



House of Commons  
Home Affairs Committee

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# The Cost of Policing Football Matches

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**Tenth Report of Session 2008–09**

*Report, together with formal minutes, oral and  
written evidence*

*Ordered by the House of Commons  
to be printed 14 July 2009*

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## The Home Affairs Committee

The Home Affairs Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Home Office and its associated public bodies.

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### Powers

The Committee is one of the departmental select committees, the powers of which are set out in House of Commons Standing Orders, principally in SO No 152. These are available on the Internet via [www.parliament.uk](http://www.parliament.uk)

### Publication

The Reports and evidence of the Committee are published by The Stationery Office by Order of the House. All publications of the Committee (including press notices) are on the Internet at [www.parliament.uk/homeaffairscom](http://www.parliament.uk/homeaffairscom). A list of Reports of the Committee since Session 2005–06 is at the back of this volume.

### Committee staff

The current staff of the Committee are Elizabeth Flood (Clerk), Eliot Barrass (Second Clerk), Elisabeth Bates (Committee Specialist), Sarah Harrison (Committee Specialist), Darren Hackett (Senior Committee Assistant), Ameet Chudasama (Committee Assistant), Sheryl Dinsdale (Committee Assistant) and Jessica Bridges-Palmer (Select Committee Media Officer).

### Contacts

All correspondence should be addressed to the Clerk of the Home Affairs Committee, House of Commons, 7 Millbank, London SW1P 3JA. The telephone number for general enquiries is 020 7219 3276; the Committee's email address is [homeaffcom@parliament.uk](mailto:homeaffcom@parliament.uk).

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# The cost of policing football matches

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## Background

1. The provision of policing at a football match, or any other commercial event such as a music concert is a “special police service”.<sup>1</sup> Special Police Services are governed by section 25 of the Police Act 1996:

The chief officer of police of a police force may provide, at the request of any person, special police services at any premises or in any locality in the police area for which the force is maintained, subject to the payment to the police authority of charges on such scales as may be determined by that authority.

2. In effect special police services are extra police officers provided for the purposes of security at commercial events. The event organiser must pay for this service at a price determined by the chief constable; if the cost is not met then the organiser can be denied a safety certificate and cannot hold the event. In 2008, ACPO made a submission to the Home Office for its Green Paper on the future of policing. In this submission it called for the introduction of “full-cost” policing. Full-cost policing would extend the definition of special police services beyond the “footprint” of the event and include so-called “consequential policing”, that is policing which is provided beyond the event itself at train stations or town centres to deal with crowds arriving at and leaving a commercial event. Our inquiry investigated special police services by focusing on the cost of policing football matches, how this is calculated and how this cost is to be met.

3. On Tuesday 16 June we took oral evidence from Assistant Chief Constable Simon Thomas and Mr Derek Smith, Association of Chief Police Officers (ACPO) Leads on Football and Finance respectively; Bill Bush, Director, Public Policy and Communication with the Premier League, and Andy Williamson, Chief Operating Officer at the Football League; and Dave Whelan and Brenda Spencer, Chairman and Chief Executive of Wigan Athletic Football Club, and Graham Turner, Chairman of Hereford United Football Club. We have also received written evidence from a number of interested parties which is published with this Report. We thank everyone who gave evidence to us.

## The Current Arrangements

4. Football clubs are currently only legally obliged to pay for the policing on their “footprint”, usually inside the stadium and surrounding car parks; the provision of “consequential policing” outside a football match, for example at a railway station or in the city centre, is currently the responsibility of the police and is provided at their discretion and at a cost to them. Clubs do not have to pay for this “extra” service. This has led to a disparity between what the police estimate the total cost of policing a football match to be, and what the clubs currently pay. In the season 2007–08 it is estimated that the policing of 13 Premier League football clubs cost the police £3.2 million in consequential policing.<sup>2</sup> This difference

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<sup>1</sup> Other examples of Special Police Services include the policing of music concerts, assistance for film-makers and the policing of film premieres, and country shows.

<sup>2</sup> “Football ‘should pay for police’” *BBC News Online*, 12 August 2008.

must be met by the taxpayer. This disparity is the result of current case law and Home Office guidance over the charging for the policing of football matches; the result is that “some forces recovered less than half, some as much as two thirds of the costs of policing football”.<sup>3</sup>

5. The debate over “full-cost” policing rests on the issue of “additionality”, extra services that the police provide because of the football match. The police argue that:

Policing full commercial events—and that includes football—is based on the premise that we buy in additional resource, in other words police on overtime, so that we maintain our core resources to police communities.<sup>4</sup>

Any police presence is “on top of the standard of normal policing”<sup>5</sup> at that time. The service they provide is over and above what the community would normally be paying for. The football match is the source of this extra expense, regardless of whether the police presence is on the club’s “footprint” or not.

6. The clubs argue that the distinction is not as clear cut as that. They neither require nor request police presence away from their “footprint” and should not be liable for the cost of providing police elsewhere:

Our clubs feel that they pay the full cost of deployment of the police which they require for policing in the ground and in the land immediately close to it which is wholly under the club’s control for the purposes of organising the match ... when fans are moving to and fro between town centres, transport intersections, hubs and the ground, they are there as citizens rather than as spectators.<sup>6</sup>

The Premier League also made it clear that “all our clubs believe that they meet the charges for the special police services which they request as legislation requires”<sup>7</sup> and that “football will contribute about £1 billion to the exchequer each year”.<sup>8</sup> The clubs therefore pay for what the law mandates and pay taxes to finance any police “additionality”. The running of their event does not depend on the presence of police in city centres and railway stations; therefore they should not be liable for paying for these.

7. Current case law and Home Office guidance supports this view and clubs are currently only charged the “full cost” of those officers deployed on their footprint.<sup>9</sup> However, recent high-profile disputes between football clubs and the police over the charges levied by the police have highlighted:

A lack of clarity in recent years ... the difficulties that we have had in terms of football have been around the fringes of what is clear, transparent and consistent about what

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<sup>3</sup> Q1

<sup>4</sup> Q21

<sup>5</sup> Q29

<sup>6</sup> Q34

<sup>7</sup> Q47

<sup>8</sup> Q49 Figures provided by Deloitte.

<sup>9</sup> Ev 17

relates to the total policing deployment and the chargeable element which comes from that.<sup>10</sup>

It is this lack of clarity over who is responsible for the provision of police services at a football match and similar events is that the source of the recent disputes between football clubs and police forces.

**8. It is right that an increase in police costs which is attributable to the policing of a football match should be met by the clubs rather than the taxpayer. Clubs should continue to pay the total cost of policing on their “footprint”. Equally, where it can be shown—using evidence which is available to the clubs—that the police are also incurring costs because of “consequential policing”, this should also be met by the club. However, clubs should not have to meet the cost of “consequential” policing that is not a direct result of their activity. Any new arrangements must allow this distinction to be made and not merely be a blanket proposal.**

### Costs

9. It is impossible to provide “average” figures for the amount football clubs spend on policing annually as every club is different and requires different methods of policing. However, in absolute terms the figures are substantial. Wigan Athletic told us that in 2007–08 they paid “about £240,000”<sup>11</sup> for policing; while Hereford United paid £80,000.<sup>12</sup> In total football clubs paid “between “£12 and £15 million” to the police in the season 2007–08, in addition to the £1 billion they paid the exchequer in taxes. Derek Smith also told us that the “cost of policing in terms of the total revenue income of football was ... about 0.6 to 0.7%”.<sup>13</sup> This figure does not include the costs of stewarding at each game—which over the course of a season runs into many thousands of pounds—or the amount clubs have spent in recent years on CCTV and all-seater stadia, which all increase safety inside the grounds.

10. This annual outlay has made football a safe environment and “relatively trouble-free”.<sup>14</sup> Home Office figures state that 72% of matches see a maximum of one arrest and there is an average of only 1.2 arrests per game.<sup>15</sup> Typical deployments of officers are significant; even at the smallest, lowest risk (Category “A”) game, 35 officers will be deployed and 20 charged for.<sup>16</sup> Graham Turner told us that “we [Hereford] had two arrests last season”<sup>17</sup> and there is no trouble after their games.<sup>18</sup> While the police are motivated by the need to secure public safety, the question arises whether the police’s response is proportionate to the risk at Hereford United and other, mostly lower league, clubs.

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<sup>10</sup> Q15

<sup>11</sup> Q71

<sup>12</sup> Q82

<sup>13</sup> Q21

<sup>14</sup> Q13

<sup>15</sup> Q13

<sup>16</sup> Ev 17

<sup>17</sup> Q78

<sup>18</sup> Q95

11. While we are of the opinion that clubs should pay the full cost of the policing which can be directly attributed to their match we also urge the police to recognise the amount of effort the clubs have expended to increase safety at the grounds and the change in atmosphere at football matches. We doubt the necessity of deploying up to 150 police officers on top of the hundreds of stewards<sup>19</sup> at an event which has on average 1.2 arrests. Unless there is specific intelligence of possible trouble which can be shared with the clubs, the police should consider reducing the deployment of officers and they should share intelligence with the clubs to better identify the policing needs and reduce them wherever possible.

## How the Police calculate costs

12. While we are certain that clubs should contribute more towards the cost of policing their matches, we are concerned about the methods used by the police in calculating these costs. We were told that these methods are not as transparent or consistent as they could be. Wigan Athletic in the Greater Manchester Police area, Hereford United in the West Mercia Police area and Sheffield Wednesday in the South Yorkshire Police area have all said to us that changes in the amount charged for police at football matches have come about apparently at the whim of a chief constable.<sup>20</sup> Mr Turner suggested that the sudden demand for payment required by the police could be caused by a change in personnel at West Mercia Police rather than a change in policing requirements.<sup>21</sup>

13. The evidence we received from football clubs suggests that the costs of policing football matches are calculated not on a fairly standardised basis but according to personal interpretation—which may change from year to year—of the police officer in charge. For example, Sheffield Wednesday commented that they were “first charged four hours per officer, then five hours, then six hours per officer per game”,<sup>22</sup> and Graham Turner told us that where previously they paid nothing, Hereford United were suddenly presented with a bill for policing. The number of spectators attending and the potential for trouble at the club’s matches had not changed enormously, yet the police perception of the demands they faced had. We suggest that these variations can be attributed to the grey areas which currently exist in the case law and Home Office guidance which allow too much room for interpretation by individual chief constables.

14. We also heard that it is not clear how much negotiation the chief constable undertakes before deciding the cost to the clubs of policing their event. ACC Thomas assured us that “it [provision of policing] is agreed with the club and it has to be transparent because the club has to have some faith in the system,”<sup>23</sup> yet Dave Whelan said that:

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<sup>19</sup> Q35, Q37

<sup>20</sup> Q67

<sup>21</sup> Q93

<sup>22</sup> Ev 16

<sup>23</sup> Q8

We are not allowed to say what category matches are, how many policemen he sends. That is nothing to do with the football club, it is entirely a police decision and we cannot even question that.<sup>24</sup>

And in written evidence to us, Scunthorpe United told us that:

It is often very difficult, if not impossible to actually see and therefore question the intelligence used by police in determining the categorisation of a match and hence the cost.<sup>25</sup>

This is troubling, especially since the chief constable can withhold the provision of any and all special police services to an event, and effectively deny the organisers a safety certificate. This effectively gives him the power of veto over a football match going ahead. That the costs and charges of the service are decided without consultation is therefore extremely troubling and, “far too much reliance [is] placed upon the relationship between those controlling a football club and the specific Police Officers with whom they liaise”.<sup>26</sup>

15. We are equally concerned that there seems to be no standardised, approved method to decide upon the policing and chargeable element of a football match. It is unacceptable that the charges levied on clubs can change seemingly at the whim of an individual and even what we thought would be standard arrangements such as the length of time officers spend on duty can differ from club to club.<sup>27</sup>

**16. We note the definitive national guidance being drawn up by ACPO and hope that this brings a degree of uniformity into the provision of policing and forms the basis for negotiations between the clubs and the police over the clubs’ liability for payment. That the cost can apparently be decided by one person without consultation and negotiation with the interested parties is unacceptable. We recommend that the proposed ACPO Guidelines be made public and form the basis for negotiation with the clubs over the chargeable element of police services and allow variables such as the length of time officers spend on duty to be standardised across the clubs. We further recommend that the police allow clubs a much greater say in the provision of policing. This must become a more collaborative process, involving an independent outside body if needs be.**

## Clubs in administration

17. A further issue is the behaviour of football clubs which enter administration. The Football League operates a “football creditor” rule which says that before a club can exit administration it must pay off its football creditors in full. Non-football creditors such as the police are classed as unsecured creditors and therefore typically receive a much lower proportion of their unpaid debt.<sup>28</sup> In recent years Leeds United, Bradford City and Leicester City have all exited from administration while paying the police and other non-football creditors a fraction of what they were owed.

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<sup>24</sup> Q 101

<sup>25</sup> Ev 15

<sup>26</sup> Ev 16

<sup>27</sup> Q59

<sup>28</sup> Q56



18. We accept that there may be good reasons why the current insolvency rules for football clubs are in place,<sup>29</sup> but we cannot accept that a club entering administration must pay off transfer fees, perhaps running into millions of pounds, before settling a debt with the police force and community at large. The Football Association should take steps to prevent this from happening. In the context of football the sums which police forces are being advised to write off may be small, but to the community at large the damage is much greater and this harms the relationship between the clubs and the public.

