

STANDING COMMITTEE (T-RV)

EUROPEAN CONVENTION ON SPECTATOR
VIOLENCE AND MISBEHAVIOUR AT SPORT EVENTS
AND IN PARTICULAR AT FOOTBALL MATCHES

COUNCIL OF EUROPE



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Athens, 31 March- 2 April 2017

Report by the Consultative team (Including the National Report of Greece)

Adopted at the 45th Standing Committee meeting on 6-7 December 2017

REPORT OF THE CONSULTATIVE VISIT TO GREECE

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PART 1

National report of the consultative visit of the Standing Committee to Greece



GREECE

MINISTRY OF CULTURE AND SPORTS

GENERAL SECRETARIAT OF SPORTS

GENERAL DIRECTORATE OF SPORTS SUPPORT

DIRECTORATE OF SPORT FOR ALL, SPORT PROMOTION

and DEVELOPMENT ,SCIENTIFIC SUPPORT

andINTERNATIONAL AFFAIRS

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National Report

National system

1. The Ministry of Culture and Sport of the Greek Government and specifically the Secretariat General of Sport -that is attached to the Ministry- is responsible for Sport in Greece. The deputy Minister of Culture and Sport, Mr.GiorgosVassiliadis and the Secretary General of Sport, Mr.IouliosSinadinos (political head, subordinate to the deputy minister), both appointed by the Minister of Culture and Sport, Mrs. Lidia Koniordou, are responsible for Sport.
2. The **Hellenic Football Federation** (HFF), member of FIFA and UEFA, is the highest football body in rank. The HFF consists of instruments dealing with professional football, such as 1) **Super League**, which is comprised by the football SAs, and it is assigned by the HFF to organize the Division A' of the Greek Football Championship, 2) **Football League**, which is responsible for the organization of the Division B' of the Greek Football Championship, while the Division C' of the Greek Football Championship is organized directly by the **HFF**.Finally, there are also the **Local Football Unions** of the country, supervising the organizations of the amateur football championships.
3. Aiming at the supervision and control of safety and security issues, the HFF has established the **Football Games Regulation** and the **Disciplinary Code**, which are harmonized and approved by FIFA. In addition (also for security and safety reasons), all Super League stadiums operate the electronic ticket and they are equipped with surveillance electronic systems (CCTV). At the same time, Super League is publishing

the declaration of the Championship as well as specific procedures for the smooth operation of the games, in order to further support the security measures.

4. All professional and amateur football matches are conducted according to the necessary –as anytime planned- strong police supervision, often though by special police units. The General Police Directorate/Hellenic Police Headquarters which is responsible for the pre-mentioned actions, has the following structure:

- Headquarters Level:

The General Police Directorate, specifically its Department of Operational Strategy and Civil Protection, is the responsible unit for combating violence in sport events.

- The jurisdictions of this Department are described in article 3 of the 178/2014 Presidential Decree (hereinafter P.D.). In addition, the National Football Information Point (NFIP) of the country operates inside the above mentioned Department, as a central point of communication, in order to assure exchange of information as well as the facilitation of the international police cooperation in the field of international sport events.

- The establishment and operation of the NFIP are described by the No. 7001/2/1349-c' dated from 12/11/2004 Decision of the Chief of the Hellenic Police Force, according to No. 2002/348/DEI dated from 25/04/2002 Decision of the Council of the European Union, which has been amended by the Decision No. 2007/412/DEI. Nevertheless, it has been replaced by the Deputy Directorates for Combating Violence (of the Hellenic Police)

- Operational Level:

All Regional Services of the Hellenic Police, in the territory of which sport events are conducted, are responsible to undertake the necessary measures for the smooth completion of the games, while in many cases they are dealing also with possible violent incidents. In addition, to this end, the Deputy Directorates for Combating Violence in Sport Events have been established in the Police Directorates of Attica and Thessaloniki respectively, staffed with expert police personnel in combating violence in sport events.

5. The Standing Committee for Combating Violence (hereinafter DEAV) operates as an independent authority, having its own board of directors as well as a group of Matches Observers. In every event of the 5 team sports, the above Committee appoints one or two Observers, who assume the responsibility to write a Report for incidents of violence might occur during the game they supervise. As regards football matches between the most popular teams, the Minister responsible for Sport, following propositions of the Greek Police and DEAV, may issue a Decision thus forbidding the fans to massively follow and support their team in away matches, in order to ensure the public order and safety.

Legal Framework

1. In Article 105 «Presence in sport events» of the P.D. 141/1991 «*Competences of the instruments and official acts of the Ministry of Public Order personnel and organization issues of the Departments*» the presence and mission of the Hellenic Police Force during sport events are described, as supplemented by article 3 of the P.D. 309/2001.
2. The Law 2725/199, as it is amended, complemented and in force today, constitutes the current legal framework of our Country to tackle the phenomenon of violence in the sport events. In the provisions of this law, the responsibilities and obligations of the Hellenic Police, in tackling the respective criminality, are defined.

More specifically:

- Article 41A “Standing Committee for Combating Violence”.
 - Participation of one (1) Officer of the Hellenic Police and one (1) representative of the National Federation of Police Officers as members in the Committee.
- Article 41B “Sport Fan Clubs, Departments of Professional Athletes, Sport SAs (PLCs)”
 - Regulation of licensing issues, operation and ticket allocation of the Clubs.
- Article 41C “Ticket allocation for sport events”
 - The relevant at the time police authority proposes, as regards ticket allocation.
 - Access of the competent services of the Ministry of Interior in the Central Electronic Tickets System in the Central Data Base is set.
- Article 41D “Sport Bodies obligations –Sport events police measures”
 - Measures taken by the Hellenic Police to maintain order during sport games are described.
- Article 41E “Electronic surveillance of sport facilities”.

The exclusive utilization and operation of the systems of electronic surveillance from the Hellenic Police is defined, as well as the data produced by them.
- Article 56A “Sport facilities and game conduct operation licenses”
 - Participation of one (1) Hellenic Police Officer in the local competent Adequacy Control Committee for all types of sport facilities.

In addition, as regards security organization issues during the sport events conduct, the No. 38404, dated from 18/08/2009, Common Ministerial Decision has been issued (Gov. Gazette 1780B’/2009) “Approval of the Sport Events Single Security Regulation”, where –among other issues- the duties and obligations of the Hellenic Police are described, in the context of its cooperation with the rest competent bodies.

3. According to the provisions of article 41a of the Law 2725/1999, which have been replaced by the provisions of article 2 of the Law 4049/2012 and amended by the provisions of article 27 of the Law 4373/2016, the Standing Committee for

Combating Violence (DEAV) is constituted in the Secretariat General of Sport (GGA) and consists of nine (9) members as follows: a) four (4) scientists of professional standing in the field of law or psychology or sociology or political science or criminology or communication, b) two (2) widely recognized members of the sport area, one of them though being a non-active athlete, c) one (1) representative of the Ministry of Justice, Transparency and Human Rights, proposed by the Minister of Justice, Transparency and Human Rights, d) one (1) high ranked officer of the Hellenic Police, proposed by the Minister of Citizen Protection, e) one (1) representative of the National Federation of Police Officials, proposed by its own board of directors.

4.

1. According to the provisions of Law 4326/2015 any natural or legal person associated with Sport, like any other sport body, has to act in every possible way in order to prevent and avoid violence phenomena in the field of Sport, inside or outside the sport venues.

2. In serious cases of violence behaviours, provocation of violence incidents, racist attitudes and in general phenomena of violence associated with Sport, in and out of sport venues, the Minister responsible for Sport, by validated decisions, taken after consulting with the Standing Committee to Combating Violence (DEAV) may impose on the relevant clubs, departments of professional athletes (TAA) and sport SAs (AAE), as well as the relative sports federations and / or the professional clubs and the individual natural persons, following a previous call and hearing, fines of ten thousand (10,000) to one million (1,000,000) euros, in particularly serious cases may even proceed in revoking their existing sport validation. The cooperation between the above legal and natural persons with the Authorities and the collection of information, when resulting in the identification and arrest of the perpetrators, constitute mitigating circumstances taken into account when setting the fines.

3. In cases of paragraph 2, the Minister responsible for Sport may also, as a precaution, in order to prevent recurrence of such incidents and behaviours, temporarily prohibit, for one or more games, the conduct of specific matches or permanently discontinue the championships or other events, by a reasoned decision, taken after a DEAV and the relevant sport federation proposition. He may also prohibit all available ways of tickets distribution and in general the use of specific zones or parts of seats of the sport facilities. In case of violation of the above prohibitions, in addition to any other consequences and penalties may be imposed, the responsible for sport Minister may require the natural or legal persons -mentioned in paragraph 1- by a reasoned decision and after a previous call and hearing, to pay fines of twenty-five thousand (25.000,00) to five million (5,000,000.00) euros, depending, in each of the above cases, on the gravity of the offense, the possible recurrence, the extent and range of impacts that have been occurred or threatened or the benefit acquired or sought. In incitement, provocation, encouragement or applause cases of

the pre-mentioned incidents in paragraph 2, racist attitudes and in general violence phenomena, caused by the printed or electronic media as well as internet media providers, in addition to other possible criminal and other consequences, by Decision of the Minister responsible for sport, obtained following the consent of the State Minister responsible for Media and propositions by the Union of Athens Daily Newspapers (ESHEA), the Panhellenic Federation of Journalists' Union (POESY) and the Panhellenic Sports Press Association (PSAT), which made within a deadline of ten (10) days of receipt of the notice of the Minister for sport, fines of five thousand (5,000) to five hundred thousand (500,000) euros may be imposed to the owners or publishers or managers of the above mentioned responsible means, following a previous call and hearing. In cases where the above acts or activities are taking place on TV or radio channels, the Minister responsible for sport informs the relevant National Radio and Television Council, in order, under its authority and jurisdiction, and additionally to other penalties, to enforce the above fines. (N.4326/2015).

5. Bodies also in operation:

- a) The Hellenic National Council for Combating Doping (ESKAN), which will be upgraded and renamed to National Organization for Combating Doping (EOKAN), within the General Secretariat of Sport.

- b) The Hellenic Sports Research Institute (EKAE), which is a public research body covering all sectors of sport science and disposes an ergometric centre and laboratory for doping control, operating in the Olympic Sport Complex of Athens (OAKA).

National status vs. Council of Europe standards

According to the Hellenic Sports Research Institute (EKAE) consultation procedures are in progress:

- For our compliance with article 4 – Domestic coordinative arrangements of SETS [218], referring to the action coordination necessity of the bodies, involved with security, policing and good services in sport events.
- For our compliance with article 11 – International Coordination of SETS [218] for the creation of a National Football Information Point (NFIP).
- For our compliance with article 8 – relations with the fans and local communities.

HELLENIC FOOTBALL FEDERATION (H.F.F.)

- DISCIPLINARY CODE

ARTICLE 15

Penalties imposed to teams for acts of violence during the football matches

General principal

The penalties listed in the present article are imposed against a team according to the game police officials' reports and descriptions, as described in CAP (**Score Sheet and game observers' reports**). The Police authority reports as well as the visual material of the match can exclusively be taken into account only as supplementary data evidence. The persecution procedures are defined in articles 34 and 35 of the present respectively.

1. Insulting Slogans – Laser pointers – Warnings

- a) In cases where the fans use banners or say slogans with swearing and insulting content, slogans and phrases that insult the players' or team/game officials' or fans' national conscience, the memory of the deceased or any individual person, then a penalty fee of two thousand (2000) to six thousand (6000) Euros may be imposed in each case. In case of use of laser machines towards players or referees or game officials, then a penalty fee of two thousand (2000) to eight thousand (8000) Euros may be imposed.
- b) In both of the above cases the following procedure is applied:**
Before the game kick-off, the game observer announces a call/warning, through the speakers, to the fans to stop any slogans or phrases as well as to remove any banners or to stop pointing with laser gadgets, making them clear at the same time about the possible heavy fines their team may have to pay. Provided that, despite the warnings, the above offences are continuing in any way during the game, then the referee is obliged to report these offences in the Score Sheet as well as the time of their occurrence. In that case, the penalty fee imposed by the relevant judicial body to the responsible team is a minimum of fifteen thousand (15000) Euros.
- c) If the referee stops (permanently) the game, the responsible team is punished with a penalty fee of minimum thirty thousand (30000) Euros.
- d) The referee that does not comply with his obligations deriving from the present, is being remitted for disciplinary control, whereas, his observer assistant that does not fulfil his game obligations, is being removed.
- e) Especially for the case of insulting slogans, the penalties of the present paragraph (15,1), are only imposed if these phrases and slogans are coming from the majority of the fans and affect the proper conduct of the match or/and its audiovisual coverage and broadcasting.

2. Torches , fireworks, firecrackers, smoke generators

Torches , fireworks, firecrackers, smoke generators and flammable materials in general are strictly forbidden inside the stadium. Torches, fireworks, firecrackers, smoke generators and flammable materials in general used in the tier seats, before, during or after the game, if no throwing of the previous mentioned materials has occurred, has as a result the following penalties:

- a) Penalty fee of two thousand (2000) to ten thousand (10000)Euros
- b) In case of recidivism and repetition of the previous offence in a following game, the provided penalty fee is doubled.
- c) In case of a new recidivism and repetition in a following game (for third time a.s.o.), the above penalty fee may rise until the amount of twenty thousand (20000) Euros.
- d) In every new case of repetition of the same offence (fourth, fifth time a.s.o.), the imposed penalties of the previous game are doubled.
- e) The recidivism of the previous mentioned in the present paragraph cases concern the same gaming season.

3. Throwingfireworks and objects

Throwing of any object in the game field or from a part of the tier seats to another, especially the throw of any torches, fireworks, firecrackers, smoke generators and flammable materials in general, before, during or after the game is strictly forbidden. Nevertheless, if any of the above restrictions occur, may result to the following penalties:

A. Before or after the game.

For throwing any kind of objects before or after the game, the responsible team is being punished with a penalty fee of three thousand (3000) to fifteen thousand (15000) Euros.

B. During the game.

- a) Throwing objects that by common experience are not capable of causing body damage, is punished with penalty fee of three thousand (3000) to fifteen thousand (15000) Euros. Nevertheless, if any -even a light one- injury of a person legally being in the game field occurs, the specified offence is being punished with a penalty fee of ten thousand (10000) to twenty five thousand (25000) Euros.
- b) Throwing objects that by common experience are capable of usually causing body damage, of a person legally being inside the game field, is punished with a penalty fee of eight thousand (8000) to twenty thousand (20000) Euros, if no body damage caused. On the other hand, if body damage

occurs a penalty fee of twenty (20000) to thirty thousand (30000) Euros is imposed.

In any case, when a spectator hits the referee or his assistants or a player or a team official by throwing an object, the referee may allow or stop the game temporarily or permanently, depending on the seriousness of the incident, according to the regulation 5 of the law of the games.

Nevertheless, if, by throwing an object -as described above- in the present, an injury of a player or coach or referee occurs, then the match is permanently stopped and the following penalty fees are imposed:

- a. thirty thousand (30000) to fifty thousand (50000)Euros
 - b. conduct of the game without spectators for 1 or 2 matchdays
- c)If the throwing object is a firework/s coming from a gun, either in curved line or straight shot, then the referee stops temporarily the game, a warning is being announced by the speakers, and a penalty fee from ten thousand (10000) to thirty thousand (30000) Euros against the responsible team is imposed. If, after the restart of the match, any of the above described firework/s throwing is repeated, the referee stops permanently the game and the responsible team is punisheda. with a penalty fee from twenty thousand (20000) to sixty thousand (60000) Euros andb. to conduct the game without spectators for 1 matchday
- d) If by throwing an object a body injury -even a light one- of a person legally being inside the game field occurs, then the match is permanently stopped(without any previous notice) and the following penalties are imposed to the responsible team
- a. fee from thirty thousand (30000) to one hundred thousand (100000) Euros
 - and b.conduct of the game without spectators for 1 or 2 matchdays

In case of recidivism of the above described incidents in paragraphs a, b, c, and d in any following matchday of the same season (either for the Cup or Championship) the provided fee penalties are 50% increased and 1 matchday without spectators is added.

4. Fans entering to the game field

A. Before the kick-off

Fans entry inside the game field one hour to fifteen minutes before the game kick-off is punished with a penalty fee of fifteen thousand (15000) Euros to forty thousand (40000) Euros. Depending on the importance of the situation, according to the regulation 5 of the Laws of the Game, is up to the referee to judge if he allows the game to begin. If, fifteen (15) min before the scheduled kick off time, the order has been fully restored and the Police Official assures the referee that there is no danger, these constitute strong evidences in order for him to take the decision to start the game, nevertheless, before doing so, the home team is responsible to address a message through the speakers to the fans that, in any case of their possible reentry, the match will be permanently stopped. In that case the

responsible team is being punished with a penalty fee from forty thousand (40000) Euros to ninety thousand (90000) Euros as well as playing the game without the spectators' presence for one or two matchdays. The game that never started is officially being validated in favour of the non-responsible team, while the responsible team is punished and loses 3 points on the league table.

B. During the game.

Fans entry to the game field during the match results to the immediate and permanent interruption of the game without any previous notice. If there is only one or individual fans entering the field, that they do not act violently and their removal is fast and smooth without any further incidents, the importance of the situation, meaning to stop or not the game, is exclusively up to the referee, according to the regulation 5 of the Laws of the Games.

If, by the entry of the fans, violent acts against persons or property damaging have been occurred, then a penalty fee of seventy thousand (70000) Euros to one hundred fifty thousand (150000) Euros is imposed, as well as to play the game without spectators for 2 or 3 matchdays. The game (that permanently stopped) is being validated in favour of the non-responsible team, while the responsible team is being punished to lose 3 points on the league table.

