Intervention (EEI) programme for offenders under the age of 16
* A diversion from prosecution programme for those aged 16 or over

The programme is flexible enough to be delivered in themed lessons, such as an input on pyrotechnics being delivered in science class, or as a stand-alone lesson, and can also be used to address offending in the wider community rather than just in a football context.

Key elements of the programme are that clubs would see a benefit from improved supporter behaviour and they have the opportunity to recruit PiP participants into volunteering roles at the club. This benefits the clubs through access to resources but can also benefit participants by providing an opportunity to work towards qualifications / awards such as the Saltire Award (an award for young people in Scotland aged 12-25 who undertake volunteering).
The school-based programme

The school-based programme is based upon delivery of a minimum of three lessons and maximum of five lessons as follows:

**Lesson 1** - What exactly is offending?
**Lesson 2** - Why get involved? What does offending look like?
**Lesson 3** - What are the consequences of offending?
**Lesson 4** - What is the language of offending?
**Lesson 5** – Songs; national, social or cultural?

The programme is fully aligned with the Curriculum for Excellence (CfE), meaning any education professional is able to deliver the programme with or without police involvement and students can achieve formal learning objectives through participation.

The school-based programme was rolled out, with training offered to all divisions, by means of a briefing paper sent to all divisional commanders in September 2016 and after nominations from divisions, training was delivered in the subsequent months. At this time the programme document was also circulated to all local authority heads of education in Scotland and it has subsequently been added to the ‘Glow’ educational resource system (which is accessible by students, teachers and selected others such as school campus officers).

The EEI programme

Early and Effective Intervention (EEI) is the means by which children in Scotland who are at risk of poor life outcomes are identified and supported. EEI works to prevent problems occurring, or to tackle them at an early stage before they escalate.

The EEI programme has been created with the intention of being delivered as a partnership between the local authorities, who have EEI delivery responsibility, and football clubs. The process would be based upon EEI coordinators identifying suitable individuals followed by engagement with the local football club (or selecting from a number of local clubs) to deliver the programme.

Delivery of the programme is intended to be on club premises facilitated by club staff and with at least some of the speakers drawn from the club (e.g. team captain, manager, and apprentice players). Other speakers would be drawn from partner organisations such as Medics Against Violence, Scottish Fire and Rescue etc.

This element of the programme remains under development and has not yet been delivered.
Diversion from Prosecution programme

Diversion from Prosecution is a disposal available to the Crown Office and Procurator Fiscal Service (COPFS) upon receipt of a Standard Prosecution Report (SPR) from Police Scotland where an individual has been charged with an offence(s). Instead of prosecution, the individual is offered an opportunity to undertake a programme designed to address their offending behaviour. In the event of the individual failing to engage or failing to complete the programme, COPFS would revert to prosecuting the individual.

In the ‘Pitchin’ In’ context, this element will mirror the content of the EEI programme and is aimed at those who are not eligible for EEI procedures (i.e. aged over 15) but for whom the programme could bring similar benefits to younger offenders.

The Diversion from Prosecution programme has been approved for action by the Lord Advocate but, as with the EEI programme, has not yet been delivered.

Current position

The school-based programme is active and has been delivered in several schools, with overwhelmingly positive feedback. Efforts are ongoing to extend this to new schools in due course and to publicise it via schools’ social media accounts.

Work is also well under way in relation to the EEI and diversion elements however the questions of timescale and leadership need to be addressed prior to their launch.
The Terms of Reference (ToR) for the review seek to address how the policing of football ‘feels’ for those involved, specifically in terms of the following points:

- Its presentation i.e. the operational demeanour and tone
- Stakeholder engagement and confidence
- Communication and media relations

**Stakeholder and Supporter Engagement**

It was evident there is an array of engagement by Police Scotland with football supporters and the wider stakeholder networks, which occurs at different levels and formats across the country. What was also apparent is there was a lack of consistency in approach, particularly at the local level, meaning good practice is not captured or replicated and, in some areas, is entirely lacking.