19. While we do not recommend that the Football Association, Premier League and Football League amend the “football creditor rule”, as it is right that clubs cannot renege on their debts to competitors by declaring administration, we would like them to take steps to prevent police forces being left out of pocket in the event of a club entering administration. For example, it may be possible for all clubs entering the Football League to pay a yearly bond as a condition of entry. This money should be used to help meet the costs incurred by the police and other non-football services when a club enters administration. A mismanaged club should not leave the community as a whole short-changed.

## Conclusion

20. At its heart the disparity between what clubs are legally obliged to pay in policing costs and what the police estimate these costs to be stems from grey areas in the current legislation and Home Office guidance. It is not clear to what extent football clubs and other holders of commercial events are liable for policing away from their “footprint”. This has led to a disparity between what the police consider the full cost of policing the football match to be and what the clubs feel themselves liable to pay.

21. Elsewhere in this Report we have suggested practical arrangements that should be introduced to make the policing of football matches more equitable in terms of cost both to the clubs and the public. In particular we have recommended that the clubs pay the full cost of policing which can be attributed to them and the police review their arrangements for policing matches and the process by which these arrangements are decided. We hope these or similar arrangements will solve the problems of payment for all “special police services”, not just football. However, it may be that the lack of clarity and consistency in the system at present prevents a mutually beneficial decision being found. If this is the case we also recommend that the Home Office consider providing legal clarification on the extent to which commercial events are responsible for policing beyond their footprint, if necessary through legislation.

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<sup>29</sup> Q56

## Conclusions and recommendations

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1. It is right that an increase in police costs which is attributable to the policing of a football match should be met by the clubs rather than the taxpayer. Clubs should continue to pay the total cost of policing on their “footprint”. Equally, where it can be shown — using evidence which is available to the clubs — that the police are also incurring costs because of “consequential policing”, this should also be met by the club. However, unless it can be proven that clubs should not have to meet the cost of “consequential” policing” that is the not a direct responsibility of the clubs result of their activity. then we cannot support any moves which would force the clubs to meet this cost as well. Any new arrangements must allow this distinction to be made and not **merely be a blanket proposal**. (Paragraph 8)
2. While we are of the opinion that clubs should pay the full cost of the policing which can be directly attributed to their match we also urge the police to recognise the amount of effort the clubs have expended to increase safety at the grounds and the change in atmosphere at football matches. We doubt the necessity of deploying up to 150 police officers on top of the hundreds of stewards at an event which has on average 1.2 arrests. Unless there is specific intelligence of possible trouble which can be shared with the clubs, the police should consider reducing the deployment of officers and they should share intelligence with the clubs to better identify the policing needs and reduce them wherever possible. (Paragraph 11)
3. We are equally concerned that there seems to be no standardised, approved method to decide upon the policing and chargeable element of a football match. That the charges levied on clubs can change seemingly at the whim of an individual and even what we thought would be standard arrangements such as the length of time officers spend on duty can differ from club to club is unacceptable. (Paragraph 15)
4. We note the definitive national guidance being drawn up by ACPO and hope that this brings a degree of uniformity into the provision of policing and forms the basis for negotiations between the clubs and the police over the clubs’ liability for payment. That the cost can apparently be decided by one person without consultation and negotiation with the interested parties is unacceptable. We recommend that the proposed ACPO Guidelines be made public and form the basis for negotiation with the clubs over the chargeable element of police services and allow variables such as the length of time officers spend on duty to be standardised across the clubs. We further recommend that the police allow clubs a much greater say in the provision of policing. This must become a more collaborative process, involving an independent outside body if needs be. (Paragraph 16)
5. The Football Association should take steps to prevent this from happening. In the context of football the sums which police forces are being advised to write off may be small, but to the community at large the damage is much greater and this harms the relationship between the clubs and the public. (Paragraph 18)
6. While we do not recommend that the Football Association, Premier League and Football League amend the “football creditor rule”, as it is right that clubs cannot

renege on their debts to competitors by declaring administration, we would like them to take steps to prevent police forces being left out of pocket in the event of a club entering administration. For example, it may be possible for all clubs entering the Football League to pay a yearly bond as a condition of entry. This money should be used to help meet the costs incurred by the police and other non-football services when a club enters administration. A mismanaged club should not leave the community as a whole short-changed. (Paragraph 19)

7. At its heart the disparity between what clubs are legally obliged to pay in policing costs and what the police estimate these costs to be stems from grey areas in the current legislation and Home Office guidance. It is not clear to what extent football clubs and other holders of commercial events are liable for policing away from their “footprint”. This has led to a disparity between what the police consider the full cost of policing the football match to be and what the clubs feel themselves liable to pay. (Paragraph 20)
8. Elsewhere in this Report we have suggested practical arrangements that should be introduced to make the policing of football matches more equitable in terms of cost both to the clubs and the public. In particular we have recommended that the clubs pay the full cost of policing which can be attributed to them and the police review their arrangements for policing matches and the process by which these arrangements are decided. We hope these or similar arrangements will solve the problems of payment for all “special police services”, not just football. However, it may be that the lack of clarity and consistency in the system at present prevents a mutually beneficial decision being found. If this is the case we also recommend that the Home Office consider providing legal clarification on the extent to which commercial events are responsible for policing beyond their footprint, if necessary through legislation. (Paragraph 21)

# Formal Minutes

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**Tuesday 14 July 2009**

Members present:

Mr Keith Vaz, in the Chair

Ms Karen Buck  
Tom Brake  
Mr James Clappison  
David T. C. Davies  
Mrs Janet Dean  
Patrick Mercer

Gwyn Prosser  
Bob Russell  
Martin Salter  
Mr Gary Streeter  
Mr David Winnick

Draft Report (*The Cost of Policing Football Matches*), proposed by the Chairman, brought up and read.

*Ordered*, That the Chairman's draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 21 read and agreed to.

*Resolved*, That the Report be the Tenth Report of the Committee to the House.

*Ordered*, That the Chairman make the Report to the House.

Written evidence was ordered to be reported to the House for placing in the Library and Parliamentary Archives.

[Adjourned till Tuesday 14 July at 2.45 pm]

## Witnesses

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**Tuesday 16 June 2009**

*Page*

**ACC Stephen Thomas**, Association of Chief Police Officers Lead on Policing at Football, and **Derek Smith**, Association of Chief Police Officers Lead on Finance Ev 1

**Bill Bush**, Director Public Policy and Communications, Premier League, and **Andy Williamson**, Chief Operating Officer, Football League Ev 6

**Dave Whelan**, Chairman, and **Brenda Spencer**, Chief Executive, Wigan Athletic Football Club, and **Graham Turner**, Chairman, Hereford Football Club Ev 10

## List of written evidence

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1	William Bush, Director of Communications and Public Policy, Premier League	Ev 15
2	Scunthorpe United Football Club	Ev 15
3	Blackpool Football Club	Ev 16
4	Sheffield Wednesday Football Club	Ev 16
5	West Midlands Police	Ev 17
6	Reading Football Club	Ev 21
7	The Football League	Ev 21

## List of unprinted written evidence

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The following submission has been reported to the House, but to save printing costs it has not been printed and a copy has been placed in the House of Commons Library, where it may be inspected by Members. Other copies are in the Parliamentary Archives, and are available to the public for inspection. Requests for inspection should be addressed to The Parliamentary Archives, Houses of Parliament, London SW1A 0PW (tel. 020 7219 3074). Opening hours are from 9.30 am to 5.00 pm on Mondays to Fridays.

Birmingham Football Club plc

## List of Reports from the Committee during the current Parliament

The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

### Session 2008–09

First Report	Monitoring of the UK Border Agency	HC 77 (HC 381)
Second Report	The Police and the Media	HC 75
Third Report	The Work of the Committee 2007–08	HC 76
Fourth Report	Policing Process of Home Office Leaks Inquiry	HC 157
Fifth Report	Borders, Immigration and Citizenship Bill [HL]	HC 425
Sixth Report	Human Trafficking	HC 23–I
Seventh Report	Knife Crime	HC 112
Eighth Report	Cost of policing the G20 protests	HC 676
Ninth Report	Project CONTEST: The Government's counter-terrorism strategy	HC 212

### Session 2007–08

First Report	The Government's Counter-Terrorism Proposals	HC 43
Second Report	Bulgarian and Romanian Accession to the EU: Twelve months on	HC 59
Third Report	Security Industry Authority	HC 144
Fourth Report	Work of the Committee in 2007	HC 226
Fifth Report	A Surveillance Society?	HC 58 (HC 1124)
Sixth Report	Domestic Violence, Forced Marriage and "Honour"-Based Violence	HC 263 (HC 1165)
Seventh Report	Policing in the 21 <sup>st</sup> Century	HC 364
Special Report	Unauthorised Disclosure of Draft Report	HC 196

### Session 2006–07

First Report	Work of the Committee in 2005–06	HC 296
Second Report	Young Black People and the Criminal Justice System	HC 181 (Cm 7217)
Third Report	Justice and Home Affairs Issues at European Union Level	HC 76 (HC 1021)
Fourth Report	Police Funding	HC 553 (HC 1092)

**Session 2005–06**

First Report	Draft Corporate Manslaughter Bill (First Joint Report with Work and Pensions Committee)	HC 540 (Cm 6755)
Second Report	Draft Sentencing Guideline: Robbery	HC 947
Third Report	Draft Sentencing Guidelines— <i>Overarching Principles: Domestic Violence and Breach of a Protective Order</i>	HC 1231
Fourth Report	Terrorism Detention Powers	HC 910 (Cm 6906)
Fifth Report	Immigration Control	HC 947 (Cm 6910)
Sixth Report	Draft Sentencing Guideline: Sexual Offences Act 2003	HC 1582

# Oral evidence

## Taken before the Home Affairs Committee on Tuesday 16 June 2009

Members present  
Keith Vaz, in the Chair

Ms Karen Buck  
Mr James Clappison  
Mrs Ann Cryer  
David T C Davies  
Mrs Janet Dean

Patrick Mercer  
Gwyn Prosser  
Bob Russell  
Mr Gary Streeter  
Mr David Winnick

*Witnesses:* **ACC Stephen Thomas**, ACPO Lead on Policing of Football and **Mr Derek Smith**, ACPO Lead on Finance, gave evidence.

**Q1 Chairman:** May I call the meeting to order and welcome our witnesses. This is a one-off session into the cost of policing of football matches and it will also consider legislation which the police use in order to police football matches. Following this session there will be another session in our continuation of our inquiry into bogus colleges when the Minister for Further Education will be giving evidence. We are very pleased to see ACC Thomas and Derek Smith here today. Thank you for coming to give evidence to this Committee. ACC Thomas, in August 2008 you said that you were concerned about local communities in effect subsidising football clubs, in other words the football clubs were not bearing the whole cost of policing on their own. What made you make a statement of that kind?

**ACC Thomas:** You have to see that statement in the context of that particular interview with *Radio 5 Live* and where they were coming from in that. They had served a Freedom of Information Act request on a number of police forces who had Premier League clubs and their story angle was that some forces recovered less than half, some as much as two thirds of the costs of policing football and they wanted to know where the rest of the money came from. So I made those comments in relation to that particular aspect of their questioning in that the costs of the shortfall of policing football come from core police budgets.

**Q2 Chairman:** Is there evidence, as far as ACPO is concerned, that football clubs are not paying what they ought to be paying for the cost of policing?

**ACC Thomas:** The position of ACPO and certainly the work we have done with the football clubs and the Football League and the Premier League is that in the vast majority of cases at the moment clubs are paying what the law allows them to pay. So we are recovering and we have been doing a lot of work, particularly since the Wigan case which clarified a lot of issues for us; police forces are attempting to recover as much as they can under case law and Home Office guidance and I believe that in the vast majority of cases that is happening. Again, it only amounts to about one half to two thirds of the cost of policing football.

**Q3 Chairman:** Does the same apply to the Premiership clubs? Some of the poorer clubs obviously cannot afford the cost of policing but when we hear about Ronaldo being sold for £80 million, obviously there is money to pay for the police in some clubs. Is this across the board or is it just limited to the bigger clubs?

**ACC Thomas:** It is across the whole of football. We do have to put it into context as it is a key point. Forty-three per cent of football games in the Football League and the Premier League are not policed at all following a decision by the police that intelligence suggests that stewards only are capable of dealing with that particular game. One of my former forces was Greater Manchester Police and Rochdale was a great example of a club in the lower league. Rochdale will have five games a year that are policed and, you are absolutely right, they will then have difficulty paying the bills for that, but we do take that into account and we do make arrangements. For instance, at that time in Rochdale they were paying by a monthly standing order so that the bill was cleared by the end of the financial year and they could use the whole season's income to pay the bill rather than paying for those particular games. I know from my colleague from the West Midlands police that Walsall have five games a year which are actually policed and the rest of the 24 games are police free. It will depend on the league how much your police bill is and how many officers are required.

**Chairman:** I should have done this right at the beginning because of course all of the Members here represent football clubs in some way or other and some of us may well be guests of clubs on occasions, in which case it would be entered in the Register of Members' Interests. I would refer everyone to the Register of Members' Interests in respect of any visits we may make that need to be registered.

