

# **Euro Sunday: 2023 Stocktake**

***A report from The Baroness Casey of Blackstock DBE CB to The Football Association Board, on progress against the recommendations set out in the Independent Review of Events Surrounding the UEFA Euro 2020 Final at Wembley (Euro Sunday).***

## Summary

I have been pleased to see the progress that has been made since my report and the seriousness with which The FA, Wembley and all its key partners have taken the issues and risks identified from the Euro Sunday experience.

Physical security improvements have been implemented to good effect and there is much more effective collaboration between all partners. There is broad consensus about this positive progress amongst stakeholders, with a strong commitment to building on it.

I find The FA and Wembley 'match-fit' for hosting the Champions League Final in 2024. The action they and their partners (notably the Metropolitan Police and Brent Council) have taken to deliver safe events and learn from Euro Sunday are to be commended and new arrangements are resulting in more effective operations for major events. My stocktake recommendations focus on building on this success, ensuring that effective operations can be maintained for the Euro 2028 Finals and sustained in the longer term, surviving inevitable changes in personnel and organisational dynamics.

- The FA and its partners should take the opportunity of the Champions League Final in 2024 to capture best practice for ensuring the safety and security of events, codifying it for the future and setting out the criteria for matches of national significance. Government should formalise these arrangements and the categorisation of matches of national significance.
- The SGSA should engage The FA in the further work they are taking forward on stewarding, and the SGSA should identify and implement solutions to structural and other challenges so that the stewarding industry is in a better position to manage future major events.
- The FA should work with its partners to codify best practice in management of Wembley Stadium's Zone Ex so that its 'Best in Class' approach can be sustained.
- The FA should amplify enforcement tools in its communications to promote positive fan behaviours, and ensure it can gauge the impact of its campaigns.
- Government should take the earliest opportunity to legislate on tailgating. While not ideal, Wembley, the Met Police and Brent should work together in advance of new laws to use all existing deterrence and sanctions to tackle tailgaters.

## Introduction

Earlier this year, I was asked by The Football Association to undertake a stocktake on progress against the recommendations set out in my independent review into 'Euro Sunday'.

I start by acknowledging the positive and proactive stance that The FA have taken in inviting me back to review progress. I regard that as a healthy step and one that demonstrates a strong sense of responsibility and accountability on the part of The FA to public safety, security and service.

The events of 11 July 2021, surrounding the Euro Final between England and Italy at Wembley, saw the disgraceful behaviour of thousands of ticketless 'supporters' – trying to force their way into the stadium and creating significant levels of disorder in and around the ground - putting the safety and security of thousands of law-abiding fans, Wembley staff, police officers and other members of the public at risk. My 2021 review sought to understand what happened and determine lessons to prevent any future similar occurrence.

In addition to analysing what happened in the run-up to and during the events of Euro Sunday, my 2021 review made six main recommendations: Five for national consideration by Government and other bodies; and one – with three elements – specifically for The FA, Wembley and its partners.

## The stocktake methodology

At The FA's request I have carried out a stocktake during August and September 2023 to review progress against these recommendations, assisted by Eric Stuart QPM, a former Police Officer and specialist crowd safety consultant, and Neil O'Connor CBE, a former Senior Civil Servant.

To review progress against my six original recommendations, written submissions were sought from seven organisations - The FA/Wembley, the Metropolitan Police, Brent Council, the National Police Chiefs' Council UK Football Policing Unit, British Transport Police, the Sports Ground Safety Association and the Department for Culture, Media and Sport – with follow-up meetings held to discuss the issues raised. I also discussed progress with the Football Supporters Association.

Preceding this engagement, Eric Stuart undertook a site visit to the stadium, conducted detailed interviews and follow-up visits with Wembley safety and security staff and the SGSA, and witnessed operations and the control room during the Community Shield match on 6 August. Eric also critically reviewed Professor Chris Kemp's review of Wembley Stadium planning, management and communication systems and structures, commissioned by The FA for the Carabao Cup Final on 26 February 2023. Eric's detailed report of his site visits, interviews and review of Professor Kemp's review has been shared with Wembley colleagues and I have taken it into account in my assessment.