At a strategic level, there is a clear commitment from the chief officer lead who has regular dialogue with the SFA, SPFL and FSOAS, most notably within the National Football Working Group, which he chairs, and has an extensive multi-agency membership. This group is supported by an Operational Working Group which, again, has a multi-agency membership and is led by the Hampden Park Safety Officer (also the chair of FSOAS).

While these groups offer the ideal mechanism to tackle strategic issues, stakeholders expressed frustration at the pace of progress on some key issues. The absence of supporters’ representation in either of the two working groups was noticeable. When stakeholders were questioned about the potential for supporters joining one, or both, of these working groups there was resistance from the membership. The rationale offered was based around the sensitive nature of some of the matters being discussed. While this may be a valid point, it was felt it should be readily achievable to either establish a separate national forum involving spectators, or have a two-part meeting. This could be fed by regional forums capturing the grass roots feedback and issues of supporters.

**Recommendation:** Consider the establishment of a national forum including key stakeholders and supporters’ groups, supported by local fans’ forums.

In relation to the engagement role of match commanders, there are localised instances of excellent practice. One such example is the approach of Superintendent Innes Walker in Aberdeen, who sits as a trustee on the Aberdeen FC community trust. In focus groups with supporters and, indeed, during observation visits to matches, supporters talked with great affection about police match commanders who they had come to know through meetings and ongoing project work. It should be noted...
these meetings often centred on thorny issues such as ‘ultras’ and their associated behaviour. Despite the difficult nature of the conversations, there remained clear respect for well-established local police match commanders.

This approach was, in some areas, undermined by the transitory nature of some police match commander appointments. This was a source of concern to safety officers, supporters and the police match commanders themselves. One example saw a club safety officer who cited that by November, he had already worked with 12 different police match commanders at his stadium during the current season. Concerns were raised in relation to the risk associated with such an operational model adversely influencing the consistency of working practices, of messaging and the ability to build relationships with supporters.

While the requirement for succession planning and resilience in terms of the police match commander cadre is well understood, it is apparent that consistency in who takes the role of police match commander would benefit all concerned. There was feedback from experienced commanders that some colleagues liked to ‘get the badge’ of having been a commander, particularly at some of the bigger venues, but then could fade from the rota.

At a local operational level, there are extensive examples of good practice in terms of engagement and, where it is present, this is one of the key strengths of Police Scotland in respect of policing football.

There was wide and very vocal support for club dedicated football officers (DFOs) from the clubs and supporters. All stakeholders were highly complimentary about the positive relationships they have with their established DFO, citing ‘their’ DFO being identifiable, accessible and very active in respect of local issues pertaining to the football club and their supporters.

During the evidence collation stage, the review team observed DFOs in a number of operational deployments. At the Rangers versus Spartak Moscow match, the local DFOs were seen to identify a potential flashpoint at the stadium and interact with the Rangers group. This appeared to prevent, consequently, potential disorder. This example was by no means an isolated one and there were many differing occasions where DFOs positively interacted leading to a positive outcome.

It is of particular note the club supporter liaison officers (SLOs), and supporters themselves, held their DFOs in very high esteem. This is reflective of the hard work completed by DFOs themselves, and is a real positive for Police Scotland and football generally. Unfortunately, this is not a consistent picture across Scotland.

**Recommendation:** Police Scotland should review the policy for the appointment of match commanders to ensure, wherever practical, there is a degree of continuity and consistency.
Recommendation: Police Scotland may wish to review their existing DFO model to ensure it is fit for purpose in enabling DFOs to undertake the necessary engagement activity to build strong relationships with clubs, supporters and communities over the long-term.