**Q4 Bob Russell:** Police authorities are authorised to determine the scales or costs of special services such as the policing of sporting events. How do you decide what these costs are?



**Mr Smith:** I need to distinguish between costs and charges at this point. The costs of policing and the charging for policing are actually two different components. The power to charge is section 25 of the 1996 Police Act and that allows the police authority to set charges and issue charges based on those that they set. The process by which the costs are established are about numbers of officers that are deployed and, in a football situation, that is graded to the grading of a game. The charges which then occur are based upon hourly rates for officers that are determined in accordance with a prescribed formula and that is how the charges are set by police authorities.

**Q5 Bob Russell:** Colleagues will be asking further questions on that so I will steer clear of any supplementaries on that. When we were preparing for this session today I informed the Chairman of my concerns that possibly the police are using more recent legislation within the grounds and outside the grounds against football supporters. What would be your reaction if I said that some disgruntled fans wished to leave the Colchester community stadium where the visiting Milton Keynes team were winning three nil early for reasons which are perhaps obvious and the police used powers of arrest to prevent people leaving the stadium? What would be your reaction to that?

**ACC Thomas:** Difficult for me to comment on that particular incident because I do not know the circumstances. Most of the time the police would stop supporters leaving a stadium as a holdback at the end of game, if there was a risk of disorder outside.

**Q6 Bob Russell:** The game is still on.

**ACC Thomas:** In that case they would be using common law powers. I am aware in some of the big stadia I have been involved in policing as match commander of the concern about terrorism. Obviously there are checks on people taking bags into the stadium and there are also checks on people if they leave before half time or perhaps half way through the second half. They might be spoken to by a steward and then by the police to ascertain whether there is a good legitimate reason for leaving and often it is because the last train is just about to leave so people do leave.

**Q7 Bob Russell:** I will not pursue the point here but I would ask please, whether you and your ACPO colleagues could see whether recent legislation giving police the power to act is being used appropriately or inappropriately in a setting of people wishing to leave a place of so-called entertainment.

**ACC Thomas:** Yes, of course.

**Chairman:** Janet Dean. Her local football club of course has just joined the Football League.

**Q8 Mrs Dean:** Burton Albion. Can you tell us how much consultation is done with the clubs in assessing the grade of the games?

**ACC Thomas:** There is an awful lot of work with the clubs, in fact only yesterday the Football League held this year's fixture list meeting. The Football League have a computer which works out the fixtures every year and then there is a meeting in the middle of June where the police from different big forces, British Transport Police, the Football League, Premier League meet to try to look at what the computer has generated to make sure that we do not have things like Manchester United and Manchester City playing at home on the same day or teams crossing the country and crossing across each other. What then happens, when that fixture list is published, is a meeting between the local police and their football club using a five stage category to grade the risk of disorder for the games for the following season. If I just run through the categories: 43% of games are police free, games that clubs steward only; and then there is a category A, which is low risk; B medium risk; C high risk of disorder; and a new grade which we brought in two years ago which is a category C, increased risk. That is where there are some peculiar or special circumstances about the risk at that game which mean it is the very highest risk we police. That is agreed before the season starts, as soon as the fixtures are published, between the club and the police. The club have some idea then what each game will cost and whether games will need to be policed during the course of the season. Thereafter about two weeks before that particular game there should be, sometimes seven days, sometimes 10 days, sometimes 14 days, another meeting between the police and the clubs and it is normally when they are debriefing one game and then planning ahead games which are coming that they look again at the intelligence grading to see what has happened during the course of the season. The vast majority of games are in fact downgraded but there are some which get upgraded in the amount of risk. That is based upon the way those travelling supporters have behaved during the course of the season when they perhaps visit other clubs in that particular region or the way home supporters have behaved in recent matches. There are lots of different things which make that intelligence grading. That is all agreed with the club and it has to be transparent because the club has to have some faith in the system.

**Q9 Bob Russell:** I may need to put this question also to the football representatives later on. When you talk about the computer with the fixtures, do the police have any input into deliberations relating to local derbies, when they should be held and so on? The reason I ask this is that this computer seems to have an ability to have Christmas and New Year games as many miles apart as possible. Is that deliberate or is that by accident?

**ACC Thomas:** You would have to ask the Football League.

**Q10 Bob Russell:** I just wondered whether the police had any input into whether they preferred to have local derbies at certain times of the year or whether they wanted them dispersed out of the holiday season.

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**ACC Thomas:** We accept in the vast majority of cases what the computer spills out as the fixture list for the following season. There is a meeting on this, and for next season it took place yesterday, where we then look at these fixtures to see whether we can spot any obvious games which would cause an increased risk and then of course could increase charges as well.

**Q11 Bob Russell:** So Christmas/New Year local derbies are not a problem for a policing budget.

**ACC Thomas:** The timing of them might be and what particular days they take place on. The police, like football fans, are now at the mercy of television schedules in the vast majority of cases. Depending on what day a game is, it can actually increase the risk or decrease the risk to games but it is television schedules more than police which have an impact on that.

**Q12 Mr Streeter:** Do you have any statistics on how many games which are policed are trouble-free so actually perhaps you need not have been there or actually nothing happened?

**ACC Thomas:** We do, but I cannot—

**Q13 Mr Streeter:** What would a rule of thumb be?

**ACC Thomas:** I am almost certain that 68% of games are trouble-free, that up to 72%, which includes those, there is one arrest or under and there is an average of 1.2 arrests per game for the 2007–08 season which is the last season for which Home Office statistics are available and the last season's will be published in October. Our games now are relatively trouble-free.

**Q14 Mr Streeter:** Do you also police premiership rugby union games?

**ACC Thomas:** To a very limited extent and also rugby league. I think you have Mr Whelan giving evidence later and he once owned Wigan Athletic and Wigan Warriors rugby league team. Football is out on its own in sporting events for the level of policing which is required. Many of us have tried to get to the bottom of why football fans sometimes behave violently where rugby fans do not.

**Q15 Patrick Mercer:** Would you prefer to see the law changed so there is legal clarification over who decides upon and then provides policing both inside and outside commercial events?

**Mr Smith:** Yes, we would. There has been a lack of clarity in recent years and the recent case law actually focuses upon the need to be clear between the organiser of the event—and may I say that is wider than simply football clubs, it goes to other commercial events—and the policing arrangements and the charging amounts which go with that. The difficulties that we have had in terms of football have been around the fringes of what is clear, transparent and consistent about what relates to the total policing deployment and the chargeable element which comes from that. From my point of view and the work that we have done, I sought to create a process and a framework that can apply consistently.

The background is that there has been inconsistency in the way that football matches have been policed and the charges which go with them. It is our view in the work we have done, particularly following the Wigan case, but also the Reading Festival case which preceded it, that we need to be clear about what it is we are deploying, why we are deploying and the charging which follows from that.

**Q16 David T C Davies:** Just following the same principle, the police issue charges to people organising agricultural shows in my constituency. I find that hard to understand because there are not usually scenes of widespread disorder or fighting between different gangs of farmers and most of the policing takes place outside the actual showground. Can you tell me whether agricultural shows are seen in a similar light to football matches?

**Mr Smith:** I accept that we are drifting away from football for a while but the general principle I have sought to establish is that the policing requirement around commercial events comes within policing under section 25 of the Act. In that case we need to be consistent in our approach whatever arena we are working in. I have tried to make sure that there is a consistency of approach. To the extent that some show grounds can be described as a commercial event, then the additional policing that is required—

**Q17 David T C Davies:** I see that consistency but you do not charge the organisers of the Notting Hill Carnival for the policing that takes place there even though it usually, dare I say it without wishing to stereotype it, causes more trouble than the average agricultural show in Monmouthshire.

**Mr Smith:** I understand the general point. There are characteristics around a commercial event which do not exist in other non-commercial events. Where the cusp of this is, is what is a commercial event and how is it so described? All I can say to you is that the work we have tried to do is to try to maintain a consistent approach so that all organisers of events have a clarity, whether it is cricket, football or a commercial event like a show ground. I can also say that there is a parallel around pop festivals which is clear. What we are seeking to do is to understand the additionality of policing which is required and then cost recover that additional policing deployment. That is the principle we have set out. It applies to football as well as it applies to other events.

**Q18 Mr Clappison:** I should perhaps declare an interest as the joint secretary of the All-Party Rugby League Group. Is it possible for the police to refuse or to threaten to refuse to provide police services inside a stadium or at a commercial event? If it is, how often does that arise?

**ACC Thomas:** It is possible because all of these services are provided as a special police service under section 25 of the Police Act 1996 where the first thing which has to happen is for a request to be made by the organiser to the chief constable to provide a policing service and then it is for the chief constable to decide whether to provide that service or not. That is one of the ultimate sanctions as regards

football if there is disagreement between the chief constable and the club as to how many officers should be required and what those charges should be. If they cannot reach agreement, the chief constable has a choice of whether or not to provide the special police service in the first place, to provide the special police service only to the limit where the club are willing to pay, which would then mean the chief constable carrying the risk of the shortfall, or to provide the full policing contingent he thinks is necessary, the club will pay what they are prepared to pay and the chief constable picks up the rest of the bill.

**Q19 Mr Clappison:** Does it often happen that there is this sort of haggling about it?

**ACC Thomas:** The haggling happens very frequently but it is my belief, and I think the Football League would say the same, that in the vast majority of cases there is no dispute at the end of the day between the police and the football club and an amicable agreement.

**Mr Clappison:** You mentioned earlier your familiarity with Rochdale, which I think is part of the Greater Manchester police area, if I am not mistaken. We have been provided with a table of Premier League policing costs, not of every Premier League club but of 14 of them. What springs out from that is that the deficit between the cost of policing and the amount recovered by the police for Manchester United is very much higher than any other club; it is over £500,000, £543,000 a year. I just wondered what reflections you might have on that, given the wealth which we are very familiar with. The Chairman mentioned a certain transfer which has taken place, the buying and the selling, the remuneration of those employed by the club and everything we know about it. It means, does it not, that £500,000 of their costs are falling on the taxpayer, more than any other club apparently?

**Q20 Bob Russell:** Plus £341,000 for Manchester City.

**ACC Thomas:** Absolutely. The disparity between what can be recovered actually reflects what can be charged for under the current case law and this guidance. Perhaps I should declare an interest in that I am a season ticket holder at Manchester United and was the match commander there previously, so it is a stadium I know better than most. At Manchester United you will have 1,200 stewards, you will have a crowd which will be in excess of 70,000, nearer 76,000, and a lot of the issues at all football stadia are safety as well as security and the club takes the lead in safety issues. Because it is such a large crowd and because of the peculiarities of the stadium, Greater Manchester Police at Old Trafford and again at the Manchester City stadium will have a lot of officers deployed outside the stadium because over the last 10 years clubs have done an awful lot of work, as have football authorities, with the standard of their stewarding and the stewarding operations. Greater Manchester Police, in both those examples, will charge for the officers deployed inside the stadium or outside the stadium on the club property or,

following the Wigan case, in the footprint that is now being talked about. A lot of the officers are away from the stadium so they cannot be charged for.

**Q21 Mr Clappison:** I enjoy football and you enjoy football but you can understand how taxpayers who perhaps do not enjoy football would feel about the fact that we are paying £500,000, which is a substantial amount for taxpayers but probably not for the football club. It would be very much in the small change area for a football club like Manchester United to have to pay £500,000 for the policing of that club.

**ACC Thomas:** I totally agree and that was the thrust of the *Radio 5 Live* interview in August 2008, which is where I think you have the figures from.

**Mr Smith:** I would like to make a point about the size and scale of football as we see it today. Deloitte have recently carried out a review of football based on the 2007–08 season and the total Football League revenue for that year was £2.5 billion. The majority of that was in the Premier League. Gate receipts were £554 million. The total cost of policing is in the range of £15 to £20 million, of which the chargeable element is somewhere between £12 and £15 million. Putting that in context, the cost of policing in terms of the total revenue income of football was less than 1%; about 0.6 to 0.7%. Even if you take it as a view of gate receipts, the cost of policing a match is worth roughly 2% or, in terms of ticket prices, something like 50p to 60p in a ticket price which ranges from £20 to £40. In terms of the overall economics of football and its delivery, the cost of policing is a component of the delivery of the service, but actually is a relatively small component. What we have tried to do and continue to do in terms of the delivery of the policing is to grade our response, to grade our deployment, so that it matches the combination of safety requirements. Let me take you back to the Safety at Sports Grounds Act 1975 and its amendments in the 1980s following significant disasters around grounds; that underpins the requirements for safety as well as disorder. Our structured approach is aimed to provide the right level of policing for a match in order to deliver both those components at a cost which is acceptable to the clubs. For the most part they are; there are relatively few cases where there is an issue about the relativity of the additionality of policing. I must say to you that we set out a principle which says that policing full commercial events—and that also includes football—is based on the premise that we buy in additional resource, in other words police on overtime, so that we maintain our core resources to police communities. The concept and the principle is that the cost recovery is based upon that additionality of policing which is provided.

**Q22 Mr Winnick:** How many police would be involved at a typically large premiership game?

**ACC Thomas:** Again I will use the Old Trafford example.

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**Q23 Mr Winnick:** Can you give a sort of average?

