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12155/22

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'I/A' ITEM NOTE

From:	General Secretariat of the Council
To:	Permanent Representatives Committee/Council
No. prev. doc.:	7385/3/21 REV 3
Subject:	DRAFT Council Resolution concerning good practice guidance in respect of police liaison with Supporter Liaison Officers (SLOs) appointed by football clubs and national federations to help prevent and reduce the scale of violence, disturbances and other prohibited behaviour in connection with football matches with an international dimension, in which at least one Member State is involved
	– Approval

- 1. Delegations will find in Annex the draft Council Resolution concerning good practice guidance in respect of police liaison with Supporter Liaison Officers (SLOs) appointed by football clubs and national federations to help prevent and reduce the scale of violence, disturbances and other prohibited behaviour in connection with football matches with an international dimension, in which at least one Member State is involved.
- 2. The Resolution urges Member States to further enhance police cooperation in respect of football matches with an international dimension through the adoption of measures designed to enhance police liaison with designated Supporter Liaison Officers (SLOs) in connection with preventing and minimising the risk of significant football-related incidents in private and public places.

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- 3. The draft Resolution was discussed by the members of the Law Enforcement Working Party (LEWP-Police) during their meetings on 5 July, 20 July and 6 September 2022.
- 4. The draft was subsequently finalised on the basis of these discussions and further written comments of the delegations requesting minor modifications.
- 5. In view of the above, the Permanent Representatives Committee is invited to recommend that the Council approves the Council Resolution concerning good practice guidance in respect of police liaison with Supporter Liaison Officers (SLOs), as set out in the Annex to this note.

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Council Resolution concerning good practice guidance in respect of police liaison with Supporter Liaison Officers (SLOs) appointed by football clubs and national federations to help prevent and reduce the scale of violence, disturbances and other prohibited behaviour in connection with football matches with an international dimension, in which at least one Member State is involved

THE COUNCIL OF THE EUROPEAN UNION,

Whereas:

- (1) The European Union's objective is *inter alia* to provide citizens with a high level of safety within an area of freedom, security and justice by developing common action among the Member States in the field international police cooperation.
- (2) Taking into account Council Resolution (OJ C 444, 29.11.2016) concerning an updated handbook of recommended measures for international police cooperation, information exchange, and preventing and countering violence and disturbances in connection with football matches with an international dimension, in which at least one Member State is involved.
- (3) Taking into account Council Resolution 12791/16¹ concerning a handbook with recommendations for preventing and managing violence and disturbances in connection with football matches with an international dimension, in which at least one Member State is involved, through the adoption of good practice in respect of police liaison with supporters.

Council Resolution 12791/16 adopted at the 3490th meeting of the Council of the European Union held on 13 October 2016.

- (4) Taking into account experience at tournaments and other football matches with an international dimension and the experts' assessment of measures that will assist in helping to prevent violence, disorder and other criminal and prohibited behaviour in connection with international and domestic football matches.
- (5) Taking into account that the recommendations proposed within are without prejudice to existing national provisions, in particular the divisions and responsibilities among the different authorities and services in the Member States concerned and the exercise by the Commission of its powers under the Treaties.
- (6) Having regard to Council Recommendation 2022/915/EU of 9 June 2022 on operational law enforcement cooperation, which provides guidance and standards to improve cross-border cooperation in the European Union.

HEREBY,

- (1) URGES Member States to continue to further enhance police cooperation in respect of football matches with an international dimension through the adoption of measures designed to enhance police liaison with designated Supporter Liaison Officers (SLOs)² in connection with preventing and minimising the risk of significant football-related incidents in private and public places.
- (2) INVITES the Member States to take into account the recommended good practices annexed hereto.
- (3) STATES that this Resolution is complementary to other Council Decisions and Resolutions in connection with football events with an international dimension.
- (4) STATES that, whilst the measures contained in the annexed handbook are intended primarily for football events, Member States may, where appropriate, apply the measures in respect of other major international sports events and professional football matches played in accordance with national competitions.

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SLOs are a bridge between the fans and the club and help to improve the dialogue between the two sides.

Handbook of good practices annexed to the

[DRAFT] Council Resolution concerning good practice guidance in respect of police liaison with Supporter Liaison Officers (SLOs) appointed by football clubs and national federations to help prevent and reduce the scale of violence, disturbances and other prohibited behaviour in connection with football matches with an international dimension, in which at least one Member State is involved.