One area of engagement, which has gone largely unnoticed to the wider public is the work done by Police Scotland local neighbourhood policing teams (NPT) where they have a football stadium within their geographical footprint. There is undoubtedly some excellent practice, examples being:

- Joint NPT and club patrols to address community concerns about supporters urinating in gardens leading to the stadium - the sanction being both by way of summons and also ban from the stadium with potential loss of season card
- The ‘Pitchin In’ project which is led by FoCUS in partnership with Glasgow City Council and other stakeholders
- Detailed engagement with businesses surrounding one football club in order to minimise the impact of match day on these businesses
- Work with local community councils around one major stadium to improve traffic flow, pedestrian experience and increase respect for local residents by supporters
- Local community outreach work which focused on hard to reach young people with the wider objective of raising awareness of support organisations to assist young people
- One club where there is a very strong partnership model with police and local authority, which is tackling high levels of social deprivation, situated on their doorstep.

Recommendation: Existing NPT good practice and engagement is shared nationally, either via CPD events or at a national seminar.

In terms of the “feel” of football policing operations, it was apparent supporter experience varies from club to club and region to region. There was generally positive feedback from the fans forum for the policing in the north and border regions of the country, with the police at Ross County being held in particularly high esteem. This view contrasted with supporter experience in the bigger cities such as Glasgow and Edinburgh where they perceived a less friendly approach from police officers. It is important the opinions of supporters are noted and reported in order for further work to be carried out to qualify and act upon their views as appropriate.

Following high-profile and recurring disorder around the Tyne and Wear derby, Northumbria Police met with Newcastle United and Sunderland supporters’ representatives seeking ways to collectively improve what was a deteriorating situation. During discussions about what the supporters wanted from
the police in terms of tactics, a Newcastle supporter said, ‘We are the silent majority’. What that supporter was referring to was the fact the vast majority of football supporters are genuine fans with no thought of disorder or violence on their minds. However, police planning, tactics and media reporting is typically focused on the small minority of risk supporters who engage in violence and antisocial behaviour. In Scotland, sectarian issues and the activity of very vocal groups of supporters exacerbate this antisocial behaviour.

The terms of reference for this review are clear in referencing the importance of spectator engagement and perspective. We would suggest the relationship with the silent majority of supporters is particularly important.

The silent majority will not capture the attention of the media nor will they capture the attention of politicians. Currently engagement with the silent majority by Police Scotland is limited and, likewise, it would seem there are differing levels of engagement by football clubs and authorities.

From the focus group with Supporter Liaison Officers there was a clear and relatively consistent view supporters felt the delivery of football-related activity was ‘being done to them’ and not ‘with them’. This view was corroborated through conversations with supporters during operational observations across Scotland. One example, outlined by supporters, was the scheduling of the Scottish League Cup semi-finals at Hampden on the same day. This event saw Aberdeen playing in the early kick-off despite having the furthest to travel.

This may be a question of perception or may be the reality, but there is a commonly held view and that perception needs to be acknowledged and addressed.

**Recommendation:** Police Scotland should consider undertaking further work to develop an overarching engagement strategy in order to give clarity of direction and cohesion of activity.

**Recommendation:** Police Scotland may wish to review their integration of supporter input to the above strategy to build a fully inclusive model.

**Media Engagement**

From the focus group with the media it was felt Police Scotland were proactive in respect of high-risk football fixtures when the force would talk about the policing operation and warn supporters to behave themselves. Usually these messages were seen as setting the tone for the operations, indicating at least subliminally, disorder was almost inevitable. Outside of these high-profile set piece events, there was little, if any, perception there was a coherent communications strategy, or messaging with regard to football policing.

Often wider media messaging centres on being reactive to the coverage of negative issues, such as the use of evidence gathering teams (EGTs). Media commentary over the past few years has centred on use of the Offensive Behaviour at Football and Threatening Communications (Scotland) Act 2012 and its subsequent repeal.
There was an acknowledgment, from the media, they have a tendency to focus on negative football policing stories and how high-risk derby fixtures follow the same repetitive process. There was also an acceptance they follow those who shout loudest, most notably the narrative put forward by ‘ultra’ type supporters and Fans Against Criminalisation (FAC). The review team made several approaches to speak with ‘ultra’ supporters and FAC but all declined to engage, which is disappointing and perhaps indicative of a mind-set. If there is to be sustained progress in the engagement between all supporters and Police Scotland, then it is incumbent on supporter groups, as well as the police to contribute to the dialogue.