**ACC Thomas:** It is very difficult for each ground; each ground would be completely different in the way it is designed, the surrounding roads, the transport system. It is difficult to give an average across the country because it varies so much.

**Q24 Mr Winnick:** But the police generally work on the assumption presumably that sufficient police must be around because you simply cannot rely on everyone being peaceful.

**ACC Thomas:** Absolutely. It is to do with how we grade risk of disorder at that particular game. Of course, over the last 10 years we have seen vast reductions in the number of police officers being used at our stadia because there has been some excellent work led by the Home Office on football with football authorities, the improvement in our stewarding, the professionalisation of stewarding and ground safety managers. Police have been able to withdraw from the safety aspects of football to concentrate on security and to try to get as few police officers as possible and 43% of games have no police officers involved.

**Q25 Mr Winnick:** If I were involved in criminality of a more sophisticated kind which you may come across from day to day, would I not work on the assumption that the police will be fully occupied in a particular city—it will not be difficult to find out when these premiership games are being played—and I could go about my unlawful business?

**ACC Thomas:** Absolutely and that is why we try, wherever we can, to do football policing as an additionality, to bring officers in on overtime to do that so we are not taking our officers away from our communities. If you look at most football grounds, our police forces will have to put on extra crime patrols around the areas, particularly, again to use the example of Old Trafford, where lots of people come by private car, they park in the surrounding streets and vehicle crime will go up during the course of the game because local criminals know those vehicles will park there for a couple of hours.

**Q26 Mr Winnick:** Much emphasis has been placed from time to time on alcohol as a disturbing factor, that if alcohol were not used, the number of police involved would be much smaller. Would you say that this remains a big problem that at some stage, perhaps after a disappointing match, the demonstrators find some solace in alcohol?

**ACC Thomas:** There is some link between supporting football clubs in England, Wales and Scotland and drinking and we seem to be almost unique across Europe. I have travelled to many countries in Europe with club sides from the UK and the English national team and we do tend to drink in relation to football. There is a link between disorder at football games and alcohol, often because people who would not set out that day to get involved in any disorder and would have no intention of getting involved in disorder, get sucked into issues because

they have had a drink and perhaps they are not fully as aware and careful as they would be normally because some inhibitions have gone because of the effect of alcohol. We certainly find people getting sucked into violence when they would not normally.

**Q27 Mr Winnick:** And more so than other European countries?

**ACC Thomas:** Yes.

**Q28 Mr Winnick:** No explanation for that? It is not in your field.

**ACC Thomas:** We have all tried for many years to work out what is the link. I know from my travels with the English national team that the vast majority of English supporters arrested in Europe, supporting an English team or a club team, have no criminal records and have never been known before for disorder in relation to football. It is because of heavy drinking and they end up in situations in which they would not normally put themselves.

**Q29 Ms Buck:** It is sometimes asserted that the costs when they are recharged are subject to negotiation by the football clubs and other event organisers when actually a police presence in an area could sometimes be a benefit to the community, could be preventing or apprehending crimes which were going to be committed anyway. How possible is it to monitor that? Is that the subject of some of the negotiations you have?

**ACC Thomas:** It does not really feature in the negotiations we have with football because we try to treat football as a special police service, an additionality. We try to overlay the football operation on top of the standard of normal policing we would normally have in that town or that city at that time.

**Q30 Ms Buck:** Is it really easy to do? Is it really easy to demonstrate that additionality in practice? Are you able to monitor it?

**ACC Thomas:** Yes. We bill those officers specifically between this hour and that hour, which is the period of the game.

**Q31 Bob Russell:** Since I asked the question earlier on about the possibility of police using recent acts of parliament, I have been given a briefing note. I think we are talking here about section 27 of the Violent Crime Reduction Act 2006 and the particular incident of which I was notified was on 19 November 2008 and Stoke City were away to Manchester United on Saturday 15 November. So this was something reported four days after the game when it was said that officers of the Greater Manchester Police entered the premises of a pub and served warning under section 27 on about 80 Stoke fans. I think it is that Act I was referring to earlier on with the Colchester United's home supporters.

**ACC Thomas:** That helps. To reassure you, there were two incidents about the same time: one was in South Yorkshire with Plymouth Argyle supporters and one with Greater Manchester Police and the Stoke City supporters. We have sat down with the

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Football Supporters' Federation and worked through with our colleagues to get to the bottom of it. In those two particular cases the forces concerned have admitted their liability in that they wrongly used those powers in that case. The Greater Manchester Police are subject to an ongoing court case being sponsored by Liberty which has yet to be resolved but in both of those cases the forces concerned have admitted they wrongly used those powers. The same power is used very well by lots of other police forces dealing with very small numbers of hooligan supporters who are drinking prior to engaging in violence, which is exactly what the Act was intended to do, but the rounding up of 80 supporters in the pub clearly was wrong.

**Bob Russell:** I am grateful for that answer. Thank you.

**Q32 Chairman:** Scotland on Sunday was reporting that the Strathclyde Police were about to publish a report which would mean that football clubs would have to pay for policing inside and outside their grounds with a total bill of £3 million a year. Do you agree with the conclusions of that report?

**ACC Thomas:** We are obviously aware that Scotland works under a different legislative framework than we do. Many chief constables in England and Wales would have an aspiration for commercial events to be able to get full cost recovery. It was mentioned briefly in our response to the Green Paper on the future of policing. However, our current Home Office guidance and our current case law do not permit that. Unless that case law were to be changed or there were a will from Government for us to be able to recover the full cost, which is the gap we have been talking about during this session, then we will carry on charging what we can charge and in the majority of cases in total agreement with the football club concerned.

**Q33 Chairman:** Basically you have no real sympathy with the football clubs. They are commercial ventures and they ought to pay is what you are saying.

**ACC Thomas:** Yes, that is the aspiration of many chief constables.

**Chairman:** Mr Thomas, Mr Smith, thank you very much for coming to give evidence to us today. We are most grateful.

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*Witnesses:* **Mr Bill Bush**, Director Public Policy and Communications, Premier League and **Mr Andy Williamson**, Chief Operating Officer, The Football League, gave evidence.

**Q34 Chairman:** Thank you for coming to give evidence to this short inquiry into the cost of policing football matches. You have had the benefit of hearing the evidence of the police just now. Do you agree with the view that football clubs are diverting the police from their proper duties in respect of the policing of football matches and then, having diverted them from their proper duties, are not paying for the cost of policing?

**Mr Bush:** Two parts to that obviously, the operational part and the cost. On the operational part I would have to say we would defer to the police's estimate of the situation. It is meant to be additional to their normal deployment and reference was made to bringing in police officers from leave and time off to work on overtime. In terms of the cost, this obviously is the key question. Our clubs feel that they pay the full cost of deployment of the police which they require for policing in the ground and in the land immediately close to it which is wholly under the club's control for the purposes of organising the match. Beyond that, there is a feeling that as good citizens, good neighbours, the clubs make substantial contributions to local economies and the national exchequer and that fans too are taxpayers. When fans are moving to and fro between town centres, transport intersections, hubs and the ground, they are there as citizens rather than as precisely taking part in being spectators. It is important to define what is meant by full cost recovery. It is the geography of the full cost recovery which is key. Our clubs feel very strongly that full cost recovery of those services provided on their territory is properly charged and properly paid.

**Q35 Bob Russell:** There is no such thing as an average team and an average ground but I am going to try as far as possible to find out, as a percentage perhaps rather than numbers, how much clubs pay for stewarding each season, their own stewards.

**Mr Bush:** I have to say I do not have the answer to that at my fingertips. I can find out and write to you. It is a substantial number. Stephen Thomas mentioned the 1,200 at Manchester United; that would be exceptional. Obviously it is a very, very large ground, one of the largest and the deployment would be much, much smaller at a mid-scale club.

**Q36 Bob Russell:** Twelve hundred stewards would outnumber the crowd at Macclesfield, would it not?

**Mr Bush:** Approximately; yes it would.

**Q37 Bob Russell:** I am just wondering whether the Football League and the Premier League might be able to give us an approximation of how many stewards they had at an average game.

**Mr Bush:** What the clubs do is the classification of matches into A, B, C and the C+ system, the ones which are particularly to be potentially difficult. Stewarding follows that. At a mid-scale match, attendance of perhaps 30,000, a category A match, there might be a level of stewarding of 200 or something of that sort, but if there is intelligence, if there is a history of a fixture and obviously, football being the traditional game it is, we would tend to know which are the more difficult fixtures, more would be deployed for that. Stewarding standards and numbers have grown substantially in recent years so more and more of the stewarding operation

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is delivered by stewards alone to standards set in agreement with local authorities without a substantial police presence inside the ground.

**Mr Williamson:** I want to add to what Mr Bush has said and he made the point at the end there that the standard of stewarding has improved immensely over recent years, so too has the standard and quality of stadia themselves and other provisions such as closed-circuit television monitoring and so on. Clubs are very much more able to manage their stadia these days for themselves and that has helped to reduce policing numbers actually deployed within stadia. The standards in that respect have to be scrutinised by the safety advisory group which oversees the licensing of each individual stadium.

**Bob Russell:** The last two answers we have had there are very illuminating because there has been a transformation in stadia and in stewarding, there is no question. I am assuming therefore there must be some sort of set procedure, some blueprint, some minimum standards or training. I wonder whether we could be sent copies of whatever the minimum requirement is and what clubs aim to achieve so we can get a feel for that as well. It may well be, as with other inquiries, that best practice is not necessarily being shared everywhere.

**Q38 Chairman:** Would you do that? It would be extremely helpful to the Committee if we could have that.

**Mr Williamson:** Yes.

**Mr Bush:** Very happy to do that.

**Q39 Patrick Mercer:** I think it is fair to say that the introduction of all-seater stadia, CCTV, stewards et cetera have improved behaviour and conduct inside the grounds considerably, yet outside the grounds we still see helicopters, armoured vehicles, mounted police, et cetera. Have we not just shifted the problem to outside the match rather than inside?

**Mr Bush:** It is important to recognise that the vast majority of matches get away with very few incidents, very few arrests. We are not complacent, we work extremely hard at this and we do have best practice sessions with people from different clubs, explaining how they achieve the standards they do and we have training courses and so on. The thing about displacement is that the developments in the wider society, for example the widespread reports about heavy drinking, Saturday evening drinking, go to a market town, the classic press coverage of those sorts of things, do take place. Football matches take place on a Saturday, sometimes on a Saturday evening if the TV companies have requested that, and the cooperation between a football club and the local police force is usually very, very strong. However, there is this area of handover between a club handing over its responsibilities, its work for fans as they disperse and then what those fans and other people then do as they move away or move into the town centre. I do not think it has been displaced. The evidence says that the arrest figures and the incident figures for incidents away from the ground are also substantially down. It does happen much less than it

used to and there is a lot of cooperation over each incident to try to find out what it was that we could learn from that incident to minimise it happening again. At what point it ceases to be football related is a moot point.

**Q40 Ms Buck:** About 40% of matches are police free. Do you have any information about what proportion of the police-free matches were premiership or championship? Are any premiership or championship matches police free?

**Mr Bush:** Very, very few; zero for the Premier League.

**Mr Williamson:** There are clubs in the championship which have police-free matches; the more anodyne fixtures.

**Q41 Ms Buck:** Would you agree that it is a very small proportion?

**Mr Williamson:** It is not so small. Obviously it increases at league one and league two level because there are simply fewer incidents, but there are certainly a good number of police-free games at championship level also.

**Q42 Ms Buck:** Mr Bush, your answer implied that it would be very rare.

**Mr Bush:** Very small. Inside the ground there would be quite a large number, in other words the club's own stewards completely police the controlled area. There would be a significant number of those. Police-free in terms of what is happening outside the grounds, in terms of traffic management and crowd control and so on, is now very much a local authority matter but the police also have an involvement. It would be very rare for there to be no involvement between the club and the police about any match, partly because of things like parking and road closures and simple movement of the numbers involved. Our average gate is around 30,000 so it is a significant number of people moving to and fro.

**Q43 Mr Winnick:** If a club is in financial difficulties, how much leeway is given by the police in terms of payment?

**Mr Williamson:** Perhaps I should address that one. Very little in fact these days. Charging by police forces is something that clubs have to meet in good time in order that their provisions are maintained going forward as ultimately, as you heard from ACC Thomas, the chief constable has the right to withdraw the provision of special police services. There are inevitably examples where some clubs have fallen behind with payments and subsequently, wherever a club has entered into administration because of other financial difficulties perhaps, the police force has been a creditor of that club. Generally speaking, these days, there is very little leeway in terms of credit and the ultimate threat of course is the removal of SPS services going forward.

**Q44 Mr Winnick:** So the police expect the clubs to pay up pretty promptly.

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**Mr Williamson:** Exactly.

**Q45 Mr Winnick:** And take very few excuses on board.

**Mr Williamson:** Yes.

**Q46 Mr Winnick:** Of course this does not apply, does it, to the organisation which you represent, the Premier League, because there are no financial difficulties? Players are involved, as we know from the media day in, day out, in payments of £80 million or more being made so you cannot put forward a plea of financial hardship, can you?