C. After the game.

Fans entry in the game field after the game is punishable as follows:

- a. Penalty fee of ten thousand (10000) Euros to forty thousand (40000) Euros, if by entering the field violent acts or property damage is occurred.
- b. If by entering the field violent acts against persons or property damage is occurred then a penalty fee of forty thousand (40000) to one hundred thousand (100000) Euros is imposed as well as playing the game without the spectators presence for 1 or 2 matchdays.
- c. In case of recidivism of the above described incidents in paragraphs a, b in any following matchday of the same season the provided fee penalties are 50% increased plus one matchday without spectators is added.

5. Individual violent incidents.

In any case of violent incidents before, during or after the game the following penalties are imposed:

- a. Penalty fee of five thousand (5000) Euros to twenty thousand (20000) Euros, if the incidents occurred in the stadium, apart the tier seats or locker rooms and the game field.
- b. Penalty fee of eight thousand (8000) Euros to forty thousand (40000) Euros if the incidents took place in the tiers seats.
- c. Penalty fee of ten thousand (10000) Euros up to sixty thousand (60000) Euros, if the incidents occurred in the game field.
- d. Penalty fee of twenty thousand (20000) Euros up to one hundred thousand (150000) Euros, if the incidents occurred in the locker rooms or the officials tiers seats, against either members of the away team or any other person in the area.

- e. In case of recidivism of the above described paragraphs a. to d. in a following game of the team, of the same season, the penalty that is provided for any offence individually is increased and may overcome the highest penalty limit of this offence, reaching up to the amount of one hundred fifty thousand (150000) Euros, increased by twenty thousand (20000) Euros for any further recidivism. Furthermore, in case of a third recidivism or more, a penalty of playing the game without spectators for 1 matchday is imposed.

6. Extensive violent incidents.

As extensive violent incidents are described those in which a large number of involved people is concerned. The cause of property damage or even light body injury during those incidents constitutes a severe case. In case of such extensive violent incidents before, during or after the game, the following penalties are imposed:

- a. Penalty fee of forty thousand (40000) Euros to one hundred thousand (100000) Euros, if the incidents occurred in the stadium.
- b. Penalty fee of fifty thousand (50000) Euros to one hundred twenty thousand (120000) Euros if the incidents took place in the tiers seats or the locker rooms.
- c. In the above cases a. and b. depending on the importance of the incidents, the judicial instrument along with the penalty fee may also impose a penalty for conducting the game without spectators for 1 or 2 matchdays.
- d. Penalty fee of seventy thousand (70000) Euros up to one hundred fifty thousand (150000) Euros as well as penalty for playing the game without spectators for 2 to 3 matchdays as well as withdrawal of 3 points on the league table, if the incidents occurred inside the game field.
- e. In case of recidivism of the above described paragraphs a. b. and d. in a following game of the team, until the end of the next 2 gaming seasons, the penalty that is provided for any offence individually is increased and may overcome the highest penalty limit of this offence, reaching up to the amount of two hundred thousand (200000) Euros, increased by fifty thousand (50000) Euros for any further recidivism. Furthermore, may be imposed:
 - 1. Penalty of playing without the spectators presence for 3 matchdays as regards the first recidivism, increased by 1 matchday for any new recidivism
 - 2. Penalty of losing 3 points on the league table for the first recidivism, increased by 1 point for any new recidivism,
- f. The instrument of disciplinary persecution of article 35 of the present is responsible for the persecution for the extensive violent incidents offence

7. Explanatory notes:

- a) The above penalties are imposed against the responsible team/s, regardless of home or away or neutral play of the match.
- b) The first degree decisions for imposing or not the penalties of the present, are issued within the exclusive deadline of 7 days from the day the offence occurred. The second degree decisions are issued within the exclusive deadline of 15 days from the appeal submission date.
- c) Recidivist is the team which has been punished by a final decision at least once in the same gaming season, except the case of paragraph 6 of the present (Extensive violent incidents). The occurrence of two or more offences provided in the same paragraph (2,3,4,5 and 6) of the present article, is considered as recidivism.
- d) The authority responsible for the organization of the championship appoints the neutral stadium when necessary. This decision cannot be contested before any instrument of any degree. In case a neutral stadium is appointed, the transportation and accommodation expenses, as regards the non-responsible away team, are covered by the punished team.

8. Local Championships

As regards the clubs of the local amateur championships (A B C) as well as the grassroots leagues

- a. Penalty fee from fifty (50) euros up to eight hundred (800) euros maximum on a case by case basis are imposed
- b. Disqualification from the right to play at home stadium. The stadium that is selected is located within the limits of the local football authority.
- c. In case of extensive violent incidents or of great importance, the organizing authority may impose a penalty of one year disqualification of the team to any game
- d. In local championships, when incidents of violence are occurred, the organizing authority may impose to the responsible team a penalty, thus forbidding the team to play at home for one to four matchdays, depending on the importance and extend of the incidents. The above penalties, in case of recidivism by the team, are doubled.
- e. In articles 28 and 29 the provisions of article 15 par. 6 are implemented accordingly.
- f. In case of fans entry and violent incidents resulted to property damages and body injuries, an added penalty for a loss of 3 points is imposed.

9. International friendly matches

The HFF judicial instrument is responsible to impose penalties for the offences provided in this article, during the organization of 23 friendly games among Greek and abroad teams, regardless of the place the incidents happened (in or outside Greece) by the persons cited in the present article, always after a previous call for defence. The referees of these games conducted in Greece are obliged to submit to HFF the relevant Score Sheet within 48 hours.

Article 27

Racism

1. Any person who shows racial prejudice, degrades or blemish in any way in public another person because of race, colour, religion, nationality etc., or commits other racial or contemptuous act, will be disqualified for at least 5 matchdays.
Furthermore, the offender will be banned to any stadium as well as he will pay a penalty fee of at least 12000 euros. In case the offender is an official member (administration board etc.) of the team, the penalty fee will be increased to at least 18000 euros.
2. a) Penalty fees in case of racial or other contemptuous acts depending on the status as described in par.1 :
 - For Officials + football players of the team = game in favour of the opponent team
 - For the responsible team: football SAs = 20000 to 80000 euros
 - Football Clubs = 1000 to 5000 euros.

In case of repetition of the offence for a second time = loss of the game as described above + penalty fee is doubled. Finally if the offence is being repeated for a third time the team will be relegated.

b) – If the fans commit racial or other contemptuous acts, the team they support, will be punished by the relative authority to a penalty fee up to at least 18000 euros. The relative judicial instrument may also impose a penalty of conducting a game with no spectators or to close a specific part of the tier seats.

c) Individual fans committing the above racial offences will be banned from stadiums for at least 2 years.
3. The penalties imposed by the present may be reduced or even cancelled out if the player in question or team are able to prove that they were not responsible for the offences or if there are important exculpatory evidences, especially if the offences are committed deliberately to cause the penalties provided for to a player or the team respectively.

The procedures of the exculpatory cases will be according to the provisions of the present regulation.

CHAPTER E: SPECIAL DISCIPLINARY OFFENCES

Article 28

Threats

Any person who blackmails or threatens a game official or any football authority, will be punished with a penalty fee of at least 20000 euros, participation ban or stadium entry ban from 1 to 3 years.

If the team has any responsibility, depending on the importance of the offence:

- no spectators allowance to watch the game
- loss of points (on the league table)
- Relegation of the team

Article 29

Violence

1. Any person uses violence or tries to manipulate a game official or team resulting to specific acts or prevents an official or team from fulfilling their obligations, will be punished with a penalty fee of at least 50000 euros plus participation ban or stadium entry ban for at least 5 years.
2. When violent incidents occur resulting to body injuries or terrorist acts against the referees or members of the board of the clubs or other stakeholders outside the stadium jurisdiction, and participation of a board member or other stakeholder or other appointed person is proved either as abettor or perpetrator, the natural person is banned from entering the stadiums for life
3. The referees, assistant referees, observers and match doctors body injury caused by a team official member, player or other person having an appointed position in the area, is considered of high importance and an especially damning case.
4. In the above described cases of paragraphs 1,2,3, in case of teams' responsibility, depending on the offence importance, the following penalties are imposed:
 - a) Spectators entry banned
 - b) Neutral stadium for the match conduct
 - c) Loss of 6 points
 - d) Team relegation

Incidents Report

Please note that the selection of matches, where incidents of violence have been observed, is purely sample indicatives, concerning Super League football matches of the last seasons.

1. Olympiakos (OSFP) – Panathinaikos (PAO) - 14.4.2013 – Football - Super League
At 17:35 the Hellenic Police used chemicals in the stadium surrounding (teams entrance), after OSFP fans attacked the police dragnet (formed by forces of the Hellenic Police of Attica) in order to protect the arrival of PAO team, by throwing objects, stones and molotov explosives.
The Hellenic Police conducted six (6) arrests, for torches possession as well as participation in the above mentioned violent incidents in the stadium surroundings. PAO security officer in charge reported that, during the teams' arrival in the Stadium and players disembarkation from the bus, two (2) firecrackers exploded in front of them. PAO security officer also reported that, the President of PAO Football SA (PLC), Mr.Alafouzou was trapped in the elevator of the stadium upon his arrival.

The game kick-off delayed 4 minutes because of limited visibility of the field caused by the large number of torches, flares and smoke-generators lit by OSFP fans. By the 9th minute of the game, there was also an interruption lasted for two minutes, because of limited visibility created by torches and smoke generators.

By the 74th minute, the OSFP fans threw 20 lit torches in the stadium surrounding.

Insulting slogans of sexual content against PAO and its fans were heard during the game.

Finally, after the match it was also reported that great parts of the stadium tier seating platform were ruined.

2. Panathinaikos (PAO) – Olympiakos (OSFP) - 22/2/2015 Football - Super League

Violent acts began upon the entrance of the Olympiakos FSA President in the field, making him also receiver of insulting slogans, while the same incidents occurred towards OSFP coach Mr. Pereira and the OSFP players. PAO fans were throwing flares. There was also a violent massive entry at Gate 13, having as result the intervention of the Hellenic Police.

During the entry of the teams, at Gate 13, 100 smoke generators, 1 petard, firecrackers and numerous flares were lit, while insulting slogans against the referee and the OSFP player Maniatis were heard. Furthermore, an insulting banner against the OSFP President Mr. V. Marinakis was hung in the fence. Five of ballistic range flares were thrown from Gate 13, as well as numerous objects, stones, lighters and bottles. During almost the whole duration of the game, slogans against the referee, Olympiakos team, city of Pireaus, President of Olympiakos and player Maniatis were shouted by the crowd.

Finally, strong police force was deployed, due to a large number of Gate 13 fans who entered the field.

3. PAOK – AEK - 23/9/2015 Football – Super League

Before the game kick-off: PAOK fans at Gate 4 threw almost 15 firecrackers. They also threw 3 smoke-generators and lit numerous torches in the tier (30), as well as two fireworks that burnt out before reaching the ground field. 58 torches lit in total during the game. A firecracker was thrown against an AEK player just before hitting a corner kick and as a result the referee stopped the game for 4 minutes. When the corner was finally kicked, a plastic bottle with water was thrown to the player. Gate 4 PAOK fans launched 4 fireworks aiming at the field. Finally, a large number of firecrackers was thrown inside the field. Fans from Gate 5 set AEK banners -that were hung upside down in the fences- on fire. The fire kept burning until the end of the game, threatening the fans of the first rows. The insulting slogans did not refer to individuals this time, nevertheless they were the ordinary ones the fans of the two teams shout when referring against to the cities of Salonika and Athens respectively.

The incidents described above are indicative and don not cover the total of what happened during the period from 2013 until today. They were selected as they depict a climate of violence upsurge in the stadiums, reaching its peak in 2015, coincided

also with the governmental change in the administration of the Ministry of Culture and Sport. The situation today is partly declined, therefore we estimate that now is the right time to implement the new legislative framework for combating sport violence, which already imposed heavy fines to the teams, postponed the conduct of high risk football matches, interrupted the conduct of the Football Cup and set under conditions the completion of the Championship. The positive result deriving from the implementation of the new legislative measures, regarding spectators' violence, is that leads towards a new starting point for combating violence in Greek stadiums, that we wish to lead also towards an integrated intervention, taking into account the directions defined from the framework of the new European Convention for Spectators Violence.

Directions of Actions

During the evaluation visit in Greece by the evaluation team we would like them to focus in the following issues:

1. Evaluate stadiums safety and security procedures,
2. Evaluate the action plan adapted by police, participating clubs, stadium owner and other involved parties before, during and after a football game and/or a sporting event,
3. Overview and analysis of the necessity of the instalment of access control and ticketing system in sport venues,

Evaluate current situation regarding the stewarding system

PART 2

**Report by the visiting team
Athens, 31 March – 2 April 2017**

Executive Summary

In July 2016, the new Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No. 218) was opened for signature in Paris during the European Football Championship. Greece was one of the first States to become a signatory to the new Convention and, in so doing, demonstrated a commitment to ratify and implement its articles and, prior to ratification, to act in a way that is consistent with, and does not undermine, the core principles and outcomes set out in its eleven policy Articles. Greece followed this up with a request that the Standing Committee of the Council of Europe would undertake a consultative visit on 30th March – 2nd of April 2017.

On that note, it is essential to mention that the visit held in Greece was a consultative visit and not an evaluation one, as it took place under the framework of new Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No. 218), which is still not ratified by Greece. Consequently, the nature of the visit was consultative and not a fully fledged evaluation visit.

In response, it was agreed that the Standing Committee would task a delegation of experts, including the head of Stadium and Security at UEFA, to undertake a consultative visit and propose recommendations in respect of the safety, security and service arrangements in connection with football (and other sports) events held in Greece.

The purpose of the visit was to provide advice and support to Greece in:

- demonstrating compliance with the new Council of Europe Convention (CETS No. 218) on an integrated approach at football matches and other sports events, launched on 3 July 2016;
- demonstrating compliance with established good practices set out in Council of Europe Standing Committee's Recommendation Rec (2015)1 ensuring that football stadia (and other sports venues) provide a safe, secure and welcoming experience for all spectators.

A visit was duly organised for 30 March to 2 April 2017. This report and its recommendations set out the outcome of that visit. For ease of reference, the term "football events" is used throughout the report, however, the delegation's observations and findings can also be applied to other major and international sports falling within the scope of the Convention.

This report compares the current safety, security and service arrangements in connection with football events played in Greece with the core principles and outcomes enshrined in each of the policy articles contained in the new Council of Europe Convention (CETS No. 218) and established good practices on safety, security and service (Part 2, Section C).

The report pays tribute to the organisers of the visit who ensured that the delegation was able to meet with, inter alia, high level representatives of the Ministry of Culture and Sports, Ministry of Justice, Hellenic Police, Hellenic Football Federation, Hellenic Super League, Standing Committee for Combating Violence (DEAV), AEK FC and Panathinaikos FC. The delegation also met with the Deputy Minister of Sports, Mr. Giorgos Vassiliadis, and the Secretary General of Sport, Mr. Ioulios Sinadinos. The meetings were supplemented by observation of the stadium safety and security arrangements and policing operations in connection with the match AEK FC versus Panathinaikos FC held at the Olympic (OAKA) Stadium.

The report stresses that the aim of the visit was not to criticise, but rather to support the authorities and other relevant stakeholders in Greece to develop and implement a strategy designed to demonstrate compliance with the CETS No. 218 Convention and provide a safe, secure and welcoming environment at football matches and other sports events.

To assist this process, the report is presented in a thematic structure that reflects the Articles of the Convention on an integrated approach at football matches and other sports events and provides an assessment of the action necessary to assist the authorities in Greece to adopt and implement policies and practices that are consistent with the intent of its Articles.

In preparing this report, the delegation is mindful of the high profile incidents of violence and disorder which took place in connection with the Greek Cup Final between PAOK and AEK held at the Panthessaliko Stadium, Nea Ionia. The delegation did not witness those events first hand and, as a consequence, cannot comment specifically on what took place or why. However, it is worth noting that the safety and security arrangements observed at the OAKA stadium gave rise to concerns that are felt to have contributed to the shocking scenes which subsequently took place just a few weeks after the visit.

The overall conclusion set out in the report is that a fundamental review of the current safety, security and service arrangements at football events in Greece, and the introduction of a new legal framework will be required if the authorities and partner agencies are to be able to demonstrate compliance with the new Council of Europe Convention CETS No. 218 and associated good practice. This conclusion is reflected throughout the report and its 28 recommendations. These recommendations are set out in the form of a draft action plan which highlights, inter alia, the need for:

- a government-led national multi-agency co-ordination group;
- a new integrated and comprehensive, multi-agency strategy;
- a new legislative framework;
- improved stadium safety certification and stadium safety management operating arrangements;
- an obligation for all stadia hosting professional football matches to have a designated, trained and assessed as competent stadium safety officer, tasked with responsibility for all in-stadia safety and security;

- more effective arrangements for ensuring that all stadium safety and security personnel, and supporter liaison officers, are trained and assessed as competent to undertake their various tasks;
- a review of policing football operations to ensure that strategic and tactical decisions reflect established European good practice; and
- more effective inclusion and, importantly, exclusion (banning order) arrangements.

The delegation fully recognises that the recommendations contained in this report represent a significant number of work streams and that it will take time to define, adopt and implement the actions necessary.

The delegation would therefore like to stress that the Standing Committee is wholly committed to providing the governmental and football authorities, and other competent agencies, in Greece with further support in meeting the challenges that lie ahead. On the other hand, the Standing Committee would also welcome periodic feedback on the progress made by the authorities in Greece concerning implementation of the recommendations in this report.

In conclusion, the delegation would like to put on record its gratitude for the willingness of all parties met during the visit to engage in open discussion and welcomes the commitment expressed to sharing experiences and expertise with their European counterparts.

Finally, the delegation would like to thank all of the colleagues in Greece who provided much appreciated help and support and demonstrated impressive levels of patience throughout the visit.