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Section One Background and Context

- 1. For over a decade, policing agencies engaged in safety and security operations in connection with international football tournaments have evidenced that making football events safe, secure and welcoming for all supporters can significantly mitigate against the threat of substantive football-related violence, disorder and other criminality.
- 2. This ethos of "service" is a key component of an integrated, multi-agency approach towards safety, security and service embedded in Council Decisions and Resolutions in connection with football events with an international dimension. It is also consistent with complementary Council of Europe documentation³.
- 3. In 2016, the Council of Ministers adopted a Council Resolution (1279/16) providing a handbook of recommendations in respect of police liaison with supporters during international football events. That handbook provided police commanders with a wide range of options to take into account when developing national and local policing football strategies in respect of consultation, communication and liaison with football supporters in order to make football stadia and public spaces safe, secure and welcoming for supporters before, during and after football matches.
- 4, The handbook also highlighted that effective liaison with supporters was but one, albeit important, element of a wider integrated approach to safety, security and service which should not be considered in isolation from other measures designed to maintain public safety and security and to promote football as an inclusive activity, including: the need for: effective but proportionate exclusion arrangements designed to prevent individuals from participating in the football experience if they evidently act in a criminal or prohibited manner in connection with a football match (inside or outside the venue); and the need for all spectator areas of football stadia to be managed effectively.

Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No.218)

Section Two. Aim of Good Practice Guidance

- 5. This guidance and associated recommended actions focus on the specific and highly important role which effective liaison between the police and SLOs can play in helping to prevent football related violence and other criminal and prohibited behaviour.
- 6. The guidance, therefore, should be widely disseminated and its recommendations customised to meet national circumstances and applied in each Member State and beyond in order to minimise risks to safety and security at football matches with an international dimension and, importantly, other professional football events.
- 7. UEFA and other relevant stakeholders are invited to promote awareness campaigns and good practice models. Study visits of states that have not yet achieved such development within the framework of the SLO project to states with large SLO experience should be encouraged. Those activities should be specifically oriented towards national associations and clubs.

Section Three. Regulatory and Current Position

- 8. The SLO concept emerged in a number of States over a period of time. Since the beginning of the 2012/13 season, clubs applying for a licence to play in one of the European competitions (Champions League/Europa League/Europa Conference League) are required under UEFA's Club Licensing and Financial Fair Play Regulations to appoint a dedicated Supporter Liaison Officer (SLO) as a main contact point for supporters.
- 9. This prompted the majority of national associations and/or professional football leagues in Europe to adopt a similar clause in their own domestic football licensing regulations. To date, more than 1,000 clubs across Europe are required to have at least one SLO.
- 10. Nevertheless, in many States, the SLO concept remains at a developmental stage. As a consequence, application of the concept varies across significantly across Europe and, indeed, within individual States.
- 11. At one level, these variations are to be expected given wide discrepancies between the size, attendances and resources of professional football clubs.

- 12. However, these variations also extend to the SLO policies and practices of national federations, leagues and clubs. In some cases, designated SLOs are equipped with the support personnel and the financial and other resources necessary to undertake effectively the wide range of functions set out in the 2016 Council Resolution (12791/16), whereas in many others, SLOs are notional and often tasked with a range of other federation or club responsibilities.
- 13. Similarly, some SLOs are paid employees whereas others undertake the role in a voluntary capacity. Some have a background of being an active supporter, whereas others are preexisting federation, league or club employees. The background of an SLO is not necessarily a crucial factor in itself, as long as the individual possess the character, skills and resources to undertake their role effectively.

Section Four. Role of the SLO

- 14. UEFA, in partnership with Supporters Direct Europe have been engaged in overseeing the rollout of the SLO project and implementation of UEFA's Club Licensing and Financial Fair Play Regulations at national association level. Together they have produced a detailed handbook⁴ on the SLO concept which outlines the role and functions of SLOs.
- 15. Whilst the primary role of an SLO is to act as a bridge between the supporters and the club/federation/league (as appropriate) and to facilitate dialogue between the two sides, the SLO concept and the 2016 Council Resolution handbook (12791/16) envisages that SLOs will also perform this intermediary role with external stakeholders, notably the police.
- 16. In essence, the work performed by SLOs incorporates an extensive and demanding range of functions, namely:
 - acting as an interface and communicating between fans, security officers, stewards and the police, etc. before, during and after matches;

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The handbook is available from Supporters Direct (SD): http://www.supporters-direct.coop