## The stocktake in detail

I pay credit to The FA and Wembley for – rightly, as the venue owners and managers - taking a high degree of responsibility and adopting a proactive approach through which they have invested significant time, money and effort to achieve the best possible outcomes. This has resulted in extensive improvements to the physical safety and security of the stadium, at a high cost and to good effect. There is now better quality stewarding and much more operational effectiveness between Wembley and its key partners in and around Wembley, including in the management of Zone Ex.

The Metropolitan Police and Brent Council, along with other partners, have also significantly stepped up their input to major events at Wembley, with more effective commitment and collaboration evident, and a much more rigorous approach to public order around Wembley stadium for significant events.

The Government has acted on my recommendation to increase the sanctions available to deter football-related disorder and work to review the challenges facing the stewarding industry has begun.

Nevertheless, there remains an important legislative step to be taken to penalise ‘tailgating’ and other related reckless behaviour.

Further steps are also being taken – and are necessary – to address the challenges facing the stewarding industry and to improve it for the future.

There also remain some areas where further improvements should be considered to clarify leadership, accountability and oversight - both for the overall management of major events and the management of Zone Ex. The FA, Wembley and its partners have an opportunity to build on the progress they have made together in the build up to hosting the Champions League Final in 2024 and the UEFA EURO 2028 - UK & Ireland, with the support of Government and other key partners.

Planning for these future events should be considered a vital opportunity to codify, formalise and safeguard the improvements and good practices that have been achieved over the last two years, and to guard against changes in personnel or loss of corporate memories across the different organisations that contribute to safe, secure and successful national events for the public – at Wembley and elsewhere.

This is important because the threat of disorder from some sections of the football community remains – we heard during the stocktake that such disorder remains ascendant in many countries since the Covid Pandemic period - and there remain other threats from individuals and organisations outside the football community with malicious intent.

I set out here in more detail the findings from my stocktake of progress against each of my original recommendations. My earlier recommendations are *italicised* and my conclusions from the stocktake are set out below each in plain text with new recommendations in **bold**.

## **2021 REPORT RECOMMENDATION 1**

*I recommend that the Government considers a new category for football matches of national significance.*

I am disappointed that this recommendation has not yet been adopted. I remain of the view that there are some major football matches – exceptional in nature and rare in frequency – that warrant a higher degree of resourcing, management and oversight and the commitment of all parties to a ‘no fail’ approach.

DCMS told us that the current categorisation of threat and risk assessments for football matches is determined by the police, and that any event receiving direct Exchequer investment will inherently be treated as nationally significant by Government, with DCMS engaging with governance and oversight with that in mind.

Police colleagues expressed the view that formal categorisation at the national level would be beneficial if it brought with it extra powers of intervention, additional oversight mechanisms or more resources.

At a practical level, Government and local partners felt there was now much better recognition of matches of national significance and that stronger approaches to managing these were being implemented by partners, based on a ‘reasonable worst-case planning’ approach and a ‘C3’ (command, control and co-ordination) plan.

We heard that the police have simplified their categorisation of matches from A/B/C/CIR where A was the lowest and CIR (Increased Risk) was highest, to high, medium or low; and that there is now a police option to define a game as one of ‘Risk of National Significance’. The FA Cup Final in 2023 and Women’s Euros Final in 2022 were cited as examples where the higher categorisation had been applied.

Nevertheless, partners recognise that while management of major events, and collaboration between them, is much improved since Euro Sunday, there remain some areas that could be strengthened to manage risks in the longer term:

- The leaders and organisations currently engaged in the management of major events at Wembley have a clear commitment to what some described as a ‘no fail’ approach that can withstand the most severe tests. But some vulnerabilities could develop over time if current relationships, personnel, levels of commitment (and, frankly, memory of how events unfolded on Euro Sunday) were to change or recede.
- There is also some uncertainty amongst partners as to what the correct procedures are for escalating or resolving differences of opinion over the management and resourcing of major events, despite the guidance (DCMS’s Gold Framework and the SGSA’s Green Guide, for example) and structures available (such as the local authority-chaired Safety Advisory Group).
- Local partners feel the guidance available is not sufficiently detailed.

I believe there is an opportunity for the partners involved in running major events at Wembley and its surrounds to work together to better codify the good practice arrangements and procedures that are now in place for management and oversight of such events, and for the escalation of issues where agreement proves challenging or where partners feel their views are not being addressed.

National and local partners should also take this opportunity to go further in setting down and agreeing the criteria that should be used to identify matches of national significance, the actions they trigger, and whose agreement or approval should be required – to formalise these so that they can be sustained through future changes in personnel and organisational dynamics.

