

**COMMITTEE ON SAFETY AND SECURITY AT
SPORTS EVENTS (T-S4)**

**COUNCIL OF EUROPE CONVENTION ON AN
INTEGRATED SAFETY, SECURITY AND SERVICE
APPROACH AT FOOTBALL MATCHES AND
OTHER SPORTS EVENTS**



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Monitoring visit to Germany within the framework of the preparations for UEFA EURO 2024

Berlin, 17-19 November 2023

Report

Adopted by the T-S4 Committee on 3 June 2025

REPORT OF THE MONITORING VISIT TO GERMANY

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PART 1

National report of Germany

I - National status

Germany was already a signatory State of the previous Convention T-RV (ETS n° 120) and was involved in the related work of the Council of Europe. Germany has already chaired the T-RV Committee for two terms of office in the past. Germany also contributed to the development of the Saint-Denis Convention with the experience and ideas of all protagonists involved in the topic of "safety, security and service at sports events". Many of the contents now laid down in the Saint-Denis Convention have been practised in Germany for a long time.

It is in the nature of things that a convention, which was created from the expert knowledge and legal foundations of the various nations and must take into account the needs of numerous signatory States, cannot be laid over the laws, the organisation of the competent authorities and the established processes like an exact silhouette.

When comparing the Saint-Denis Convention with the practice in Germany, an understanding of the federal State structure and the constitutional requirement of abstract legislation is of fundamental importance. Federal structures require constitutionally defined responsibilities, a more complex organisation of authorities and special coordination mechanisms. In contrast to Anglo-Saxon case law, it is not possible in Germany to enact legal norms for individual cases.

With its ratification, the Saint-Denis Convention has become *de facto* national law in Germany. In particular, the extension of the scope of application and the objectives of the Convention (Art. 1 and 2) are covered by the German regulations.

Coordination structures are common practice in Germany (Art. 4). Due to the federal structure of the State, these are very diverse. Due to the need for brevity, reference is only made here to the committee structure of the specialised ministries at federal level and, specifically for the area of security and sport, the "National Committee for Sport and Security" (responsible for developing the "National Concept for Sport and Security" of the cross-departmental and cross-federal strategy). At local level, the responsible authorities work together and coordinate with non-governmental organisations. International exchange of experience is ensured through integration into the EU body structure (in particular the Law Enforcement Working Party) and the Council of Europe. The existing specialised networks (e.g., the NFIP network) also contribute to this.

The aspects of safety and security at sports stadiums (Art. 5) are the central point of the regulatory content in numerous laws at all administrative levels. This includes, for example, building regulations for the construction of a place of assembly through to the regulation of the tasks and powers of the responsible security authorities. In principle, the authorities in Germany must be close to the citizens. For non-governmental organisations, service orientation is in their own vital (economic) interest.

Contingency and emergency planning (Art. 7) are provided for by law. Germany has a strong exercise culture.

With regard to fan relations and dialogue with the public (Art. 8), the "corner dialogues" between the police and representatives of the fan groups on the respective match day, which are practised

in Germany, are an example of this. In addition, special social prevention projects are carried out in the cities with relevant football clubs and respective supporter scenes in partnership with the German Football Association and State organisations in accordance with the "National Concept for Sport and Security".

The legal obligation of the police to act appropriately and proportionately as well as the judicial reviewability of any police action guarantee the legality of police action (Art. 9). The police in Germany can be regarded as very experienced in dealing with all types of events. The reputation of the police among the population is very high. Many measures for the transparency of police measures and police-public relations work are considered to be very successful. Police operations are regularly organised on the basis of conceptual planning in a system of written deployment orders and instructions.

Germany has a tried and tested system of repressive and danger-preventing regulations that has proven its worth in dealing with violent offenders and troublemakers (Art. 10). Necessary adjustments will be taken into account during the legislative process. International judicial and police co-operation is common practice.

Germany's geographical location in the centre of Europe alone makes international networking necessary in all areas. The EU regulations and bilateral and multilateral police treaties enable intensive police co-operation. The establishment of an NFIP for the exchange of information has proved its worth.

II - Major problems and incidents

The Central Information Centre for Sports Operations (ZIS), based at the North Rhine-Westphalia State Office for Central Police Services (LZPD NRW), has performed a wide range of tasks since its establishment in 1992. One focus is the annual/seasonal analysis of matches in the top four divisions in Germany (Bundesliga, Bundesliga 2, Bundesliga 3 and five regional leagues) as well as other national (in particular DFB Cup matches) and international matches (club matches of German club teams in international competitions and matches of the German national football team). These seasonal analyses allow a comparison with previous seasons and identify trends in the development of the values under review.

However, in the last six seasons, starting with the 2017/2018 season (and subsequently 2018/2019, 2019/2020, 2020/2021 and 2021/2022) up to the preparation of the current annual report for 2022/2023, different framework conditions must be taken into account for a comparative analysis. This applies in particular to the pandemic restrictions during the coronavirus pandemic in Europe from the 2019/20 season to the 2021/2022 season. The annual report for the 2022/2023 season is currently being finalised by the Ministry of the Interior of the State of North Rhine-Westphalia and is expected to be published on Wednesday, 15 November 2023, as part of the meeting of the National Committee for Sport and Safety (NASS). As a first step, the key figures of the currently published report (2021/2022 season) are therefore presented below.

The data collected in the core area include :

- Spectator numbers (stadium visitors)
- Information on criminal proceedings initiated
- Information on measures that deprive and restrict freedom
- Information on injured persons
- Deployment hours of the State and Federal police forces.

In addition to the pandemic-related impairments, it is also important to consider the clubs playing in the respective leagues, which can provide a reason for the increase or decrease in key figures.

The current status for the 2021/2022 season is therefore as follows:

The ZIS annual report presents the nationwide security situation in football in relation to the **1,180** matches analysed¹ of the teams in the top three divisions (985 of which were League matches) and the **1,796** matches in the five regional leagues. The data in this report come from the direct exchange of information between the police authorities on the occasion of football matches. The police authorities' data on the potential for violence among supporters of clubs in the top three divisions increased only slightly by **18** people to **12,734** (12,716)² during the reporting period. A total of **700** people were injured, **123** of whom were police officers.

Furthermore, a total of **3,627** criminal proceedings were initiated in the Bundesliga up to the 3rd division at League matches, DFB Cup matches, international matches and other matches, including **57** offences that are to be considered in the context of a legal-political attitude. A total of **5,151** deprivation of liberty/restrictive measures (feM/fbM) were carried out.

The workload of the police authorities of the federal States and the federal government for the direct management of operations during football matches totalled **1,504,227** hours in the reporting period.

A comparative analysis of the Bundesliga and Bundesliga 2 shows that, with a total of around **35 per cent** fewer spectators in Bundesliga 2 stadiums, around **24 per cent** more hours were spent dealing with incidents. In addition, approx. **60 per cent** more injuries, approx. **23 per cent** more criminal offences and approx. **60 per cent** more restraining/deprivation of liberty measures were recorded during Bundesliga 2 matches compared to the Bundesliga.

This development is largely due to the composition of the Bundesliga 2 in the past reporting period, in which the clubs Dynamo Dresden and Hansa Rostock were promoted from the Bundesliga 3 and FC Schalke 04 was relegated from the Bundesliga. Approximately **36 per cent** of the total number of hours worked during League matches in the Bundesliga 2 alone were for the three aforementioned teams' guest appearances at locations throughout Germany.

¹ This also includes DFB Cup matches, international club competitions as well as international and other matches.

² Figures in brackets represent the previous year's figures, if shown.

In the regional leagues, a total of **135** people were injured in connection with match operations, including **32** police officers, **898** criminal proceedings were initiated and **911** custodial/restrictive measures were carried out. A total of around **280,000** hours were spent dealing with operations during match operations in the regional leagues.

A final analysis of the past seasons shows that the problems associated with football events in Germany - in relation to the matches in question - remain at a comparatively high level. In addition, an increase in the misuse of pyrotechnic devices at such events can be observed, unfortunately also resulting in injuries to uninvolved spectators, including young people and children. In addition, racist and discriminatory behaviour has been reported in individual cases, particularly to the detriment of members of the clubs. This unacceptable behaviour subsequently sparked nationwide media attention.

III - Legal framework

Safety

The topic of events safety is a complex administrative law matter. According to Section 2 (2) No. 7 of the Building Code for Berlin (BauO Bln) (<https://gesetze.berlin.de/bsbe/document/jlr-BauOBE2005V8P2>)³, sports venues are special buildings under building law. This legal basis contains, for example, the basic provisions on fire protection, requirements for the materials used and escape routes. In addition, this law sets out the procedures for testing, certification and monitoring. The procedures in connection with building supervision are also defined.

The basis for the legal organisation of a major event within approved places of assembly is the Betriebs-Verordnung (BetrVO) (<https://gesetze.berlin.de/bsbe/document/jlrBauAnlBetrVBErahmen>). Detailed regulations govern the individual aspects that need to be regulated for the operation of publicly accessible buildings. The spectrum ranges from the consideration of the needs of wheelchair users to the number of visitors or regulations in connection with fire protection.

From the catalogue of responsibilities for regulatory tasks, the Berlin police are responsible in accordance with No. 23 (catalogue of responsibilities for regulatory tasks (<https://gesetze.berlin.de/...>)). The Berlin police are also responsible for assisting in the authorisation of events by examining and evaluating security concepts.

The Trade, Commerce and Industry Regulation Act sets out the requirements for the safety and security services that event organisers use to ensure the safe execution of the event (Section 34a

³ The law cited is a provision of the federal state (Land) of Berlin. Due to the division of responsibilities in Germany, there are similar regulations on this matter in all 16 federal states.

GewO - Security services (<https://www.gesetze-im-internet.de/...>). This ensures that qualification standards are observed when performing this task.

Security

The area of "security" can be generalised into three main areas:

- Police law (security law);
- Criminal law (incl. ancillary criminal law); and
- Civil law (incl. sports and association law).

The general police law, which is the responsibility of the federal States, gives the police authorities powers to take and avert measures against imminent dangers. According to the federal structure in Germany, the police organisations of the federal States are responsible for this. The classic police measures in this context are speaking to people at risk, reporting requirements, area entry bans, removal orders, detention and (for international away matches) passport-restricting measures. This danger prevention is regulated on the basis of the General Act for the Protection of Public Safety and Order (ASOG Berlin (<https://gesetze.berlin.de/...>)) for the state of Berlin. In accordance with the system of authorities and the allocation of tasks by the legislator, the public order authorities are the original authorities responsible for averting danger; the police have urgent jurisdiction in the event of specific dangers and to prevent crime.

In the area of German criminal law, a large number of abstract criminal provisions of the German Criminal Code (StGB) can be realised. The main offences in the area of football are assault (with qualifications), property offences (including robbery), insults and trespassing. Ancillary criminal offences are committed in particular for the illegal use of pyrotechnics and the possession or carrying of weapons.

Separate reference should be made to the possibility under criminal procedure of prohibiting attendance at sporting events as a secondary penalty or as a condition of probation.

Criminal procedural law (Code of Criminal Procedure (StPO)) authorises the criminal prosecution authorities to take measures to gather evidence for the conduct of criminal proceedings (the catalogue ranges from identity checks and confiscation measures to telecommunications surveillance).

Civil law, which gives the organiser the opportunity to take measures in their area of responsibility, is also of great importance. This applies in particular to the stadium ban, which is a special form of the domiciliary right under civil law. In addition, there is the possibility of claiming recourse under civil law from troublemakers in the event of damage or attributable violations of the law. The possibilities of sanctions under sports or association law should also not be neglected. Here, the club can be sanctioned for the misbehaviour of spectators. The sanctions can take the form of a (sporting) point deduction or a fine, for example.

Service

Significant aspects of the service sector (supply, disposal) are already regulated in building regulations or in the concepts to be submitted and subject to authorisation.