- providing detailed information for fans attending matches to facilitate match day travel and logistics and removing the potential for misunderstandings;
- providing input at security meetings before home games and high-risk away games;
- explaining the actions of fans to police and stewards and vice-versa to break down barriers and misconceptions;
- attending "concourse meetings" inside the stadium with club security officers, stewards and the police an hour or so before kick-off to evaluate the situation;
- working to prevent disorder by exerting a calming and de-escalating influence on fans and other stakeholders, mediating in conflict situations, and encouraging a positive supporter culture;
- attending debriefing meetings after matches;
- contributing to police training;
- participating in local sport and security committees,
- building an effective communication structure with fans, clubs, security staff, police, local and national government, other SLOs, transport companies, etc.
- 17. This represents an extremely demanding menu of strategic and operational activities, especially if an SLO is working in isolation, or is employed on a voluntary or part-time basis, or in a dual or multi-capacity by the club. Indeed, the task becomes almost impossible if an SLO is not provided with sufficient time, along with human and other resources, to deliver these core functions effectively.

Section Five. SLO and Police Liaison

- 18. Whereas in States with more developed SLO arrangements, the potential benefits of police liaison with SLOs are generally recognised, in States where the SLO concept remains at an embryonic stage, the absence of sufficient SLO time and resources can have a negative impact on the development of a positive and productive relationship with policing agencies responsible for crowd management functions both inside and outside of football stadia.
- 19. Moreover, in some States, lack of resources can seriously undermine the development of mutual trust between the two parties. This, in turn, can fuel misconceptions amongst some police personnel regarding the role of the SLOs. The personal integrity of SLOs and their closest possible connection to the club, and possibly to the national association, should be taken into account.
- 20. It is extremely difficult to dispel such misconceptions, if police interaction with SLOs is limited to responding to actual or potential conflict scenarios on match days, when SLO explanation of supporter concerns or behaviour can be misinterpreted by some police personnel.
- 21. The reality is that developing the trust necessary to develop a mutually beneficial relationship requires the SLO to have the support and resources necessary to liaise with the police on a regular basis in order to perform a range of inter-related functions, notably.
 - acting as an ongoing interface and communicating between supporters and the police,
 before, during and after matches;
 - providing detailed information for supporters attending matches to facilitate match day travel and logistics and removing the potential for misunderstandings;
 - providing input at security meetings before home games and high-risk away games;

- explaining the actions and concerns of supporters to the police, and vice-versa, to break down barriers and misconceptions;
- attending pre-match "concourse meetings" inside the stadium with club security officers and the police before kick-off to evaluate the situation;
- working to prevent disorder by exerting a calming and de-escalating influence on supporters, mediating in conflict situations, and encouraging a positive supporter culture;
- attending debriefing meetings after matches;
- contributing to police training;
- participating in local security committees;
- participating with the police representatives in social and other community projects aimed, inter alia, to encourage positive behaviour amongst younger supporters generally and those subject to exclusion measures; and
- building an effective communication structure with the police at a local level.
- 22. It is also important for SLO employers and the police to recognise that whilst the absence of sufficient SLO resources and a support team may be particularly noticeable on match days, it can also restrict the potential for SLOs to:
 - work on an ongoing basis with supporters in promoting positive behaviour; and
 - generate an environment in which the football experience is safe, secure and welcoming for all current and potential spectators; and
 - identify potential solutions to existing or emerging safety and security challenges/problems.

Section Six. Barriers to Effective Liaison

- 23. In essence, the main obstacles to the police and SLOs achieving effective liaison in all States can be summarised accordingly:
 - absence of widespread recognition of the mutual benefits to be derived from effective police and SLO liaison;
 - absence of a national football policing supporter liaison strategy;
 - absence of designated police supporter liaison officers or local police contacts tasked to liaise with SLOs;
 - absence of recognition of the importance and mutual benefit of SLOs maintaining and enhancing the trust of supporters when liaising with the police;
 - perceptions among police that SLOs are quasi supporter representatives;
 - police perceptions that the role of SLOs is exclusively related to what occurs inside stadia on match days;
 - lack of effective national SLO strategies and SLO peer support networks;
 - absence of SLO support team to deal with match day challenges;
 - absence of the SLO resources necessary to develop an ongoing relationship with local policing agencies;
 - lack of clarity on what information can be shared between SLOs and police contacts.

Section Seven. Recommended Good Practices

Joint action for public and football authorities

(a) Explanation and promotion of the mutual benefits of effective police and SLO liaison

- 24. In many States, there is a clear lack of awareness among senior policy makers within government, police and the football authorities of the potential benefits to be derived from more effective liaison between the police and SLOs. This includes the potentially significant impact which such liaison can have on the level and seriousness of football-related criminality in connection with international and domestic professional football matches.
- 25. To create the level of awareness necessary to encourage and facilitate effective liaison between the police and SLOs, governmental departments with responsibility for policing and sport-related safety and security should work with the football authorities and national SLO coordinator in identifying the best means for explaining and promoting enhanced cooperation between the police and SLOs in all localities hosting professional football matches.