**Mr Bush:** Some would say we are a sport with a lot of very rich players and a lot of very poor clubs but that would be a stereotype which I obviously would not use as a defence. All our clubs and the league itself approach the police charges question as a charge for a service. It should not properly be related to the income of the club. Obviously there is a kind of relationship in that the bigger the club, the more likely it is to have a strong income stream, the more likely it is to have very large attendances, the more police it is going to need and so on. Actually it is a charge for a service. The police assess what that charge should be in local discussions with the club and a cost is arrived at. For a modest, small club with small attendances by Premier League standards but which is a difficult ground for geographical reasons, architectural reasons, may have a difficult fixture because of history between local rivals or even distant rivals which can be occasionally tense, the charge would be larger than for a very large club which is a very easy to operate ground, particularly the bigger new stadia where getting crowds in and out straightforwardly is much easier than it used to be for some of the older grounds.

**Q47 Mr Winnick:** I read the evidence that you all pay taxes; both organisations have provided us with that view. As far as the general public is concerned, a few clubs owned by very, very rich people, be they British or Russian, as the case may be, the average citizen may well ask why they as taxpayers should be paying when these very rich individuals, who, for all we know, perhaps use the ownership of the clubs as playthings but, be that as it may, why should we, the average taxpayer pay for police work when these multi-millionaires can well afford it?

**Mr Bush:** This is the important distinction which was very much at the heart of the two Wigan cases, the Wigan first judgment and then the appeal, about special police services as a charge and then general policing elsewhere and where that dividing line is. All our clubs believe that they meet the charges for the special police services which they request as legislation requires. Although the word haggling was used earlier, there is an exchange about what is an appropriate charge, how much policing is needed and a significant use of intelligence about whether there might be trouble and so on. We strongly feel that for general policing the Premier League centrally and each club individually tries very, very

hard to be a good citizen. We do pay tax, business rates, income tax, VAT and so on. We make a substantial contribution to the exchequer.

**Q48 Mr Winnick:** And rightly so.

**Mr Bush:** Indeed; this is not a plea to reduce taxes, it is just—

**Q49 Chairman:** A statement of fact.

**Mr Bush:** —a statement of fact; exactly. The thing I am trying to wrest from my head is that the Deloitte research document referred to earlier gave an estimate for when the recent tax changes take effect that football will contribute about £1 billion to the exchequer. Football clubs are also very conscious, including very large clubs, and I would argue that very large clubs make a very big commitment to being good citizens locally. At one level that can be formal arrangements, particularly behind a new stadium, using the old section 106 powers to make sure there are planning gains with local residents fully taken into account in one way or another. More generally clubs engage in extensive work with the local police, not just for match day but for a very wide range of activities.

**Chairman:** All of us are aware of that.

**Q50 Mr Streeter:** Given that 70% of games are trouble free and given that you seem to have weeded out most of the hardcore thugs, the people who used to go along just to have a punch-up in the good old days, and given that these discussions are going on between you and the police, do you think that perhaps the police are being too pessimistic or too heavy-handed in the level of policing they say is appropriate for many of these games, apart from the obvious huge derbies like Plymouth versus Exeter, a massive local derby? Do you think perhaps the police are fighting the old war and are not being modern enough in their approach and are imposing too high a grade and too high a charge?

**Mr Williamson:** I would agree with ACC Thomas in the sense that most clubs do have a happy working relationship with their local police forces, though there are isolated cases where sometimes clubs have difficulty in agreeing the levels of policing that are appropriate. That could be a general difficulty throughout the season or it could be through isolated games. One thing I would like to emphasise is that football would like to work with the police to try to reduce the overall deployment of the police resources and then that would potentially have the effect of reducing the gap between those costs which are recorded from football and those which are not because they refer to policing public space. There are occasions where the deployment of police is perhaps exaggerated in some cases, perhaps the intelligence that may have been gathered is not sufficiently scrutinised and match commanders may take a safe view in those circumstances and sometimes that causes friction between the club and the police forces.

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**Q51 Mr Clappison:** You mentioned that there are rich players and you said poor clubs. We have been supplied with a list of the policing costs of 13 Premier League clubs and the deficit which has arisen between the costs which were recovered and the total cost of providing policing. I cannot help but notice that, for example, Bolton Wanderers generated a deficit of £18,793, Portsmouth did not cause any deficit at all and they are perhaps two of the poorer clubs in the Premiership. With Manchester United, which is the largest club and which is a huge commercial organisation, very much a commercial organisation these days—I am sure they do good work but they are primarily a commercial organisation with a very strong commercial motive and ethic—they charge £543,000 which is by far and away the most charged by any football club, which would be a small amount to them, a very small amount to them, but a very large amount to taxpayers. How do you think taxpayers feel about that amount being charged by this club?

**Mr Bush:** I go back to what I said before which is that I am sure Manchester United pay the full amount for the special police services deployed within Old Trafford itself and within the closely drawn, under control footprint. I have not seen those figures. I have some similar figures which ACPO have provided. A fair definition of full cost recovery often covers an extremely wide area including, in Manchester's case, into the main transport intersections and so on. Without knowing the detail of those figures, I would imagine the discrepancy between the amount Manchester United actually do pay for full cost recovery for SPS in their ground and very close to the ground and the number you mentioned, £500,000, is down to police costs incurred away from Old Trafford where the general understanding is that this is part of the general policing responsibility.

**Q52 Mr Clappison:** A table has been provided to us of 13 clubs, the total cost, the costs recovered and the deficit and I am talking about the deficit here of £543,000. I am just curious as to why Manchester United—I know they are the biggest club and have the biggest stadium—but their deficit is by far and away the most and out of proportion to all the other clubs. To take another club with a large stadium and a large following, perhaps not quite as large as Manchester United, Arsenal, they have a 60,000 stadium, they presumably have all the costs of people travelling to and from the ground and complicated city centres and so forth and their deficit is actually under £300,000; it is only £290,000. Some of the smaller clubs are lower than that. Manchester United sticks out like a sore thumb.

**Mr Bush:** All I can say is that I believe those figures would be based on the police's view as to the impact of football across their deployment as a whole, the city as a whole and that when 77,000 people disperse into a major city, that cost would be greater than 90,000 dispersing from Portsmouth or the low 20,000s dispersing from Bolton. A match can only go ahead with SPS agreed between the club and the local commander and that should be full cost

recovery for those special police services. In terms of the police estimate of a wider £500,000, if that is what it is, I would argue that Manchester United's contribution to the British economy, the North West's economy and the Manchester economy is very, very significant and can way outweigh that £500,000. The operations of many, many companies, many, many organisations will impose specific costs which are different from operations of a different sort but those costs are covered through general taxation and Manchester United make a very substantial contribution to the general exchequer.

**Q53 Mr Clappison:** Do you not think they could manage to pay just a small part of those profits from players' wages; £500,000 would not be a big element from a single player's wages for Manchester United? Could they not just manage to pay that back to the taxpayer?

**Mr Bush:** That is true for any organisation. I am sure if the BBC were sitting here then it could be asked whether, if a famous performer took a reduction, the licence fee could be less or a private company, if the wages were lower and operating costs were lower then this could be returned to the consumer. Manchester United is a very successful club; it is a huge ambassador for Manchester and makes a major contribution to the Manchester economy.

**Q54 David T C Davies:** One of the things which taxpayers may find a little difficult to understand is why it is, if a club goes into administration, the costs to the police are fairly low down the list of things which have to be paid and I think paying for footballers is ranked higher up. Going back to the figure banded around earlier on, taxpayers would find it hard to understand why somebody ought to be paid £80 million for a footballer's transfer before the taxpayers are paid for the cost of policing.

**Mr Bush:** No Premier League club has gone into administration, no Premier League club has failed to pay the SPS charges agreed with its local police. Famously Wigan of course contested the charges; it did not contest the principle of paying them, but contested the geography and the scale.

**Q55 David T C Davies:** You sound fairly confident about the fact that Premier League clubs have never gone into administration and by implication never will.

**Mr Bush:** No, no, that was an historical reference.

**Q56 David T C Davies:** You sound very confident and I share your confidence but in that case why not change things around and, to put it in the vernacular, put your money where your mouth is and say if it ever did happen you would pay the policing costs before you pay off costs owed to other clubs for football transfers?

**Mr Bush:** You are referring to something called the football creditor rule and the Football League has much more experience of this than we do.

**Mr Williamson:** Indeed that is a truism. You are quite correct that any outstanding bill which might be due to the police force is an unsecured creditor



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and football does operate a preference in the sense of requiring football creditors to be paid in full in the event of a football club seeking to exit from administration. The way that the insolvency policy works in football nevertheless does require the phoenix club to get a CVA approved by the other unsecured creditors, so the unsecured creditors do have a voice and they have to get a CVA approved based on the dividend which is being offered to the unsecured creditors. Obviously that is a legal requirement for any company in insolvency and we follow that. The precursor, as you quite rightly identified, is that football creditors have to be paid in full because otherwise the other clubs in the organisation simply would not accept a restructured club which was stripping itself of debt in other circumstances.

**Q57 Bob Russell:** Unsecured creditors also include St John's Ambulance but we are talking about police here. If a club enters administration—and perhaps we could cite the example of Leicester City in 2003 or Ipswich Town. In the case of Leicester City they left owing Leicester Constabulary £92,000. If a club enters administration and does not pay off its debt to

the police in full, would it not be possible for other clubs or the league, as good friends and good colleagues in the good name of football, to pay that debt to the community at large? After all, £92,000 is not a lot of money spread through the 23 clubs in the league, is it?

**Mr Williamson:** I am not a lawyer but we have to be careful that we are not seen to be preferring any unsecured creditor as against others which would put us in conflict with the law.

**Q58 Bob Russell:** Heaven forbid that football would ever be in difficulties with the law of the land.

**Mr Williamson:** As I say, I am not a lawyer but I think that would put us in some difficulty with other unsecured creditors. The Football League, from time to time, has made a donation to St John's Ambulance, perhaps with one eye on the sort of debts that some clubs have left behind, but those donations are entirely voluntary.

**Chairman:** Mr Bush, Mr Williamson, thank you for giving evidence today. We have asked for some information and it would be extremely helpful if you could let us have a note of those figures, on stewards in particular, and any other information that you think is relevant. Thank you very much.

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*Witnesses:* **Mr Dave Whelan**, Chairman, **Mrs Brenda Spencer**, Chief Executive, Wigan Athletic Football Club and **Mr Graham Turner**, Chairman, Hereford United Football Club, gave evidence.

**Q59 Chairman:** Thank you very much for coming to give evidence. You have heard the evidence, Mr Whelan, Mr Turner, Mrs Spencer, from the police. May I start with you, Mr Whelan? Wigan Athletic took a case to the High Court in which you claimed successfully that you were being overcharged by the police for their services. What was the basis of your claim?

**Mr Whelan:** Number one, as you know, football matches last two hours, the crowd has to come and the crowd has to go. We were getting charged for six hours per match. Down the road are Bolton Wanderers who were being charged for five hours. Obviously I asked Manchester Police why we were being charged for six hours and why Bolton were being charged for five hours. The answer I got was a very strange one, that they could hold gas cylinders at the Bolton stadium, which I did not understand at all. I also enquired as to why the six hours would be for a football match which lasts two hours with even an hour on either side and we were told that the police officers who policed our game got travelling time at double time. So wherever they were coming from, they got one hour travelling time. I asked the obvious question: do policemen get paid for travelling time when they are coming into work on normal duty? The answer is no, they do not get paid for that. So why charge a football club. In our vicinity there were three public houses where supporters, especially the visitors go and have a drink at least one hour to one and a half hours before the game and sometimes afterwards. We pay our rates like every other business and every

organisation and I felt it was most unfair that we should be charged for the policing of those public houses, people coming in on the train to Wigan central station, men there and we were being charged for that. Every time a policeman worked for Wigan Athletic we were being charged double time plus uniforms.

**Q60 Chairman:** You cited the fact that when Leeds United played your club you were charged £43,000 but when they played Preston, Preston were only charged £7,700. Is that right?

**Mr Whelan:** That is absolutely correct. At the same time we had 17,000 people on against Leeds United. Both Preston and Burnley, which is in our vicinity, were charged something in the order of £6,000 for the same fixture. We felt, I felt, that was most unfair so these are the things which we challenged the police on.

**Q61 Bob Russell:** You have given such a comprehensive answer to the Chairman that you have actually answered the question I was going to put which was to ask what reason the police gave and you have given a quite interesting answer. May I go off at a slight tangent? As chairman of a premiership club, is it the view of premiership clubs or indeed clubs at any level that the visiting fans, the visiting teams, the visiting directors, should be given equal rights in an attempt hopefully to have a level playing field in every respect and that will diminish crowd problems? Is that the policy of Wigan, that you treat the visiting team on the same level as the home team?

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**Mr Whelan:** That is the policy of all football clubs in football leagues throughout the UK. We try to look after them as well as we can and if we look at it, in football these days, I know we have had trouble in the past, but if we look at it seriously now we are talking about 5% or 6% of matches where we get some trouble. Things have really, really improved over the years with security, with dividing the fans. We can only charge the same amount for fans as we can charge for our people, whereas in the past we could charge our fans £20 and charge the visitors £30. We cannot do all that any more. It has helped enormously and we have all learned a lot through experience. I think now football matches are really good on security.