Section B Visit Background and Explanation

B.1 Structure of Report

In addition to the foregoing executive summary (Part 2, Section A), this report comprises three sections and four appendices, which together provide the main observations and recommendations of the consultative visit (hereafter described as the “visit”) undertaken in March and April 2017 by a delegation of the Council of Europe Standing Committee on Spectator Violence (hereafter described as the “delegation”).

The Section B in Part 2 provides essential background to, and an explanation of, the visit and its purpose, while Section D summarises the report’s key conclusions in a draft action plan designed to assist, and be completed and updated by, the authorities in Greece and sent to the secretariat of the Standing Committee on an annual basis. This Action plan highlights the 28 recommendations, each of which is allocated a priority status of "essential", "important" or "desirable". This terminology is used to indicate the relevance of each action in demonstrating compliance with the 2016 Council of Europe Convention on an integrated approach at football matches and other sports events (hereafter described as the “Convention”) and established European good practices. In reality, timescales are inevitably influenced by a number of factors, not least of which is the need to establish enabling legislative provisions.

The main body of the report is provided in Part 2, Section C which outlines the intent of each Article of the Convention and provides recommendations on measures that Greece can apply in order to demonstrate compliance with the principles and outcomes enshrined in the Convention.

The recommendations also take account of the good practices on safety, security and service set out in:

- Consolidated Recommendation Rec (2015)1 of the Council of Europe Standing Committee on the European Convention on Spectator Violence and Misbehaviour at Sports Events and in particular at Football Matches (hereafter described as the “Standing Committee”);

The report is augmented by a number of appendices, including a stadium safety and security inspection, undertaken by an expert of the UK Sports Grounds Safety Authority (SGSA), in connection with the AEK FC vs. Panathinaikos FC match played at the OAKA stadium; and the observations of SD Europe on increasing the potential value of Supporter Liaison Officers (SLOs) in reducing risk levels through more effective communication with supporters.

For ease of reference, the term “football” events is used throughout the report, however, where appropriate, the delegation’s observations and findings can also be applied to other major national and international sports events designated by the Ministry of Culture and Sports as falling within the scope of the Convention.

B.2 Purpose of Visit

In July 2016, the new Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No. 218) was opened for signature in Paris during the European Football Championships. Greece was one of the first States to become a signatory of the new Convention and, in so doing, demonstrated a commitment to ratify and implement its Articles and, prior to ratification, to act in a way that is consistent with, and does not undermine, the core principles and outcomes set out in its eleven policy Articles. Greece followed this up with a request that the Standing Committee of the Council of Europe would undertake the consultative visit featured in this report.

On that note, it is essential to mention that the visit held in Greece was a consultative visit and not an evaluation one, as it took place under the framework of new Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No. 218), which is still not ratified by Greece. Consequently, the nature of the visit was consultative and not a fully fledged evaluation visit.

The delegation was aware from the outset that during such a short visit it would not be possible to conduct an in-depth assessment of every aspect of the safety and security arrangements in connection with football events in Greece.

It was also conscious that it did not have access to an English language version of Laws 2725/1999 (as amended) and 4326/2015, the primary legislation on safety and security in connection with sports events, or draft legal proposals intended to be introduced in the near future. This is regrettable as it precluded the delegation from providing a detailed evaluation of the current and proposed legal framework governing safety and security at sports events. However, it was clear from the many discussions which took place during the visit and observations of events at the OAKA stadium, that to demonstrate compliance with the Convention would be best served by the preparation of a new legal instrument to be enforced in connection with football matches played in 2018.

The delegation also recognises that, during the visit, some questions or remarks might have been misinterpreted. However, the delegation can only comment on what it was told and what it observed which may or may not be wholly indicative of the wider situation in Greece.

In submitting this report, the delegation wishes to stress that its purpose is not to criticise, but to support the authorities and other relevant stakeholders in Greece through the provision of external and expert observation in respect of football safety and security.

This is important as safety and security arrangements are and must remain the preserve of each national State. This report and any subsequent advice are not intended to undermine that core principle.

Moreover, the delegation fully acknowledges the wide variations in the constitutional, judicial, policing, cultural, and historical circumstances, and the equally varied character and

severity of football-related incidents and risks, which exist among and within each national State. This precludes universal application of definitive models of good practice. The reality is that the wide range of established good practices set out in Standing Committee Recommendation Rec (2015)1 invariably need to be customised to meet national imperatives and circumstances.

B.3 Visit Itinerary

Although the duration of the visit was short and focused exclusively on Athens, the visit organisers in Greece were able to provide an intensive and meaningful itinerary comprising a series of meetings with high level representatives of the Ministry of Culture and Sports, Ministry of Justice, Hellenic Police, Hellenic Football Federation, Hellenic Super League, Standing Committee for Combating Violence (DEAV), AEK F.C and Panathinaikos FC. The delegation also met with the Deputy Sport Minister, Mr Giorgos Vassiliadis, and the Secretary General of Sport, Mr. Ioulios Sinadinou. In addition, some members of the delegation met with representatives of the Panathinaikos ultra group (Gate 13). The meetings were supplemented by observation of the stadium safety and security arrangements and policing operations in connection with the match AEK FC versus FC held at the Olympic (OAKA) Stadium.

B.4 Standing Committee Delegation

The delegation comprised:

- Adrian Dinca, Vice Chair of the Standing Committee, Delegate of Romania and Delegation Leader;
- Martin Schlosser, National Football Information Point of Austria, Delegate of Austria;
- Sergey Khrychikov, Head of the Secretariat of the Standing Committee, Council of Europe;
- Paulo Gomes, Secretariat of the Standing Committee, Council of Europe;
- Olympia Karavasili, Secretariat of the Standing Committee, Council of Europe;
- Mark Smith, UK Sports Grounds Safety Authority, Delegate of United Kingdom;
- Lena Gustafson-Wiberg, Supporters Direct Europe;
- Marc Timmer, Head of UEFA Stadium and Security,
- Phivos Constantinides, UEFA;
- Chantal Hectors, UEFA;
- Khaled Hatem, Project Stadia (Interpol);
- David Bohannon, Chair of the European Group of Football Safety and Security Experts ("EU Think Tank") and Visit Rapporteur.

B.5 Supporting Documentation

To assist the visit, the authorities of Greece provided a National Report containing a range of important background information. This proved to be of assistance prior to and during the visit, not least in terms of outlining the legislative, regulatory, strategic and operational framework governing the safety, security and service arrangements in connection with football events in Greece.

B6 Status of Report

As stressed above, the delegation would like to repeat the reassurance offered at every opportunity during the visit that the aim of this report is to support and assist the authorities in Greece in providing a safe, secure and welcoming environment at football matches generally.

All States that sign, and subsequently ratify, the Convention are obliged to ensure that their legal and operating arrangements comply with the content of the Convention's policy Articles. To assist States achieve this obligation, and in recognition of the diversity of national imperatives and circumstances, the Articles are largely focused on key principles and outcomes.

To support States adopt, and demonstrate compliance with, each Article, the Standing Committee has adopted a consolidated Recommendation Rec (2015)1 which provides a wide array of established good practices on designing and delivering an integrated approach to safety, security and service in connection with football events, along with supplementary and detailed annexes on each of the three pillars.

This report therefore, focuses on the extent to which the current legal and operating arrangements in Greece are in compliance with the content of both the Convention and the Consolidated Standing Committee Recommendation.

In conclusion, this report should be seen as an ongoing commitment on the part of the Standing Committee to provide, on request, further advice and support in respect of all aspects of this report and its Recommendations.

Section C: Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events - Compliance with Policy Articles

Article 1 - Scope of Convention

Intent: The aim of Article 1 is for each State which ratifies the new Convention (hereafter described as "States") to designate the football and (where appropriate) other sports events covered by its Articles, preferably within its legislative or regulatory framework.

Compliance: To demonstrate compliance, the legal framework should provide an enabling provision requiring the Ministry of Culture and Sports to maintain a schedule of all professional national and international football matches played in Greece, along with any other sports events which the Ministry of Culture and Sport designate as being subject to the Convention.

Compliance: To demonstrate compliance, the Ministry of Culture and Sports should make clear in law that all professional football matches held in Greece are subject to the Articles of the Convention.

In so doing, the Ministry of Culture and Sports should also determine which category or type of other sports events, if any, fall within the scope of the Convention. There are numerous options available. For example, it could be a sports event held in a stadium or other venue with a designated maximum attendance; or it could be on the basis of safety or security risk assessment criteria; or it could be any sports event in which one or more of the teams involved is associated with or named after a professional football club. Whatever option is pursued, legal provision should provide clarity on the sports events concerned.

Recommendation 1 :The (proposed new) legal framework should specify that all professional football matches played inGreece are subject to the Articles of the Convention. In addition, the Ministry of Culture and Sport should consider and clarify in law what other sports events, if any, are subject to the Convention. [status: desirable]

Article 2 - Aim of the Convention

Intent: Articles 2a and 2b oblige States to adopt and apply an integrated, multi-agency and balanced approach to safety and security in connection with football matches (inside and outside of stadia) and ensure that all public and private agencies collaborate to ensure that preparatory and operational arrangements are undertaken in an integrated manner. Article 2c requires that, in so doing, States should take full account of the established good practices set out in Council of Europe Standing Committee Recommendation 1/2015.

Compliance: These are primarily policy and strategic requirements, though it would be prudent (if not essential) to include a generic commitment in law towards delivering a multi-agency integrated approach to safety, security and service in connection with football events (inside and outside of stadia).

Recommendation 2: The (proposed new) legal framework should include a generic commitment to delivering an integrated multi-agency approach to safety, security and service in connection with football related events (inside and outside of stadia and irrespective of the timing and location).[status: desirable]

Article 3 – Definition of Terminology used in the Convention

Intent:The aim of Article 3 is to encourage European-wide usage of established safety and security terminology.

Compliance: The terminology used across Europe to describe safety and security functions and personnel varies widely. Whilst harmonisation of such terminology is desirable and would assist international co-operation and communication, it is the outcome and effectiveness of the measures applied which is most important.

Nevertheless, for ease of reference, the terminology used within reflects that set out in Article 3 of the Convention. It would be prudent to adopt Council of Europe terminology in Greece and for the legal framework and strategy to incorporate the definitions set out in the Article.

Recommendation 3: The (proposed new) legal framework should incorporate the definitions set out in Article 3 of the Convention, [status: desirable]

To enhance awareness of Council of Europe terminology, it would also be desirable to stress in the (proposed new) strategy, that the integrated approach encompasses events inside and outside of stadia, given their overlapping character and impact, and embraces all aspects of an event flow approach which commences with spectators making their arrangements for attending a match and concludes when they have returned home after the match. Whilst the event flow model was designed for international matches, the same logic and flow should be applied to domestic matches. Again, it is recommended that a version of an event flow model is incorporated within the national strategy.

Recommendation 4 : The (proposed new) strategy should highlight that the integrated approach encompasses events inside and outside of stadia throughout the period of an event. [status: desirable]

Article 4 – National Co-ordination Arrangements

Intent: The aim of Articles 4 (1-4) is to oblige States to establish national and local multi-agency safety and security co-ordination arrangements to ensure the development and nationwide application of a comprehensive and integrated strategy. Article 4.5 requires States to undertake a comprehensive legislative review aimed at ensuring legal clarity in respect of the roles and responsibilities of public and private agencies engaged in making football events safe and secure.

Compliance: The expectation is that national co-ordination will be government-led, while responsibility for local co-ordination will be vested in a designated municipal or regional authority.

National Co-ordination

It is for the Government of Greece to determine which Ministry will play the lead role in co-ordinating the development and application of an integrated, multi-agency approach and associated national strategy.

In isolation, no-one agency or sector can tackle football security challenges or make football events safe and welcoming for all participants and spectators. It is important, therefore, for

thenational co-ordination structure, remit and operating arrangements to be multi-agency in character. It is equally imperative for the national co-ordination group to comprise expert and influential representatives of all relevant governmental departments (Interior, Justice, Sport, etc.) and public and private (i.e. football) agencies, along with other stakeholders, including supporter representatives, as appropriate or necessary.

Discussions during the visit suggested that the national co-ordination process would be overseen by the Deputy Minister for Sports.

Recommendation 5 : The Greek authorities should establish and lead a national co-ordination group, comprising expert and influential representatives of governmental, public and private (i.e. football) agencies and other as appropriate or necessary, tasked to develop and deliver an integrated multi-agency approach to safety, security and service in connection with football events.[status: essential]

Recommendation 6: The national co-ordination group should commission the preparation of a national multi-agency strategy document setting out the key components of a [new] integrated approach to safety, security and service. [status: essential]

Local Co-ordination

The national co-ordination group should consider designating a local or regional public authority with responsibility for establishing a multi-agency co-ordination group tasked to a) co-ordinate and oversee multi-agency preparations for football events held in their locality and b) ensure that the principles and content of the national strategy is adopted and applied. The aim is to ensure a consistent approach in respect of all professional football events played in Greece.

It will be for the national co-ordination group to determine the structure, role, membership and *modus operandi* of the local co-ordination process.

Recommendation 7 : The national co-ordination group should i) designate a municipal or regional authority to establish a local multi-agency group tasked to oversee and co-ordinate preparations for football events held in their locality and ii) provide guidance on the structure, role, and membership of such groups, taking into account established European good practice.[status: desirable]

Review of Legal and Regulatory Framework

A crucial element of Article 4 centres on the need for the national co-ordination group to undertake or commission a review of the current legal framework in order to identify the amendments necessary to ensure that its provisions:

- comply with the new Convention and the safety, security and service good practices contained in the Council of Europe Standing Committee Recommendation Rec (2015)1;

- facilitate and empower delivery of all aspects of the Convention and associated national integrated multi-agency strategy; and
- provide clarity of the roles and responsibilities of all public and private personnel engaged in football operations (inside and outside of stadia).

It is anticipated that a significant number of legal changes will be required to demonstrate compliance with the Convention and to deliver an effective integrated multi-agency strategy, notably in respect of stadium safety management and exclusion arrangements.

In these circumstances, it would be desirable to reflect the outcome of the proposed review in a new Law to be launched in January 2018.

Recommendation 8 : The national co-ordination group should review the current legal framework, and identify the legal amendments necessary to ensure that it:

- **complies with the new Convention and the safety, security and service good practices contained in Council of Europe Standing Committee Recommendation Rec (2015)1;**
- **facilitates and empowers delivery of all aspects of the national integrated multi-agency strategy;**
- **provides clarity of roles and responsibilities of all public and private personnel engaged in football operations (inside and outside of stadia); and**
- **represents a balanced approach to safety, security and service.[status: essential]**

Communications and Media Handling Strategy

Whilst not featured in the Convention, it is important to ensure that the ethos, principles and safety and security measures set out in the national strategy are widely understood, not only by supporters and the wider community, but also within in each operational agency at every level (ranging from high level policy makers and strategists to front line safety and security practitioners).For this to be achieved, the national co-ordination group should set up a multi-agency communications and media handling group comprising specialists from key governmental, policing, football and other authorities.

The group's core task should be to explain and promote the core components of the national strategy.In so doing, it would be prudent for the group to develop a multi-agency protocol on liaison with the media to ensure agreed and consistent key messages are relayed in a unified manner by all agencies wherever possible.The group will also need to explore and determine the most effective means for explaining the strategy to different stakeholders, including safety and security practitioners, supporters and the wider community.

Recommendation 9 :The national co-ordination group should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. [status: important]

Article 5 - Safety, Security and Service in Stadia

Article 5 is the most demanding and explicit component of the Convention. However, the primary purpose of the Article is to provide the means for developing a safe, secure and welcoming environment within football stadia. This is likely to incorporate a number of interrelated strategic, practical and legal changes to the current stadium safety management arrangements in Greece. The key elements are featured below.

On the basis of the observation of the safety and security arrangements in connection with AEK vs, Panathinaikos match at the OAKA stadium, the delegation was concerned about the safety management arrangements in place, notably in the sector designated for the use of ultra fans. The external police searching of ultra fans entering the stadium complex was minimal and no ticket or searching was undertaken at the gate of the ultra fan sector. Black bags were passed over the entry fence with no check on contents. The absence of any form of effective entry check resulted in the sector becoming significantly over-crowded with overspill into the upper tier and neighbouring sectors.

Throughout the match widespread use of pyrotechnics in the sector was observed and post-match inspection revealed numerous glass bottles (many broken) and other prohibited items scattered all over the sector.

The over-riding impression was an absence of any safety management of the ultra sector and no steward/security personnel intervention was observed. In effect, the sector was controlled by the ultra fans. This is very empowering for the fans concerned and whilst the absence of any visiting supporters precluded any violent incidents, European experience evidences that a failure to control risk supporters can manifest into serious incidents in certain circumstances.

The delegation included an experienced and expert stadium safety inspector who undertook an inspection of the match day stadium safety operation and the physical and technical condition of the stadium. The inspection report is provided at Appendix C of the report. The content is disturbing. It includes 13 generic stadium safety recommendations along with 15 recommendations regarding the OAKA stadium. It is strongly recommended that the inspection report findings are taken into account by the national co-ordination group as part of the report's recommendations on stadium safety and security and supporter liaison. The findings are also reflected in the following stadium safety related recommendations in which the focus is primarily on the need for arrangements which should significantly improve in-stadia safety management arrangements.

Independent Stadium Safety Authority

Intent: Articles 5.2 and 5.3 of the Convention place an obligation on States to ensure the effectiveness of stadium safety arrangements (stadium safety certification in particular) by ensuring that national standards in respect of stadium design, infrastructure and associated safety management arrangements are in place, applied, monitored and enforced by the competent public authorities.

Compliance: The national co-ordination group should review the current arrangements and consider the merits of establishing an independent public authority ("Stadium Safety Authority") to develop stadium safety standards (covering physical infrastructure, technical equipment and, importantly, safety management arrangements), monitor application of these standards, and assess their effectiveness.