Action for police decision makers

(b) Football policing supporter liaison strategy

- 26. Whilst the handbook on police liaison with supporters during international football events (Council Resolution 12791/16) provides police commanders with a range of supporter communication and liaison options, there is a self-evident need for the relevant lead government department and senior law enforcement management in each State to consider and develop a consistent nationwide approach towards liaison with SLOs.
- 27. To that end, the police in all localities hosting professional football matches should proactively seek to engage with SLOs as a means for developing effective and trusted channels of communication.
- 28. In so doing, police decision makers should recognise that effective police and SLO liaison is complementary to, rather than a substitute for, a broader national approach to supporter communication generally, not least amongst frontline police personnel.

(c) Designated police supporter liaison officers or local police contacts

- 29. Policing structures vary across Europe, and there is no definitive model of how best to maximise police and SLO liaison. In some countries, the preference is to appoint "police liaison officers" to work alongside SLOs. In others, the role is allocated to "dialogue policing" or "sports anti-conflict" units, or football police spotters undertaking communication and/or evidence gathering tasks.
- 30. Irrespective of the option adopted, the key is to ensure that a designated police officer or team is tasked to act as a contact and liaison point for SLOs either in connection with forthcoming football matches or, preferably, on a wider and ongoing basis.

(d) Dispelling any negative police perceptions

31. A key role of each designated police contact point should be to dispel any negative perceptions of SLOs among police commanders and front-line units deployed on football crowd management duties. This includes ensuring that all police personnel are aware that SLOs are not supporter representatives and that police commanders are aware of the wider role and remit of SLOs.

Actions for football authorities and professional football clubs.

(e) National SLO strategies

- 32. It is important for the national football federation and professional football leagues to jointly develop a nation-wide approach to empowering and resourcing club SLOs to undertake their wide range of functions effectively, notably, but not exclusively, in respect of developing positive and mutually beneficial liaison with the police (see paragraph 36 below).
- 33. The needs and/or capacity of clubs will vary in accordance with a range of factors, but the key principles and actions of the SLO concept should be adopted and applied by all professional football clubs in order to provide a consistent approach to liaison with the police.

34. The need for an appropriately resourced national SLO coordinator, employed by either the federation or professional leagues (depending upon national circumstances) can be crucial in supporting and facilitating such an approach.

(f) SLO peer support networks

35. SLOs are frequently confronted with unexpected and challenging scenarios which can, in some States, leave them feeling isolated and potentially de-motivated or, conversely, blessed with a wealth of experience which can and should be shared with their peers within the national SLO network. One function of the recommended expanded role of designated national SLO coordinators should be to encourage and facilitate experience-sharing and peer support networks, not least to assist new or inexperienced SLOs to develop the competences necessary to maximise ongoing cooperation with the designated local police contact(s).

(g) SLO remits, resources and support team

- 36. Across Europe many professional football clubs have yet to be convinced that the employment of an SLO is necessary, often because they have a small fan base and consider that their existing approach to supporter liaison is working well without an SLO. In some circumstances, this can be accompanied by a tendency to appoint a notional SLO from among their existing staff and a reluctance to provide their SLO with the resources to undertake all of the core SLO duties as set out in the handbook on police liaison with supporters (Council Resolution 12791/16).
- 37. For many SLOs, the absence of sufficient time and resources is especially noticeable on match days, when SLO activities range from strategic liaison and information exchange with club, police and other contacts (where in place) to operational interaction with organised "fan groups", which can restrict the potential for SLOs to engage with other supporters of their club. This represents a lost opportunity for SLOs to play a pivotal role in making the football experience safe, secure and welcoming for all spectators.

- 38. In view of the extremely demanding role of SLOs, not least in maximising the potential for ongoing and effective liaison with the police, it would be prudent for the football authorities to encourage, or oblige within their licensing arrangements, for professional football clubs to adopt the following policies and practices:
- in circumstances where an SLO is appointed, whilst also engaged in other club duties, the SLO should be allocated at least 50% of his or her time to SLO functions;
- if not already in place, all SLOs should be provided with a comprehensive job description setting out their core functions based on those set out in the handbook on police liaison with supporters (Council Resolution 12791/16);
- SLOs should be provided with additional support personnel, either in a paid or voluntary capacity, notably on match days;
- SLO or SLO team members (depending upon the circumstances) should travel with supporters to away fixtures;
- SLO job descriptions and annual objectives should highlight that their core role is to liaise with, and act on behalf of, all supporters, not just organised groups; and, crucially,
- it should be stressed to all SLOs that developing effective liaison with the police must be a core and ongoing duty.