**Q62 Bob Russell:** And that goes for behind the scenes, for the visiting teams, that they are treated with respect and equal to the home players.

**Mr Whelan:** It depends who we are playing. When an away team is coming we get a report from the police as to the category of that game. We have a security meeting before each match and decide whether there could be a problem and certain clubs with spectators do carry a little bit of a problem when they come to visit us. We are all aware of that and the police will up the security and their numbers then. So everything at a football match, especially in the Premier League, is fantastically thought out and everything is coordinated. It is run really, really well on security.

**Q63 David T C Davies:** I could not agree more with that. I remember as a boy being turned away from a match because it was too dangerous and things have certainly changed now. What is your relationship with GMP at the moment then following the court case?

**Mr Whelan:** I have to say the relationship with GMP has always been good. We have had our differences of opinion. Obviously I felt strongly enough to take them to court and on appeal we were successful but now I have had a meeting with the GMP and brought up this idea of Bolton paying five hours when Wigan Athletic, Manchester United, Manchester City are paying six hours which is most unfair. How can they justify six hours? Those are the questions and how can they justify charging us double pay? Whatever a police constable or an inspector or a sergeant earns we get charged double for that game. I think that is most unfair and those are the reasons we took them to court.

**Q64 David T C Davies:** You feel they are basically trying to make a profit out of it rather than simply supplying police officers.

**Mr Whelan:** We pay our rates in the order of something like £250,000 per annum and the rest of the time we paid our rates. If people are coming on the train to the central station to watch Wigan Athletic we do not think and I do not think it is fair to say that we should pay for policemen to stand in the town centre and make sure those supporters behave themselves.

**Q65 Chairman:** So you would be very much against the proposals in Scotland which are that the clubs should pay for all the policing costs outside the ground?

**Mr Whelan:** The ruling that we got was a very, very fair ruling: we pay for policemen who are actually on the land that we own. If policemen are on the public highway, public streets or public land, we should not be charged. Football is a national institution in this land and if we start to pay the kind of fees that the police were asking Wigan Athletic to pay then we are going to kill football and we are going to kill football in its present form. In this land of ours it is so popular and the biggest, biggest sport on earth and I just feel we have to protect it. I know we want security but I feel the police have to work very, very closely with the football clubs and be fair in what they charge.

**Q66 Ms Buck:** Can you give us an indication of exactly how much you do pay for policing?

**Mr Whelan:** Brenda Spencer can tell you that a little better than I can.

**Q67 Chairman:** Mr Turner, please do feel free. These questions are also directed at you.

**Mr Turner:** Ours is almost a totally different case to Wigan.

**Mrs Spencer:** I find that the main problem is that whoever is running the local police force seems to have the jurisdiction over what he can do. This was shown in the cases where we proved that when we played Leeds we had this massive bill and yet another club round the corner had a bill which was five times less than we were paying. That just goes from the chief superintendent who is in charge of that division and we feel it is wrong that one man should be responsible for saying what should or should not be done. That was proved as well because we had a gentleman in charge when these high charges occurred and yet prior to that we had no problem and since that we have had no problem. We are now back on an even footing with our police. Why should one person have the authority to charge these extortionate prices in a local constabulary? That is amazing.

**Mr Turner:** Our situation was such that we have not paid police charges for many years; we do not have police inside the ground. We have had a great relationship with our local constabulary and then last closed season the force solicitor of West Mercia police and a superintendent came along with an agreement for us to sign on vicinity charges. They were public car parks, the cattle market, the main A49 going north/south through Hereford. We looked at it and the threat was that if we did not sign the agreement they would go for full recovery of costs which would be three times the amount. We have pared everything back to the bone in order to run a small club. I will give you the extreme example. We played Swindon Town and the gate was 4,006 and our police bill, without policemen inside the ground, was £16,500. At £4 per head, if that is going to continue, and we have not settled the case yet, then we are for certain going to have to put £4 or £5

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onto our admission charges because our main stream of revenue is from supporters. If we are to pay these bills to the police for vicinity charges, for instance for a municipal car park which is three quarters full by twelve o'clock on a Saturday with shoppers and with office workers, we are facing a problem. I do not think people realise the contribution that we as a small club make to the community. It is a big part of a lot of people's lives; although the gates are not high a lot of households take an interest even if they do not come to the game. We have a community football scheme where we go into schools; our players go out every fortnight and coach youngsters. There are all sorts. We are involved with the college for blind people and we have just put audio equipment into the ground to enable them to come along and to soak up the atmosphere, shout at the referee if they want to and listen to a commentary through it. We get involved in all those sorts of schemes.

**Q68 Chairman:** Do you accept the principle that you have to pay something?

**Mr Turner:** No.

**Q69 Chairman:** You think you should pay nothing.

**Mr Turner:** If it is inside the ground, if it is on our footprint of land that we control or own, yes, we would certainly be prepared to pay for that.

**Q70 Chairman:** Do you take Mrs Spencer's point that it is unfair that one police officer should determine the cost?

**Mr Turner:** After 10 years of no bills from the police, suddenly we have been presented with this agreement which we obviously have not agreed to, so yes.

**Q71 Ms Buck:** Can we just drill down a bit into the amounts of money we are talking about because I am not clear about that? How much did you as a club pay last season for policing?

**Mrs Spencer:** About £240,000.

**Q72 Ms Buck:** To put that in context, how much do you think you spent on stewarding operations?

**Mrs Spencer:** That is in comparison with the police, if not more. That is why we feel that policing should be reduced because we are paying all this money to have the stewarding trained to the level which is demanded by Health & Safety and we then have to pay the police as well.

**Q73 Ms Buck:** Is the stewarding all internal or not internal to the grounds?

**Mrs Spencer:** Most of it is internal.

**Q74 Ms Buck:** So we are talking about two separate things. Do you recognise that we are talking about two separate things?

**Mrs Spencer:** Yes. We do bring outside people in just to make up the numbers if we are short on stewarding on the day.

**Q75 Ms Buck:** Indeed but the stewarding operation is internal to the ground.

**Mrs Spencer:** Yes.

**Q76 Ms Buck:** You do not steward outside the ground.

**Mrs Spencer:** Just on the perimeter where the gates are, that is all.

**Q77 Ms Buck:** So they are two quite distinct things, the issue of policing behaviour into and out of the ground and inside the ground.

**Mrs Spencer:** Yes.

**Q78 Ms Buck:** Mr Turner, are you able to give us an indication of the stewarding costs that you incur?

**Mr Turner:** Off the top of my head I think it would be less than £2,000 per game. We had two arrests last season and one was a streaker. We are a relatively trouble-free club. A lot of families come to the game. I am not sure about the Premiership as I do not get to see many games there, but I think it is general for smaller clubs like ours which hold great attraction for families.

**Q79 Chairman:** Is it £2,000 a year or £2,000 a match.

**Mr Turner:** A match.

**Mrs Spencer:** A match.

**Q80 Chairman:** What are policing costs per match for Hereford?

**Mr Turner:** I have given you the example of £16,000 for Swindon.

**Q81 Chairman:** Is that an average?

**Mr Turner:** No, that is the extreme case. Some of them are police-free games and they will not put any extra police in the vicinity of the ground. Some are hundreds of pounds; several fixtures at £3,000.

**Q82 Chairman:** So for the last financial year how much did you spend on policing?

**Mr Turner:** We are still in dispute over the invoice but the total invoicing would come to somewhere around £80,000.

**Q83 Chairman:** How much did you spend on stewarding last year?

**Mr Turner:** Probably £50,000.

**Q84 Chairman:** So £130,000 in total.

**Mr Turner:** Yes, and that is for an average gate over the season of 3,200.

**Q85 Ms Buck:** You talked about all the community benefit you invest in as a club. Is it not equally arbitrary? Mrs Spencer was arguing that clubs should not be subject to an arbitrary decision about costs. Is it not equally arbitrary for a club to say that they are putting in so much community benefit that they choose, it is their club priority, for the taxpayer to pay for the policing? Do we not need some form of consistent approach to this that either basically we have agreements as to what the clubs do provide

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for policing some community activities or the whole thing just goes into general taxation and you do not pay anything?

**Mr Turner:** It is a request for special police services and we feel within the footprint of the ground, within the vicinity of the ground, on the basis of two arrests, that we do not request special police services.

**Q86 Mr Winnick:** The dispute is over a £20,000 bill which the police sent last year. This was after a game against Swindon.

**Mr Turner:** It was £16,600.

**Q87 Mr Winnick:** You have disputed that, have you not?

**Mr Turner:** We have disputed every bill. We have solicitors involved and they are in discussion with the police over the whole matter.

**Q88 Mr Winnick:** Has any of the £20,000 been given to the police?

**Mr Turner:** No.

**Q89 Mr Winnick:** Nothing at all.

**Mr Turner:** No.

**Q90 Mr Winnick:** Do I take it that you are disputing the entire sum or that you want to reach a compromise figure?

**Mr Turner:** No, we are disputing the principle of charging us for municipal car parks where the council takes the profits from carpark charges, from the livestock market, from the main thoroughfare through Hereford. We are disputing that principle; in the opinion of our solicitors the law does not entitle the police to ask for those amounts.

**Q91 Mr Winnick:** No disrespect to Hereford whatsoever. It would be true to say that you are not a club which Alan Sugar or Russian billionaires are trying to buy.

**Mr Turner:** Hardly.

**Q92 Mr Winnick:** Do you have a struggle financially?

**Mr Turner:** Yes.

**Q93 Mr Winnick:** In what way?

**Mr Turner:** We have pared everything back to the bone; we were relegated last season simply because we would not loosen the purse strings to pay out money we could not afford. These extra charges which have come about only over the last 12 months might just be because of a single person at West Mercia police who has decided to change tack and suddenly start charging for vicinity charges. It is something we cannot absorb. It is a possibility that the club will get themselves into financial difficulties because of these extra charges. Without a shadow of a doubt we will have to put the charges onto admission prices with a result that supporters will say "Swindon Town are coming. We've got to pay an extra fiver. We're not coming to the game". Diminishing returns.

**Q94 Mr Winnick:** We know you are supported by the Football League. Presumably you have the support of the local community, local press.

**Mr Turner:** Yes; local authority as well.

**Q95 Mr Streeter:** You say you have had two arrests in the last 12 months within the ground. Are there boozy punch-ups in the evening after home matches in Hereford town centre that the police are worried about?

**Mr Turner:** No.

**Q96 Mr Streeter:** There is no trouble at all.

**Mr Turner:** No.

**Q97 Mr Streeter:** They are imposing police presence upon you when you do not think it is necessary.

**Mr Turner:** Yes.

**Q98 Mr Streeter:** I think that is a serious point you have made there. If full-cost policing were introduced, vicinity charges and the lot, what would it do to your business? Would you survive?

**Mr Turner:** No, not in its present state and possibly not as a league club. We would almost certainly have to be part-timers.

**Mr Streeter:** I think Mr Turner has made some very compelling arguments this morning, if I may say so.

**Q99 Chairman:** Indeed. Mr Whelan, you do not object to having to pay something. You do not think it should be totally free.

**Mr Whelan:** I think every Football League club, every Premier League club believe they have to pay a fair and proper part of the police bill. That is general and we have no objections to paying a fair price. We believe in it and we want to be secure. We want two or three games, so you would get no objections whatsoever from us.

**Q100 Chairman:** But your concern, as expressed by Mrs Spencer, is that one individual police officer decides ultimately how many police officers should turn up on a particular day and that is not subject to challenge. That is your concern.

**Mr Whelan:** What Mrs Spencer has just said is absolutely true. One man decides what we are going to pay and how many policemen he is going to put there. We have experienced, because of the change of that policeman from season to season, our prices going up or coming down.

**Q101 Chairman:** You have asked the police and the local community to bear in mind that clubs have a local following and provide services way beyond their commercial enterprise which itself might reduce the cost of policing because of what they do in the local community. Is that another argument you are putting forward?

**Mr Whelan:** We are not allowed to say what category matches are, how many policemen he sends. That is nothing to do with the football club, it is entirely a police decision and we cannot even question that.

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**Q102 Chairman:** Are you and Mr Turner telling this Committee that as a result of the good works done even by clubs like Manchester United you are actually reducing the overall cost of policing to the community because you are taking young people off the streets and giving them training and your coaches go out and do whatever coaches do for football teams.

**Mr Turner:** Yes. Charlton Athletic are heavily involved in preventing knife crimes with the Metropolitan Police. They are an example of what can be done. Football in particular is a focal point for the community and where the problems that we

face in society cannot always be addressed by some quarters, involvement with footballers and football clubs can sometimes address those problems more easily than other avenues.

**Q103 Chairman:** And overall reduce the cost of policing.

**Mr Turner:** Yes.

**Chairman:** Mr Whelan, Mr Turner, Mrs Spencer thank you very much indeed for coming to give evidence; it has been very helpful in our evidence today and we are most grateful. Thank you very much.