Such a development would not be achieved in quick time given the need to: establish the independent public body in law; make legal provision for empowering its role and functions; identify, train and equip a team of experts to undertake their designated functions; determine roles, responsibilities and operating arrangements etc. Once established, the independent body should be well placed to monitor performance and provide expert instruction on the improvements necessary to the safety management arrangements in each stadium. If it is decided to pursue this option, it would be prudent to seek advice and assistance from UEFA and the CoE.

Recommendation 10 : The national co-ordination group should consider establishing an independent public authority tasked to: develop stadium safety standards, covering physical infrastructure, technical equipment and safety management arrangements; monitor application; assess effectiveness; and issue stadium safety certificates. [status: important]

Stadium Safety Certification

Intent: Article 5(2) of the Convention, in particular, highlights the importance of each State having in place effective stadium safety certification arrangements.

Compliance: This is a crucial requirement. Irrespective of the age or physical infrastructure of a stadium, effective safety management arrangements should still be able to provide a safe environment for all visitors. The importance of the stadium safety certificate is that it provides a blueprint for how this can be achieved. On the basis of discussions and observations during the visit, the delegation is not convinced that this core objective is being achieved.

The national co-ordination group should therefore review the current stadium safety certification arrangements and consider the need for, and merits of, refining the law to require all football stadia hosting professional football matches in Greece to be in possession of a stadium safety certificate issued by the proposed independent public body ("Stadium Safety Authority").

Effective stadium safety certification should be a pre-requisite to a stadium receiving a license to host a professional football match. The key issue is possession of a safety certificate, not whether the safety certificate is sought by and issued to a stadium owner, stadium operator, resident club or event organiser.

Again, enacting this important development would require the personnel of the proposed independent public body to be empowered in law, equipped, trained and assessed as being competent to undertake their stadium safety certificate functions effectively.

Recommendation11 : The national co-ordination group should make provision for the (proposed) independent public "stadium safety authority" to issue stadium safety certificates and monitor compliance with its conditions.[status: important]

Stadium Safety Officers

Intent: Article 5(6) of the Convention requires each State to ensure that stadium safety and security personnel are trained and equipped to undertake all of their activities effectively.

Compliance: The role of the stadium safety officer is absolutely crucial to making football stadia safe, secure and welcoming. For that reason, it is recommended that the issue of a stadium safety certificates should be subject to the stadia having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadia safety, security and service matters.

This will require clarification of the process for designating the training and accreditation arrangements for stadium safety officers. The content of the training will need to be linked to the development of more comprehensive and effective stadium safety management arrangements.

A parallel initiative should be pursued in terms of seeking and determining the timing and other arrangements for the provision of expert UEFA joint training for stadium safety officers and police match commanders.

In addition, it will be necessary to identify the legal changes necessary and desirable to empower and inform the roles and responsibilities of stadium safety officers. Thereafter, the role of the national co-ordinating committee would be to monitor and evaluate the impact of the training on the efficacy of stadium safety management arrangements.

Recommendation12 : The national co-ordination group should make provision for the issue of a stadium safety certificate to be subject to a stadium having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadia safety, security and service matters.[status: important]

Stadium Stewards

Article 5(6) also applies in respect of all stadium safety officers having access to a sufficient number of stadium stewards (either directly employed or contracted) trained by persons, assessed as competent to deliver training, assess the competence of trainees and accredit stewards. It also requires that stewards are otherwise equipped to undertake their varied tasks effectively.

During the visit, it became apparent that the primary focus of the private security companies and other stadium security personnel was focused on the security threats. This is understandable but overlooks the potential risk of a safety incident which can occur at every professional football match and, indeed, as history demonstrates, be caused or exacerbated by security measures.

It would be prudent, therefore, for the national co-ordination group to review the current arrangements with a view to ensuring that stadium stewarding training and accreditation arrangements comply with established European good practice.

It is recommended that the national co-ordination group, in partnership with the Hellenic Football Federation and professional leagues, determine the roles, responsibilities and operating activities of stadium stewards and explore with UEFA the possibility of receiving their expert *train the trainers* steward events.

In parallel, necessary and desirable legal provisions should be introduced; along with the development of a steward recruitment and national training programme and a stewarding implementation strategy. Thereafter, the focus should be on monitoring and evaluating the impact of steward training on stadium safety management arrangements.

Recommendation 13: The national co-ordination group should make provision for ensuring that all stadium stewards are trained by persons, assessed as competent to train and accredit stewards as being able to undertake their varied tasks effectively.[status: essential]

In-stadia Role of Partner Agencies

It is also important to ensure that the in-stadia role of the police and other partner agencies is clear, both in law and operating arrangements, and widely understood by all safety and security practitioners. Discussions during the visit suggested that this was not the case, even in respect of fundamental issues like who is responsible for stadium evacuation arrangements.

The national co-ordination group should require the Ministry of Interior, relevant police directorates, Hellenic Football Federation and professional leagues to jointly determine the in-stadia role of police and other public services, along with the measures necessary to enhance awareness of their role and the procedure for transferring responsibility from the event organiser to the police or other relevant public authority.

It would be prudent to develop a programme of awareness training and, importantly, to liaise with UEFA regarding provision of joint training of stadium safety officers and police commanders.

Recommendation 14: The national co-ordination group should make provision ensuring that the in-stadia role of the police and other public authorities is clear, both in law and operating arrangements, and widely understood by all safety and security practitioners.
[status: essential]

Stadium Technical Facilities

Intent: Article 5(3) of the Convention incorporates a requirement for each State to ensure that the technical infrastructure and facilities in stadia hosting professional football matches complies with national and international standards and good practices.

Compliance:In order to demonstrate compliance, the national co-ordination group should commission an expert view on the efficacy of current stadia CCTV and other technical facilities in order to determine what improvements are necessary to meet stadium safety needs and evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality. Once established, the proposed independent "stadium safety authority" should incorporate new national standards in mandatory instructions and, thereafter, monitor progress on implementation and impact on stadium safety management arrangements.

Recommendation 15: The national co-ordination group should commission an expert view on the efficacy of current stadia CCTV and other technical facilities in order to determine what improvements are necessary to meet stadium safety needs and police evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality [status: important]

Audit of Stadium Safety and Security

In addition to the actions proposed above, the national co-ordination group, in partnership with the Hellenic Football Federations should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all stadia hosting professional football matches. The aim would be to assess the specific improvements required in each stadium to demonstrate compliance with European standards and good practices. This should include monitoring of stadium safety management operations. This proposed audit would also inform the development of enhanced technical, operating, and safety management standards by the proposed independent "stadium safety authority".

Recommendation 16: The national football authorities should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all or selected stadia hosting professional football matches in order to inform the development of enhanced technical, operating and safety management standards. [status: desirable]

Preventing and Countering the Use of Pyrotechnics in Stadia

Intent:Article 5(5) of the Convention obliges each State to develop effective arrangements for identifying, preventing and tackling established and emerging in-stadia safety and security risks and to develop such arrangements in consultation with public authorities and stakeholders. The issue of pyrotechnic use in stadia is cited as a key issue covered by this Article.

Compliance: Greece is not alone in experiencing significant problems associated with the use of pyrotechnics in stadia. Confronting this issue will not be easy for any State. However, the findings of an independent scientific study of the health and safety risks associated with the use of all pyrotechnical devices in stadia (commissioned jointly by UEFA and Football Supporters Europe) are unequivocal: "no safe use of pyrotechnics is possible in spectator

areas within football stadia". The study also stressed that this risk is applied to all participants at a football event including safety and security personnel and players and officials.

Recommendation 17 :Based on the findings of this study and on the European model strategy which is currently being drafted by EU, Council of Europe and UEFA, the national co-ordination group should aim at reviewing the steps necessary to deter, prevent and counter the use of pyrotechnics in stadia. [status: important]

Article 6 - Safety, Security and Service in Public Places

Intent: The aim of Article 6 is to build upon the obligation in Article 4, regarding local multi-agency co-ordination, through encouraging all agencies and stakeholders involved in football related activity (organised or spontaneous) in public spaces (city centres, transit routes, etc.) to co-operate in assessing risk and preparing appropriate preventative measures designed to create a safe, secure and welcoming environment whilst minimising disruption and providing reassurance to local communities.

Compliance: The delegation did not have the opportunity to observe football related operations in public places during the visit. In discussion, all parties recognised that the police and other public authorities have primary responsibility for events in public places. There also appeared to be a high level of awareness of the potential overlap between what happens inside and outside of stadia.

However, the apparent absence of effective local multi-agency co-ordination arrangements is not compliant with the Convention, or established good practice, and highlights the need to establish in law a standing local multi-agency co-ordination structure.

Adoption of Recommendation 7 above would ensure compliance with the Convention. It would also facilitate the preparation of comprehensive, multi-agency safety, security and service preparations for organised and spontaneous events, including public viewing arrangements, in public places, notably but not exclusively, in respect of higher risk domestic and international football events.

Article 7 – Contingency and Emergency Planning

Intent: The aim of Article 7 is to ensure that stadium multi-agency contingency plans (prepared by the stadium operator) and local emergency plans (prepared by the relevant public authorities) are complementary and tested in regular joint exercises.

Compliance: The importance of contingency and emergency planning has never enjoyed a higher profile, especially in respect of the threat of terrorist incidents. However, European experience evidences that emergencies and, in particular, other challenging scenarios can occur at every football event. Nevertheless, discussions during the visit suggested that if emergency and contingency planning arrangements are already in place, they are not widely understood.

The delegation discussed this matter with operatives during the match observation and was told that the police are responsible for emergency evacuation and would otherwise assume control of (and by definition responsibility for) in-stadia safety and security in the event of a major incident. However, emergencies manifest in different forms and can evolve at variable speeds. European experience demonstrates the importance of all public and stadium agencies, and their personnel, having a clear understanding of their respective roles and responsibilities in undertaking remedial activity during all stages of an emergency, including any embryonic phase. The delegation was not wholly convinced that this was currently the case.

This perception may not be accurate, of course, and it may be that the emergency planning of public authorities falls under the responsibility of an agency which did not participate in visit discussions. It is also recognised that responsibility for ensuring harmonisation of public authority emergency plans and stadium specific contingency plans may already fall under the remit of a designated public authority and be covered in associated operating standards and guidance. Understandably, no specific legal instruments were supplied on public authority emergency plans, or the associated testing and exercising arrangements, prior to the visit.

In terms of stadium emergencies, an important role for the proposed designated stadium safety officer (see Article 5 and Recommendation 12 above) should be to develop, refine as necessary, and maintain a record of the contingency plans to be applied when dealing with all types of in-stadia emergencies and unexpected scenarios, including emergency evacuation arrangements. Clearly all such plans would need to be prepared in consultation with the police, fire and rescue, and medical services, and counter terrorism advisers, and take full account of municipal emergency plans for dealing with emergencies in public places that impact upon stadium facilities and/or operations.

In the absence of definitive advice, it would be remiss of the delegation not to raise this vital issue in its report and in its recommendations.

A related issue, covered in the recommendation below, centres on ensuring that if and when in place, or refined as necessary, the contingency and emergency plans would need to be tested in multi-agency table top and full-scale exercise with steps taken to ensure roles of each agency in an emergency are clear and widely understood at practitioner level.

Recommendation 18 : The national co-ordination group should review the current arrangements for preparing and testing comprehensive multi-agency stadium contingency and public authority emergency plans for incidents at or nearby stadia hosting football events. [status: important]

Article 8 - Engagement with Supporters and Local Communities

Intent: The aim of Article 8.1 is to highlight the importance of encouraging all national and local agencies engaged in football related planning and operations to communicate effectively with supporters, resident communities in host cities and territories and other stakeholders. Article 8.2 extends beyond event-related communication and falls under the generic umbrella of community development. It commits States to encouraging public and

private agencies and other stakeholders to initiate or participate in multi-agency social, educational, crime-prevention and other community projects designed to foster mutual respect and understanding, especially among supporters, sports clubs and agencies responsible for safety and security.

Compliance:The national co-ordination group should liaise closely with the police, HFF, football leagues, SD Europe, Hellenic supporter groups and other relevant stakeholders in developing a more effective supporter liaison strategy.

The outcome of this initiative should be to oblige all public and football authorities to develop and implement comprehensive and effective supporter liaison strategies in accordance with European good practices. Importantly, these strategies should aim to encourage a sense of inclusion and consultation among supporters generally whilst marginalising the influence of risk groups and their organisers and ensuring that ultra-areas in stadia are subject to effective stadium safety management arrangements and constraints.

In developing fan liaison strategies, full account should be taken of the good practice options set out in Standing Committee Recommendation Rec (2015)1.

Supporter Liaison Officers (SLO) Attached to this report at Appendix D are supplementary observations and recommendations provided by SD Europe, who lead on SLO matters. They confirm that the Hellenic Football Federation (HFF) has fully implemented the UEFA requirement on football clubs competing in UEFA competitions in appointing a SLO in accordance with Article 35 of the UEFA Club Licensing and Financial Fair Play Regulations. SD Europe also confirms that the HFF has extended this requirement to cover all clubs competing in the Super League by including a comparable provision in its domestic club licensing arrangements. This is positive, however, SD Europe also have doubts regarding the extent to which the intended role of SLOs, as set out in the UEFA SLO Handbook, is fully understood or applied by all parties. Appendix D sets out a number of areas which they believe should be reviewed and the delegation consider that it would be prudent for the national co-ordinating group to commission a multi-agency review of the issues raised as part of a wider supporter liaison initiative.

Recommendation 19: The national co-ordination group should encourage all stakeholders to review and expand their supporter liaison activities and, in so doing, review the current Supporter Liaison Officers (SLOs) arrangements to ensure compliance with the role and remit set out in the UEFA SLO Handbook, taking into account the observations and suggestions of SD Europe.[status: important]

Community Engagement: European experience demonstrates the importance of developing and implementing a range of social and preventative projects designed to lure young supporters away from negative fan behaviour, not least through promoting a culture of tolerance and respect for others irrespective of team supported and other manifestations of diversity.

Similarly, European experience evidences that the participation of professional football clubs and national federations in a range of community-based social, crime prevention, educational and other projects can assist in developing closer links between the clubs and the wider community. Such projects not only promote a very positive public image of the club but can also add value to the delivery of the project, for example, by using club facilities to encourage disaffected or alienated young people to participate in educational and other initiatives. Moreover, and importantly, community engagement can help encourage a wider, cross-section of people to attend football events, particularly if such initiatives are accompanied by the kind of high profile improvements to stadium facilities observed by the delegation during the visit.

Recommendation 20 : The national co-ordination group should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination. [status: desirable]

Article 9 – Police Strategies and Operations

Intent: The aim of Article 9 is to encourage the adoption of established good practices in respect of policing strategies and operations in public places and within stadia.

Compliance: To demonstrate compliance with this Article, the Ministry of Interior should ensure that policing football operations take into account established good practices. This should include ensuring that the key role of the sports police is fully recognised by other law enforcement agencies engaged in policing football operations.

It is not uncommon across Europe for some individuals active in supporter groups to use this as a shield for engaging in criminal activity. The delegation has no evidence to suggest that this is the case in Greece but considers that it would be prudent for the sports police (NFIP) to liaise with the criminal police regarding any possible linkage.

Recommendation 21 :The Ministry of Interior should ensure that: policing football operations take into account established good practice and are in compliance with the Council of Europe Convention’s obligations, and take full account of the key role played by the sports police. [status: important]

The absence of visiting supporters at the AEK FC vs. Panathinaikos FC match meant that the threat of violence was low and the policing operation relatively discreet. However, there was no intervention from police officers in close proximity to the ultra fan sector where fans were quite openly bringing into the stadium or passing to fellow fans bags and black sacks containing what could have been prohibited items. The delegation recognises that checking and curtailing this activity should have been the primary responsibility of private security personnel at entry gates. However, in the absence of such checks, the delegation felt that the police could have intervened. This observation may be unfair and it would be wholly inappropriate to draw any conclusions on the basis of one isolated observation.

Nevertheless, the delegation think that it would be prudent for the Ministry of Interior to consider if policing operations in connection with football events are unduly reactive and focused on countering incidents of violence. If so, this would not reflect established good practice which highlights the importance of proactive and early police intervention to prevent or limit the scale of prohibited behaviour. It would also not be consistent with the need for an ongoing police review of their arrangements for gathering, sharing and analysing information, intelligence and evidence of inappropriate or prohibited fan behaviour and potential risks, before, during and after each match, in order to inform deployment and tactical decisions.

The Ministry of Interior should encourage policing football operations to incorporate a strategic and tactical policy of proactively:

- identifying and targeting individuals and/or groups posing increased safety or security risks with view to early intervention to prevent escalation of risk;
- gathering evidence against individuals causing or contributing to violence, disorder or other criminality or antisocial deeds;
- ensuring that an appropriate number of designated police spotters are provided with necessary technical aids, like hand-held video cameras for intelligence and evidence gathering purposes; and
- monitoring the number of arrests and prosecutions in comparison with the number of incidents.

Recommendation 22 : The Ministry of Interior should review current policing football operations with a view to adopting a strategic and tactical policy of identifying and gathering evidence in respect of individuals and/or groups posing increased safety or security risks.[status: important]

The Ministry of Interior should also ensure that all police match commanders are aware of established good practices in respect of reducing risk through effective liaison with supporters, taking into account the various supporter liaison options set out in the Recommendation Rec (2015)1. The aim throughout should be to demonstrate a commitment to effective liaison as a means for marginalising the influence of risk groups and avoiding the empowerment of individuals and groups whose behaviour poses safety risks inside and outside of stadia.

Recommendation 23 : The Ministry of Interior should ensure that all police match commanders are aware of established good practices in respect of reducing risk and marginalising the influence of risk groups through effective liaison with supporters, taking into account the various supporter liaison options set out in the Recommendation Rec (2015)1.[status: important]

The Ministry of Interior should liaise with the Council of Europe regarding the delivery of a national policing football training event for police trainers and key practitioners with a view to adapting the training to meet the needs of the Hellenic Police. Thereafter Police academies and Police training centres should incorporate the training into their training programs in

order to ensure that all police personnel (newly recruited and experienced alike) are aware of their role and duties in accordance with the European standards.