As has been highlighted in the above section, there are many examples of positive activity by local policing teams across Scotland, but little evidence of this being promoted by the force’s media team to add balance to the discourse. The media team tends to centre on responding to criticism or formulaic press statements pre-event. This strategy is in stark contrast to the upbeat Police Scotland messaging around other events such as golf tournaments.

Journalists were unanimous in their interest in regular engagement with Police Scotland.

The use of social media by Police Scotland in respect of policing football is, at best, limited. Use of engagement streams such as Twitter are rare. One thread seen by the review team involves an explanation of the deployment of EGT at a match, which was not received positively by supporters and was subject to strong adverse comment. This sort of experience may, in part, explain the reluctance around social media engagement.

However, there was a strong desire from supporters and SLOs for greater locally led Police Scotland social media streams. While such an approach requires corporate oversight, safeguards and training, the positive outcomes can be significant. The social media model of the Welsh national police deployment to the Euro 2016 tournament in France is an example of such good practice. It demonstrated how an established and relevant social media presence could support effective police engagement strategies and plans. Moreover, social media accounts are now routinely held by DFOs across England, Wales and Northern Ireland. Not only supporters of his own club acclaim the DFO at Preston North End (Lancashire Constabulary), but he is national recognised for his informative and engaging messaging. Should Police Scotland move in a similar direction they would enhance their own engagement opportunities, as well as the overall police social media reach across the United Kingdom. This can only improve supporter experience and relationships. The issue is particularly relevant given the staging of the EURO 2020 tournament, in part, in Scotland.

**Recommendation:** Police Scotland should review its media strategy for football policing.
It was interesting to note feedback from supporters and stakeholders citing the Police Scotland social media updates during the 2018 Ryder Cup. These communications were regarded as informative and good-humoured, allowing the police to appear more approachable, and setting a different tone when compared to the media messaging around football operations.

There are many strong examples of supporter and stakeholder engagement by Police Scotland at differing levels. However, these excellent examples do not appear to be promulgated throughout the force and are not part of a formal structure or strategy. Furthermore, the involvement of supporters within existing forums is sporadic and appears to be at the lower operational level.

**Recommendation:** Police Scotland may wish to review their existing social media policy, particularly with respect to access levels and its use within the overarching engagement strategy.
An Independent Review of Football Policing in Scotland
Throughout the review, the issue of stadium safety certification was repeatedly raised with the team. Although this area did not fall specifically within the terms of reference of the review, it was felt the report needed to make comment on this very important issue.

**Recommendation:** An urgent multi-agency review is conducted to establish an appropriate governance, consultation and inspection regime for Scottish venues used for football and other events.

Specifically, with regard to the terms of reference, the review report makes the following recommendations:

1. Operational planning for, and the management of football matches, including our approach to:
   - Risk Identification, Management and Mitigation
   - Intelligence gathering and its efficacy
   - Information sharing with clubs and supporters’ groups
   - Resource deployment and flexibility, both within and outside football stadia
   - Command and control clarity and practices

**Recommendation:** The Police Scotland media plan should engage supporters and the media to explain the force’s responsibilities and what sits with others.

**Recommendation:** Police Scotland should agree with partners a single national approach to the management and charging of TTROs.

**Recommendation:** Police Scotland should consider, with partners, the options for developing a national approach to HVM at events, incorporating fixed and mobile barrier assets. Police Scotland should also satisfy itself via its CTSA’s, that all venues have undertaken thorough reviews of their security measures and that identified actions have been undertaken.

**Recommendation:** Police Scotland may wish to consider a further examination of the cost recovery in place across Scotland.