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# Written evidence

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## **Memorandum submitted by William Bush, Director of Communications and Public Policy, Premier League**

The Premier League and the Football League together represent the 92 Football Clubs which comprise the top four divisions of English football. The Football League was formed in 1888, the first professional league in the world. The Premier League was formed by the (then) 22 Clubs in the First Division of the Football League in 1992. Crowds attending football matches in England have been substantial ever since the inception of professional football, and indeed before. Policing has been provided throughout that period. The legislation establishing the system for charging for policing at events dates from 1964, updated in 1996 and has been frequently tested in the courts. The most recent significant case is Wigan Athletic Football Club v Greater Manchester Police resolved at the court of first instance in 2006 and in Appeal, handed down in December 2007. These Judgments confirm other significant cases in this area, including Reading Festivals v West Yorkshire Police 2006. The most recent Home Office Guidelines were issued in 2000. Statute and Case Law are therefore now well established and clear and our Clubs engage in discussions with their local police on the following basis:

1. Charges for Special Police Services are determined through local agreements, ensuring that each Club's individual circumstances are properly taken into account. This is very much in line with the Wigan Judgment from December 2007.
2. The law, confirmed by the Wigan Judgment, is clear that charges can only relate to the costs reasonably incurred for the deployment of Police on land owned and/or controlled by the Club solely for match-day crowd management purposes.
3. Other costs may well be incurred by the Police which they feel to be "football related" even if away from grounds. This could include transport locations, car-parks, pubs and bars where fans congregate going to or from matches or simply watching televised football in pubs. These costs fall to the general Police budget, and properly so—fans and Football Clubs pay their taxes and as citizens it is perfectly reasonable for them to receive public services paid for from general public funds.
4. According to Deloitte football in England will pay over £1 billion in tax in the coming season. Our surveys of fans suggest that over four million people attend Premier League matches at some point in a season and their tax contribution to the Exchequer will be vastly greater.
5. Clubs strive to be good citizens and good neighbours. They work hard with local councils and with local residents and businesses to minimise the impact of match days and to contribute to the local community and the local economy.
6. This "good citizen" role extends to close working partnerships with the Police. The Premier League and its Clubs participate in a number of anti-crime initiatives, including Positive Futures, the National Anti-Knife Crime Initiative, the Home Office's It Doesn't Have to Happen campaign, Street Games, education projects aimed at improving attendance and, especially, Kickz. Kickz is a scheme designed jointly with the Police to use football to engage vulnerable young people in high crime areas. There are now over 100 Kickz projects around England, primarily delivered by Premier League Clubs but with funding also being made available to Football League Clubs. Total committed expenditure is now in excess of £12 million. Early results suggest that crime and anti-social behaviour is falling in the areas where Kickz is being delivered and several Police Forces are asking for the Kickz programme to be extended. These Forces include the Metropolitan Police, West Midlands Police, and Merseyside Police.
7. Demanding large increases in charges and blurring the boundary between Special Police Charges and general policing risks breaking the strong and constructive relationships that currently exist between local police and Football Clubs. First, it is unfair to charge twice—fans and Clubs pay large amounts in tax and reasonably expect to receive good public services, including policing, when going about their lawful business. Second, a tried and tested system exists to establish charges for Special Police Services at matches and this system does not need to be replaced. Third, extending charges means Clubs are being treated as customers of specific services and not as citizens.

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## **Memorandum submitted by Jamie Hammond, General Manager, Scunthorpe United FC**

Obviously, for a Club the size of Scunthorpe United, all costs generally, but policing charges specifically, are of great concern. It is often very difficult, if not impossible, to actually see and therefore question the intelligence used by police in determining the categorisation of a match and hence the cost.

Secondly, it seems to us that Clubs' Safety Advisory Groups, who, as you know, administer the Ground Safety Certificates under which football clubs operate, will not go against the wishes of the local police force, thus negotiation with regard to match categorisations and hence police charges can be very difficult.

However, I would have to say that under the current management of our local police force, we have a good working relationship, but I am fearful for the future of police charges and would question why it is that football clubs bear the brunt of police charges when compared to other sports or events?

Whilst I accept that there is a need for football clubs to request Special Police Services (SPS) inside football grounds, from time to time, I do feel that with the great strides that have been made recently into stewarding by football clubs the need for SPS should decrease in the future. However, I would be very strongly opposed to football clubs being charged for policing outside football grounds and feel that it would be iniquitous when compared to other events, operations and industries.

I know that ACPO is in the process of finalising national guidance and a consistent policy to police charging at football matches nationally to police forces. I would suggest that this guidance and a new approach to charging be put in abeyance until the outcome of the Home Affairs Select committee Inquiry into the cost of policing football matches reports its findings.

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**Memorandum submitted by Karl Oyston, Chairman, Blackpool Football Club**

My observations, based upon my 10 years as Chairman of Blackpool Football Club competing within all three divisions of the Football League and also representing League 1 on the Football League Board for three years, are as follows:

1. There seems to be no consistency of application or methodology across football with either specific Football Clubs or specific Police forces being guilty of bad practice and in certain cases there is far too much reliance placed upon the relationship between those controlling a football club and the specific Police Officers with whom they liaise. This has been outlined in my time at Blackpool when an extremely good working partnership was virtually destroyed by one Officer who the Club could simply not get along with.
2. There seems to be little or no “science” used in order to calculate policing categories and this sometimes allows certain Police Forces to hide behind the excuse of “police intelligence”. There now exists a very accurate and regularly updated Safety Officers website whereby virtually all Ground Safety Officers report upon the behaviour of both home and away fans at every match. It is therefore possible for us to quickly and easily prepare our own research of how our visiting Clubs have behaved both home and away in all of their most recent fixtures. This, to my knowledge, does not seem to be adequately used by the Police Forces as either a check or supplement to their own intelligence sources.
3. Policing is obviously one of the few areas that we, as administrators of Football Clubs, have little or no control over and must, in extreme circumstances, allow the Police to inflict both categories and costs upon us. Having said all this, I consider we at Blackpool have an excellent working relationship with Lancashire Constabulary and the Lancashire Constabulary’s costs and categorisation of matches is done jointly and fairly and improvements that we make, in both our stewarding and environment, are met with reductions in Police presence and therefore costs. We also work extremely closely with our Police Liaison Officer and exclude such supporters that are considered to be of any detriment to the behaviour of the crowd. I do not believe that all Football Clubs have such a close relationship that will provide such benefits.

In conclusion, I believe it would be possible for a working party to be formed to recommend and implement best practice from around the country which would both incentivise and reward Football Clubs to get their own houses in order and minimise police presence and therefore cost, and create an environment whereby all Football Clubs and all police forces work towards a common goal of eradicating unacceptable behaviour, both in and around football stadia and within the football culture in this country.

*June 2009*

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**Memorandum submitted by Sheffield Wednesday Football Club**

Thank you for giving my Club the opportunity to submit evidence to the inquiry into the cost of policing football matches.

First of all it is important to note that Sheffield Wednesday Football Club recognises that the responsibility for the safety of spectators lies at all times with the stadium management. The Club also acknowledges that for certain matches and events the presence of the Police may be required to maintain public order and to prevent the commission of offences and Sheffield Wednesday Football Club welcomes the support of South Yorkshire Police Force in providing Special Police Services for matches and events at Hillsborough Stadium.

Further, you should be aware that Sheffield Wednesday Football Club has never sought to avoid paying for the police services that have been provided and we have always settled our bills promptly.

However, Police charges nationally went up astronomically last year after the decision in the Court Case *Wigan Athletic v Greater Manchester Police (GMP)* when ACPO gave all Police Forces guidance on charging “Full Cost Recovery” to Football Clubs.

Here is a summary of charges from South Yorkshire Police (SYP) to Sheffield Wednesday for the past four seasons:

Police charges 2008–09	£360,272
Police Charges 2007–08	£258,454
Police Charges 2006–07	£204,307
Police Charges 2005–06	£143,386

As you can see our charges have more than doubled over the past four seasons. This is partly due to the fact that we were first charged four hours per officer then five hours and now six hours per officer per game, but is also a fact that South Yorkshire Police seeks “Full Cost Recovery” since the decision in the *Wigan Athletic v Greater Manchester Police (GMP)* case.

Last season our charges per categories were:

Category CS, £9,941 (Club Security), category A, £13,378, category B, £16,201, category C, £24,330, category CIR, (Cat C Increased Risk) £36,111, (v Sheffield United).

The problem is that at present the General Safety Certificate states that the certificate holder (the Club) shall secure, at the holder’s expense, the attendance at the specified activity of such police officers as in the opinion of the Chief Constable is sufficient to ensure the orderly behaviour of spectators.

This is an anomaly in that the organisation providing the service decides the number of staff that will be deployed and sets the charges with no negotiation or agreement. This is certainly not the case for other services that we buy in on match days such as stewarding and catering staff.

The questions that need to be addressed are:

- (i) the number of hours duty that clubs have to pay. (As stated above, we are now charged six hours and in most cases police officers are only deployed at the stadium or on the stadium footprint from 13:00 to 17:00)
- (ii) the actual hourly charge per officer, and
- (iii) what officers we are charged for.

*June 2009*

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### **Memorandum submitted by Derek Smith, Director of Resources, West Midlands Police**

#### **EXECUTIVE SUMMARY**

1) The provision of police officers at football matches, as a Special Police Service (SPS), is necessary to ensure the safety of supporters who attend those matches and deter crime and disorder. Although stewards are able to perform these roles without police support in approximately 40% of matches, in the remainder of matches it is accepted that a police presence is essential. Current Home Office guidance and the Police Act 1996 give the police the authority to recover costs from football clubs for a proportion of officers who are deployed to police those matches at the ground and in its immediate vicinity. This cost recovery is based on the principle of full cost, to include items such as pay, overtime, pension costs and other overheads.

2) Despite this guidance, police forces have varied greatly in their approach to the policing requirement and the charge regimes that have been put in place. Recent case law—most notably that of *Greater Manchester Police vs. Wigan Athletic FC Ltd* (and subsequent appeals), has added to the law that structures the use and cost recovery of Special Police Services. In particular, it has extended the area for which SPS can be charged to include land in the vicinity of the stadium that is controlled for the purposes of the match and for the benefit of the club. I am in the process of developing definitive charging principles based on the existing guidance and case law.

3) I recommend that the Government incorporates current guidance and case law into a new Home Office Circular to provide a definitive guide to charging for the policing of football matches, bearing in mind the requirements as laid down in the Safety of Sports Ground Act 1975 which charges Local Authorities with ensuring that proper arrangements are in place to secure the reasonable safety of spectators.

#### **ABOUT THE SUBMITTER**

4) I am Derek Smith, Director of Resources for West Midlands Police. I am a member of the Association of Chief Police Officers (ACPO) and a member of the ACPO Finance Business Area. I have been a member of ACPO since 1999. One of my roles is to provide national guidance to all forces in England and Wales on charging for police services.



5) Since the Wigan case, I have been leading a working group drawn from the majority of forces in England and Wales in order to develop definitive guidance about charging for police services at football matches. It is anticipated that this guidance will be issued within the next month.

#### FACTUAL INFORMATION

6) The police fulfil two primary functions when deployed at football matches. The first is to ensure that the match is conducted in an environment that is safe for all those attending. The second is to provide a disincentive to crime and disorder and to deal with any such occurrences should they arise.

7) In order to be able to play football matches in its stadium, a club requires a Safety Certificate under the Safety of Sports Grounds Act 1975. This Act and its subsequent amendments came about due to a number of serious incidents at sports grounds that led to significant loss of life, most notably:

Ibrox	2 January 1971	(66 Dead from a structural failure, leading to the first Act)
Bradford City	11 May 1985	(56 Dead from a fire in the stadium)
Heysel, Brussels	29 May 1985	(39 Dead from disorder in the stadium)
Hillsborough	15 April 1989	(96 Dead from design & control problems)

Each of these disasters left many dead and injured and affected the Government's view of safety standards and requirements for the future.

8) The Safety of Sports Ground Act charges Local Authorities with ensuring that proper arrangements are in place to secure the reasonable safety of spectators attending football matches. This includes the provision of a sufficient number of stewards, and/or police officers to ensure lawful and orderly behaviour within the sports ground and the means of access to and egress from it. Such numbers will depend on the intelligence assessment of the threat to public safety for each match.

9) In a certain proportion of matches, currently approximately 40%, it is not necessary for police officers to be deployed within the stadium or its immediate vicinity as a special police service, because the functions in relation to safety can be properly carried out by stewards and it is judged that there is a very low likelihood of crime and disorder. However, police officers will be required in the remainder of matches because, as highlighted by Mr. Justice Mann in the recent Wigan case:

*Para 85 (c) "...the police provide their services in the stadium precisely because the club cannot achieve the full effect with stewards. The presence of uniformed and trained police officers has the desired deterrent effect on those who might otherwise be minded to commit events of disorder, and civilian stewarding cannot really have that effect."*

#### STATUTE AND REGULATION

10) Section 25 of the Police Act 1996 provides for personnel to be provided for Special Police Services (SPS). The policing of football matches falls under the definition of SPS. The power to recover the costs for such services is contained within Section 25 (1) of the Act which states:

11) "The chief officer of police of a police force may provide, at the request of any person, special police services at any premises or in any locality in the police area for which the force is maintained, subject to the payment to the police authority of charges on such scales as may be determined by that authority."