In the case of international matches of the national team in Germany, the German Football Association is the organiser, meaning that its guidelines for improving security at national matches must be observed during security-related preparation and implementation.

The German Football Association (DFB) is responsible for international matches of the German national team. When it comes to UEFA tournaments for clubs, the clubs themselves are responsible.

IV - National structure

The constitutional federal structure also applies in the area of sport.

At federal level, the Federal Ministry of the Interior and Community is responsible, among other things, for sports policy of overriding importance, elite sport (major sporting events, the Olympic Games), sports promotion, the complex of sports facility construction as well as the areas of anti-doping, the integrity of sport and integration through sport.

In the Federal Parliament (Bundestag), a sports committee deals with the most important legislative aspects of (federal) sports policy.

At the level of the federal States, the topic of sport is not necessarily located in the Ministry of the Interior. The topic of sport is often assigned to the Ministries of Culture, Youth, Education and Sport (the names vary). The following tasks are prioritised here:

- The promotion of competitive and popular sports in co-operation with sports associations and sports clubs;
- Cooperation between schools and sports clubs;
- Cooperation with the sports universities; and
- Financial support for the construction of sports facilities.

Actual grassroots work is carried out at local level. This means the concrete implementation of concepts and funding programmes with local clubs and citizens.

Independently of this, the complexes of safety and security are dealt with in the federal structures. The responsibilities of the authorities are based on the statutory allocation of tasks to the general administrative authorities (e.g., building authorities, fire brigade, etc.) or the police.

In Germany, the task of the National Football Information Point (NFIP) is carried out by the Central Information Centre for Sports Operations (ZIS). Since the mid-90s of the last century, this

office has been based at the North Rhine-Westphalian police force, following a decision by the German interior ministers. The ZIS is a federal and state institution and the central police competence centre for all types of sport, not just football.

In principle, it can be assumed that each sport has a national federation, which then has its own regional structures. The Olympic sports are summarised in the German Olympic Sports Confederation (DOSB).

The German Football Association (DFB) is the umbrella organisation of 27 football associations in the Federal Republic of Germany, to which almost 24,500 football clubs belong. This organisation has its headquarters in Frankfurt am Main. Regular DFB members are the League association, the five regional associations and 21 state associations. With more than 7 million members of the affiliated clubs, the DFB is the largest national sports association in the world.

The DFL and DFB are the largest organisers of football events in Germany. They are responsible for the tasks that an organiser must perform within their jurisdiction. The organiser's area of responsibility is relatively broad under German law. In particular, the areas of safety and service must be dealt with intensively by the organiser.

Firstly, the organiser is responsible for the safety of his event. They fulfil this responsibility by drawing up a safety concept and deploying safety services. The organiser is responsible for taking all measures to ensure that the event runs smoothly and pleasantly, from guaranteeing the smooth deployment of safety services to creating supply facilities. This involves interaction with government agencies, which review the necessary concepts and, within the scope of their responsibilities, provide components for the security of the event in the event of an incident (police, medical care). Checks are also carried out at the event to ensure that the organiser fulfils all of its obligations.

The DFB is preparing for UEFA EURO 2024 and ensuring that the tournament is a complete success, both on and off the pitch. With a clear focus on safety, security and service, the DFB is taking special measures to guarantee an unforgettable event:

1. Training of stewards by QuaSOD. Stewards are the first line of safety and support the fans during matches. The DFB runs extensive training programmes to equip stewards with the necessary knowledge and skills to deal with different situations. For example, stewards are trained to respond to medical emergencies. If a fan has a medical emergency, the stewards can quickly administer first aid, clear the area and ensure coordination with the medical teams on site to provide immediate care for the affected person.
2. Liaising with local authorities is another important part of the DFB's preparations. Close co-operation with law enforcement agencies, emergency services and local governments ensures that everything runs smoothly during the tournament. For example, the law enforcement authorities coordinate security measures. These include setting up security checks at the stadium entrances, using sniffer dogs to detect explosives and working together to identify potential threats.
3. In addition, the DFB spares no effort to ensure that the stadiums are ready for the big event. Extensive inspections, maintenance work and upgrades have been carried out to meet the highest standards in terms of safety, comfort and technology. This includes

improvements to facilities, seating and accessibility for fans with disabilities to enhance the overall fan experience. To make the stadium more accessible for all, practical examples include installing ramps and lifts for fans with mobility impairments and providing sign language interpreters and special seating arrangements for people with disabilities.

UEFA and the DFB have jointly founded EURO 2024 GmbH to organise the tournament. The foundation is accompanied by a consistent assumption of responsibility in its own area and leads to clear structures in the distribution of tasks between the organiser and the host country. DFB EURO GmbH, a wholly owned subsidiary of DFB e.V., is the organiser of the matches within the meaning of the MVStättVO.

With a view to the 2024 European Championship, Germany has given the required security guarantees. In order to implement these, a EURO 2024 task force has been set up within the Federal Ministry of the Interior and Community and, from a police perspective, a European Championship project group has been set up within the Ministry of the Interior of the State of North Rhine-Westphalia.

The EURO 2024 staff is primarily responsible for the national security concept and social aspects of the tournament. It has a coordinating role at the interface between politics and administration. In addition, it is also jointly responsible for international relations and aspects of the tournament in official matters. He is the moderator and link for all other stakeholders such as the countries, the host cities (including the stadium operators) and EURO 2024 GmbH.

The European Championship project group in the Ministry of the Interior of the state of North Rhine-Westphalia has been commissioned by the Conference of Interior Ministers to draw up a framework concept for managing police operations during the UEFA European Football Championship 2024. This concept is closely interlinked with the national security concept and forms the basis for the police measures of the Federal states and the federal government during the tournament.

V - Good practices and lessons learnt

Cooperation between governmental bodies (both at federal and state level), the German Football Association (DFB), the German Football League (DFL) and the police authorities (in particular the state police forces) improved over the years.

Due to the federal structure of the Federal Republic of Germany, many projects and prevention projects have been established and developed at state level.

Some of the projects to increase security and protect stadium visitors are described below.

" Communication with the stands" // („Kurvengespräche“):

This is a platform for dialogue between the local police and the football club. In particular, dialogue is held with fan representatives and the "active fan scene".

The aim is to make policing and over-all security measures transparent in advance. In addition, the Ultras' ideas regarding choreographies, etc., are also made transparent in this communication format.

The police deploy specially trained officers for this purpose.

Nationwide stadium bans („Bundesweite Stadionverbote“):

In the case of offences of a defined quality, the DFB has the option of issuing a nationwide stadium ban against the violent person. This measure is limited in time. Should a person who has been banned from a stadium still attempt to attend a stadium, this will automatically lead to a new criminal complaint and exclusion from the event.

The consequence of further conspicuous criminal behaviour is the extension of the stadium ban.

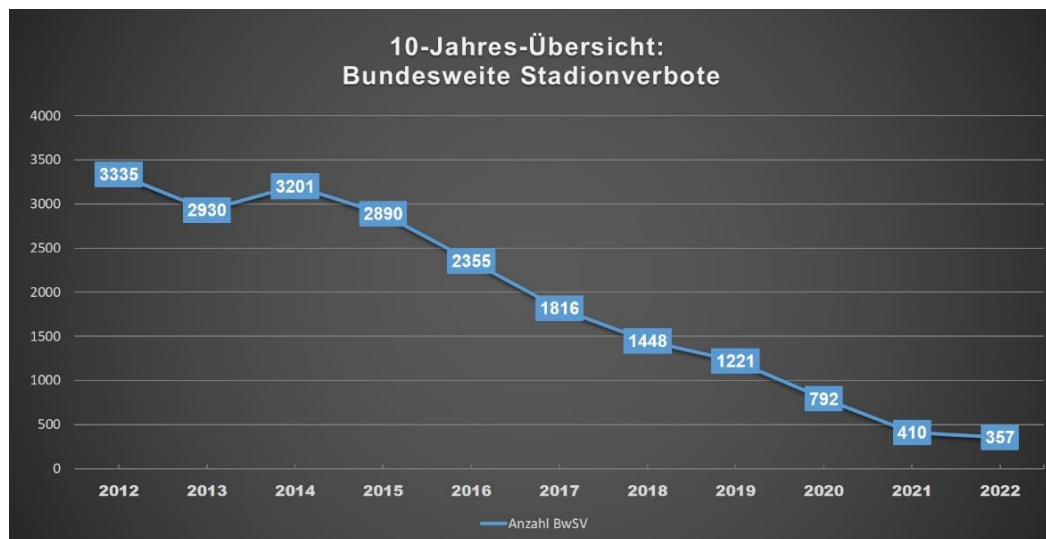


Figure 2: 10-year overview of the number of nationwide stadium bans in Germany

The declining numbers can be explained by the coronavirus pandemic and the associated restrictions on football events.

Deployment of Spotters (Szenekundigen Beamte):

The deployment of these trained officers has proven its value in the past, also on international scale. In the organisation of the local police forces, such specialised officers are available for almost every professional football club. They have a special relation to the club and are familiar with the club structures. The local football information points are not only deployed at their club's home matches, but also accompany the supporters on request of the hosting city competent police authority. At matches involving the German national team, it is possible to deploy the so-called SKB Team Germany. This is made up of spotters from the local football information points of the state police forces of the federal states.

Supporter Liaison Officers (SLOs):

The DFB institutionalised a special function within the structure of the professional clubs. Specialised Supporters Liaison Officers (SLO) have the task to maintain reliable contacts to their supporters' scene for keeping up a constant line of dialogue. This function can also be used in a communicative system with the police organisations dealing with match related operations.

Regular High-Level Communication to security related issues:

Regular institutionalised round table meetings of high representatives of the federation, the league, the chairman of the Conference of Ministers of the Interior and representatives of the governing parties of the Länder, the Federal Ministry of the Interior and Community, specialised senior officials and the head of the DFB-based supporters coordination guarantee a direct link between the decision makers of all relevant stakeholders.

VI – Annexes

The attached presentations and information materials contain organisational charts and statistics.

The following partners and interest groups should be mentioned:

- Federal Ministry of the Interior - National Sports Policy
<https://www.bmi.bund.de/DE/themen/sport/nationale-sportpolitik/nationale-sportpolitik-node.html>
- Federal Ministry of Justice
https://www.bmj.de/DE/Startseite/Startseite_node.html
- German Football Association (DFB)
<https://www.dfb.de/index/>
- German Football League (DFL)
<https://www.dfl.de/de/>
- German Olympic Sports Confederation (DOSB)
<https://www.dosb.de/>

The most important laws in connection with sporting events are as follows:

- Criminal law:
 - Criminal Code (StGB)
 - Code of Criminal Procedure (StPO)

- Weapons law:
 - Weapons Act (WaffG)
- Explosives law (in connection with pyrotechnics):
 - Explosives Act (SprengstoffG)
- Assembly law:
 - Assembly Act (VersG)
 - Ordinance on Places of Assembly (VStättVO)

The federal state of Berlin serves as an example here:

<https://gesetze.berlin.de/bsbe/document/jlr-BauAnlBetrVBERahmen>

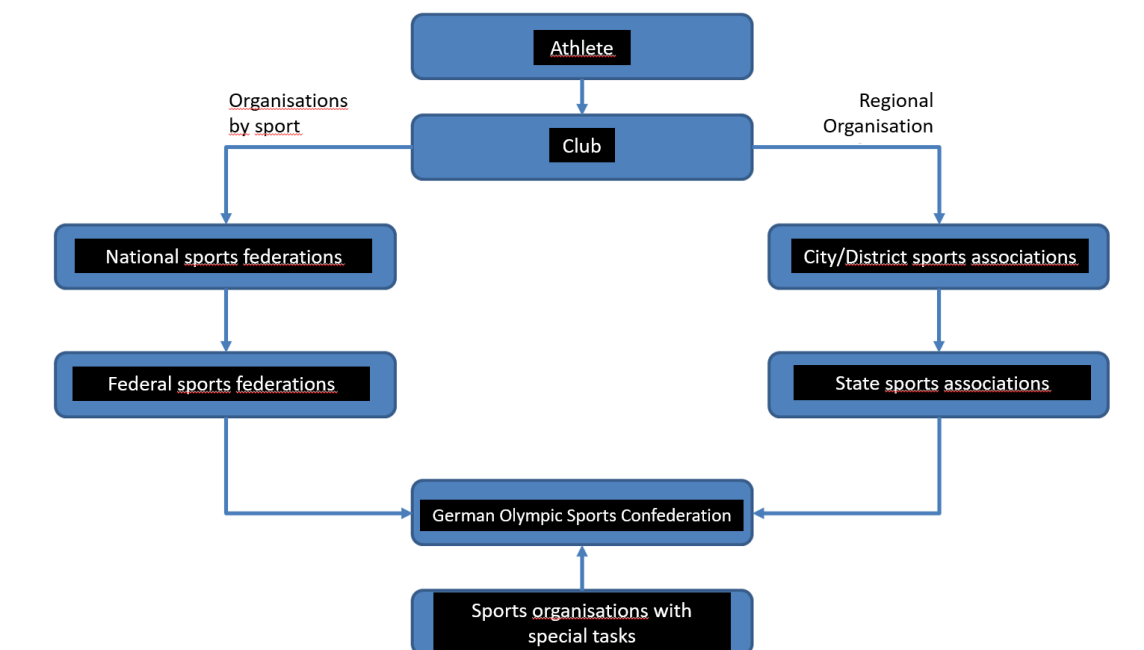
In addition, each state police force has its own police law for hazard prevention. A large number of preventative measures can be derived from this in the context of sporting events.