(h) International Matches

39. It is strongly recommended that all football federations appoint and resource a national team SLO to undertake core SLO duties in connection with international matches played at home and abroad.

- (i) Sharing of information between police contacts and SLOs
- 40. To effectively deliver their core police liaison functions, police contacts and SLOs need to develop the mutual trust necessary to enable SLOs to inform and, where appropriate, influence policing football risk assessments, strategies and tactics.
- 41. This trust should result in SLOs being able to make a valuable contribution to police planning for football matches, not least because SLOs should have first-hand information regarding the mood among supporters and be most up-to-date regarding the logistical plans of supporters. The information provided by SLOs should help ensure that the police encounter fewer "surprises" or "unexpected events" in connection with police match operations. This information, coupled with that provided police intelligence officers and spotters should contribute to a realistic risk assessment and estimation of numbers of officers required on match day.
- 42. To facilitate this process, there should be clarity on the type of information that each side can be expected to provide.
- 43. SLOs should recognise that there will be sensitive police risk assessment and operational planning information and intelligence which cannot be shared.
- 44. As indicated above, police planners should expect to receive from SLOs a range of potentially important logistical and other information, such as: the number of supporters travelling; their anticipated or known means of travel; planned meeting points; and current mood and concerns among supporters; along with anything specific relating to the match.
- 45. However, police planners and contact points should not expect to receive speculation on the intentions of any "risk groups", not least because the behaviour of such supporters can and does vary depending upon the circumstances and is rarely pre-determined. Moreover, it is the function of police football intelligence officers and/or police spotters to provide information on any risks posed by such groups.

- 46. However, SLOs are best placed to help explain the likely impact and potential consequences of operational tactics and what actions are likely produce a positive reaction among supporters.
- 47. In essence, effective police liaison with SLOs should help in assessing the mood, wishes and concerns of supporters and assist decision makers in developing and adopting operational strategies and tactics, which are likely to be perceived by supporters as appropriate and proportionate.

(j) Match day liaison between police contacts and SLOs

- 48. As stressed in the handbook on police liaison with supporters (Council Resolution 12791/16), police contact with supporters either in an ongoing structured manner or as part of policing football operations, or both, is a primary imperative in terms of effective liaison with supporters and in minimising safety and security risks.
- 49. However, the experience in States with more developed SLO arrangements demonstrates that it can also be very productive for the police and supporters alike if the liaison is undertaken with the assistance of the designated SLO and the police contact acting as intermediary persons. This is especially the case in circumstances where tensions are emerging and when the immediate need is to diffuse tension and/or resolve conflict.
- 50. As stressed in the 2016 handbook, intermediaries should only be used by the police on the basis of a risk assessment. It should also be recognised by all parties that SLOs are not supporter representatives, or the extended arm of perceived risk groups: they are the link between police and supporters.
- 51. In practice, the clothing worn by the police contacts is not crucial, but it is preferable if the police contact is clearly identifiable (high visibility vests with their designated role, say, "police liaison officer" or "communication officer" described).

52. As stressed in paragraph 22 above, it is crucial that supporters understand and trust the (intermediary) role of SLOs. That trust is the key to maintaining and enhancing the potential and mutual benefits to be derived from effective liaison with the police. It is important, therefore, for the police to recognise that SLO liaison with supporters can be a delicate matter. Nothing should be done to put the safety or the credibility of the SLO at risk, for example, by giving the impression that the SLO is acting as an "informer". In high risk scenarios, liaison between the police contact and SLOs may often need to be discrete.

Section Eight Conclusions

- 53. The relationship between a designated police contact and SLOs should help to break down any misconceptions, prejudices, rumours on both sides and, in so doing, contribute to a better understanding of their respective roles and contribute to a reduction of any lingering mistrust or suspicion. Joint police and SLO training can assist this process.
- 54. By cultivating a constructive working relationship between police contacts and SLOs, the police can help to create a more welcoming experience and facilitate positive behaviour among supporters attending international and domestic football matches. Greater and more positive interactions with the police can improve the willingness among supporters to manage their behaviour and be more open to engage in dialogue with the police without fear or prejudice.
- 55. In so doing, police liaison with SLOs can make a positive and meaningful impact in terms of preventing violence, other criminality and prohibited behaviour, reducing the potential scale of any misbehaviour, and isolating individuals intent on causing problems in connection with international and domestic professional football matches.