Recommendation 24 :The Ministry of Interior should ensure that police personnel engaged in the preparations for, and operations during, football events receive appropriate and specialist training in European policing football good practices.[status: important]

The Ministry of Interior should ensure that the Greek sports police, notably the National Football Information Point (NFIP), is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the CETS No. 218 and secondly play a key role in delivering the proposed comprehensive exclusion strategy.

Recommendation 25 : The Ministry of Interior should ensure that the Greek sports police, notably the National Football Information Point (NFIP), is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the CETS No. 218 and secondly play a key role in delivering the proposed comprehensive exclusion strategy.[status: important]

Recommendation 26 :The Ministry of Interior should ensure that, on a risk assessment basis, funding is provided to deploy police delegations to, and host incoming police delegations from, countries whose national and club football teams are competing against teams from Greece in European competition and other international matches.[status: important]

Article 10 - Prevention and Sanctioning of Offending Behaviour

Intent: The aim of Article 10 is to oblige all States to review its existing arrangements for preventing and sanctioning persons who act in a violent or other criminal way in connection with football events, notably in respect of ensuring that individuals committing offences are subject to effective measures excluding them from the football experience.

Compliance: European experience evidences the importance of effective exclusion in preventing and tackling football related violence, and facilitating stadium safety management arrangements.

Exclusion should be seen as a preventative measure, rather than a penalty for wrongdoing which is the function of sentencing on conviction of a criminal or administrative offence, and there are many varied exclusion options in place across Europe which enjoy different levels of success. Stadium ban arrangements exist in Greece and around 300 persons are currently subject to bans. The delegation is in no position to assess whether or not this is an appropriate number or why the current arrangements do not appear to be effective in deterring misbehaviour, preventing re-offending or transforming the behaviour of risk fans.

The possible explanations for this are manifold and it would not be appropriate for the delegation to speculate if the reason is linked to the character of the exclusion process, the absence of sufficient number of police spotters and evidence gatherers, the reluctance of

adjudicating authorities to impose the current bans, or whether or not there is a connection with the wider security arrangements which are perceived by many supporters to be unduly focused on penalising football supporters generally (through draconian ticketing and ID checks, or prohibition on visiting fans) rather than targeted at the organisers and perpetrators of football related violence and other criminality.

However, the delegation is clear that the current exclusion arrangements are not effective in terms of preventing and countering football-related criminality (irrespective of whether the offending behaviour occurs inside and outside of stadia) and that the national co-ordination group should undertake a detailed review of the current approach to exclusion, and the associated legal framework, taking into account established good practice and consulting European experts in this area.

Moreover, in recognition that some football clubs in Greece are multi-sport in character or name, the delegation considers that it would be prudent for the proposed review to consider the inclusion of legal provision enabling the adjudicating authority to prohibit banned individuals from attending other sports events where appropriate.

Recommendation 27 : The national co-ordination group should review the current exclusion process with a view to introducing more effective arrangements, taking into account European models of good practice which have delivered high levels of success in deterring football related violence and misbehaviour, preventing repeat offending, and transforming the behaviour of excluded persons.[status: essential]

Article 11 - – International Co-operation

Intent: Article 11 sets out a number of ways in which States are obliged to demonstrate a commitment to working in partnership on the international stage.

Compliance: The Ministry of Interior should continue to ensure that the head of the NFIP participates in all meetings of the Council of Europe Standing Committee, while the Ministry of Sport should ensure that an official working in the area of sports safety should attend Council of Europe Standing Committee meetings.

Recommendation 28 : The Ministry of Interior should continue to ensure that the head of the NFIP participates in all meetings of the Council of Europe Standing Committee while the Ministry of Sport should ensure that an official working in the area of sports safety should attend Council of Europe Standing Committee meetings.[status: desirable]

Section D Concluding Remarks and Draft Action Plan

D.1 Concluding Remarks

In conclusion, the delegation would like to again stress that the report and accompanying Action Plan is intended to:

- assist and support the authorities in Greece in developing an integrated approach to safety, security and service at football events based on established good practice customised to fit national circumstances; and
- assess the extent to which the current safety and security arrangements are compliant with the Articles of the Convention and the good practices contained in Standing Committee Recommendation Rec (2015)1.

This report and the accompanying appendices aim to be comprehensive and accurate, however, it is recognised that some of the explanations provided in meetings and other discussions may have been misinterpreted. That is why the report retains a draft status until such times as the authorities in Greece have had opportunity to comment on points of accuracy.

The delegation would like to stress once more that the Standing Committee is committed to providing the governmental and football authorities, and other competent agencies, in Greece with further support in meeting the challenges that lie ahead. The Standing Committee would in particular welcome periodic feedback on the progress made by the authorities in Greece concerning implementation of the recommendations in this report.

Finally, the delegation would like to thank, once again, all of the colleagues in Greece who provided much appreciated help and support and demonstrated impressive levels of patience throughout the visit.

D.2 Draft Action Plan (see below)

Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and other Sports Events 2016

REPORT OF THE STANDING COMMITTEE CONSULTATIVE VISIT: DRAFT ACTION PLAN

This draft Action Plan forms part of the report of the Council of Europe Standing Committee Consultative Visit on 30th March - 2nd April 2017. The Action Plan has been prepared with the aim of enabling the authorities in Greece to:

- demonstrate compliance with the principles and outcomes enshrined in the Convention;
- reflect the established good practices on safety, security and service contained in Standing Committee Recommendation 1/2015; and
- ensure that football stadia (and other sports venues) provide a safe, secure and welcoming experience for all spectators.

To further assist this process, each of the various actions has been allocated a status of "essential", "important" or "desirable". This terminology is used to indicate the relevance of each action in terms of demonstrating compliance with the 2016 Convention and established European good practices. For ease of access, the recommended actions are presented under the relevant Convention Article.

In recognition of the need to adopt an integrated approach, it is stressed that the actions overlap and are inter-related, and should be considered and implemented in that light.

The text of this action plan refers specifically to football matches but can, where appropriate, also be applied in connection with other sports events where considered necessary or appropriate by the national authorities.

It is recognised throughout that the recommended actions need to be considered in the light of national circumstances and imperatives and that the adoption of established good practices will need to be customised accordingly.

The delegation stands ready to provide, on request, support and assistance in taking forward the actions recommended in this plan.

Article 1 - Scope of Convention

Recommendation 1 : The (proposed new) legal framework should specify that all professional football matches played in Greece are subject to the Articles of the Convention. In addition, the Ministry of Culture and Sport should consider and clarify in law what other sports events, if any, are subject to the Convention. [status: desirable]

| Milestones | Timing | Lead Agency | Progress |
|---|--------|---------------------------------|----------|
| According to articles 41 <i>et al</i> of Law 2725/1999 (G.G. A' 121) and its amendments, not only professional football matches but basketball and volleyball professional championships are subject to most of the articles of the Convention. | | Ministry of Culture and Sports. | |

| Article 2 - Aim of the Convention | | | |
|---|---------------|--|-----------------|
| Recommendation 2 : The (proposed new) legal framework should include a generic commitment to delivering an integrated multi-agency approach to safety, security and service in connection with football related events (inside and outside of stadia and irrespective of the timing and location). [status: desirable] | | | |
| Milestones | Timing | Lead Agency | Progress |
| According to article 41D of Law 2725/1999 and the Joint Ministerial Decision for the approval of a single safety regulation at sport events nr. 38404/2009 (G.G. B' 1780), there is a generic commitment to delivering an integrated multi-agency approach to safety, security and service in connection with football related events. | | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection. | |
| Article 3 – Definition of Terminology used in the Convention. | | | |
| Recommendation 3 : The (proposed new) legal framework should incorporate the definitions set out in Article 3 of the Convention, [status: desirable] | | | |
| Milestones | Timing | Lead Agency | Progress |
| Articles 56A to 56E of Law 2725/1999 as amended with laws 4479/2017 (G.G. A' 94) and 4603/2019 (G.G. A' 48) for the function and operation of sport venues and the Joint Ministerial Decision nr. 408113/21902/2725/603 (G.G. B' 3568) as amended, for the implementation of article 56B of Law 2725/1999, regard amongst others safety and security measures in the context of sport events and the process of sport venues infrastructure licencing. Also safety and security proceedings are refered in the provisions of the Joint Ministerial Decision for the approval of a single safety regulation at sport events nr. 38404/2009 (G.G. B' 1780). | | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection. | |

| Recommendation 4 : The (proposed new) strategy should highlight that the integrated approach encompasses events inside and outside of stadia throughout the period of an event. [status: desirable] | | | |
|--|--------|--|----------|
| Milestones | Timing | Lead Agency | Progress |
| According to article 41D of Law 2725/1999 and the Joint Ministerial Decision for the approval of a single safety regulation at sport events nr. 38404/2009 (G.G. B' 1780), there are operation plans defining the actions throughout the period of an event. | | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection. | |
| Article 4 - National and Local Co-ordination Arrangements | | | |
| Recommendation 5 : The Greek authorities should establish and head a national co-ordination group, comprising expert and influential representatives of governmental, public and private (i.e. football) agencies and others as appropriate or necessary, tasked to develop and deliver an integrated multi-agency approach to safety, security and service in connection with football events.[status: essential] | | | |
| Milestones | Timing | Lead Agency | Progress |
| <p>The Article 41A of Law 2725/1999 as amended, defines that, within General Secretariat of Sport (SGS), the Standing Committee for Combating Violence (DEAV in Greek), is established, consisting of nine (9) members, as follows: a) four (4) eminent scientists in the field of legal science, psychology or sociology or political sciences or criminology or communication; (b) two (2) distinguished senior sport officials, one shall be a non active athlete; c) one representative from the Ministry of Justice, Transparency and Human Rights designated by the Minister for Justice, Transparency and Human Rights; (d) one (1) senior officer of the Hellenic Police designated by the Minister for Justice, Transparency and Human Rights; and (e) one (1) representative from the Panhellenic Federation of Police Officers, appointed by its administration board. The members of the above committee are appointed for a period of three years by decision of the Minister of Culture and Sport.</p> <p>Sport federations, professional associations and collective bodies representing athletes, referees, coaches and supporters shall appoint their own representatives to the Standing Committee for Combating Violence.</p> | | Ministry of Culture and Sports. | |

| Recommendation 6 : The national co-ordination group should commission the preparation of a national multi-agency strategy document setting out the key components of a [new] integrated approach to safety, security and service.[status: essential] | | | |
|--|----------------|--|---|
| Milestones | Timing | Lead Agency | Progress |
| The Ministry of Culture and Sports have considered this recommendation and planned to integrate its content within the new legal framework. | September 2019 | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection. | Legal framework preparations were stopped due to the declaration of early elections for the members of the Hellenic Parliament. |
| Recommendation 7 : The national co-ordination group should i) designate a municipal or regional authority to establish a local multi-agency group tasked to oversee and co-ordinate preparations for football events held in their locality and ii) provide guidance on the structure, role, and membership of such groups, taking into account established European good practice.[status: desirable] | | | |
| Milestones | Timing | Lead Agency | Progress |
| According to article 41D of Law 2725/1999 and the Joint Ministerial Decision for the approval of a single safety regulation at sport events nr. 38404/2009 (G.G. B' 1780), a pre-match meeting is held few days before the event and in a local level the day of the match, in which the delegates from public and private authorities participate in order to verify the implementation of safety and security measures. | | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection. | |
| Recommendation 8 : The national co-ordination group should review the current legal framework and identify the legal amendments necessary to ensure that it: | | | |
| <ul style="list-style-type: none"> • complies with the new Convention and the safety, security and service good practices contained in the Council of Europe Standing Committee Recommendation 1/2015; • facilitates and empowers delivery of all aspects of the national integrated multi-agency strategy; • provides clarity of roles and responsibilities of all public and private personnel engaged in football operations (inside and outside of stadia); and • represents a balanced approach to safety, security and service.[status: essential] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The Hellenic Government and particularly the Ministry of Culture and Sports have considered this recommendation and planned to integrate its | September 2019 | Ministry of Culture and | Legal framework preparations were stopped due to the declaration of |

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|---|----------------|---|---|
| content within the new legal framework. | | Sports in cooperation with the Ministry of Citizen Protection. | early elections for the members of the Hellenic Parliament. |
| Recommendation 9 : The national co-ordination group should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. [status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The multi-agency media and communication strategy was planned to be implemented after the legislation of the new legal framework. | October 2019 | Ministry of Culture and Sports in cooperation with Ministry of Digital Policy and Media. | |
| Article 5 - Safety, Security and Service in Stadia | | | |
| Recommendation 10 : The national co-ordination group should consider establishing an independent public authority tasked to: develop stadium safety standards, covering physical infrastructure, technical equipment and safety management arrangements; monitor application; assess effectiveness; and issue stadium safety certificates. [status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| Articles 56A to 56E of Law 2725/1999 as amended, with laws 4479/2017 (G.G. A' 94) and 4603/2019 (G.G. A' 48) for the function and operation of sport venues and the Joint Ministerial Decision nr. 408113/21902/2725/603/4-10-2017 (G.G. B' 3568) as amended, for the implementation of article 56B of Law 2725/1999, regulate the process of sport venues infrastructure licencing. The article 56C of Law 2725/1999 determines the composition of the Committees that are in charge of the stadia licencing process. Safety management arrangements were to be considered in the preparation of the new legal framework. | September 2019 | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection, Ministry of Finance, | |

| | | | |
|---|----------------|---|-----------------|
| | | Ministry of Interior and Ministry of Infrastructure and Transports. | |
| Recommendation 11 : The national co-ordination group should make provision for the (proposed) independent public "stadium safety authority" to issue stadium safety certificates and monitor compliance with its conditions.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| We were in the process of resolving bureaucracy issues regarding the institutional form of the stadium safety authority, due to the fact that Greek legislation is very strict on the conditions of establishing independent public authorities. In addition, the issue confronts overlapping of responsibilities between many competent Ministries that needs time to be resolved. | December 2019 | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection, Ministry of Finance, Ministry of Interior and Ministry of Infrastructure and Transports. | |
| Recommendation 12 : The national co-ordination group should make provision for the issue of a stadium safety certificate to be subject to a stadium having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadia safety, security and service matters.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The majority of sport venues in Greece are owned by the municipal authorities and this is the main reason why they don't have a certified stadium safety officer. Usually, the sport venues have a director who is often a public servant. In the new legal framework that was in process we were determining the mission and role of the stadium safety officer | September 2019 | Ministry of Culture and Sports in cooperation with the | |

| appointed by the stadium contracted user and the education and training skills he/she has to follow in order to be certified. | | Ministry of Citizen Protection and the Ministry of Education. | |
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| Recommendation 13 : The national co-ordination group should make provision for ensuring that all stadium stewards are trained by persons, assessed as competent to train and accredit stewards as being able to undertake their varied tasks effectively.[status: essential] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The Hellenic Government and particularly the Ministry of Culture and Sports have considered this recommendation and planned to integrate its content within the new legal framework. | September 2019 | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection and the Ministry of Education. | |
| Recommendation 14 : The national co-ordination group should make provision ensuring that the in-stadia role of the police and other public authorities is clear, both in law and operating arrangements, and widely understood by all safety and security practitioners. [status: essential] | | | |
| Milestones | Timing | Lead Agency | Progress |
| Given the importance and sensibility of the issue of the spectators' safety and security, the Hellenic Government tries to identify and legislate the best and most efficient solution for the in-stadia role of the police and other public authorities and the role of stadium security officers and stewards. | September 2019 with a long transitional period. | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection. | |

| <p>Recommendation 15 : The national co-ordination group should commission an expert view of the efficacy of current stadia CCTV and other technical facilities in order to determine what improvements are necessary to meet stadium safety needs and police evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality [status: important]</p> | | | |
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| Milestones | Timing | Lead Agency | Progress |
| <p>Article 41E of Law 2725/1999 and the Joint Ministerial Decision nr. 229158/12878/1281/237/2015 (G.G. B' 1802 2015) for the installation and operation of electronic surveillance systems at sport venues, regulate the issues regarding the CCTV function and its use for electronic surveillance of sport events. In addition, according to article 56C of Law 2725/1999, a police officer participates in the sport venues adequacy control committee. Police officers are in charge of the use of the CCTV systems and trained for this purpose.</p> | | <p>Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection and Ministry of Finance.</p> | |
| <p>Recommendation 16 : The national football authorities should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all or selected stadia hosting professional football matches in order to inform the development of enhanced technical, operating, and safety management standards.[status: desirable]</p> | | | |
| Milestones | Timing | Lead Agency | Progress |
| <p>The Hellenic Football Federation (HFF) has already incorporated UEFA's instructions and technical documents in its regulations and have appointed international experts to inspect Greek stadia hosting professional football matches.</p> | | <p>HFF</p> | |
| <p>Recommendation 17 :Based on the findings of this study and on the European model strategy which is currently being drafted by EU, Council of Europe and UEFA, the national co-ordination group should aim at reviewing the steps necessary to deter, prevent and counter the use of pyrotechnics in stadia.[status: important]</p> | | | |
| Milestones | Timing | Lead Agency | Progress |
| <p>Article 41F of Law 2725/1999 prohibits and imposes sanctions for violence offences at sport events. Particularly according to paragraph 1d of article 41F of Law 2725/1999, imprisonment of up to two years and a monetary penalty will be imposed, unless the act is heavier punishable</p> | | <p>Ministry of Culture and Sports in cooperation</p> | |