An example for the federal state of Mecklenburg-Vorpommern is the “SOG – MV”:

<https://www.landesrecht-mv.de/bsmv/document/jlr-SOGMV2020rahmen>

It should also be noted that other areas of law must be taken into account. In addition to building regulations, for example, the provisions on escape and rescue routes must also be observed.

The structure of German sport is shown schematically below:



PART 2

Report by the Monitoring Team

Preamble

In accordance with the Council of Europe Convention on an integrated safety, security and service approach at football matches and other sports events a delegation from the Committee on Safety and Security at Sports Events (T-S4) visited Berlin on 17-19 November 2023.

The purpose of the visit was to carry out a monitoring visit to assess the level of preparedness of the German authorities in advance of the UEFA EURO 2024 which was to be held in 10 cities across Germany from 14 June to 14 July 2024.

As is standard procedure, a report was prepared based on the observations and findings received of the monitoring team. The report is thus a position statement framed within the window of 17-19 November 2023.

It is important to note that at the time of the visit the tournament was still 6 months from the date of the opening match and so it was to be expected that many recommendations contained within the report were still ‘works in progress’.

As is the case in reporting in all such visits, the exercise is aimed at supporting the host authorities in implementing the best standards and practices. The findings and comments by the monitoring team should in no way be viewed as the criticism of a lack of preparation or failure of planning by the German authorities. The monitoring team formulated recommendations which are intended to reflect a continuous action for tasks that were still in progress, intended to be in the spirit of encouragement to complete the relevant subject area or task ahead of the tournament.

The report captures and reflects the state of play at that specific time in November 2023 of the preparation and planning for the tournament with no expectation that the preparations were complete at the time.

Acknowledging the high number of recommendations, it is important to once again highlight that they were formulated in a constructive spirit of adding value to the event.

SECTION A - Executive Summary

Together with the FIFA Men's Football World Cup and the Summer Olympic and Paralympic Games, the UEFA European Men's Football Championship is one of the three major global sports events. Organising such a tournament places major demands and responsibilities on all competent authorities in the host country, notably in respect of ensuring the safety, security and welcoming of the participating teams and staff, visiting supporters and local communities.

UEFA EURO 2024 is the 17th edition of the Men's Football European Championship and will take place from 14 June to 14 July 2024 in 10 cities across Germany, involving the participation of 24 national teams and comprising 51 matches. Six matches of the UEFA EURO 2024 including the final match will be hosted at the Olympic Stadium in Berlin.

In the framework of the Multiannual Programme of Monitoring Visits of the Saint-Denis Committee and the formal request of the German delegation, the Saint-Denis Committee carried out a monitoring visit to Berlin (Germany), under the Guidelines on Monitoring of the Saint-Denis Convention, aimed at proposing recommendations in respect of the safety, security and service arrangements in connection with UEFA EURO 2024 matches and to assess the status of the preparations for this event.

The visit also gave the opportunity to be updated on and review the current safety, security and service policies of Germany regarding football matches and other sports events in order to assess the challenges that lie ahead.

The visit was organised by the German Federal Ministry of the Interior and Community (BMI) and took place between 17 and 19 November 2023.

It is reassuring that the tournament is to be held in a country which has a solid record of hosting major events, and which has a mature structure towards the safety, security and service levels of spectators.

That said, and as pointed out in the list of Recommendations contained within this report, the main challenges facing the German authorities and UEFA in the organisation of the tournament are no different to those charged with hosting any major event and are the golden thread running through all of the Recommendations.

These challenges can be classified as : *Coordination, Cooperation, Communication, Inclusiveness, Mobility, Crowd Management and Technologies.*

Thanks to the Federal governance system in Germany, there is a solid foundation for the safety and security approach of the law enforcement authorities. In order to ensure sound levels of coordination and cooperation between all stakeholders involved, there will be a need to monitor the different approaches in the Länder in legislation, policing strategies and operations and resources available will need to be monitored to ensure that levels of spectator safety, security and enjoyment of the event are consistent from region to region. In this respect, minimum levels of service should be set with external verification to ensure that those standards are being met.

Key to this is the vital support needed by trained and qualified stewards, whose numbers will be required in many thousands across all of the stadia, the fan meeting points and fan zones throughout the tournament. The German authorities, whilst confident in their ability to meet the required numbers, must also recognise that in most recent major tournaments, last minute concerns have been raised over difficulties experienced in getting to the required stewarding levels.

UEFA EURO 2024 will be a celebration of football held in a country which, because of its central European location, will allow for movement of many thousands of fans and not just from participating countries. The tournament will be the first fully accessible major football event post the pandemic, so that too will attract new generations who will not have had the opportunity to attend a major sporting event.

Many thousands of fans will converge on host cities, both with and without tickets, to enjoy the party atmosphere. It is for this reason that, whilst maintaining the need to have robust safety systems in place for the stadium, similar levels of safety should be afforded to those, often gathering in larger numbers than the main event, who will instead view and participate in the festivities remotely from fan meeting points and fan zones.

These satellite events will have a marked impact upon local communities and businesses and so great care and attention should be afforded to those locals to ensure that ‘business as usual’ can be achieved and that the events are delivered following full communication and involvement with those local communities.

As mentioned above, these events must also be designed and managed to the same levels as those for the stadia. Clear lines of responsibility must be drawn up by the wide range of authorities who have legislative control within these areas to ensure that there is a co-ordinated approach to the safety of all users of those spaces.

Finally, the overall perception of enjoyment of any event is often framed around the spectator experience of getting to the venue, getting into the venue and then crucially at the end of the event being able to get away from the venue, all within a ‘reasonable’ timeframe. Clearly delays will occur particularly on the egress, due to numbers involved, however much can be done to help to smooth that movement by good wayfinding and directional signage, the help and assistance of volunteers, good levels of lighting to assist movement and of course good links to public transport systems.

All of the above are ‘knowns’. They are common to all events and should present no surprise. Good levels of detailed planning are therefore crucial to the success of the tournament.

SECTION B – Visit Background and Explanation

B.1 Purpose of the Visit

The Council of Europe monitoring visit to Germany was carried out by a team appointed by the Saint-Denis Committee (T-S4), comprising experts in the three pillars of the Convention: safety, security and service.

The visit was formally requested by the German Federal Ministry of the Interior and Community, in accordance with the Committee's Guidelines on Monitoring, which recommend as a priority the holding of monitoring visits in the context of preparations of major sporting events.

This was the first monitoring visit of the Saint-Denis Committee since it was established in April 2021 and is part of its 2022-2025 multiannual programme of monitoring visits. Therefore, this was also the first occasion to implement and test the Monitoring Guidelines adopted by the Committee, and to refine them if deemed necessary.

The primary aim of this visit was to assess arrangements for the UEFA EURO 2024 but also to examine key elements of national measures, policies and practices on safety, security and service based on/in light of the provisions of the Saint-Denis Convention, at football matches and other sports events. The goal is to ensure compliance with the Convention's standards and, wherever applicable, offer recommendations for incorporation into national policies and practices.

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, security and service arrangements in connection with football events in Berlin.

For future visits, it would be preferable to have a better balance between time for presentations and time for questions and answers. Also, for future visits, the host authorities should endeavor to provide a complete national report at least 8 weeks before the visit. Further, the report when received was incomplete, causing further difficulties for the delegation.

Following the team's recommendations, Germany will present an Action Plan to the Committee, as part of the visit report, as per the Monitoring Guidelines (paragraph 5.9).

B.2 General comments

The tournament in Germany in 2024 will take place against a backdrop of a complex geo-political situation within the world, which will pose challenges perhaps not seen at other tournaments. It is reassuring therefore that the event will be held in a country which can boast mature systems and structures in relation to public safety which should give confidence to the event organisers and participants.

The German authorities have undertaken a comparative review of the safety, security and service provisions for the FIFA World Cup 2006 and compared them to the upcoming UEFA EURO 2024 Championship and rightfully indicated that the current landscape is substantially different, being

influenced by digitalisation, cybersecurity threats and geopolitical situation; furthermore, all stadia hosting matches during the WC 2006 will be involved also during the UEFA EURO 2024, with the exception of Dusseldorf, which is a new venue for this major sport event.

The authorities, whilst having developed plans for the safe running of the event, must be prepared for unexpected threats and risks arising, and so must be well versed in dynamic risk assessments to allow swift interventions to ensure that the safety and security of stadia and city areas and their inhabitants are adequately protected. There is of course a limit to the level of preparedness of range of scenarios that any organisation can plan for, however there cannot ever be a case of over preparing and planning and in particular role playing through the use of multi-disciplinary table-top exercises.

The Federal governance system implemented in Germany provides solid grounds for the safety and security approach of the law enforcement authorities, but also can pose some challenges as regards the coordination and cooperation between all stakeholders involved. The different approaches in the federal states (Länder) ranging from legislation, policing strategies and operations, resources available, etc., will be one of the main topics of concern in connection with the UEFA EURO 2024 matches. The German authorities identified this challenge and it was mentioned that extensive work is done in order to mitigate it, especially by adopting a policy of inclusion and comprehensive consultation with all actors at all levels (federal, Länder and host cities). Although this is often difficult to achieve due to the number of parties involved making the coordination and cooperation arrangements very difficult to manage, it nonetheless should be the aim and objective.

Another challenge identified during the visit was the fact that the police concept for the matches in Berlin was not shared yet with EURO 2024 GmbH in order to have an integrated approach for the UEFA EURO 2024. The delegation is aware that some of the police planning elements and information can be sensitive or confidential and cannot be shared with private stakeholders, but a minimum of information should be provided to all actors involved.

Recommendation 1 – German police authorities should work in close cooperation with EURO 2024 GmbH in order to ensure that an integrated approach as regards safety and security is delivered during UEFA EURO 2024. (status: essential)

The stewarding remains the top challenge mentioned by the German authorities. Difficulties are encountered as regards making available a sufficient number of qualified stewards for the UEFA EURO 2024. Furthermore, the fan zones and fan meeting points will require also stewarding, that will put even more pressure on the stewarding companies.