**Recommendation:** Police Scotland should review their training, accreditation and CPD of football commanders (and other football roles), including opportunities for greater interoperability with other United Kingdom police forces.

**Recommendation:** Police Scotland should review the policy for the appointment of match commanders to ensure wherever practical there is a degree of continuity and consistency.

**Recommendation:** Police Scotland should issue / reissue clear guidance to all divisions as to the roles, responsibilities and policies relating to football policing to ensure a corporate approach, supported by an internal inspection regime to monitor compliance.

**Recommendation:** Police Scotland should agree with partners a single national approach to the management and charging of TTROs.

**Recommendation:** Police Scotland should review their training, accreditation and CPD of football commanders (and other football roles), including opportunities for greater interoperability with other United Kingdom police forces.

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Contributors to the Review

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Paul Connolly
David Hamilton

Other Contributors

Mari Millar  Glasgow SAG Chair
Paul Smith  St Johnstone Stadium Manager
### Matches observed during review

<table>
<thead>
<tr>
<th>Date</th>
<th>Competition</th>
<th>Teams</th>
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<tr>
<td>Thursday 25 October</td>
<td>UEFA Europa League</td>
<td>Rangers v Spartak Moscow</td>
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<tr>
<td>Wednesday 5 December</td>
<td>Scottish Premier League</td>
<td>St Johnstone v Hearts</td>
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<td>Saturday 8 December</td>
<td>Scottish Premier League</td>
<td>Celtic v Kilmarnock</td>
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<tr>
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<td>Scottish Premier League</td>
<td>Livingston v Hearts</td>
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<td>Wednesday 19 December</td>
<td>Scottish Premier League</td>
<td>Hibernian v Rangers</td>
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<tr>
<td>Saturday 29 December</td>
<td>Scottish Premier League</td>
<td>Rangers v Celtic</td>
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Deputy Chief Constable Mark Roberts, South Yorkshire Police

Deputy Chief Constable Mark Roberts has been the NPCC lead for football policing since 2014. As Divisional Commander for Trafford in GMP between 2009 and 2014, he was responsible for policing Old Trafford, home to Manchester United. During this time, he was also a silver commander for England, travelling abroad to numerous fixtures including the EURO 2012 tournament. DCC Roberts was in charge of Old Trafford for the football events there during the 2012 Olympics and led on numerous other high profile matches at Manchester City and the other clubs in Greater Manchester, as well as concerts and the Ashes cricket at Lancashire County Cricket Club. He was the silver commander for the 2011 riots in Manchester and Salford.

DCC Roberts was the lead for UK policing support to France in 2016, overseeing the operations for England, Wales and Northern Ireland, and support to the operation in Russia for the 2018 World Cup. He leads on policy for the police service in discussions with the government, the football authorities and other agencies. DCC Roberts regularly contributes to reviews on football policing and was a critical friend to preparations for the UEFA Champions League (UCL) final in Cardiff.

Steve Neill

Steve served with Northumbria Police ending his 30 years’ service as chief superintendent, with responsibility for Operations Department including the football portfolio. Steve has extensive experience at all ranks in policing football and was the lead commander for both Newcastle United and Sunderland football clubs. Steve was the silver commander for numerous local derbies between these clubs, during which he introduced a new supporter engagement and neighbourhood-policing model, which directly led to reduced disorder at these fixtures and greater trust between supporters and police. For the last four years of his service, Steve served as an England overseas commander most notably leading the English policing delegation on the ground during the European Championships in France in 2016.

Upon retiring from the police, Steve took up a position as Head of Safety and Security at Sunderland Football Club and is now a fully qualified safety officer. Steve also holds an MBA from Northumbria University. Hailing from Banbridge in Northern Ireland, Steve also lived in Edinburgh and Irvine for many years giving him an understanding of some of the context in which Scottish football takes place.
Adrian Roberts,  
UK Football Policing Unit  

Adrian retired from the Metropolitan Police in 2014 as one of the country’s most experienced public order commanders, having commanded numerous high-profile events at all levels, including large-scale demonstrations, major safety / security operations, and local / force-wide football operations.