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| <p>according to other provision, to anyone who intentionally, within sport venues or surrounding area or auxiliary facilities or premises, or parking spaces, during the event, possesses or uses pyrotechnics, smoke fireworks, firecrackers and generally flammable materials. If the above act was committed in circumstances which indicate that the offender is particularly dangerous for the smooth conduct of sport events, a term of imprisonment of up to three years shall be imposed, unless the act is more heavily punishable under other provision. The offender that proved to have committed in the past violence offences at sport events or participated in acts being himself/herself in command or acting on the basis of an organised criminal plan, or caused significant damages to third-party property, is defined as particularly dangerous.</p> <p>In case of conviction, the court shall impose to the offender, for a mandatory period of two to five years, prohibition to enter and attend sport events, of any sport indistinctly, even those held outside the Greek territory, involving a match of the team, in relation to or in connection with which the offence was committed.</p> <p>The court may also prohibit the entrance to and attendance of any other sport event, if by the circumstances and the personality of the offender is considered that he/she is dangerous for the undisturbed conduct of the sport events.</p> <p>In order to enforce the ancillary (supplementary) sentence, the court shall order the offender to appear at the police station of his/her place of residence or stay, prior to the beginning of the sport event and to remain there or at a directly supervised by the police authority area, two hours before up to two hours after the sport event has ended. At the request of the sentenced person, the court shall specify by its decision the sport and the sport events to which the above ancillary sentence applies. If the sentenced person violates the above conditions, he/she shall be punished by imprisonment of up to three (3) months, which shall not be converted into a monetary penalty or suspended, plus a monetary penalty (fine). In addition, if the above violation occurs during the period of suspension of the main penalty, the competent police department draws up a report to that effect, which is immediately transmitted to the Public Prosecutor at First Instance of the place of issue of the conviction, the Article 101</p> | | <p>with the Ministry of Justice, Transparency and Human Rights and the Ministry of Citizen Protection.</p> | |
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| <p>par.1 of the Criminal Code is applied.</p> <p>If the offender is a minor, the attendance of sport events shall be prohibited, as a reformative measure and if the minor is under 16, instead of the above, the award of responsible custody of the minor to his/her parents, commissioners or guardians shall be imposed as a reformative measure.</p> <p>In addition, according to article 41H of Law 2725/1999 "Restrictive measures against offenders of violence in sport events", as inserted with article 37 of Law 4603/2019 (G.G. A' 48), in the course of the prosecution and for as long as the pre-trial takes place, if there are serious indications for the guilt of the accused for one of the offenses of violence in sport events, the locally competent criminal prosecutor may, by order, impose on the accused one or more restrictive measures, provided that this is necessary to avoid the risk committing new offenses. If the defendant has been convicted in the past, by an irrevocable court order decision, with penalty for committing offense of violence in sport events, then the imposition of restrictive measures against him/her is obligatory.</p> <p>These restrictive measures imposed shall be in particular:</p> <p>(a) ban on admission to one or more sports facilities, of one or more sports, during train courses and / or competitions; (b) ban on admission to sports facilities in which a specific team of a sport club, or Department of Remunerated Athletes (T.A.A.) or Sport Societés Anonymes (A.A.E.), uses to train or compete; and (c) the obligation of the defendant to appear in the police station of his residence up to two (2) hours before the kickoff of the competitions in which participates a specific team of a sport club, Department of Remunerated Athletes (T.A.A.) or Sport Societés Anonymes (A.A.E.) and his/her obligation to stay there up to two (2) hours after their competition is over.</p> <p>The prosecuting order referred to above shall be communicated to the defendant, to the competent police authority and all interested parties, sport federation, organizing sport authority, sports club, Department of Remunerated Athletes (T.A.A.) or Sport Societés Anonymes (A.A.E.), in order to be informed and ensure that the order will be executed. The restrictive measures shall be in force from the notification to the</p> | | | |
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| <p>defendant and shall cease automatically by their revocation or by replacing them in accordance with paragraphs 4 and 5 of article 41H of Law 2725/1999 or upon completion of the penal proceedings under Article 370 CCI.</p> <p>The provisions of this Article shall apply to a minor accused person as well, who has completed his/her fifteenth (15th) year of age. In this case, the prosecutor's order it is also communicated to his custodian parents or his guardians.</p> <p>Moreover, according to article 41I (41Θ in Greek) of Law 2725/1999 as inserted with article 37 of Law 4603/2019 (G.G. A' 48) imprisonment of at least two (2) years period, a fine of five thousand euros (5000) and a ban on admission to sports facilities for a period of one to five years, shall be imposed to the defendant who violates the restrictive measures imposed on him under Article 41H.</p> <p>Penalties as referred to in paragraph 1 shall be imposed also to those convicted for violating a consequent ban on attending sport events, imposed in accordance with case a' of par. 7 of Article 41F.</p> <p>To a minor defendant who violates the restrictive measures imposed on him under the Article 41H or the restraining measure of the prohibition to attend sport events imposed in accordance with case b' of par. 7 of Article 41F, the reform measures of Article 122 of the Criminal Code or the treatment measures referred to in Article 123 of the Criminal Code, as well as a ban on entry into sports facilities for a period of one up to five years are imposed.</p> <p>Parents, commissioners or guardians having custody of a minor who violates the restrictive measures imposed on him/her under Article 41H or the restraining measure of the prohibition to attend sports events imposed on him/her under par. b' of Article 41F, are punished with a term of imprisonment of at least one year and a fine of three thousand (3,000) euros. If the minor has been placed under their supervision in accordance with Article 122 of the Criminal Code, parents, commissioners or guardians who have the custody are punished with a term of imprisonment of at least two years and a fine of five thousand (5,000) euros.</p> <p>Sport events security officers referred to in paragraph 4 of Article 41d of</p> | | | |
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| <p>Law 2725/1999 and private security staff of paragraph 11 of the same article, who intentionally permit entry into the sports facility of their jurisdiction, to anyone who has been punished with restrictive measures or consequent ban of entry, they are punished with imprisonment of at least two (2) years, a fine of five thousand (5.000) euros and a ban of their duties as security officer on sport events or ban on their duties as a private security for one to five years, unless the act is punished otherwise by another criminal provision.</p> <p>The sport events security officers referred to in paragraph 4 of Article 41D shall be punished by imprisonment of at least six (6) months, a fine of three thousand euros (€ 3,000) and a ban on performing their duties as security officer for a period of time from six (6) months to three (3) years, if, by negligence, in breach of their official duties, do not prevent entry to the sports facility they secure, anyone who has been punished with a restrictive term or consequent ban on entry.</p> <p>The commission of a new offense of violence by the person who entered the sport facility, in breach of a restrictive term or penalty imposed, shall be considered an aggravating circumstance in the evaluation of the offenses referred to above.</p> | | | |
| Article 7 – Contingency and Emergency Planning | | | |
| Recommendation 18 : The national co-ordination group should review the current arrangements for preparing and testing comprehensive multi-agency stadium contingency and public authority emergency plans for incidents at or nearby stadia hosting football events.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The Common Ministerial Decision nr. 38404/2009 (G.G. B 1780), and particularly article 7, describes the competent authorities to decide the contingency and emergency planning. This issue confronts overlapping of responsibilities between many competent Ministries that needs time to be resolved. | | Ministry of Culture and Sports in cooperation with the Ministry of Citizen Protection and Ministry of Infrastructure | |

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| | | and Transports. | |
| Article 8 - Engagement with Supporters and Local Communities | | | |
| Recommendation 19 :The national co-ordination group should encourage all stakeholders to review and expand their supporter liaison activities and, in so doing, review the current Supporter Liaison Officers (SLOs) arrangements to ensure compliance with the role and remit set out in the UEFA SLO Handbook, taking into account the observations and suggestions of SD Europe contained in Appendix D of this report.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The Hellenic Football Federation (HFF) has fully implemented the UEFA requirement on football clubs competing in UEFA competitions to appoint a Supporter Liaison Officer (SLO) as laid down in UEFA Club Licensing and Financial Fair Play Regulations. In addition, the HFF has extended this personnel requirement to cover all clubs competing in the top tier of Greek football. | | HFF | |
| Recommendation 20 : The national co-ordination group should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination.[status: desirable] | | | |
| Milestones | Timing | Lead Agency | Progress |
| European programmes that promote the values of respect, tolerance, anti-violence and non-discrimination (such as Aspire, Erasmus+) are implemented by the Ministry of Culture and Sports/General Secretariat of Sports, with the cooperation of local authorities for refugees and other social communities. These programmes are developing and expanding to all stakeholders. In addition, and according to article 35 of Law 4603/2019 (G.G. A' 48) that amended article 33 of Law 2725/1999, the participation of amateur athletes coming from countries of the European Union or third countries in Greek championships is promoted. | | Ministry of Culture and Sports/General Secretariat of Sports in cooperation with other competent authorities. | |
| Article 9 – Police Strategies and Operations | | | |
| Recommendation 21 : The Ministry of Interior should ensure that: policing football operations take into account established European good practice and are in compliance with the Council of Europe Convention’s obligations, and take full account of the key role played by the sports police[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The competent Greek Police services have already been informed of these practices, as defined in the EU Handbook for football, taking into | | Ministry of Citizen | |

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| account of any existing data, in order to redefine and update the operational measures adopted. We would like to underline that this Convention has been signed by our country in 2016 but has not been ratified by law in our national law in order to allow its application. | | Protection in cooperation with Ministry of Culture and Sports. | |
| Recommendation 22 : The Ministry of Interior should review current policing football operations with a view to adopting a strategic and tactical policy of identifying and gathering evidence in respect individuals and/or groups posing increased safety or security risks.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| For the above purpose, the competent Greek Police services update their operational plans on an annual basis after having already evaluated the previous sporting season. In any case, this identification and evidence-gathering strategy is implemented following the European and national legal framework. | | Ministry of Citizen Protection in cooperation with Ministry of Culture and Sports. | |
| Recommendation 23 : The Ministry of Interior should ensure that all police match commanders are aware of established good practices in respect of reducing risk and marginalising the influence of risk groups through effective liaison with supporters, taking into account the various supporter liaison options set out in the Recommendation Rec (2015)1.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The relevant Greek Police services have already taken note of these practices as described in the EU Handbook for football matches, taking into account of any existing data, in order to redefine and update the operational measures taken. Before each match, all relevant information, such as those generated by the information network and in particular by the communication developed by the Hellenic Police Special Services (Subdivision Against Football Violence in Attica & Thessaloniki) with their respective supporters' clubs. | | Ministry of Citizen Protection in cooperation with Ministry of Culture and Sports. | |
| Recommendation 24 :The Ministry of Interior should ensure that police personnel engaged in the preparations for, and operations during, football events receive appropriate and specialist training in European policing football good practices.[status: important] | | | |
| Milestones | Timing | Lead Agency | Progress |
| The staff of the competent Greek Police Services, which is involved in the aforementioned role, participates on an annual basis in CEPOL training programs aimed at assimilating and, by extension, implementing | | Ministry of Citizen Protection in | |

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| <p>the good practices in question. It is noted that relevant training take place at a bilateral level between police authorities, such as the responsible officers of the Subdivision Against Football Violence of Attica by their British counterparts training session, which took place in May 2018.</p> | | <p>cooperation with Ministry of Culture and Sports.</p> | |
| <p>Recommendation 25 :The Ministry of Interior should ensure that the Greek sports police, notably the National Football Information Point (NFIP), is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the CETS No. 218 and secondly play a key role in delivering the proposed comprehensive exclusion strategy.[status: important]</p> | | | |
| <p style="text-align: center;">Milestones</p> | <p style="text-align: center;">Timing</p> | <p style="text-align: center;">Lead Agency</p> | <p style="text-align: center;">Progress</p> |
| <p>The NFIP of our country fully meets the obligations and duties resulting from the EU Council Decision nr. 2002/348/JHA of 25/04/2002 on security during football matches with an international dimension, as amended by Decision 2007/412/JHA of 12/06/2007, and it is already provided with the necessary resources and equipment.</p> | | <p>Ministry of Citizen Protection in cooperation with Ministry of Culture and Sports.</p> | |
| <p>Recommendation 26 :The Ministry of Interior should ensure that, on a risk assessment basis, funding is provided to deploy police delegations to, and host incoming police delegations from, countries whose national and club football teams are competing against teams from Greece in European competitions and other international matches.[status: important]</p> | | | |
| <p style="text-align: center;">Milestones</p> | <p style="text-align: center;">Timing</p> | <p style="text-align: center;">Lead Agency</p> | <p style="text-align: center;">Progress</p> |
| <p>Based on the EU Handbook for football, this funding is provided in each of these cases and in accordance with Chapter 3, paragraph 5, "Costs and Financial Adjustments" of the Council Resolution on an updated Handbook of Recommendations on International Police Co-operation and Preventive Measures to combat violence and disturbances in connection with football matches of an international character, involving at least one Member State. It should be noted that prior to the sending of a relevant invitation by each Contracting Party, matches required threat-risk assessment is always preceded.</p> | | <p>Ministry of Citizen Protection in cooperation with Ministry of Culture and Sports.</p> | |
| <p style="text-align: center;">Article 10 - Prevention and Sanctioning of Offending Behaviour</p> | | | |
| <p>Recommendation 27 : The national co-ordination group should review the current exclusion process with a view to introducing a more effective arrangements, taking into account European models of good practice which have delivered high levels of success in deterring football related violence and misbehaviour, preventing repeat offending, and transforming the behaviour of excluded persons.[status: essential]</p> | | | |

| Milestones | Timing | Lead Agency | Progress |
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| The current exclusion process has been reviewed and new articles 41H and 41I (41Θ in Greek) of Law 2725/1999 have been inserted with articles 37 and 38 of Law 4603/2019 as stated above in Recommendation 17, deterring sport related violence and misbehaviour. | | Ministry of Culture and Sports in cooperation with the Ministry of Justice, Transparency and Human Rights and the Ministry of Citizen Protection. | |
| Article 11 - International Co-operation | | | |
| Recommendation 28 : The Ministry of Interior should continue to ensure that the head of the NFIP participates in all meetings of the Council of Europe Standing Committee while the Ministry of Sport should ensure that an official working in the area of sports safety should attend Council of Europe Standing Committee meetings. [status: essential] | | | |
| Milestones | Timing | Lead Agency | Progress |
| Each time a Delegation of the Ministry of Sport participates in the Standing Committee of the Council of Europe, the National Football Information Office of our country sends its report to the issues relevant for the Agenda, if required, and the issues in question are related to the remit of the Hellenic Police Force. | | Ministry of Citizen Protection in cooperation with Ministry of Culture and Sports. | |

Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events

Policy Articles

ARTICLE 1 – Scope

1. The Parties shall, within the limits of their respective constitutional provisions, take the necessary steps to give effect to the provisions of this Convention in respect of football matches or tournaments played in their territory by professional football clubs and national teams.
2. The Parties may apply the provisions of this Convention to other sports or sports events hosted in their territory, including non-professional football matches, especially in circumstances where safety or security risks are involved.

ARTICLE 2 – Aim

The aim of this Convention is to provide a safe, secure and welcoming environment at football matches and other sports events. To that end, the Parties shall:

- a. adopt an integrated, multi-agency and balanced approach towards safety, security and service, based upon an ethos of effective local, national and international partnerships and co-operation;
- b. ensure that all public and private agencies, and other stakeholders, recognise that safety, security and service provision cannot be considered in isolation, and can have a direct influence on delivery of the other two components; and
- c. take account of good practices in developing an integrated approach to safety, security and service.

ARTICLE 3 – Definitions

For the purposes of this Convention, the terms:

- a. “safety measures” shall mean any measure designed and implemented with the primary aim of protecting the health and wellbeing of individuals and groups who attend, or participate in, a football or other sports related event, inside or outside of stadia, or who reside or work in the vicinity of the event;
- b. “security measures” shall mean any measure designed and implemented with the primary aim of preventing, reducing the risk and/or responding to any violence or other criminal activity or disorder committed in connection with a football or other sports related event, inside or outside of stadia;

- c. “service measures” shall mean any measure designed and implemented with the primary aim of making individuals and groups feel comfortable, appreciated, and welcome in connection with a football or other sports related event, inside or outside of stadia;
- d. "agency" shall mean any public or private body with a constitutional, legislative, regulatory or other responsibility in respect of the preparation and implementation of any safety, security or service measure in connection with a football or other sports related event, inside or outside of stadia;
- e. "stakeholder" shall mean spectators, local communities or other interested parties who do not have legislative or regulatory responsibilities but who can play an important role in helping to make football or other sports events safe, secure and welcoming, inside and outside of stadia;
- f. "integrated approach" shall mean recognition that, irrespective of their primary purpose, football and other sports related safety, security and service measures invariably overlap, are inter-related in terms of impact, need to be balanced, and cannot be designed or implemented in isolation;
- g. “multi-agency integrated approach” shall mean recognition that the roles and actions of each agency involved in football or other sports related planning and operational activity should be co-ordinated, complementary, proportionate, and designed and implemented as part of a comprehensive safety, security and service strategy;
- h. "good practices" shall mean measures applied in one or more countries that have proven to be very effective in meeting the stated aim or objective;
- i. "relevant agency" shall mean a body (public or private) involved in the organisation and/or management of a football or other sports related event held inside or outside of sports stadia.

ARTICLE 4 – Domestic Co-ordination Arrangements

1. The Parties shall ensure that national and local co-ordination arrangements are established for the purpose of developing and implementing a multi-agency integrated approach to safety, security and service at national and local level.
2. The Parties shall ensure that the co-ordination arrangements involve the participation of all key public and private agencies engaged in safety, security and service matters connected with the event, both inside and outside of the venue where the event is taking place.
3. The Parties shall ensure that the co-ordination arrangements take full account of the safety, security and service principles set out in this Convention and that national and local strategies are developed, regularly evaluated and refined in the light of national and international experience and good practice.
4. The Parties shall ensure that national legal, regulatory or administrative frameworks clarify the respective roles and responsibilities of the relevant agencies and that these roles are complementary, consistent with an integrated approach, and widely understood at a strategic and operational level.