Recommendation 2 – EURO 2024 GmbH, in close cooperation with the German authorities, should identify solutions in order to have sufficient number of stewards available during the tournament. The number decided upon should consider the potential impact upon stewards and volunteers caused by the inevitable long working hours due to the length of the tournament. (status: essential)

During the visit, pyrotechnic incidents were mentioned as one of the most important challenges by the police representatives and it was suggested that an integrated approach in this regard is needed, involving also the clubs and fan organisations.

Recommendation 3 – The German authorities, in cooperation with all stakeholders, should organise and deliver a campaign on raising awareness on the danger of using pyrotechnics at football events; the findings of a scientific study in this regard can be used https://de.uefa.com/MultimediaFiles/Download/uefaorg/Stadium&Security/02/48/11/68/2481168_DOWNLOAD.pdf (status: important)

The fans movement from city centre to the football arena is an important element. The visiting delegation had the opportunity to observe the friendly match Germany vs Türkiye and especially during egress, the time needed to reach the city centre by car exceeded 1 hour. It should be remembered that many spectators' experience of the event will be coloured by the experience of getting to and from the stadium.

Recommendation 4 – The German authorities in cooperation with all stakeholders should carefully plan the mobility concept in order to ensure a smooth transfer to and from the stadium for the fans. (status: important)

The delegation also welcomed the signature, some days prior to the visit, by the German Football Association (DFB) and UEFA, of a [Human Rights Declaration for UEFA EURO 2024](#), which can be considered a very good practice to be adopted on the occasion of a major sporting event. Annex 1 of this Declaration comprises a list of risks, measures and the bodies responsible for preventing and mitigating human rights violations, which range from safety, security, health and labour discrimination and abuse, diversity, accessibility and inclusion, to freedom of speech and free press.

The Council of Europe regrets not having been invited to provide its input on this Declaration and the absence of reference notably to the Saint-Denis Convention.

The delegation was pleased to hear that UEFA EURO 2024 aims to be the most sustainable one to date and that the relevant authorities, notably the Berlin local authorities, are working on a sustainability strategy and on a climate protection and climate change concept.

The delegation would like to stress that the Saint-Denis Committee is wholly committed to provide the governmental and football authorities, and other competent agencies in Berlin, with further support to meet the challenges that lie ahead (including technical assistance and expertise), recalling the list of training and other technical assistance tools that the Council of Europe and its partners can deliver.

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 share experiences and expertise with their European counterparts.

The delegation would also like to thank all colleagues in Berlin for their hospitality and much appreciated help and support throughout the visit.

B.3 Visit Itinerary

The delegation appreciated the overall organisation of the visit and the efficient way it was ran, with a rather compact but rich programme, with presentations from relevant public and private stakeholders and a visit to the Berlin fan zone and the Berlin Olympic stadium, including the friendly match between Germany and Türkiye men's national football teams.

It is important to note that, since this match was organised by the [German National Football Association \(DFB\)](#), numerous standards and procedures were different from those to be implemented during the tournament.

It is also important to mention that the presentations focused only on local arrangements in respect of UEFA EURO 2024 safety, security and service preparations and so no understanding could be made by the delegation of how preparations were proceeding throughout the rest of the German host cities.

The delegation recognises and appreciates that the hosts invited top members of the team of EURO 2024 GmbH, the entity that represents and is responsible for implementing the strategy of [UEFA](#), the event owner. This enabled the delegation to have a comprehensive view of the preparations for the event, having observed the integration between the public and private pillars.

The delegation was also pleased to meet with representatives of the Berlin Police, the body responsible for the safety and service aspects of the State of Berlin - the [Berlin Senate Department for the Interior and Sport](#) – and the DFB.

The delegation considers that it would have been beneficial to have also met representatives from the [German Federal Police \(Bundespolizei\)](#), the organisation responsible for border protection and the railroad and aviation security, and who therefore play a relevant role notably in ensuring the security of foreign supporters.

The delegation would also have liked to meet with the supporters' representatives, who are a key stakeholder for the Saint-Denis Convention, and to have discussions on socio-educational prevention projects for fans – e.g., the Fan Projects Coordination Office (KOS) -, a subject where Germany is a European reference.

This monitoring visit was also the opportunity for national stakeholders and event organisers to meet, sometimes for the first time, to exchange and update each other. In this sense, the monitoring visits contribute to reinforce the multi-agency integrated approach at national level.

The following draft programme is based on the Saint-Denis Convention. The topics addressed were presented in lectures, presentations and during visits.

17.11.2023 (Friday - Day 1 - Arrival)

- 15:00 to 16:00 - BMI (Berlin, (Bundesallee 216-218, 10719 Berlin; (Bundeshaus))
 - Welcome
 - Introduction
 - Presentation of the German delegation
 - Presentation of the programme
- 16:00 h to 18:00 h - Technical presentations

	Responsible	Topic	Time
Lecture 1	Staff Euro SI Euro GmbH	<ul style="list-style-type: none"> - National Security Concept (NSK) for EURO 2024 - Current status of EURO 2024 preparations Overview - Comparison NSK 2006 to 2024 (innovations; location fields etc.) 	45'
Break 15'			
Lecture 2	ZIS	<ul style="list-style-type: none"> - Innovations for the 2006 World Cup - Status of IPCC 2024 preparation 	30'
Lecture 3	Berlin SenInn	<ul style="list-style-type: none"> - Comments on the planning status of UEFA EURO 2024 within the host city of Berlin 	30'

18.11.2023 (Saturday - Day 2 - Matchday):

- approx. 10:30 a.m. - Arrival stadium
- 11:00 a.m. to 1:00 p.m. - Technical presentations

	Responsible	Topic	Time
Lecture 1	Berlin Police	<ul style="list-style-type: none"> - Situation report - Communication with network partners - Presentation of BAO and highlighting of individual orders - Use of force - Spatial planning - Dealing with pyrotechnics 	30'
Break 10'			
Lecture 2	Berlin SenInn	<ul style="list-style-type: none"> - Traffic management ("Traffic Perimeter", "Last Kilometer") - Regulations for stadium access - Communication 	30'
Break 10'			
Lecture 3	DFB	<ul style="list-style-type: none"> - Tasks of the organiser - Role of private security services - Stadium security - Alcohol - Pyrotechnics 	45'

- 13:00 - 14:00 – Lunch

- *14:00 hrs to 16:00 hrs - Stadium tour*

	Responsible	Topic	Time
Part 1	Berlin SenInn DFB	Stadium tour - Common control rooms - Signage - Spectators with disabilities - Toilets - Protection of the playing field - Firefighting plans	60'
Part 2	Berlin SenInn	Bell tower tour - Overview Olympic site - Traffic management	30'
Part 3	Berlin SenInn/ Berlin Police	„FeSa" tour (Arrest Collection Centre)	30'

- *16:00 hrs to 17:00 hrs - Technical lecture*

	Responsible	Topic	Time
Lecture 1	IBP	- Responsibilities in DEU - Legal foundations - Situation in DEU - NASS	30'
Lecture 2	ZIS	- SKB Team DEU	30'

- *17:00 to 18:00 - Safety meetings around the match*
 - *DFB // SenInn*
- *18:00 hrs to 19:00 hrs - Entrance area and cash desk tour*
 - DFB
 - Tour of the cash desk area
- *19:00 - 20:15 Dinner*
- *from 20:15 match preparation*
- *20:45 Start of the match*
- *From 23:00 Transfer to the hotel (BMI chauffeur service)*
 - About fan meeting focal points, if applicable
- approx. 24:00 End of Day 2

19.11.2023 (Sunday - Day 3 - Departure)

- *10:00 - 12:00 - Feedback at the BMI/Federal Palace*
 - IBP
 - Final debrief

B.4 Structure of the Report

This report comprises 3 Parts, 4 Sections and 2 Appendices and includes an Executive Summary at Section A, which together provide the main observations and recommendations of the monitoring visit (hereafter described as the “visit”) undertaken in November 2023 by a delegation of the Council of Europe’s Saint-Denis Committee (hereafter described as the “delegation”).

Section B provides essential background to, and an explanation of the visit and its purpose.

Section C comments upon the current level of preparedness in Berlin as regards the UEFA EURO 2024 matches when viewed against the core principles and outcomes enshrined in each of the policy Articles 1 to 11 of Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events – (CETS No 218) - Compliance with Policy Articles.

Section D summarises the report’s key conclusions together with a draft Action Plan designed to assist, and to be completed and updated by the German authorities and sent subsequently to the Secretariat of the Saint-Denis Committee, as well as giving a list of technical assistance tools that are available at the European-wide level and from which the hosting country can benefit when implementing the Action Plan.

This Action Plan highlights the 73 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 Saint-Denis Convention and established European good practices. It must be reminded the constructive approach of the exercise, aiming at supporting the host authorities in implementing the best standards and practices.

The recommendations also take account of the good practices on safety, security and service set out in the Recommendation Rec (2021)1 of the Saint-Denis Committee and other complementary European good practices.

Whilst the report is “football” centric in its observations, the delegation’s observations and findings can also, where appropriate, be applied to other major national and international sports events designated by the Berlin authorities as falling within the scope of the Convention.

The fact that the Council of Europe invites its partners, namely UEFA and the supporter associations like FSE, in such monitoring activities not only demonstrates the importance of a multi-agency public-private integrated approach between these stakeholders at the pan-European level around common standards but also increases legitimacy and improves the quality and coherence of their deliveries so as to support the country to meet those standards in the follow-up.

The delegation recognises that as is normal during visits, some questions or remarks might be misconstrued due to misinterpretation. Allowances for this are made whenever possible, however the delegation can only comment on what it was told and on the field observations.

The delegation would wish to stress that its purpose is to be a critical friend to support the authorities and other relevant stakeholders through the provision of external and expert observation in respect of football safety, security and service.

This is important as safety, security and service 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 invariably need to be customised to meet national imperatives and circumstances.

B.5 Saint-Denis Committee Delegation

The visiting delegation was composed of:

National delegates to the Saint-Denis Committee:

- Mr Adrian Dinca, Chair of the Saint-Denis Committee and team leader (Security);
- Mr Rodrigo Cavaleiro, Vice Chair of TS-4 Saint-Denis Committee (Security);
- Mr Ken Scott MBE, Head of Inspectorate of Sports Grounds Safety Authority, member of the T-S4 Advisory Group on Monitoring and rapporteur for this visit (Safety and Service).

Observers to the Saint-Denis Committee:

- Mr Steve Furnham, UEFA Head of Safety and Security operations Unit (Safety and Service);
- Mr Giovanni Spitaleri, Senior Safety and Security Expert, UEFA (Safety and Service);
- Mr Ronan Evain, CEO Football Supporters Europe (FSE) (Service).

Secretariat:

- Mr Paulo Gomes, Secretary of the Saint-Denis Convention and Head of the Saint-Denis Unit, Council of Europe; and
- Ms Marie-Francoise Glatz, Secretary of the Saint-Denis Convention, Council of Europe.

B.6 Supporting Documentation

Prior to the visit, the hosts shared with the delegation a copy of the National Report of Germany, prepared by the Federal Ministry of Interior and Community. The document shared with the Delegation did not include Parts 5 and 6, which were delivered after the visit.

B.7 Status of the Report

The report is intended to support and assist the German authorities to help them create a safe, secure and welcoming environment at football matches and other sports events.

All States that 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 in achieving 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 to adopt and demonstrate compliance with each Article, the Saint-Denis Committee has adopted T-S4 Recommendation Rec (2021)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 those three pillars.

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

In conclusion, this report should be seen as an ongoing commitment on the part of the Saint-Denis Committee to provide, on request, further advice and support in respect of all aspects of this report and its recommendations and also to provide solutions for the adoption of the multi-agency integrated approach model in Berlin and throughout Germany, especially taking into consideration its role as host city for the UEFA EURO 2024 Football Championship.