On retirement, Adrian became the Head of Safety & Security and Safety Officer at Crystal Palace Football Club, gaining a valuable understanding of football safety / security operations from the view of a Premier League football club. He then became a safety and security consultant, delivering presentations / training and advice to senior police officers and strategic managers at home and abroad in public order, command and control, and spectator safety at large sporting events (including football matches); together with conducting peer safety / security reviews, including Wembley Stadium and the London (Olympic) Stadium.

Adrian is now an assistant director within the Home Office’s UK Football Police Unit, where amongst other responsibilities he is able to maintain a current knowledge around best practice with regard to delivering football-policing strategies both in the UK and abroad.

Kirsty Haken,  
South Yorkshire Police  

Kirsty Haken is the deputy head of corporate communications at South Yorkshire Police. After spending more than 13 years across the communications spectrum, Kirsty brings experience of policing and wider public sector communications from a tactical and strategic perspective.

Kirsty most recently managed the communications around the policing operation for the Russia World Cup 2018, supporting the National Police Chiefs’ Council Football Policing Lead, providing specialist advice to police teams in the UK and Russia and delivering effective communications to local, national and international media outlets.
Chief Inspector Melita Worswick, College of Policing

Melita is a Greater Manchester Police officer currently seconded to the College of Policing as the policing standards manager for specialist operations, which includes public order and public safety. She is responsible for the public order and public safety training, which includes, but is not limited to, the accreditation and continuous professional development of commanders and POPS advisors (was TAC Ads).

Melita is an accredited silver commander and has experience of working in this role at a variety of events including, Cat A, B, C and CIR football fixtures. She maintains her accreditation while at the college. After nine years as an experienced and accredited bronze commander working a number of football fixtures, Melita ceased this role in March 2018. To further her currency she continue to assess on the command courses in Greater Manchester.

Melita is a qualified trainer with a PGCE and has experience of training at a number of levels.

Philip Birchenall, College of Policing

Philip Birchenall is an experienced public order command trainer, tactical / public order public safety advisor now working as curriculum designer for the public order public safety team at College of Policing. As a serving Greater Manchester Police officer, Phil has worked on major events ranging from the riots of 2001 and 2011, Commonwealth and Olympic Games to state visits and government conferences. As well as training domestic commanders, Phil has trained many members of the international policing community. He was able to draw upon his extensive experience of advising at both domestic and international football fixtures when writing the new C4 Event Command Module.
Ken Scott FRICS,  
Sports Ground Safety Authority

Ken has presented papers across the country speaking on all aspects of the building regulations, but specialises in safety of sports grounds and crowd management at large outdoor events. He served as chair of the Core Cities Group and its Safety at Sports Grounds and Events Working Group and was chair of the Sunderland Stadium of Light Safety Advisory Group before joining the Sports Grounds Safety Authority (SGSA) in 2013.

In April 2016, Ken became head of inspectorate at SGSA. Ken was a co-author of the Football Stadia Improvement Fund / FLA Sports Ground and Stadia Guide No 3 on Concourses and co-author on a new SGSA guide on alternative uses of sports grounds. He is also co-author of the RICS guidance document Sports Grounds Certification published in 2012. He also took the strategic lead role and is co-author of the Guide to Safety at Sports Grounds sixth edition (the Green Guide) published in 2018. The document is widely respected around the world as the leading guidance document on safety of sports grounds.

As a member of a BSI technical committee working on spectator safety, Ken sits on the CEN committee looking towards standardising legislation and guidance on spectator safety across Europe.

Ken is also one of a small team of experts supporting the Interpol Stadia Knowledge Management System, a platform set up to share best practice harvested from the world's largest sporting events.

Ken is frequently asked to present papers on sports grounds safety and has travelled the world to share his expertise to delegates ranging from independent venues to world and national governing bodies, governments and trade organisations.