ARTICLE 5 – Safety, Security and Service in Sports Stadia

1. The Parties shall ensure that national legal, regulatory or administrative frameworks require event organisers, in consultation with all partner agencies, to provide a safe and secure environment for all participants and spectators.
2. The Parties shall ensure that regulations or arrangements to guarantee the effectiveness of stadium licensing procedures, certification arrangements and safety regulations in general are in place, applied, monitored and enforced by the competent public authorities.
3. The Parties shall require the relevant agencies to ensure that stadium design, infrastructure and associated crowd management arrangements comply with national and international standards and good practices.
4. The Parties shall encourage **the relevant agencies to ensure** that stadia provide an inclusive and welcoming environment for all sections of society, including children, the elderly and those with disabilities, and incorporate, inter-alia, the provision of appropriate sanitary and refreshment facilities and good viewing facilities for all spectators.
5. The Parties shall ensure that stadia operating arrangements are comprehensive; make provision for effective liaison with the police, emergency services, and partner agencies; and incorporate clear policies and procedures on matters that might impact on crowd management and associated safety and security risks, including:
 - use of pyrotechnics;
 - any violent or other prohibited behaviour; and
 - any racist or other discriminatory behaviour.
6. The Parties shall require the relevant agencies to ensure that all public and private personnel involved in making football and other sports events safe, secure and welcoming are equipped and trained to deliver their functions effectively and in an appropriate manner.
7. The Parties shall encourage their competent agencies to highlight the need for players, trainers or other representatives of participating teams to act in accordance with key sports principles, like tolerance, respect and fair play, and recognise the negative impact which acting in a violent, racist or other provocative manner can have on spectator behaviour.

ARTICLE 6 – Safety, Security and Service in Public Places

1. The Parties shall encourage all agencies and stakeholders involved in organising football and other sports related events in public spaces, including the municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations, to work together, notably in respect of:
 - a. assessing risk and preparing appropriate preventative measures designed to minimise disruption and provide reassurance to local communities and businesses, in particular those located in the vicinity of where the event is taking place or public viewing areas; and

- b. generating a safe, secure and welcoming environment in public spaces that are designated for supporters to gather before and after the event, or locations in which supporters can be expected to frequent of their own volition, and along transit routes to and from the city and/or to and from stadia.
2. The Parties shall ensure that risk assessment and safety and security measures take account of the journey to and from the stadium.

ARTICLE 7 – Contingency and Emergency Planning

The Parties shall ensure that multi-agency contingency and emergency plans are developed, and that those plans are tested and refined in regular joint exercises. National legal, regulatory or administrative frameworks should make clear which agency is responsible for initiating, supervising and certifying the exercises.

ARTICLE 8 – Engagement with Supporters and Local Communities

1. The Parties shall encourage all agencies to develop and pursue a policy of pro-active and regular communication with key stakeholders, including supporter representatives and local communities, based on the principles of dialogue, and with aim of generating a partnership ethos and positive co-operation as well as identifying solutions to potential problems.
2. The Parties shall encourage all public and private agencies and other stakeholders, including local communities and supporter representatives, to initiate or participate in multi-agency social, educational, crime prevention and other community projects designed to foster mutual respect and understanding, especially amongst supporters, sports clubs and associations as well as safety and security agencies.

ARTICLE 9 – Police Strategies and Operations

1. The Parties shall ensure that policing strategies are developed, regularly evaluated and refined in the light of national and international experience and good practice, and are consistent with the wider, integrated approach to safety, security and service.
2. The Parties shall ensure that policing strategies take account of good practice including, inter-alia: intelligence gathering; ongoing risk assessment; risk-based deployment; proportionate intervention to prevent escalation of risk or disorder; effective dialogue with supporters and the wider community; and evidence gathering of criminal activity as well as the sharing of such evidence with the competent authorities responsible for prosecution.
3. The Parties shall ensure that the police work in partnership with organisers, supporters, local communities and other stakeholders in making football and other sports events safe, secure and welcoming for all concerned.

ARTICLE 10 – Prevention and Sanctioning of Offending Behaviour

1. The Parties shall take all possible measures to reduce the risk of individuals or groups participating in or organising incidents of violence or disorder.

2. The Parties shall, in accordance with national and international law, ensure that effective exclusion arrangements, appropriate to the character and location of risk, are in place to deter and prevent incidents of violence or disorder.

3. The Parties shall, in accordance with national and international law, co-operate in seeking to ensure that individuals committing offences abroad receive appropriate sanctions, either in the country where the offence is committed or in their country of residence or of citizenship.

4. Where appropriate, and in accordance with national and international law, the Parties shall consider empowering the judicial or administrative authorities responsible for imposing sanctions on individuals who have caused or contributed to incidents of football-related violence and/or disorder, with the possibility of imposing restrictions on travel to football events held in another country.

ARTICLE 11 – International Co-operation

1. The Parties shall co-operate closely on all, and associated, matters covered by this Convention in order to maximise collaboration in respect of international events, share experiences and participate in the development of good practices.

2. The Parties shall, without prejudice to existing national provisions, in particular the allocation of powers among the different services and authorities, set up or designate a national football information point of a police nature (NFIP). The NFIP shall:

- a) act as the direct and single contact point for exchanging general (strategic, operational and tactical) information in connection with a football match with an international dimension;
- b) exchange personal data in accordance with the domestic and international rules applicable;
- c) facilitate, coordinate or organise the implementation of international police cooperation in connection with football matches with an international dimension.
- d) be capable of fulfilling efficiently and promptly the tasks assigned to it.

3. The Parties shall further ensure that the NFIP provides a national source of expertise regarding football policing operations, supporter dynamics and associated safety and security risks.

4. Each State Party shall notify the Committee on safety and security at sports events in writing the name and contact details of its NFIP, and any subsequent changes with regard to it.

5. The Parties shall cooperate at international level in respect of sharing good practice and information on preventative, educational and informative projects and the establishment of partnerships with all agencies involved in the delivery of national and local community and supporter focused or driven initiatives.

Appendix B



INSPECTION REPORT

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| Venue: | OAKA Stadium |
| Event: | AEK v Panathinaikos |
| Date: | 2 nd April 2017 |
| Start Time: | 19:30 |
| Inspecting Officer: | Mark Smith |
| Other Inspecting Officers in Attendance: | COE Inspection team |

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| SAFETY PERSONNEL IN ATTENDANCE | |
| Club Safety Officer: | PapanagiotouDimitris (Security officer) |
| Police Match Commander: | Yes |
| Fire & Rescue Service Officer: | Yes |
| Ambulance Service Officer: | Yes |
| Other:SL Delegate | Yes |
| Ministry of Culture and of Sport | Yes |
| COE: | Yes |

| | |
|------------------------|--|
| ATTENDANCE | |
| | |
| Sports Ground Capacity | 68 079 – I believe this capacity is only based on the number of seats available. |
| | |
| Home | 19,000 – this is an estimated total as there was no monitoring of numbers carried out at the match apart from ticket sales. Turnstiles were not used in all areas as exit gates were opened in at least 2 sections of the ground and some turnstiles were continually displaying an error message. |
| | |
| Visitors | No visitors were present apart from around 50 accredited VIPs from Panathinaikos. |
| | |
| Steward No. | Reported that there were 230 private security staff (these do not carry out the full role of a steward but primarily carry out a security role). |
| Police Number | 255 |

| COMMUNICATIONS | | COMMENTS |
|--|---|--|
| Is the PA clearly audible in all parts of the stands/ground spectator area? | Y | There was a separate PA box controlled by 2 gentlemen who had direct radio contact into the police CCTV room if any messages were needed to be broadcast. |
| Is the CCTV working as per certificate? | Y | The Police have sole responsibility for the CCTV within the ground and run the system on match day. The club would appear not to be able to have access to the footage recorded. Footage is recorded onto a hard drive and is kept for the whole season. |
| Is the CCTV being operated by trained personnel? | Y | There were 2 operators who were from the police and had only received training from the CCTV manufacturer in its use. No specialised training is expected. |
| Are the stewards, supervisors, medical staff, and police Radios working correctly? | Y | 3 different channels are used for the police, security firm and stadium staff. From what I witnessed on the day radio communication was working although how effective this was I would not be able to comment on due to the language barrier. |
| FIRE | | |
| Has the fire alarm been checked?.If so, by whom? | Y | I was told this had been checked although the fire panel is in a locked office off a concourse and at the time I could not access this but only observe it was in place through a window. This appeared a poor arrangement as the panel could not be easily monitored and should ideally be located within the control room. |
| All designated fire doors/closing devices in good order | N | Throughout the stadium fire doors were in poor repair with closing mechanisms damages, fire door escapes locked and other fire doors wedges open. |

| | | |
|--|---|---|
| Means of escape routes throughout the venue/stadium clear | Y | |
| Exit doors/gates open without difficulty, no unauthorised holding devices | N | Some fire exits were locked by chains. |
| Adequate emergency exit and exit route signage | Y | |
| Check condition of stairways – slip resistance, trip hazard, adequacy of lighting | N | There was an issue with the change in step size on the stand stairs which could cause a trip or fall hazard. |
| All areas clear of accumulated litter. Adequate provision for waste storage/disposal | Y | |
| Visual inspection of drawing fire safety items. | N | No plans could be provided at the time of the inspection. |
| GROUND CONDITIONS | | COMMENTS |
| Are the exit doors and gates as per plan and properly marked? | Y | |
| Are all padlocks in designated safe place? | N | Some exits were chained and unmanned. |
| Are all barriers and separating elements sound and risk free | N | A variety of separating elements are used which includes high level fencing tie wrapped and screwed in place and barbed wire. |
| Is the ground free of any potential missiles? If yes, what action is being taken? | N | Spectators easily got in pyro's, glass bottles and cans, firstly by throwing these over exit gates to spectators already inside and then when exit gates were opened these items were just carried in with no checks. |
| Are any structural elements defective | N | Although the ground needs maintenance from a visual inspection the structure appeared to be sound. |
| Directional / Advice signs in place and visible? | Y | |
| FIRST AID | | |

| | | |
|--|-----|---|
| Are the facilities available as per certificate? | Y | I have yet to see a safety certificate, but first aid facilities appeared to be good. |
| Have medical staff been briefed? | Y | Part of pre-match briefing. |
| Have medical staff been issued with their designated roles? | Y | |
| Number of first aiders? Is this correct? | Y | There were two ambulances from two different private companies, 3 doctors and 5 other medical staff from the private medical suppliers as well as a number of Red Cross Volunteers. |
| Number of Nurses/Doctors? Is this correct? | Y | 3 doctors. |
| Is the First Aid post clearly identified? | N | There was only minimal signage. |
| What accident records are kept? | Y | |
| Any accidents recorded which should have been reported but have not? | N/K | Not known. |
| Follow up accidents? | N/K | Not known. |
| ATTENDANCE | | COMMENTS |
| Are observations / assessments made of the crowd waiting to enter? | | The crowds built up quickly especially in the Ultra and the family section, for some reason the security staff opened up the exit gates in these two sections and let spectators in without any searching or checks or monitoring numbers which led to overcrowding in the ultra area. Poor and very little searching taking place. |
| Are the numbers of spectators admitted to the ground being recorded? | N | Nobody could demonstrate to me that numbers were being monitored in any way, the only monitoring available was the number of tickets sold which would have no bearing on the actual number of spectators within the ground. |
| | | |

| | | |
|---|---|--|
| Is the maximum capacity within permitted numbers? A) Stand /section B) Ground | N | The upper tiers of the ground should not have been used but these were opened due to overcrowding in some areas of the lower tier. Although the ground permitted number was not exceeded I would suggest that certain sections of the ground were over capacity in particular the lower ultra section where no monitoring of numbers appeared to take place. |
| Are the capacities of each section of the ground being recorded? | N | As above. |
| Are turnstiles or method of monitoring entry working satisfactorily? | N | Some turnstiles had error messages, exit gates were used instead of entering through turnstiles and there was no system showing any monitoring of numbers. |
| STEWARDS | | |
| Number of supervisors Number of stewards | N | There were no stewards as such but instead there were 230 security staff from a private security company. |
| Are stewards easily identified? | N | There only appeared to be a few members of security staff wearing high visibility vests around the ground, others were wearing a blue uniform which didn't stand out in amongst the crowd. |
| Is a record kept of stewards for later identification? | Y | There were some signing in sheets which I saw but due to the language barrier I could not say what these were an actual record of. |
| In agreed positions? | Y | There were very few pre agreed positions discussed at the briefing and these appeared to be covered. |

| | | | |
|--------------|--|------------|--|
| Arestewards: | Trained | Y | Private Security staff are used instead of stewards. The Security supervisors attend a briefing that if then passed down to the staff on their team. The information on safety contained in the briefing is minimal and mainly concentrates on simple security instruction on controlling gates and searching. |
| | Instructed & briefed | Y | All the private security staff have to carry out 104 hours' worth of training and pass an exam. The individual then needs to obtain a licence which involves carrying a number of checks on the applicant. I cannot comment on the training carried out as I did not see a copy of what is included. |
| | Aware of emergency alert system Aware of emergency actions | N/K | There was no information included in the briefing about actions to take in an emergency or how the security staff would be alerted. Due to the language difficulty, it was hard to ascertain from questioning if the security staff fully understood what actions should be taken in an emergency. |
| | | | |

| EVENT LOG | | COMMENTS |
|--|-----|--|
| Has the Safety Officer carried out a pre-safety check? | Y | Although I did not witness any checks I was informed that the police carry out a pre event check with dogs around the stadium. Again although I did not witness this being carried out I was told that the match delegate had carried out a check of the ground in the morning. |
| Paper check seen? | N | No paper work could be provided at the time. |
| Comments made? | N | |
| If any action is required has it been carried out? | N/K | Not known. |
| Has action been checked? By whom? | N/K | Not Known. |
| Emergency power check carried out? | Y | Security Manager explained there were 2 generators that provided back up power. They had been used earlier in the season when there was a power cut across the area and took around 7 minutes to kick in. |
| Has a risk assessment been carried out for the event? | Y | A type of risk assessment is carried out in the form of meetings that take place before the match particularly the match organisational meeting that takes place on the match day which includes match delegates, police, security staff, officials and representatives from both clubs. This meeting considers any issues, the numbers of security staff and police, the provision of emergency services etc. |
| Satisfactory? | N/K | Although the organisational meeting considers some risks associated with the game it does concentrate on security. Many more consideration should be made prior to the match to assess both the security and safety of fans. |
| | | |

| EVENT MONITORING | | |
|--|------------|--|
| Do entry flow rates appear satisfactory? | N | The turnstiles and staff scanning tickets could not keep up with the queues of fans and in some areas exit gates were opened to allow fans in before the game started. |
| Are all gangways kept clear? | N | Due to overcrowding in some areas gangways were used for standing on and even in areas that were not overcrowded fans chose to sit on the gangway stairs instead of the seats and no attempt was made to move these. |
| Are there any pinch points evident from crowd observation or plan? | Y | In most areas crowds are prevented from any forward movement due to high wire fences, barbed wire and the drop at the front of the stands. This means in overcrowded areas where fans are standing on gangways it makes it very difficult to exit the ground through the rear gates. |
| Are appropriate plans in place for crowd segregation where required? | N/K | There were no away supporters inside the stadium so segregation was not required. |
| Are there any signs of crowd discomfort or unrest? | Y | There was a high crowd density particularly in the ultra section which meant some fans blocked gangways and spilled out into the upper tier which was meant to be out of use. |
| Are all persons seated in seated areas? | N | Persistent standing in some areas around the ground. |
| If no, what action is being taken? | | None. |



Pic1

Pic2

The pictures above show the Ultra section which appeared to be overcrowded after exit gates were opened to allow spectators in without monitoring numbers. The stepped gangway is directly in front of where the picture was taken but cannot be seen due to fans having to stand in this area.



Pic3



Pic4

To start with spectators were coming through the turnstiles within the family area and names being ticked off of a list. Due to the time taken and the queues outside the security staff opened exit gates and did not check names or numbers of people entering as can be seen in the above pictures.



Pic5



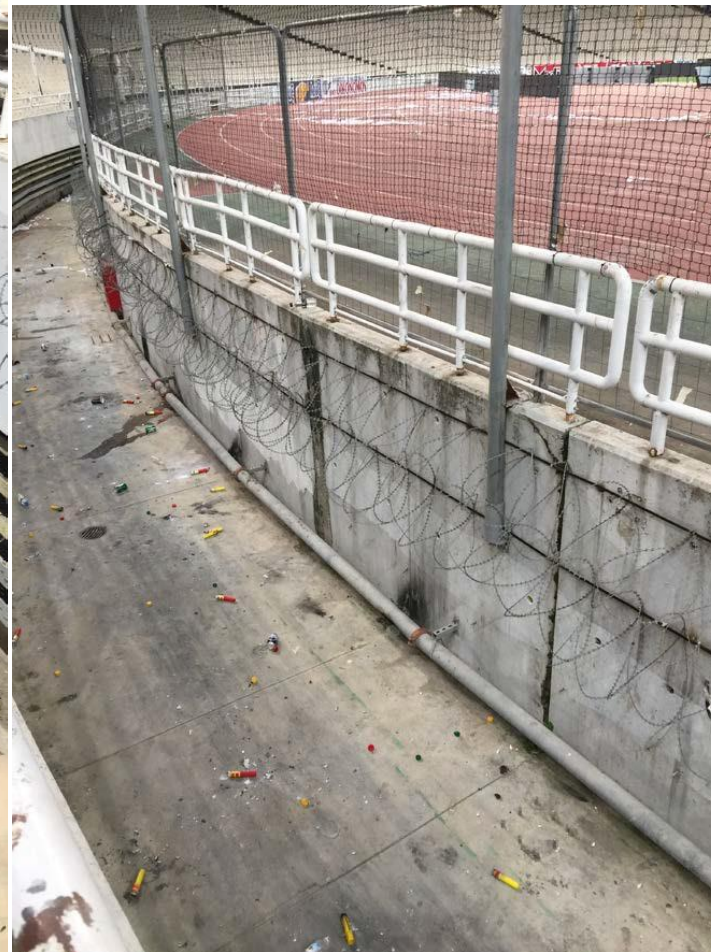
Pic6

Pic 5 above shows an emergency exit that remained chained and locked during the game and could not be used if an emergency occurred.