I noted that DCMS have begun to implement some criteria through their Gold Framework for events that attract Government support. This could be taken further.

The FA suggested that a new approach to identifying football matches of national significance might include the following, and I set these out here as a basis for future dialogue between partners:

**Criteria:**

Global mega event;  
Bid event (not BAU);  
Significant global profile/media interest;  
Significant Govt funding;  
Significant risk;  
Significant operational complexity;  
Significant geographical reach.

**Example events:**

FIFA World Cup;  
UEFA EURO;  
UEFA CL Final.

**Approval process:**

Event owner applies;  
Support from key stakeholders (e.g. police) achieved;  
Government (DCMS) approval.

**Measures:**

Partners commit to 'no fail' approach;  
Partners prioritise and allocate resource/  
time/senior leadership;  
Independent assurance included in  
governance;  
Additional oversight group in place  
(Ministerial chair to be decided);  
Powers given to partners to unlock  
resources as required.

The introduction of external and objective challenge to oversight arrangements – to 'kick the tyres' on assumptions and planning – has been suggested as an additional element that could be built in for the future.

Codifying the best practice arrangements for managing matches of national significance could take the form of a 'Con-Ops' (concept of operations) drawn up between partners to agree and clarify roles and procedures, based on principles of mutual aid, without altering legal or statutory responsibilities of any individual organisations.

This work could be taken forward with the SGSA, who indicated a willingness to contribute to such an exercise and, potentially, with Government, seeking their endorsement and agreement, particularly where national oversight is necessary.

An agreed Con-Ops could be tested and supplemented through scenario planning and exercising, ahead of the Champions League Final. There are organisations in the civil contingencies world who might be able to facilitate or assist in this area.

**I recommend that The FA, with DCMS, the SGSA and its local partners (in particular the Met Police and Brent Council) take the opportunity of the Champions League Final on 1 June 2024 to capture best practice for ensuring the safety and security of events, codifying it for the future (and potentially for other venues across the country) and setting out the criteria for matches of national significance. Government should then formalise these arrangements and the categorisation of matches of national significance in line with my original recommendation, and ahead of the UEFA EURO 2028 - UK & Ireland.**

The same opportunities exist in relation to management of Zone Ex which I comment on against recommendation 3 below.

## **2021 REPORT RECOMMENDATION 2**

*I recommend that the Government consider tasking the SGSA to work with The FA and the event industry to undertake a review of stewarding.*

This recommendation has been partly acted on, but there is more to do.

At DCMS's request, the SGSA have undertaken a review of stewarding with research in two phases: looking first to improve understanding of the labour market for stewarding; and second to examine structural issues contributing to the current challenges.

We heard some criticism that the research had been narrow in its engagement, but the SGSA is now establishing a stewarding reform working group to take its research forward and address the stewarding challenges within football. Their plans include the development of factsheets, and policy guidance and training on the Security Industry Authority sports ground exemption. The establishment of a working group and further stage of work to address stewarding challenges provides an opportunity to widen engagement and go further to address structural and other challenges to improve stewarding in the UK.

We heard from The FA and other stakeholders several views and suggestions about how stewarding capacity and capability could be improved and were impressed with the changes Wembley have instigated to improve the quality of stewarding at the stadium – including a

standing contract, with budgetary cover, to ensure contracted security/stewarding companies pay the London Living Wage as a minimum.

I know that The FA are keen to feed their suggestions into further stages of the SGSA's work and the SGSA have indicated their willingness to ensure such engagement.

**I recommend the SGSA engage The FA in the further work they are taking forward on stewarding, and that the SGSA take the opportunity to identify and implement solutions to structural and other challenges so that the stewarding industry is in a better position to manage future major events, including UEFA EURO 2028 - UK & Ireland.**

### **2021 REPORT RECOMMENDATION 3**

*The SGSA, the events industry, the police and local government agree on a way forward on who is accountable for Zone Ex.*

I heard positive feedback from all involved about the new arrangements that have been put in place for the management of Zone Ex since Euro Sunday, based on a 'Best-in-Class' approach. In particular, I heard praise for and was impressed by:

- The arrangements The FA and Wembley have put in place for Operational Command of Zone Ex from Wembley Stadium, with all partners co-located in a dedicated Zone Ex Ops Room, next to the main Control Centre, and with direct communication to it and the Emergency Services.
- The steps Brent Council have taken to implement the Public Space Protection Order, particularly to control the sale and consumption of alcohol around Wembley on the occasions of major events.
- The more proactive stance and presence of the Metropolitan Police and its approach to enforcement.
- The better presence of Wembley stewards, local authority enforcement officers and police across the Zone for major events.