SECTION C - Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS 218)

Compliance with Policy Articles

Article 1 - Scope of the Convention

Intent

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.*

• Comments

Integrated Approach to Safety, Security and Service

Adopting a multi-agency integrated approach to safety, security and service is imperative when hosting major tournaments and in organising the annual calendar of national and international football events. Extensive European experience and established good practice demonstrates that this approach is crucial in helping to reduce risks associated with sport events because all three pillars are inter-related and overlap. No one agency and no element of a wider strategy can prevent or tackle safety or security risks in isolation. It is imperative, therefore, that all agencies work together to ensure that the various operations are complementary.

Article 2 - Aims of the Convention

Intent:

The aim of the 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;*
- c. take account of good practices in developing an integrated approach to safety, security and service.*

- **Comments**

The aim of Article 2 is integral to the safe hosting of any major event and so to avoid unnecessary repetition commentary is woven throughout all of this report.

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

- **Comments**

It is recognised that in some European languages the terms "safety" and "security" share a common definition. As a consequence, attempting to explain the three pillars can pose difficulties. However, European good practice evidences the importance of distinguishing between the two concepts. For ease of reference therefore, the following outline definitions have been found to be useful:

- "safety" is generally interpreted as incorporating measures designed to protect the health and safety of individuals in their capacity as spectators at an event or members of the wider community;
- "security" is generally interpreted as incorporating measures intended to prevent or respond to criminal and anti-social behaviour inside and outside of stadia and other sports grounds; and
- "service" is generally interpreted as including a wide range of measures (services) designed to meet the needs of individuals in a manner that makes them feel comfortable, appreciated, welcome and active participants in an event - it also embraces a range of preventative measures like sports-related community projects and supporter engagement.

The above categories or pillars are only used for ease of reference, and it is imperative to recognise that initiatives developed under one of the three headings are bound to overlap and/or impact on the other two, given the extent to which they are inter-related.

The key to successful delivery of the integrated concept centres on the adoption of a strategic approach and the need for the integrated approach to be co-ordinated effectively at national and local level.

Article 4 - Domestic Co-ordination Arrangements

Intent

The aim of Article 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

• Observations

Germany is a federal State, with the internal security broken down in a federal level – with the Federal Police ([Bundespolizei - BPOL](#)) and the Federal Criminal Police Office ([Bundeskriminalamt - BKA](#)) -, 16 federal States (Länder) with exclusive responsibilities in the field of policing, and the local authorities.

In order to ensure uniform and/or harmonised strategies, policies and procedures, namely in the field of internal security, several coordination bodies and instances exist at federal level, for several decades, like the Conference of Interior Ministers (Innenministerkonferenz, abbr. IMK).

Germany has adopted in 1993 a National Strategy for Sport and Security (NKSS), a federal joint plan to improve security at football matches. On the basis of this strategy, the Conference of Ministers of the Interior set up the National Committee on Sport and Security (NASS), which forms the basis for a multi-agency approach between police forces, municipalities, sport associations and federations, fan projects, transport companies, as well as the federal Ministries for Family Affairs, Senior Citizens, Women and Youth, of Justice and of the Interior and Community.

Several other coordination bodies already exist at different levels and on different topics, like the National Committee for Sport and Security - responsible for developing the National Concept for Sport and Security -, the BMI Task Force EURO 2024, the European Championship Project Group (Ministry of Interior of North Rhine-Westphalia), the Police Project Group, the Police Group of State Police Forces, the Project Groups of the Federal States, or the Host Cities Project Group on Security. Other overall coordination bodies are planned to be established in the coming months, like the National Coordination Committee (NKA), planned to be set up in January 2024.

With regard to strategic documents and concepts, and as mentioned in the German national report, the above-mentioned “European Championship Project Group (Ministry of Interior of North Rhine-Westphalia), was commissioned by the Conference of Ministers of the Interior to draw up a framework concept for managing police operations during the tournament”, which is “closely

interlinked with the national security concept and forms the basis for the police measures of the federal States and the federal government during the tournament”. It would be interesting to know this document, if and when it will be available⁴.

Moreover, the subgroup on Security of the BMI, among other tasks, will have to deliver in the coming weeks or months, a National Security Strategy (December 2023) and a National Concept on Police and Human Rights (Q1 2024).

Germany has a long and consolidated experience in organising different types of major events. For instance, Berlin has 7.000 demonstrations and rallies and hosts 35 major events per year, including athletics championships and concerts, with between 250.000 and 300.000 relevant events of different nature per year.

During the visit, the delegation could observe that the safety, security and service preparations for the tournament are quite advanced, in terms of organisational structures, policies and procedures. Another reassuring observation is that safety and service come first and security after.

• Comments

The federal structure of Germany, with a federal level, 16 federal States (Länder) with exclusive responsibilities in the field of policing – except for the Federal Police and the Criminal Police (BKA) –, and the local authorities of the host cities, with responsibilities for instance in the field of building regulations, with a large number of different public and private stakeholders with different and sometimes overlapping roles and responsibilities, makes the C3 topics (co-ordination, co-operation and communication) the main challenge when it comes to put together, engage and align these three layers in the organisation of an international major sporting event.

The establishment, in 2020, of the National Coordination Committee (NKA) should enable to reinforce the political leadership at the top of the federal structure, which is extremely important to make strategic decisions in a timely and effective manner.

The key issue is to ensure that safety, security and service areas have the same standards across the country - which is a right of all participants in the event -, despite the different legal and regulatory frameworks and organisational culture in each federal State.

The fact that there is a long tradition of having several federal coordination bodies working in the field of internal security, like the Conference of Interior Ministers (Innenministerkonferenz, abbr. IMK), which, for instance, defined common standards and procedures for the public order police forces of the 16 States, is an important added value and clearly facilitates, at the political and strategic level, the definition of a common approach to the event.

The same political and strategic coordination at the federal level is expected in the other relevant areas, like the labour, transport, and social ones, just to mention three examples, which have an impact and are impacted by the event.

⁴ In the meantime, the national strategy for UEFA EURO 2024 was adopted at the 219th Standing Conference of the Interior Ministers of the Länder in the Federal Republic of Germany (1 to 3 June 2024) and will be updated as needed. The framework strategy for policing, which is around 500 pages long, was drawn up by a joint federal and state working group and approved on 24 November 2021. It is available to all police authorities involved in the tournament as a basis for their work.

An important aspect that should be addressed by these different structures and strategies is the communication and media policy. The digitalised society we live is a huge consumer of instant and permanent information. The available Internet, apps and social networks should be used as much as possible by the different public and private stakeholders to communicate, if possible, in a coordinated manner, with supporters and the whole community, in particular in case of a crisis.

Despite all the accumulation of knowledge and experience across the last decades, this should not be a reason to be complacent regarding the planning and delivery of the UEFA EURO 2024 tournament. In fact, the risks and threats are continuously evolving and becoming more and more hybrid, namely boosted by digitalisation and cybersecurity.

As mentioned in the German reply to the Monitoring Questionnaire 2022, “communication among all partners of the ‘Sport and Security’ network, as envisaged by the National Strategy for Sport and Security (NKSS)”, which include an important number of public and private stakeholders, is one of the main challenges that Germany is facing and will face in the lead for the tournament.

Therefore, there is a need to have a clear identification of the chains of command and of roles and responsibilities, as well as simplified and fast ways of communication, in urgent and/or crisis situations.

Recommendation 5 – German authorities should implement an overall structure of coordination between the federal, state and local levels within each of the states where stadia are located to ensure that a common standard of spectator safety is applied to all stadia. (status: essential)

Recommendation 6 - German authorities should implement in due time an overall structure of effective coordination, co-operation and communication arrangements between the federal, state and local levels, with clear roles and responsibilities, so as to ensure a swift share of information on risk assessment and a harmonised delivery of safety, security and service standards during the tournament. (status: essential)

Recommendation 7 - The relevant authorities should develop a government-led multi-agency communication and media strategy. This strategy should involve spokespersons from all public and private agencies involved in the tournament. It should comprise not only information addressed to the mass media, but also dissemination and receipt of information to supporters and the local community. It is also recommended that this media centre is situated within the stadium. (status: essential)

Recommendation 8 - It is recommended that the working arrangements at local level are captured in a framework or Terms of Reference document so that complete clarity in terms of agencies involved, primacy, aims and objectives, roles and responsibilities, and ranking of personnel expected to participate in the group are clearly defined.

Article 5 - Safety, Security and Service in Sports stadiums

Intent

- 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.*

Compliance

- **Observations**

The existing legal, regulatory and administrative frameworks seem to be sufficient, namely with regard to requiring event organisers to provide a safe and secure event for all participants.

However, like other European countries, Germany has been facing, since the aftermath of the COVID-19 pandemic period, significant difficulties in recruiting a sufficient number of qualified stewards for sports events, not only for the sports venues but also for the fan zones.

One of the difficulties seems to be the lack of harmonised provisions regarding the vetting check of candidates to stewards across the 16 federal States.

On the other side, and unlike previous organising countries, the German authorities are not envisaging the adoption of a temporary law for UEFA EURO 2024, aiming at reinforcing the police powers in the field of identification, search and arrest, and speed up the criminal justice and extradition procedures.

Also, all stadia should develop a common standard to determine if a minimum age of entry for spectators is required to ensure the safety and welfare of young children.

- **Comments**

Stewards are an essential part not only of the stadium safety management structure, but also of the safety and service arrangements in the fan zones and other similar areas. Attention should be paid to the extended duration of the tournament, the subsequent impact on all stadia and their supporting city infrastructure and the effect that this will have upon all staff, including stewards and volunteers.

This should be factored into the estimation of numbers of staff needed to adequately support the safe running of the event with an allowance made for ‘burn out’ of staff due to long hours required of them.

In order to overcome the difficulties in recruiting stewards, there is a need to harmonise legislation from the different States, namely with regard to the rules for screening the candidates.

During the visit to the friendly match between Germany and Türkiye men’s national football teams, a number of babes in arms were seen within the stadium. Notwithstanding the issues caused around determining the exact capacity of the crowd, serious safety issues can arise in the event of increased crowd densities or at times of movement around the stadium, particularly on exiting.

Recommendation 9 - The German federal authorities, in consultation with the EURO 2024 GmbH, should find a legal solution in order to harmonise and facilitate the recruitment of stewards for the tournament. (status: essential)

Recommendation 10 - The German federal authorities, in consultation with the EURO 2024 GmbH should develop a policy to be implemented by all stadia to be used for the tournament around the minimum age of entry for children, both accompanied and unaccompanied by adults. Also that the carrying of babes in arms should be risk assessed but in general not allowed on the grounds of the safety and welfare of the child. (status: essential)

Intent

2. *The Parties shall ensure that the competent public authorities put in place regulations arrangements to guarantee the effectiveness of stadium licensing procedures, certification arrangements and safety regulations in general and ensure their application, monitoring and enforcement.*
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.*

Compliance

• Observations

The existing provisions in the field of design, infrastructure, licensing, certification and inspection are foreseen in the legislation on building, which are a competency of the local authorities to enforce and inspect.

The existing building law “sets out procedures for testing, certification and monitoring, as well as supervision”, as mentioned in the German national report.

Since this is the responsibility of local authorities, it seems that the required standards may be quite different from city to city, from venue to venue.

In most modern stadia, a heavy reliance on technology, particularly around entry and e-ticketing at turnstiles, is common. As with all forms of technological dependence, a backup in the event of a systems failure can cause serious crowd safety issues to those outside awaiting entry to the stadium.

It was observed at the match visit that lighting levels and general signage around the stadium were particularly poor. Whilst regular users of the stadium may be comfortable with this, due to regular usage, visitors to the tournament will be visiting in many cases for the first time and so will need maximum wayfinding assistance.

- **Comments**

If there are different standards and requirements according to the different local authorities, in the field of licensing, certification and inspection of sports venues, then there is a need to ensure that levels of safety of spectators at all venues are of the highest standards.

The venues have different standards, ages and layouts. The level of safety, security and service quality delivered to all participants and spectators should be the same across the 10 host cities.