Pic 6 above shows a change in height of steps on the vertical gangways.



Pic 7



Pic8

The pictures above show the fencing that has been put up in front of the Ultra section along with barbed wire. Pic 7 also shows the spent pyrotechnics at the end of the match.

Safety Recommendations

National Recommendations

1. It is felt that the management at each venue should be responsible and accountable for safety at the venues and their management procedures once established should not be changed without first going through a period of consultation with all interested parties.
2. Pending the establishment of the proposed independent stadium safety authority, each region in Greece establish a safety team approach consisting of senior representatives from emergency services, stadium managers and operators, sports federations which meets regularly and at least annually and covers all sports venues to which spectators are admitted.
3. Initially Greece should aim to prepare a set of generic venue regulations or conditions of entry that outline the standards of behaviour that are acceptable in the sports grounds. They should then carry out a programme of education and information to inform clubs, sports governing bodies and most importantly spectators that there are to be changes implemented and that such antisocial behaviour is not acceptable and will no longer be tolerated.
4. A training program and vocational work-related qualifications should be established for Event Safety Managers and Safety Stewards.
5. Each venue must have a dedicated safety control point from which the event may be safety managed, monitored and controlled.
6. Each venue should have a standard operating procedures manual and contingency plans which complement those major incident plans prepared by the emergency services.
7. Each sports venue should set a maximum safe capacity based on an assessment of the physical condition and safety management systems in place. In setting this capacity figure we recommend the principles contained in the UK Guide to Safety at Sports Grounds are followed and once determined in no circumstances should a larger number of spectators be admitted.
8. Each venue must have a robust access control system to determine the level of attendance.
9. It is an essential element of ensuring safety that the sports venues are regularly inspected and monitored by competent and independent persons. It is recommended that each region in Greece carry out a detailed survey and inspection of each venue at least annually.
10. It is our view that the fire service should be given the responsibility to undertake a detailed fire safety risk assessment of all public sports venues. It is also suggested that this approach could be extended to public venues. In addition, whenever there is a requirement for venue managers determine the maximum safe spectator capacity this capacity is discussed and agreed to by the fire service.

11. We recommend that serious consideration is given to the introduction of new primary “public safety” legislation which will provide an overarching legal framework that places responsibility of safety on the owners or operators of sports venues to which the public are admitted. It may also prove advisable if a similar framework covered all public venues e.g. cinemas, theatres and all public entertainment venues.
12. As well as the public safety legislation consideration should be made to the preparation of legislation and regulations to make anti-social behaviour at sports events unlawful.
13. The responsibility for the management of safety at the stadium should rest clearly and identifiably with the stadium management team and the responsibility for control of public order with the police.

OAKA Stadium recommendations

1. It is essential that a safe maximum capacity for the stadium be agreed by all parties involved at the Stadium and that this limit should then not be exceeded. The stadium may use the template provided by the SGSA to evaluate these capacities.
2. Currently the police carry out both safety and security functions inside and outside of the stadium. We suggest that this is a role for trained stadium safety personnel to carry out supported as necessary by police officers.
3. A controlled entry management system should be introduced that ensures all spectators enter only through turnstiles and the number is monitored at a central control point to ensure the capacity for each section is not exceeded. The turnstile monitoring system should be monitored from the Stadium control room.
4. The structure should be assessed by a competent structural engineer as part of an overall annual survey of the stadium.
5. We strongly recommend the stadium management have access to an effective CCTV system that covers the whole stadium and which can be operated from a stadium safety control room and is available to both the police and safety management team.
6. It is recommended that an emergency evacuation time for each enclosure is determined and that there are sufficient number of exit gates to allow the safe evacuation of the seating enclosures within the emergency evacuation time.
7. There should be a consistent and coordinated system of signs to direct spectators to the appropriate entrance and then by stages to their viewing positions. Signage including emergency exit routes should be clearly visible from all areas of the ground. These signs

should be clearly distinguished from signs providing information; they should be placed at such a height that they may be seen over the heads of other spectators. They should also be placed in both lateral and transverse directions to enable spectators entering the Stadium from any point to decide quickly which direction to take to reach their intended destination. A review of the existing stadium signage should be included.

8. The fire detection and alarm system and operation needs reviewing. Consideration should be given to ensure the system can be monitored during events by stadium safety staff from a central control point or room.
9. We recommend that consideration should be given to the installation of a modern public address system which is linked to a stadium control room and can be used by stadium managers to enhance safety arrangements.
10. It is our recommendation that a multi-agency safety control room to accommodate the Event Safety Officer, the Police Commander, communications officers and other representatives of the other safety related agencies likely to be present is installed at all venues.
11. The stadium management should appoint an Event Safety Officer who has overall responsibility for the management of safety at the stadium. They should also engage its own Event Safety Stewards to undertake safety related tasks.
12. Stadium management should prepare a series of safety management systems and procedures that enable the safety officer and safety steward to properly discharge their duties and responsibilities.
13. It is essential that an effective management system is implemented that clearly identifies responsibilities, lines of communication and control.
14. There is a need for a recognised person or body to be responsible and accountable for the overall safety arrangements at each Stadium. This should include a rigorous system of inspection of the stadium by experienced and competent specialists that ensures the stadium remains in a satisfactory condition.
15. It is suggested that all the changes suggested for each stadium are linked to a common theme of improving spectator safety and comfort.

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## **Role of Supporter Liaison Officers (SLOs) in the Greece**

### **Observations of Supporters Direct Europe**

#### **Background**

The Hellenic Football Federation (HFF) has fully implemented the UEFA requirement on football clubs competing in UEFA competitions to appoint a Supporter Liaison Officer (SLO) as laid down in Article 35 of the UEFA Club Licensing and Financial Fair Play Regulations. In addition, the HFF has extended this personnel requirement to cover all clubs competing in the top tier of Greek football, the Super League, by including a comparable provision in its domestic club licensing arrangements. As of the 2016-17 season, a total of 16 clubs are required to appoint at least one SLO. In the Football League, the second tier of the Greek game, the SLO position is recommended but not mandatory.

Overall responsibility for implementation of the SLO licensing regulation and compliance therewith is held by the HFF. Thus far, the HFF has held one SLO training event for Greek clubs in conjunction with SD Europe, in May 2014. As far as resources are concerned, the HFF, working with SD Europe, has produced a localised version of the UEFA SLO handbook together with four toolkits of SLO-related material.

In 2016 the HFF, in conjunction with SD Europe, conducted a series of monitoring visits to ten Super League clubs for the purpose of assessing the quality of their SLO work. This exercise was repeated in April 2017. Following the first set of visits the HFF became the first national football body in Europe to sanction clubs for noncompliance with the SLO licensing requirement. At the same time, the HFF expressed a willingness to reinvest in SLO training the funds raised through these sanctions.

There is no dedicated SLO for the senior national team.

In the first quarter of 2017 the HFF obtained funding approval from UEFA for a fan dialogue project to be run under UEFA's football and social responsibility programme, HatTrick. This project, designed in conjunction with SD Europe, comprises a range of measures intended to strengthen the role of club SLOs and improve dialogue between the HFF and supporters in the period until 2020.

As a further sign of its commitment to supporter liaison and dialogue, in March 2017 the HFF agreed to be a partner in a Erasmus+ project application submitted by SD Europe with the support of UEFA. The project, which was approved for funding by the EU in July 2017, will aim to tackle issues of spectator-related disorder by improving the cooperation between club SLOs and the football and public authorities.

## **Visit report**

During the visit the consultative team had the opportunity to discuss supporter liaison issues with representatives of the Ministries of Sports and Justice, the police, the HFF, AEK Athens and Panathinaikos, including the club SLOs. The feedback provided was both instructive and contradictory.

### **Ministry of Justice**

Representatives of the Ministry of Justice stated that with two months of the season left there had been no incidents of spectator-related disorder at all this season

Great store was placed by the Ministry representatives in the new sports law and a package of repression-based measures such as prosecutions of perceived offenders within 24 hours, prison sentences with no early release and stadium bans, which were considered the most effective form of punishment. Positive reference was also made to the new electronic ticketing system, which is linked to the purchaser's name and social security number. Under the new law, ticketholders are not only responsible for their own behaviour but also for that of others, should they give their ticket to another person to attend the game instead.

The Ministry representatives appeared to consider the co-operation between them and the police and between clubs and the police to be excellent.

### **Police**

For their part, the police representatives described their relationship with club SLOs as good. The police call meetings with SLOs for the purpose of obtaining information. Asked if they shared any information with the SLOs, the answer was negative.

No official meetings are held by the police with supporter groups or with supporters at all. Unofficial meetings may take place, however, in order to develop relations with fans who it is believed could provide the police with information in the future.

The police representatives are also placing a lot of faith in the new sports law.

With regard to racism and discrimination inside stadiums, the delegation was informed that there were occasional banners only.

### **Hellenic Football Federation**

The representatives of the HFF stated that the ban on away fans had helped a lot in terms of safety and security. However, the discussion kept coming back to two main points:

1. Stadium infrastructure. No grounds were considered up to standard. The HFF was very clear, however, that it cannot invest in something it does not own.
2. The lack of trust and confidence in the referees. Both clubs and fans lack trust in the match officials.

The representatives of the HFF said they believed a reform of the structure and governance of the big clubs could help to improve the situation as would an amendment to the sports law to bring it in line with the latest standards.

According to the HFF, SLOs have the respect of the police and are a big influence on supporter groups. They stressed the fact that the SLO role is a licensing requirement.

### **Super League**

When the match organisation procedures were presented, there was no mention of the SLO. When asked if SLOs are invited to planning and pre-match meetings, the answer was unclear.

A question relating to the level of implementation of the SLO role by clubs met with a similarly ambiguous response.

When asked who was responsible for taking the decision to evacuate a stadium if necessary, the Super League representatives said officially it was the match delegate but in reality it was the police.

### **Panathinaikos FC**

Panathinaikos have had an SLO for three years and relations with fans are said to have improved. The SLO always meets with fans five-to-six days ahead of derby matches, for example. The SLO is employed for approximately 10 hours a week.

It was noted that club SLOs are not issued with central accreditation by the Super League.

### **Matchday**

The SLOs of both clubs (Panathinaikos and AEK Athens) were present at the pre-match organisation meeting.

When the match delegate was asked who was responsible for making the decision about stadium evacuation, the answer was "the police".

Members of the delegation were told that tickets and ID cards would be checked while the person was still outside the gate and, once the check was completed, the steward or private security employee would press a button to open the turnstile. On walking around the stadium, however, it was clear to the delegation that ID cards were not being checked at all, and at one gate the steward simply pressed the button and let people in, and out, without checking their tickets.

The SLO of AEK was positioned on the track in front of the active fans for the whole match.

Before kick-off, fireworks were set off from the track in front of the stand and flares and smoke bombs were used on the stands. According to AEK officials, the fireworks were permitted by the police, but not the rest.

## **Supporters**

As no conversations were held with supporter representatives as an official part of the visit, some important insights may not have come to the attention of the visiting delegation.

## **Findings**

It once again became clear that some things are similar in the football world whatever country you visit. Obtaining different answers to the same question is not unique to Greece, but it is worrying that it is not clear who is responsible for the organisation of a football match (e.g. stadium evacuations).

In relation to the SLO function, which was SD Europe's focus, the following was noted:

- General awareness of the SLO role remains low.
- Both clubs said they appreciated and recognised the benefits of the function. However, from our experience of working in Greece, we are not convinced that it is fully accepted by all fan groups yet.
- At some clubs the safety officer is fulfilling the role of the SLO.
- The HFF representatives were clear that the SLO position is a licensing requirement but were unable to provide detailed answers regarding the status of implementation. This will probably be because the HFF SLO coordinator was unable to meet the delegation.
- We are concerned about the perception of the SLO role by the police. We do not think it is a sustainable situation to call SLOs to meetings simply for the purpose of obtaining information from them. Our impression was that the police do not understand the SLO function at all.
- We also wish to express concern about the new sports law and the implications it can have on dialogue and the SLO role. We believe provisions such as a fan ID card, collective punishments, ticket distribution restrictions, ban on organised away travel, disproportionate punishments, etc., could put the SLOs in a very difficult position, alienate the main supporter groups, encourage rogue behaviour, etc.
- The request from Panathinaikos for central accreditation for club SLOs is in our view a very good idea. It sends out a clear message that the role is taken seriously.
- Greece seems to be at a turning point in many ways. If the position is implemented properly, club SLOs could play an extremely valuable role in ensuring meaningful dialogue between the various stakeholders in Greek football.

## **Recommendations**

1. Football authorities to issue central match accreditation for SLOs.
2. Football authorities to ensure that SLOs are included in the matchday organisation procedures.
3. HFF to commit to hold regular SLO and SLO/safety officer training workshops.
4. HFF to ensure that no club safety officers are deployed as SLOs.
5. HFF to encourage club SLOs to organise themselves at national level (network with elected spokespersons).

6. HFF to appoint a national team SLO.
7. HFF to commit to a sanction system for noncompliance with the SLO licensing requirement with fines that are ring-fenced and reinvested in SLO training and development.
8. HFF and relevant ministries to commit to a sanction system on supporter behaviour with fines that are ring-fenced and reinvested in the development of SLO, dialogue and socio-pedagogical fan projects.
9. Relevant ministries to commit to educate and train other stakeholders (e.g. the police) to ensure they have a better understanding of the SLO function.
10. HFF and the government to establish a procedure of regular meetings with the SLO coordinator and club SLOs at national (ministry) and local (regional or prefecture) level.
11. The police to commit to adopt dialogue procedures with club SLOs and supporters in line with the provisions set out in the EU Handbook on Police Liaison with Supporters.
12. The national co-ordination group should consider establishing an independent public authority tasked to design, implement, manage, monitor the application and assess the effectiveness of fan projects at national and regional/prefecture level.

Stuart Dykes  
SLO Coordinator,  
SD Europe

Lena Gustafson-Wiberg  
Djurgårdens IF SLO,  
Consultant SD Europe

August 2017

**VISIT PROGRAMME**

**ATHENS / 30<sup>th</sup> March-2<sup>nd</sup> April 2017**

Friday 31st March 2017

- 09:30 Ministry of Justice  
Mr. Konstantinos Simitzoglou, District Attorney of First Instance, Athens District Attorney for Sports, Disciplinary Offences Prosecution Officer of the Hellenic Football Federation  
(Headquarters of the Ministry of Culture and Sports, 37 Andrea Papandreou Str., Marousi, 15180, Ground Floor, 101 Hall)
- 11:00 Hellenic Police  
(Headquarters, 4 P. Kanellopoulou Str., 10177, Athens, 5<sup>th</sup> floor)  
Mr.PanagiotisEfstathopoulos, Officer Grade A, Division of General Policing, Department of Operational Planning and Civil Protection  
Mr.DimitriosLiaskos, Lieutenant, Division of General Policing, Department of Operational Planning and Civil Protection  
Mr. Kostas Favatas, Colonel, Athletic Violence Department of Attica  
Mr.EvangelosMitrousis, Captain, Athletic Violence Department of Attica
- 12:00 Hellenic Football Federation  
(Goudi Park, 11510 Athens, near Badminton Theatre)  
Mr. Nikolaos Bartzis, Deputy President of H.F.F. Normalization Committee  
  
Mr.AlexandrosDedes, Secretary of H.F.F. Normalization Committee  
  
Mr.PanagiotisKorkodeilos, H.F.F. Media Officer  
  
Mr. George Dimitriou, S.L.O. Coordinator H.F.F.
- 13:30 Super League  
(174 Messogion Str., 15125 Maroussi)  
Mr. Christos Daras, Deputy President  
Mr. Theodoros Laios, Competitions Director  
Mr.SotiriosTakis, Head of Security  
Mrs. Adda Mode, President's Office
- 15:00 AEK F.C.  
(Olympou&Patmou Str., 15123 Maroussi)  
Mr. Minas Lysandrou, Vice President & CEO  
Ms.AggelikiArkadi, General Director  
Mr. Nikolaos Karaouzas, Commercial Director  
Mr. Nikolaos Smparounis, Head of Matches Organization

Saturday 1st April 2017

- 11:00 PANATHINAIKOS F.C.  
(10, GermanikisScholisAthinon Str., 15123 Maroussi)  
Mr. Spyros Vlachos, Operations Manager  
Mr. Apostolis Kaskanis, Head of Security  
Mr. Michalis Nikitoglou, Supporter Liaison Officer  
Mrs. Katerina Basari, Assistant to Operations Manager
- 12:00 Visit to Panathinaikon Stadium (Kallimarmaron)  
Visit to Acropolis Museum

Sunday 2nd April 2017

- 11:00 Match Organizational Meeting with Super League Security Experts, Hellenic Police, Referees, Observers, AEK F.C., PANATHINAIKOS F.C., delegates, OAKA Venue Officers, etc.  
(OAKA Stadium)
- 12:30 Standing Committee for Combating Violence (DEAB)  
Mr. Nikolaos Damaskopoulos, President  
Mr. Zisis Bellos, Deputy President  
Mr. Konstantinos Kaminaris, Member  
(Civitel Olympic Hotel)
- 13:30 Mr. Ioulios Synadinos, General Secretary of Sport  
Mr. George Kaloudis, Legal Advisor to the General Secretary of Sport  
Mr. Alexandros Adamidis, Special Consultant to the General Secretary of Sport  
(Civitel Olympic Hotel)
- 19:30 Football match AEK F.C.-PAO F.C., OAKA Stadium

## **PART 3**

### **Comments by Greece**



Besides the filling out of the Action Plan (see pages 44-59), no further comments were received from Greece.