I heard that further steps to strengthen the controls on alcohol sales around Wembley – for example through the possible addition of licensing conditions – were being kept under review for the future. It seems sensible to me to keep such steps in mind for future deployment if necessary.

The partners around Wembley Stadium are working much more effectively together for the public currently, and are demonstrating best practice in the management of Zone Ex. However, as with the arrangements for overall management of major events, there remain some ambiguities that concern partners and which could create vulnerabilities in the longer term should partnerships and personalities not remain as strong as at present.

It was acknowledged clearly by partners that there were local complexities and different legal responsibilities present in the management of Zone Ex. I understand these, and the need to observe and work to them, but believe – as with overall event management under recommendation 1 above – that there is an opportunity for The FA, Wembley and its national and local partners to better codify the procedures for operational management and oversight of the Wembley Zone Ex so that the ‘Best-in-Class’ approach that has been adopted can be sustained and indeed learned from.

**I recommend that The FA continues to work with its national and local partners to codify best practice in management of Wembley Stadium’s Zone Ex so that its ‘Best in Class’ approach can be sustained up to and including the UEFA EURO 2028 - UK & Ireland Euro Finals 2028.**

#### **2021 REPORT RECOMMENDATION 4**

*I ask that The FA - as the governing body that oversees football - lead a national campaign to bring about a sea-change in attitudes towards supporter behaviours.*

This was one of my most important but also most challenging recommendations.

Behaviour change is on the one hand one of the most enduring and impactful outcomes that can be achieved to tackle social ills. But it can also be the most difficult to achieve, requiring a broad range of tools and approaches to effect change.

I was pleased to hear about and see examples of the campaigns which The FA have adopted to try to educate and influence positive fan behaviours and to isolate and set clearer expectations on negative behaviours such as tragedy chanting and racism.

As part of its campaign, I was told that The FA has a working group that is monitoring its campaigns and will be identifying outcome measures against which their impact can be assessed.

I also saw and heard about new approaches to enforcement, using the improved technology at Wembley and rapid communications between Wembley staff and the Police to identify, target and tackle individual fans and groups of fans displaying negative and criminal behaviours. Application of the Public Space Protection Order in Zone Ex was another example of this good practice. Effective use of enforcement – and awareness of its use – can form an important part of any approach to behaviour change.

Stakeholders expressed awareness of The FA’s campaigns in this space and stood ready to engage and support such work more actively.

**I recommend that The FA amplifies enforcement tools in its communications to promote positive fan behaviours, and takes steps to ensure it can gauge the impact of its campaigns.**



## **2021 REPORT RECOMMENDATION 5**

*I recommend that the Government consider strengthening the penalties for football-related disorder, particularly behaviours which recklessly endanger lives and these penalties should be well understood and robustly enforced.*

Government has responded to this recommendation and has introduced a series of changes in relation to the existing Football Banning Order (FBO) legislation, including:

- Adding Class A drug offences at matches and football-related online hate crime to the list of offences for which an FBO can be imposed on conviction;
- Amending the threshold for the imposition of an FBO to make it more likely that courts impose an FBO following conviction for football-related offences; and
- Extending the legislation to women's elite domestic football.

As discussed under recommendation 3 above, better use is being made of civil and criminal sanctions to tackle anti-social and criminal actions in and around Wembley.

One significant issue remains to be tackled. That is the practice of 'tailgating' and other associated behaviours that involve ticketless fans trying to gain illicit entry to Wembley stadium. Such behaviours carry significant risk for the safe and secure management of major events. A small number of ticketless fans trying again and again to gain illicit access cause distress to legitimate fans around them and divert significant resources away from stewardship and wider management, security, safety and public enjoyment of the event.

Some consideration had been given to applying civil sanctions to tailgating, potentially under the Public Spaces Protection Order, but most partners I spoke to were concerned that such measures, which would only allow the imposition of relatively small fines, would not have sufficient deterrent impact. I agree a criminal sanction is necessary – with the ability to apply Football Banning Orders, and to apply these across the surrounding area where links to the match are clear.