In relation to dependence upon technology at key points within the stadium, e.g., at the turnstiles, a Plan B must be in place to ensure that in the event of a systems failure, which could be genuine or by cyber-attack, robust methods are in place to return to business as usual within the shortest period of time, to ensure that unsafe spectator conditions are not allowed to develop.

Moreover, maximum use of the space outside of stadia should be promoted to create multi-channel queuing lanes with dispute resolution areas, and areas for bag searching away from turnstiles, to avoid disruption to the flow of spectators into the stadium.

Recommendation 11 - The German federal authorities should find a legal solution in order to harmonise the standards on the design, infrastructure, licensing, certification and inspection at sports venues. (status: essential)

Recommendation 12 - It is recommended that a document or security/stewarding plan is developed for each event, which contains the respective roles, responsibilities and primacy of the police, safety officer, stewards, volunteers, security companies along with the competence expected of each practitioner. See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}), (status: important)

Recommendation 13 - In the case of a safety officer and safety management team being used which are not those normally the responsible persons within the venue, a thorough review of the competence of such people should be carried out by a competent authority and if any deficiencies are identified, appropriate amendments made to the safety management arrangements factor and, as a consequence, the maximum safe capacity level set out in the safety certificate. (status: important)

Recommendation 14 - It is recommended that the event organiser develops and sets out a level of service and training expected of personnel supplied by the security company. A contract to this effect such as a service level agreement specifying the numbers, and quality of security staff should be in place. See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}). NB: this level of service and training plan should be consistent across all 10 stadia. (status: important)

Recommendation 15 - Due to the large numbers likely to be needed to demonstrate necessary standards of safety, this process and any training needed to equip stewards with the skills needed should commence immediately. Training, qualification and competence should be evaluated by a third party to ensure the necessary levels of safety management are achieved. Concerns in any of the above areas should result in the appropriate alteration of the stadium management factor and a reduction in the maximum safe capacity level set out in the safety certificate. (status: important)

Recommendation 16 - To counter the effect of large numbers of stewards who will be new to the stadium, it is recommended that a series of ramped test events with increasing spectator numbers are arranged to allow familiarisation and for testing of systems and procedures at reduced capacity levels. (status: important)

Recommendation 17 – The German federal authorities should ensure that all venues with a dependency of electronic systems within their respective stadia have procedures on place to deal with a systems failure which could be either genuine or with criminal intent. (status: essential)

Recommendation 18 – The German federal authorities should ensure that all venues should follow a prescribed model around the design of queuing channels with filter areas to take out those without proper accreditation without impeding the flow of spectators into the stadium. Also that in that design areas are identified outside of the stadium and away from turnstiles for the necessary searching of bags for prohibited items (status: essential)

Recommendation 19 - The level of searching to be deployed and rate of flow through searching lanes should be calculated prior to the opening match. As the impact will be to slow the normal speed of entry through a conventional turnstile, additional searching lanes should be provided, which exceed the number of turnstiles in a ratio which reflects the degree of slowdown by searching. Advice and guidance can be found in the Guide to Safety at Sports Grounds (Green Guide), Edition 6. (status: essential)

Recommendation 20 - All searching lanes should be served with sufficient numbers of female stewards to reflect the expected demographic of the crowd, to help ensure that any delays in the queuing at female or family screening and searching lanes are kept to a minimum. (status: essential)

Intent

4. *The Parties shall encourage the relevant agencies to ensure that stadiums provide an inclusive and welcoming environment for all sections of society, including children, the elderly and those with disabilities, and incorporate, in particular, the provision of appropriate sanitary and refreshment facilities and good viewing conditions for all spectators.*

Compliance

• Observations

At the friendly match that the delegation attended at the Berlin Olympic Stadium, the DFB sold low price tickets – minimum price of 15 Euros -, to ensure a diverse demography and the participation of families in the match, which proved to be effective.

With the same purpose, during the tournament, UEFA will make available cheaper tickets, a fourth new category named after the “Fans First” (orange colour), which are for seats located behind the goals.

The Berlin Olympic stadium seemed to have a sufficient offer of refreshment areas and toilets. The DFB also confirmed that renovation works were carried out in the Olympic stadium to improve accessibility and viewing conditions for persons with disabilities.

As their national report mentions, Germany has made “improvements to facilities, seating and accessibility for fans with disabilities, to enhance the overall fan experience. Practical examples include installing ramps and lifts for fans with mobility impairments and providing sign language interpreters and special seating arrangements for persons with disabilities”.

At the entrance to the friendly match in Berlin, the delegation noticed that very young children were allowed to enter with their parents. It was not possible to clarify, on the spot, if there was a legal or regulatory minimum age and, if so, which age.

Moreover, reading the UEFA EURO 2024 Stadium Rules document, the delegation also noticed that spectators are required to be seated during the match – no standing places are permitted in stadia of the tournament -, however, it is not required that spectators take the seat for which they bought the ticket.

- **Comments**

All stadiums, fan meeting points, fan zones and fan walks should have similar service standards, namely in terms of sanitary and refreshment facilities, and take into consideration the risks associated with weather conditions during match days – for instance, providing sufficient paramedic units, volunteers and fresh water in case of high temperatures.

For safety and security reasons, there should exist a clear rule preventing children of under 5 or 6 years of age from entering the stadia of the tournament.

Moreover, for the same reasons, there should also exist a rule obliging spectators to use the seat for which they bought a ticket.

Recommendation 21 - The German federal authorities and the EURO 2024 GmbH should ensure similar service standards inside and outside of sports venues, namely in terms of inclusiveness, sanitary and refreshment facilities during the tournament. (status: important)

Recommendation 22 - Consideration should be given to adoption of UEFA/CAFE and the International Paralympic Committee (IPC) standards listed below and that all existing sporting venues carry out an accessibility audit to enable development of an action plan for improvements to increase diversity and equality. (status: important)

a) UEFA/CAFE Standard

<https://www.cafefootball.eu/en/access-all>

b) IPC Standard

https://www.paralympic.org/sites/default/files/document/130902143349868_IPC+Accessibility+Guide_2nd+EDITION_FINAL.pdf

Intent

5. *The Parties shall ensure that stadiums' 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, in particular:*

Compliance

- **Observations**

It was not clear if the German Government and EURO 2024 GmbH will write down “statements of intent” setting out the roles and responsibilities of namely the police and the safety management personnel.

- **Comments**

With regard to the roles and responsibilities of the different competent authorities inside the stadium and in the Zone Ex areas which can be a mix of public and private areas outside of the stadium, it is important to make sure that they are agreed upon and written, and, in particular, the transfer of responsibilities to the police in case of a public order or criminal incident, so they can be clearly understood by all parties.

Recommendation 23 - The German federal authorities and the EURO 2024 GmbH should agree upon a system of “statements of intent” setting out clearly the roles and responsibilities of the police and the safety management staff, as well as the arrangements for transferring overall responsibility to the police in case of a relevant incident. (status: essential)

Recommendation 24 - The relevant authorities should identify and implement systems for ensuring the provision of adequate and appropriate training at both the theoretical and practical level for such safety officers, supervisors and safety stewards, and establish, document and monitor procedures for ensuring that those who have been trained are then assessed as being competent to perform their allocated tasks. (See [https://www.coe.int/en/web/sport/t-s4-recommendations#\[%22133417550%22:\(0\)\]](https://www.coe.int/en/web/sport/t-s4-recommendations#[%22133417550%22:(0)]), Annex A, Appendix 33) (status: important)

Recommendation 25 - The delegation recommends that a national network be established to enable stadium Safety Officers to share information along with sharing expertise and good practises. (ESSMA, the European Stadium & Safety Management Association is the European network for this practice <http://www.essma.eu/>.) (status: desirable)

a. The use of pyrotechnics

Compliance

- **Observations**

As mentioned in the German reply to the T-S4 monitoring questionnaire 2022, “the Ministers of the Interior of the federal States, in cooperation with the DFB and the German Football League (DFL), adopted a national recommendation for action to prevent pyrotechnics from being taken into sports venues. So far, this recommendation for action has not been published. It is currently being implemented nation-wide. Results regarding the implementation are expected in 2023”.

Furthermore, the DFB adopts a 3-step policy to deal with pyrotechnics thrown into the pitch, which is in line with UEFA’s policy. The DFB and the Police seek to identify the individual perpetrators in the stands, through the CCTV systems, and they usually apply sanctions to the clubs.

- **Comments**

The adoption of a recommendation for action to prevent the use of pyrotechnics inside sports venues at the federal level is a good practice, as it sets procedural standards for the police forces in this field.

It is also important that all national associations apply the same policy and train their teams on how to deal with pyrotechnics thrown into the pitch. It is also important that private security, firefighters and other relevant stakeholders are aware and apply these safety procedures.

On the preventative side, UEFA and the DFB should launch an awareness-raising campaign, addressed to spectators, to deter the use of pyros, both inside and outside of stadia, before and during the tournament.

On the repressive side, whenever possible, the sanctions should be applied to the individual perpetrators and not to their group of supporters or their club.

The organiser of the tournament should also prevent from using pyrotechnics, fireworks or other similar devices during the opening ceremony or other special events, even if under control of firefighters, to give the example to spectators.

The German authorities and UEFA EURO 2004 GmbH should also assess the risks associated with new ways of using pyrotechnics, such as the remote ignitions.

The German police authorities should also intensify cooperation with other national counterparts, EUROPOL and INTERPOL, in order to tackle international networks of production, distribution and sale of pyrotechnics.

Recommendation 26 - The German federal authorities and the EURO 2024 GmbH should launch a public campaign, before and during the tournament, to raise the awareness of the fans about the risks associated to the use of pyrotechnics at football matches, in accordance with the recent scientific studies on this matter (https://www.uefa.com/MultimediaFiles/Download/uefaorg/Stadium&Security/02/48/11/68/2481168_DOWNLOAD.pdf). (status: important)

Recommendation 27 - The relevant authorities should take preventative measures to attempt to prevent the use of pyrotechnics in the stadium during UEFA EURO 2024 matches. (status: important)

Recommendation 28 - For UEFA EURO 2024 matches, all fire officers, police officers, stewards, private security, staff of the stadium authorities and all other persons working at the stadium, especially the key decision makers, should be briefed and trained on the UEFA pyrotechnic policy and guidelines and the action required to be taken by them to ensure that the proper procedures are used and the proper action taken to ensure the safety of all persons if pyrotechnics incidents occur in UEFA EURO 2024 matches. (status: important)

b. Any violent or other prohibited behaviour

Compliance

• Observations

At national level, even if the number of violent incidents in and around football stadia has significantly increased in the German national League competitions since the pandemic, reaching or in some cases overcoming the figures of the pre-pandemic period, this increase is more concentrated in three clubs from the eastern part of Germany.

German and other national authorities have also observed the increasing use of drones over and around sports venues, sometimes with non-malicious but sometimes with malicious intentions.

• Comments

The delegation was informed by UEFA that the alcohol policy established for the tournament shall allow the selling and consumption of up to 5⁰ alcoholic beverages inside the stadia. This level was up to 2⁰ during the FIFA World Cup 2006. The associated potential risks for violence and disorder inside and outside of stadia should be considered by UEFA and public authorities.

Since recent statistics show that the increase of incidents is concentrated on three eastern German clubs, sports authorities and the police should adopt preventative and deterring measures targeted at the risk supporters from these clubs.

The fact that Germany privileges sports banning orders, applied by the sports authorities, seems to be a good practice, in the sense that they are applied quicker, while ensuring the right to appeal to a court.

As regards the tournament, besides the existing public campaigns aimed at preventing spectator violence, German authorities should benefit from UEFA ticketing policy and from international police cooperation to prevent banned people from buying tickets and travelling to Germany.

With regard to the increasing use of drones, be it over or around stadia, German authorities should use specialised police units in all host cities to deter the use of such devices and intervene quickly and in an exemplary manner. International police experience should also be beneficial for the German Police authorities.