12) Home Office Circular 34/2000 "Home Office guidance on football-related legislation" sought to clarify the position in relation to charging for SPS at football matches. The relevant paragraphs read (so far as is material):

13.3 *It is Government policy that the costs of special services should be paid in full by those using the service and that no part of these costs should be allowed to add to the general level of police expenditure. Charges should be reviewed and adjusted as necessary on an annual basis.*

13.4 *The aim in principle should be to recover the full cost of:*

- *Those police officers who are deployed at football matches on the private property of the football club;*
- *Where officers are posted outside the ground for part of their tour of duty and inside it for the remainder, the full cost of their time spent inside should also be recovered.*

13.5 *"Full cost" means the total cost of:*

- *A police officer including pay.*
- *Overtime.*
- *National insurance.*
- *Notional pension charges.*

- *Travel costs.*
- *Rent allowance.*
- *Compensatory grant.*
- *Uniform.*
- *Administrative costs.*

*13.7 There must be a direct link between deployment and charges if the full cost is to be recovered.*

13) It should be noted that some of the detail set out above has been superseded by changes in policy and case law. This needs to be reflected in a new circular.

14) There is perhaps a perception amongst certain sections of society that football hooliganism and associated disorder is a thing of the past. It is certainly true that it is less extensively reported by the media, but it still exists. Partly due to the effect of recent legislation that seeks to ban offenders involved in football-related violence from attending matches, it is now as likely to take place away from a stadium as within it, but it still occurs at or within stadia. It is therefore still essential to provide an appropriate level of policing at football matches to ensure the safety of those attending as per the Safety of Sports Ground Act 1975. And as per Home Office Circular 34/2000, that policing should not be allowed to add to the general level of police expenditure.

15) There is also a perception that the resources used to police football matches are not significantly different to the 1980s when football violence was at its peak. In the Taylor report into the Hillsborough disaster, it was highlighted that 5,000 officers would be deployed on football duties on any Saturday afternoon during the football season, and at many League matches, 300 officers could be on duty inside the stadium alone. It is estimated that instead of the 5,000 officers deployed during the 1980s, this has now been reduced to between 2,000 and 2,500, and as such the burden on clubs has significantly reduced. A view of typical deployments is given in paragraph 24, showing the significant reduction in officer numbers.

#### GUIDANCE

16) Despite the Home Office guidance, police forces have varied greatly in their approach to the policing requirement, and the charge regimes that have been put in place. This has led to inconsistent treatment that has made the justification of some approaches more difficult.

17) Recent case law, most notably that of *West Yorkshire Police Authority vs. Reading Festival*, and *Greater Manchester Police vs. Wigan Athletic FC Ltd* and subsequent appeals, have added to the law that structures the use and cost recovery of SPS. The salient points that arise from that and other cases are as follows:

#### 18) *Request*

Club officials must meet with police at the start of the season to agree the level of resourcing that will be required for each match based on an assessment of the risk involved. The risk depends on a number of factors. Some of these are as follows:

- the home team;
- the League they play in;
- risk posed by away fans;
- day of the week;
- time of kick-off;
- type of match and its importance;
- likely attendance level;
- how many away supporters will attend and their mode of transport;
- previous incidents of disorder;
- how many and how effective are the club stewards;
- specific intelligence in relation to the threat of disorder; and
- and history of disorder between the two teams.

19) For SPS to be provided, there must be a request by the club for SPS, and an agreement by the force to provide the officers. This should be part of an annual agreement between the parties.

#### 20) *Locality*

SPS will be charged for the deployment of officers within the stadium and land in the vicinity of the stadium which is controlled for the purposes of the match and where the police presence is for the benefit of the club. This would therefore include, for example, a car park near to the ground that is used specifically for the purposes of the match, and public roads that are closed for the purposes of the match. This area has

come to be known as the “footprint” of the ground. The footprint is a clear indication of the locality for charging purposes based on a reasonable view of the vicinity in question. Charging for officers within the footprint of the ground as reflected in the Wigan case is now in conflict with Home Office Circular 34/2000. This is impeding agreement between clubs and forces regarding what elements of the total policing requirement can be charged for and needs to be clarified in a new circular.

## 21) Deployments

From a policing perspective, policing activity is divided into three phases as follows:

- The first phase is the period prior to the match, which includes parade time, travel to collect equipment and get to the ground, the briefing of staff and pre-match deployment, for example at the entrances to the ground.
- The second phase covers the period when the match itself is being played.
- The third phase covers the period after the match, to include proper dispersal of the crowd, debriefing, travel to deposit equipment and return to police stations.

22) Six hours has been identified as the appropriate amount of time between officers arriving for duty at their home station and completing their duty having policed the football match, covering all the phases identified above. The Wigan case addressed the issue of whether this whole period was chargeable as SPS. In his judgement, Lord Justice Mann clarified that as officers had been brought in for duty on what would otherwise have been a rest day, and they would not have been on duty were it not for the match, then their duty of six hours should be charged for as SPS if deployed within the footprint of the ground during all three phases of the match. Where officers are deployed within the footprint for only parts of the three phases, then it is appropriate to charge for a partial deployment. To provide a consistent and manageable approach, this should be charged at three hours.

23) Each game is categorised according to the perceived risk. Non-risk games, where a police presence is not required, are classed as Category CS—Club Security Only (Police Free Fixture). Low risk games are classed as Category A, medium risk as Category B and high risk as Category C. A very low proportion of the most high-risk games where there are increased risks, for example some local derbies, are categorised as Category C—(IR) Increased Risk.

24) Although each football ground is unique, and therefore has its own requirements, typical deployments of police officers for each Category of game are as follows:

	<i>Premier League/ Championship</i>		<i>Leagues 1 and 2</i>	
	<i>Total Officers</i>	<i>Officers Charged</i>	<i>Total Officers</i>	<i>Officers Charged</i>
Category A	70	45	35	20
Category B	100	60	60	35
Category C	150	100	90	65

## 25) Charge

The charge for SPS should be calculated in line with agreed full economic cost recovery principles. This will include both a calculation of direct costs but also the addition of a contribution to force overheads. It should be noted that during the Wigan case, this principle of full economic cost recovery was not challenged, and is a principle that applies to all other commercial events where SPS is provided, such as the policing of pop concerts, not just football matches.

## CONTEXT

26) According to the 2009 Deloitte Annual Review of Football Finance, the total revenue of the 92 professional clubs in the season 2007–08 was £2,460 million. The revenue of the Premier League clubs alone was £1,932 million. The revenue of the Premier League clubs has grown by a compound annual rate of over 16% since its inception in 1992, and is now nearly 11 times more than the 22 clubs in the old First Division in 1991–92. In the same period, the Championship clubs have seen an increase in revenue of nearly 12% annually, while even the revenues of the clubs in Leagues 1 and 2 have increased by nearly 10% annually.

27) Policing charges for the 2008/09 season were approximately £12 million to £15 million. This equates to between 0.5% and 0.6% of the total revenue of the 92 professional clubs. The approximate cost of policing per spectator is 50 pence, with ticket prices varying in general between £16 and £40. Thus the policing cost to clubs is typically less than 2% of the average ticket price.

28) It should also be noted that as well as the chargeable element of the policing of football matches, a substantial element of additional policing is provided that is not allowed to be charged for under current guidelines and case law. This is approximately £8 million to £10 million of further resources.

29) The Deloitte report showed that revenue income has been rising at a significant rate, up 21% in the last year for the 92 professional clubs as a whole and 26% for the Premier League clubs. Policing charges on average rose by between 3% and 5%. This underpins the issue that although policing is a key part of the delivery of successful football, it is not a significant cost to the industry in overall terms. By making the police service's approach more consistent there will be some increase in charges to reflect the new reality of locality for policing; however it would not be material to the clubs' overall cost structure.

30) The service is very mindful of "small clubs," and the structured intelligence approach will lead to a clearer view of required policing deployments that will potentially increase the number of police-free matches but will also help determine the actual deployments for policing these clubs.

#### RECOMMENDATIONS FOR ACTION

31) At present, Home Office Circular 34/2000 and recent case law are in conflict with each other. This is causing discord between clubs and forces and impeding agreement between them about what resources can be charged for. It is recommended that the Government incorporates current guidance and case law into a new Home Office Circular to provide a definitive guide to charging for the policing of football matches.

32) It should also bear in mind the requirements as laid down in the Safety of Sports Ground Act 1975 which charges Local Authorities with ensuring that proper arrangements are in place to secure the reasonable safety of spectators attending football matches. This includes the provision of a sufficient number of police officers to ensure lawful and orderly behaviour within the sports ground and the means of access to and egress from it.

*June 2009*

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#### **Memorandum submitted by Reading Football Club**

Thank you for your letter dated 10 June 2009, addressed to Reading FC Chairman, Sir John Madejski. We would like the following information considered at the inquiry:

As you are aware, the existing legislation is for charging football clubs for police officers deployed on the property of the football club.

We agree with this arrangement and would not support a proposal for full cost recovery of policing outside the stadium ownership.

The reasons for this are as follows:

1. The police resources deployed outside the stadium footprint, are beyond the control or influence of the football club.
2. Public disorder occurs in towns other than on football days which may be connected with public houses, night clubs, or other areas of public gatherings. Response to these incidents are the responsibility for the local police authority with no additional charges to those premises over and above the business rates paid.
3. We have agreed with Thames Valley Police a basis for policing of football matches. We have complied with the recommendations made by TVP by investing our stewarding and security operation. Troublemakers are banned from attending the stadium and over recent years this has resulted in very few incidents of public disorder both at the stadium and in the town centre. This action has helped to break the cycle of violence and antagonism which occurred at Reading's football ground in the past.
4. The majority of matches held at Reading FC do not have police attendance. Last season out of 26 matches held, police attended 11 matches. For the forthcoming season, we expect to reduce police attendance to between four and eight matches.

On this basis it would be unacceptable and unfair to now change the legislation to include for costs which are unaccountable.

*June 2009*

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### **Memorandum submitted by the Football League**

Following the recent Select Committee inquiry into costs for the policing of football matches, The Football League has sought to provide the Committee with additional information on the cost of stewarding football matches and an overview of the training that stewards receive:

#### **COST OF STEWARDING FOOTBALL LEAGUE MATCHES (SEASON 2008–09)**

Championship—£6,186,512.02 (average of £11,207 per match)  
 League 1—£3,415,731.49 (average of £6,188 per match)  
 League 2—£1,905,943.04 (average of £3,453 per match)  
 Total Football League—£11,508,186.55 (average of £6,949 per match)

#### **TRAINING FOR STEWARDS OPERATING AT FOOTBALL STADIA**

Steward training has been continually reviewed and developed over many years. It is the responsibility of the management of each club to ensure that all safety personnel, whether employed in-house or under contract are appropriately trained. Training must ensure that stewards are competent to undertake both their normal duties and their roles under the emergency and contingency plans applicable to the stadium within which they work. This will include the specific needs of vulnerable and juvenile spectators.

The training itself must be conducted by occupationally competent people using suitable training resources. The standard resource on which the training is based is the Football Authority's Training Package. The package has been produced jointly by the Football League, Premier League and Football Association under the guidance of the Football Safety Officer's Association and the Football Licensing Authority. The package provides the underpinning knowledge to satisfy the requirements of the National Occupational Standards—there are a number of training providers and the qualification sits at Level 2 on the National Curriculum Framework. During the training stewards are assessed by occupationally competent assessors to demonstrate their competency against the National Occupational Standards and performance criteria of the relevant qualification (Certificate in Event and Match Day Stewarding—CEMS and National Vocational Qualification—NVQ).

It is recommended that supervisors hold a level 3 spectator safety qualification and Safety Officers frequently obtain a Level 4 qualification. Safety Officers also attend a course organised on behalf of the Safety Officer's Association to help equip them for their role. Records of steward training are maintained by each club and are open to inspection by the local authority responsible for issuing the Safety Certificate for the stadium. The Football Licensing Authority take an overview of, and advise on, steward training.

CRB checks are carried out on stewards carrying out sensitive roles. Where steward training falls below the required standard the Safety Factor (S Factor), on which the stadium capacity is based, can be reduced by the licensing authority.

Regular table-top exercises are held to test the response and contingency plans for emergency situations at each stadium. Each local authority issuing a Safety Certificate for a football stadium, chairs a Safety Advisory Group. The group meets with the relevant football club on a regular basis and provides a significant level of scrutiny and control through advice to the local authority on matters relating to the safety certificate and match-day operations.

Local authorities monitor the training and assessment of stewards as part of their safety certificate function and clubs receive visits from the Football Licensing Authority regional inspectors. In addition Crowd Control Advisors—usually retired senior police officers with experience as Match Commanders—employed by the Football Association, visit clubs on match days and provide advice and support as necessary. The Football League employs a former senior police officer with substantial experience as a Match Commander to advise clubs on safety and security issues.

Safety at football grounds is the responsibility of each club and steward training is seen as a critical part of safety management. Clubs have invested greatly in new and improved stadia, built to the highest safety standards and fitted with control rooms and technology to a very high specification. This investment in people, design and technology has resulted in an environment which is safe, welcoming and free from the type of disorder sometimes seen in the past. There is a need for the police to stand back and examine their role and consider whether they are policing the crowd behaviour of the past—their numbers and consequent costs do not always reflect the new face of football.

*July 2009*