I understand the current Policing Minister, Chris Philp MP, visited Wembley and saw first hand instances of tailgating.

**I recommend that The FA and Met Police continue to press for early legislative action on tailgating and that Government take the earliest opportunity to legislate. While not ideal, Wembley, the Met Police and Brent should work together in advance of new laws to use all existing deterrence and sanctions available to them to tackle tailgaters with the same concerted effort that some ticketless fans use to try to gain illicit entry.**

**2021 REPORT RECOMMENDATIONS 5 A), B) AND C) SPECIFICALLY FOR THE FA/WEMBLEY AND KEY PARTNERS:**

*a) The FA and Wembley should strengthen plans for safety both physical and human, ahead of any matches or events of significant risk. This should include but not be limited to:*

- *The physical fences and means of separating and filtering unticketed fans from those with legitimate access.*
- *Particular attention should be made to ensuring those entering through gates provided for wheelchair users and other more vulnerable members of society are not endangered by the reckless actions of others.*
- *A staff survey of all those involved with security, stewarding and safety on Euro Sunday so The FA can be doubly sure their views are taken into any future changes.*
- *Security plans should be regularly peer reviewed by experienced safety and security professionals to ensure rigour.*
- *The incoming Chair of The FA should take steps to be sure that she and The FA Board have suitable oversight of safety and security at Wembley Stadium.*

*b) A more joined up approach between Wembley and the MPS is required to managing public safety on match-days, including joint tasking and debriefing of operational teams.*

*c) The key partners represented on the Wembley SAG, most notably the MPS, The FA and Brent Council, need to make a concerted effort to proactively solicit and listen to each other's concerns and avoid any single agency from becoming too dominant.*

Everything I have seen and been told in written submissions, discussions, site visits and in Eric Stuart's detailed examination of improvements and current arrangements pertaining to crowd safety indicate that The FA and Wembley have fully implemented recommendation 5 a). Indeed, they have gone further – and are to be commended for doing so.

Improvements seen during this stocktake, in addition to much improved collaboration and engagement between relevant parties, include:

- A new and considerably enhanced Control Room with upgraded CCTV;
- A new dedicated Zone Ex Operations Centre with a multi-agency presence and multi-task focus, linked directly to the Control Room;
- Upgrades to the Pass Gates, which were a means of illegal entry for many during the 2021 disorder, to incorporate a double airlock system;
- Additional magnetic locks on the final exit emergency doors, allowing increased magnetic strength to be applied by the safety officer to prevent unauthorised access;
- Installation of higher speed entry turnstiles at the hospitality entrances, reducing queues and potential for attack from outside;
- Increased use of body worn cameras;

- The creation of an evidence pod within the control room, permitting the processing of footage and speedy transfer to the police for action;
- Deployment of a mobile deputy safety officer for every event, increasing resilience; and
- Better communications with staff and partner organisations/agencies.

The only aspect remaining to be completed is a strengthening of the stadium perimeter by means of a new fence line, which has had to go through a planning permission process and is reported to be on track for completion ahead of the 2024 Champions League Final.

I believe recommendations b) and c) have been implemented by The FA, Wembley, the Met Police and Brent Council to the best of their current abilities and the approaches they have all applied demonstrate a high degree of commitment and proactiveness. The issues at play here overlap with those I have identified above under recommendations 1 and 3, namely around remaining areas for improvement to sustain and codify good practice and procedures for oversight and escalation.

### Conclusion

I was pleased and honoured to be asked to undertake this stocktake of progress against my 2021 review and have been impressed by the good work carried out at Wembley by The FA and Wembley staff, as well as by the commitment and collaboration of Wembley's key partners in the Met Police and Brent Council.

Wembley and its partners recognise that there is no room for complacency and have demonstrated a commitment to continue to work to improve and sustain the safety, security and enjoyment of events at Wembley Stadium.

The staging of the Champions League Final at Wembley in 2024 and the UK hosting UEFA EURO 2028 - UK & Ireland should provide opportunity and incentives for Government to go further to formalise arrangements for matches of national significance, to ensure improvements in stewarding and to put new laws in place to penalise tailgating.

**BARONESS CASEY OF BLACKSTOCK DBE CB**  
**NEIL O'CONNOR CBE**  
**ERIC STUART QPM**

**31st October 2023**