Other new or renewed threats and risks that need to be addressed are cybercrimes, NBCRE (nuclear, biological, chemical, radiological and explosive), transnational organised crime and terrorism, since this third major international event and its many soft targets presents itself as an opportunity for perpetrators.

Recommendation 29 - The German federal authorities and the EURO 2024 GmbH should adopt effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns. (status: essential)

c. Any racist or other discriminatory behaviour

Compliance

• Observations

As mentioned in the German reply to the T-S4 Monitoring Questionnaire 2022, the “Cabinet Committee for the fight against racism and right-wing extremism” presented its final report in 2021. This report “outlines measures and projects of the BMI. This Ministry is in charge of implementing the package of proposed measures. In addition, the National Action Plan against Racism was presented on 15 March 2022 and includes punitive and preventive measures”.

Also as mentioned in the above-mentioned reply to the Monitoring Questionnaire, the “Federal Agency for Civic Education (an executive agency of the BMI), is planning to implement a project in connection with the UEFA EURO 2024, in cooperation with a civil society organisation, using stadia as extracurricular learning spaces for civil education. Further projects will be dedicated to the topic of hate speech in sport. For example, a symposium will be held on sport and democracy which will also deal with human rights and discrimination in sport”.

At national level, even if the number of racist and other discriminatory incidents has increased, in and around football stadia, there are several national and UEFA campaigns – like the “RESPECT” campaign – to prevent racism, antisemitism, anti-Muslim, homophobia and other discriminatory behaviour.

• Comments

It is significant that the BMI has a package of measures to implement at the federal level, to prevent and fight against racism and extremism, and that a National Action Plan against Racism is being implemented. It would be important to follow-up their implementation and impact.

The existing national and UEFA public campaigns should also be carried out during the tournament, perhaps in a more effective and visible way, whenever possible in cooperation with the supporter organisations.

German authorities should also benefit from the European Union / Council of Europe joint project on “Combating hate speech in sport”, of which Germany is a partner. Likewise, German authorities and EURO 2024 GmbH should take into consideration the good practices adopted by FIFA and FIFPRO to address online hate speech during the FIFA World Cup Qatar 2022.

Recommendation 30 - The German federal authorities and the EURO 2024 GmbH should implement the national action plans and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour during the tournament, namely by benefiting from the campaign of the EU-CoE joint project on “Combating hate speech in sport”, of which Germany is a partner, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes (ex: FARE). (status: important)

Recommendation 31 - The relevant authorities should make use of legislation and develop contingency plans to tackle any racist or discriminatory behaviour in sports stadia. Also, it should be recognised the importance of education in helping solve this issue by developing educational programs of awareness. (status: important)

Recommendation 32 - For UEFA EURO 2024 matches, all police officers, stewards, private security and staff of the stadium authorities deployed or likely to be deployed within the stadium footprint, especially the key decision makers, should be briefed and trained on the UEFA guidelines and the action required to ensure that the proper procedures are used and the proper action taken if any incidents of racism or discrimination occur in UEFA EURO 2024 matches. (status: important)

Recommendation 33 - The relevant authorities should put measures in place to refuse entry into the stadium for spectators who display or carry with them racist or other discriminatory leaflets, symbols or banners and that the relevant authorities continue to apply zero tolerance in respect of any kind of discrimination inside the stadium, fan zones and public spaces during UEFA EURO 2024 and beyond. (status: important)

Intent

6. *The Parties shall require the relevant agencies to ensure that all personnel, from the public or private sectors, involved in making football matches and other sports events safe, secure and welcoming are equipped and trained to fulfil their functions effectively and in an appropriate manner.*

Compliance

• Observations

At the federal and state levels, police forces are well trained, equipped and experienced in dealing with major national and international events.

There is a harmonised approach to police uniforms, equipment, training and tactics across the 16 federal States.

• Comments

Even if the police forces are well trained and equipped, with regard to the safety management there is a concern regarding the lack of candidates to stewards, the different screening requirements and the need to train them adequately in due time, as well as the recruitment and training of the planned 16.000 volunteers.

Because this is the third major international sporting event, attracting an expected number of around 10 million foreign spectators, both the public and private security personnel and volunteers should be trained in English and other common languages, in order to facilitate dialogue and communication with supporters.

The EURO 2024 GmbH is planning to hire private companies to ensure the safety and service of fan zones and other similar areas. There should be a common policy regarding the quality assurance of private companies responsible for safety and service of fan zones. Moreover, their roles and responsibilities should be established by site written agreements.

Recommendation 34 - The German federal authorities and the EURO 2024 GmbH should equip and train police, stewards and volunteers in an appropriate manner, namely in foreign languages. (status: important)

Recommendation 35 - The delegation recommends that a document or stewarding plan is developed for each event, which contains the respective roles and responsibilities of the police, stewards, volunteers, security companies along with the competence expected of each practitioner. (see [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}) Annex A, Appendix 41) (status: important)

Recommendation 36 - The German federal authorities and the EURO 2024 GmbH should ensure the quality of private companies who shall provide safety and service at fan zones and other similar areas. (status: important)

Article 6 - Safety, Security and Service in Public Places

Intent

1. *The Parties shall encourage all agencies and stakeholders involved in organising football matches and other sports 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 reassurances to the local community and businesses, in particular those located in the vicinity of where the event is taking place or public viewing areas;*

Compliance

• Observations

As mentioned in the German reply to the T-S4 Monitoring Questionnaire 2022, “in order to further enhance security in stadia, since 2016 some federal States have pushed for more and better cooperation between clubs, SLOs, local police, public order authorities and local transport companies by creating the so-called stadium alliances. The aim is to establish such stadium alliances across the country”.

In the case of Berlin, local communities and businesses became quite used to host major events on a regular basis and they seem to accept this as normal and positive in general terms.

It seems that, again in the case of Berlin, there are no specific arrangements or dedicated lines of communication with the local community and local businesses to involve them in the different stages of the planning and delivery of the matches, fan gatherings across the city and side events.

Two other important issues are the side events – planned or unexpected – that require a significant police deployment, in particular during match days; and the public works in host cities and in the main itineraries connecting the main cities across the country, that should not disturb significantly the mobility of spectators and tourists.

As Germany is a very central country in the heart of the European continent, it is expected that many thousand spectators and tourists will travel daily by car, train or plane from their home countries to a German city, during the match day, and return home the same day. This poses important challenges for the police forces, notably for the Federal Police, road traffic management bodies and the transport operators.

The Berlin Police informed the delegation that there are local mechanisms of coordination that enable the police to plan and request resources, both for the planned and for the unexpected side events in the city and in the State. If need be, they can use volunteer police officers, but it was not clear for the delegation if these are retired or in the active service. On the other side, and as usual, they can request police officers from other parts of the country.

In the case of Berlin, the Olympic Stadium is in a park outside the city, with plenty of open spaces around, which is reassuring in terms of crowd management and mobility. However, when the delegation attended the friendly match on a Saturday evening, it was noticed that there is a need to make significant improvements in terms of public illumination and signage, to facilitate the mobility of pedestrians, in particular persons with disabilities.

The delegation further noticed that the spectators were body searched after having passed the turnstiles. The delegation was told that the reason is to avoid excessive concentration of persons outside. Probably, this procedure is specific for the national team matches and the delegation expects that it will be different during the tournament. In any case, the body search inside the stadium perimeter raises security issues and should be revised.

The delegation also noticed mobility problems in the vicinity of the stadium, when the match finished, in particular significant traffic crowds. This should require more police and municipal staff on the spot, managing the traffic and informing people about alternative itineraries. The two metro stations are quite away from the stadium and there is a need for more signage, in particular to foreign spectators.

• Comments

The above-mentioned stadium alliances, which promote a multi-agency partnership at local level, are a good practice that deserves being spread nation-wide, even if the delegation is not aware of its current level of implementation and real impact.

For the tournament, there should be a common local partnership approach across the 10 host cities, to actively engage the municipal authorities, police, local communities and businesses, supporter

representatives, football clubs and national associations in dealing with safety, security and service. The priority should be the events during match days, namely the fans' meeting points, the fan zones and the fan walks, as well as the main public transport lines leading to the stadia, which will have a major impact in the routines of the ordinary citizens and businesses.

Moreover, and in particular in the case of Berlin, there is a need to have public lighting and signage around the stadium, and a better traffic management when the match is finished.

Recommendation 37 - The German authorities should ensure a partnership approach across the 10 host cities, in order to actively engage the municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations in dealing with safety, security and service. (status: essential)

Recommendation 38 - The relevant authorities should:

- a. review and determine the appropriate pre-entry searching regime to be applied during the tournament and the measures required to mitigate entry delays (e.g., effective signage en-route to the stadia, explanatory communications to visiting supporters, pre-match entertainment, etc.);
- b. consider the response to be adopted should delays on entry generate safety risks;
- c. once the arrangements have been reviewed, the outcome should feature in stadium contingency plans designating responsibility for determining whether or not to weaken security checks in the event of an emerging safety scenario; and
- d. as with other contingency plans, the arrangements should be subject to a multi-agency table-top exercise. (status: essential)

Recommendation 39 - The relevant authorities should implement an information system to communicate the following:

- a. At the entrances of the fan zone: expected time of entry (queuing + security controls), similar to what can be found in airports (status: essential); and
- b. In the city: inform fans when the fan zone reaches full capacity, in order to avoid large queues and associated problems. (status: essential)

Intent

- b. *creating 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 the stadium.*

Compliance

• Observations

Since there will be much more fans (10 million) than available tickets (2,8 million), there is a need to keep the ticketless fans busy in the dedicated fan zones and similar areas planned for the host cities and other cities across the country that plan to organise these public viewing areas.

Therefore, crowd management and the quality of safety, security and service delivery in these public spaces is of utmost importance during this tournament.

The delegation noticed that the two meeting points planned for two central places in Berlin may be insufficient for the expected number of fans, even if there is some flexibility in terms of expanding the space available. Therefore, the calculations of space and maximum safe capacity may need to be reviewed, in order to avoid problems of crowd management and control during match days.

The fan zone will be located in the main park Tiergarten, which has a wide area, and several entries and exit points are planned. However, most of this area is wooded, which limits visibility of the main screen. This will most probably lead people to concentrate close to the main screen, to watch the games in good conditions, which will raise important crowd management concerns.

In Berlin, the fan walk leading from the fan zone to the stadium is quite long and large, with the possibility to use more space around, if need be. Other host cities should also plan a similar fan walk with the necessary conditions to effectively manage the crowd.

Germany has a very effective public transport offer. Berlin, in particular, has a wide and diversified public transport network, which makes it easy for visitors to circulate around the city. A combined match - public transport ticket is planned to facilitate the mobility of foreign fans, which can be considered as a good practice.

Local police will coordinate with the transport companies to ensure an adequate flow of the crowd, namely to and from the metro and train stations, in particular at the end of the matches.

It must be remembered that spectators' perception of experience of the event is often guided by experience of getting to and from the venue.

• Comments

Given the fact that a high number of ticketless fans is expected for the tournament, all the host cities and other that are planning to have public viewing spaces should make sure that these place with massive gatherings of fans have a safe capacity and the minimum safety and service standards.

Recommendation 40 - The local authorities and EURO 2024 GmbH should ensure that there are sufficient and adequate fan zones, fan meeting points and fan walks and that there are effective crowd management arrangements. Appropriate safety and security preparations should be developed. To cater for the possibility of rival supporters gathering in close proximity, alternative back-up locations should be identified to provide separate areas for rival supporters to gather to help manage any risks. (status: essential)

Recommendation 41 - The local authorities and EURO 2024 GmbH should ensure that fan zones and meeting points are designed to allow for comfortable conditions for the expected number of visitors at peak periods. As fans may be within the area for a number of hours, consideration should be given to additional comfort space needed to allow for fans sitting down or taking refreshment whilst inside the area. The design should be founded on crowd modelling principles, which should predict prime viewing areas and allow for cross movement of fans. Entry and exit points should be designed using the same principles with direction given by well positioned signage. (status: essential)

Recommendation 42 – Sufficient numbers of staff should be deployed to ensure that large corridors remain accessible to move from one TV screen to another, to avoid significant congestion around the screens that are the closest from the main entry points. (status: important)

Recommendation 43 - In relation to open public viewing areas, extensive guidance and good practices on the preparatory and operating arrangements on large scale public viewing areas is set out in the Recommendation Rec (2021) 1 of the Saint-Denis Committee. (status: important)

Recommendation 44 - The relevant authorities should take account of the good practice contained in the Recommendation Rec (2021) 1 of the Saint-Denis Committee in developing plans for organised and spontaneous fan areas and public viewing from fan zones. (status: important)

Recommendation 45 - The German authorities and EURO 2024 GmbH should have an effective mobility plan, namely by facilitating the circulation of fans in public transport networks in host cities and within the country. (status: essential)

- **Observations**

During the briefing with the Berlin Police, the issue of challenges in obtaining authorisation for fan walks was addressed. The discussion highlighted the complexities associated with securing permission for organised fan marches.

- **Comments**

In certain instances, experience has shown that lacking the required flexibility to accommodate fan walk intentions while practicing 'facilitation within limits'—demonstrating the ability to assist them in their legitimate aspirations while guiding routes according to our planning and public order requirements—can lead to a potentially worse outcome. Fans may resort to unauthorised marches, causing additional constraints to other citizens, if their legitimate intentions are not addressed within the established limits. Ultimately, it may lead to public order problems.

Recommendations 46 - German authorities should consider the implementation of a special and temporary legal provision for the UEFA EURO 2024 event to facilitate a quicker process for authorising fan walks, addressing the legitimate aspirations of fans while ensuring efficient planning and public order maintenance. (status: important)

Article 7 - Contingency and Emergency Planning

Intent

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 shall make clear which agency is responsible for initiating, supervising and certifying the exercises.

Compliance

• Observations

At the Berlin Olympic stadium, the DFB briefly presented the command and control room and mentioned the good practice of organising joint simulation exercises and crisis management meetings and crisis communication.

Although the federal law foresees the need to have contingency and emergency plans, it was not clear for us if each of the 10 stadiums of the tournament have contingency and emergency plans, as well as the fan zones and the 24 team-base camps and other relevant premises.

As in other areas of business, there has been an increase of cyberattacks and illicit use of some technology-based systems, like UEFA's ticketing system. UEFA reported 120 million hits requesting tickets, that, if not detected, would go to the black market. Only 20 million of those requests were made by real people. For the future, for each ticket application, UEFA may ask for the payment of 5 Euros, aiming at preventing fraud.

• Comments

It is important that the safety management work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans in the 10 stadiums of the tournament, as well as in the fan zones, in the 24 team-base camps and other relevant premises, and that they are tested and refined through joint exercises.

Furthermore, it goes without saying that the new and advanced technologies currently at our disposal, from electronic tickets to drones to Artificial Intelligence, open a wide range of opportunities to improve the quality of safety, security and service delivery, but also open a wide range of potential risks and threats that need to be prevented and mitigated. Notably, it is important to ensure business continuity, through redundant systems, in case the electronic systems fail. This is the case, for instance, with the electronic ticketing and turnstiles in stadia, for which there should be a plan B in case there is a power failure or a cyber-attack.

Recommendation 47 - A risk register highlighting all perceived risks relating to the tournament should be developed. The register should clearly set out all identifiable risks, their causes, impact and mitigation. The register should also identify the ownership of all risks. (status: important)

Recommendation 48 - A detailed command and control structure should be documented to provide details of the role of each party within the safety management operation and their specific responsibilities. This is considered to be essential to develop a clear hierarchical structure for clarity of who is in overall command of the event. See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}) – **Annex A**. All key decision makers should be located together in the same room. (status: important)

Recommendation 49 - The safety management should work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans, in the stadiums and other relevant premises, and that they are tested and refined in multi-agency table-top exercises. (status: essential)

Recommendation 50 - Once developed, the contingency plans in each stadium should be tested in multi-agency table-top exercises designed to identify any gaps in the contingency arrangements. Such exercises should involve all parties engaged in the delivery of the event and incorporate a selection of differing scenarios which could occur either before, during or after a match. (status: essential)

Recommendation 51 - The relevant bodies should ensure that the procedures based on technologies, like the ticketing and accreditation, should have a redundant system to ensure business continuity, so as to mitigate the impact of technical failures of cyberattacks. Namely, with regard to electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)

Article 8 - Engagement with Supporters and Local Communities

Intent

- 1. The Parties shall encourage all agencies to develop and pursue a policy of proactive and regular communication with key stakeholders, including supporter representatives and local communities, based on the principle of dialogue, and with the aim of generating a partnership ethos and positive co-operation as well as identifying solutions to potential problems.*

Compliance

- Observations**

The different coordination bodies already established or to be established, at Federal, State and local levels, from the National Coordination Committee (NKA) to the host cities' working groups, aim at ensuring that all relevant stakeholders work together in the different stages, from planning to delivery.

Different initiatives aimed at ensuring effective dialogue and communication are envisaged, like the traditional fan embassies and the figures of the team supporter liaison officers (TSLOs), which will be a reality in 7 to 10 participating national associations.

Still within the service pillar, the organiser will also recruit around 16.000 volunteers, who will be deployed in the stadia – 1.100 - and in the city centre – 600 -, in average, taking the example of Berlin.

- **Comments**

Supporter representatives and local communities and businesses should be included in the federal, state and local coordination and cooperation instances, at least at some stage, to give them a sense of belonging and co-accountability.

Notably, local communities and businesses, in particular those in the vicinity of stadia, should be consulted in the host cities' security and mobility plans decision-making process.

Such major events have a positive but also negative impact in the daily routines of local communities and businesses, and everything should be done by local authorities to mitigate the negative effects arising from the significant increase of the demography during the tournament.

All German citizens should see this tournament also as their “national” event, to which they are part and should benefit from, and which leaves a legacy in terms of infrastructures, economy, tourism and know-how in the organisation of major sporting events, not to mention the geopolitical importance and global visibility of this type of event for the country.

Moreover, the event should not only be beneficial for the 10 host cities but for as many cities as possible, who should take that opportunity to set up public viewing areas, organise different types of events and social-cultural activities to attract locals and visitors.

These side events are particularly important if one remembers that 1 in 4 visitors will be ticketless and need to be entertained during their stay in Germany.

Recommendation 52 - The relevant authorities should ensure that the needs of supporter organisations are taken into account, from the planning to the delivery of tournament and associated events. (status: important)

Recommendation 53 - The fan embassies have proved to be an efficient tool during previous major sport tournaments and could provide both intelligence to police and also communication to visiting fans. For that purpose, the local authorities should liaise closely with FSE (Football Supporters Europe) and take note of the UEFA social responsibility project “Respect Fan Culture – Fans Embassies at UEFA EURO 2024”. (status: important)

Recommendation 54 - The relevant authorities should provide all visiting supporters with clear, useful and easily accessible information, written both in English and in the language of the visiting supporters. (status: important)

Recommendation 55 - The relevant authorities should ensure that the needs of local communities are taken fully into account in the planning and delivery of the tournament with associated events and initiatives designed and delivered to provide all local communities with reassurance and encouragement to participate in the festivities. (status: important)

Recommendation 56 – The relevant authorities should carry out a post event debrief of the coordination between public authorities, tournament organisers and supporter

organisations, in order to develop guidelines so that good practice can be replicated at other tournaments. (status: important)

Intent

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 among supporters, sports clubs and associations as well as agencies responsible for safety and security.*

Compliance

- **Observations**

As mentioned in the German reply to the Monitoring Questionnaire 2022, “there are a number of local projects that work on the basis of the National Strategy on Sport and Security. In 1993, the Fan Project Coordination Centre (KOS), was founded to guide and coordinate socio-educational fan projects and their content, as part of youth work, and to assist in setting up new fan projects”.

Moreover, “in 2010, a quality label for fan projects based on the National Strategy on Sport and Security was introduced, aimed at providing socio-educational football fan projects in Germany with an instrument for quality assurance”. This should also be considered as a good practice, that could be replicated in other countries.

- **Comments**

The KOS, a consolidated federal coordination structure, concentrates knowledge and experience and ensures a nation-wide coordination and approach, which should be considered as a national good practice.

Likewise, the quality label for fan projects, which is an instrument for quality assurance, should also be considered as a good practice, that could be replicated in other countries.

Recommendation 57 - The relevant authorities should support, consult and involve KOS fan project organisation and other relevant similar organisations in the drafting and delivery of the safety, security and service strategy for UEFA EURO 2024. (status: important)

Article 9 - Police Strategies and Operations

Intent

1. *The Parties shall ensure that policing strategies are developed, regularly evaluated and refined in the light of national and international experience and good practices, and are consistent with the wider, integrated approach to safety, security and service.*

Compliance

• Observations

In Germany, the policing strategies are managed in close connection by the Federal Ministry of Interior and Community with the Ministries of Interior of the States (Länder). The Länder have the competence to adopt their specific strategies and doctrine of engagement as regards policing football that take into consideration the available European good practices. During the visit, it was mentioned that the Länder have a very close cooperation as regards the sharing of resources in case of major events, this being a regular practice of the concerned police forces.

Recommendation 58 – The German authorities should carefully plan the police resources needed for the UEFA EURO 2024 security (including sufficient reserves) and ensure the coordination between the Länder in achieving this objective. (status: important)

• Observations

The existing national police coordination and cooperation structures may ensure the necessary harmonisation between the 16 State police forces in terms of tactics, profile and equipment. They should adopt a low profile and a reasonable threshold of tolerance, and adjust it whenever necessary, using the appropriate public order personal equipment. The 3D approach adopted during the 2006 FIFA World Cup is still an up-to-date operational procedure.

The police project group “PG EM 2024”, based in North Rhine-Westphalia, is coordinating the planning and organisation of police operations and developing a coordinated framework for the deployment of federal and State police forces.

• Comments

It will be important to keep developing and training the 3D approach and, in particular, the de-escalation concept, if possible, through joint exercises between the different State police forces.

Recommendation 59 - In accordance with European good practice, during UEFA EURO 2024 policing tactics, profile and equipment should be determined on the basis of: ongoing dynamic risk analyses; graded deployment, with protective equipment used only where necessary; and early targeted and proportionate interventions to prevent the escalation of risk. (status: essential)

Recommendation 60 - The relevant police authorities should keep developing and training the 3D approach and, in particular, the de-escalation concept, if possible, through joint exercises between the different State police forces. (status: essential)

Intent

2. *The Parties shall ensure that policing strategies take account of good practices including, in particular: intelligence gathering, continuous risk assessment, risk-based deployment, proportionate intervention to prevent the 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.*

Compliance

• Observations

The German police is using an intelligence-led system that relies on the spotters' work; this is materialised in a positive manner in the risk assessments – both initial and continuous – and in the police deployment. The delegation observed the police deployment for the match in Berlin and can conclude that sufficient resources were allocated in order to cover all the areas of interest both inside and outside the stadium footprint. Communication/dialogue police teams (comprised of police officers who received dedicated training in this regard) are being used regularly for engaging in dialogue with the fans.

The regular police officers deployed were not wearing the full riot gear which could have facilitated them entering in dialogue with the fans if needed. Their deployment protocol which included groups of 8-10 police officers can constitute a barrier in communication with the fans, as they can be reluctant to engage in dialogue in this case. The normal uniformed police officers should be encouraged in having dialogue with the fans during their deployment and, by doing so, contributing to the implementation of a safe and welcoming environment for all attending UEFA EURO 2024 football fixtures.

Recommendation 61 – The German police authorities should further invest in adopting a policy of dialogue with the supporters involving all the deployed police officers. (status: important)

• Observations

Police forces will keep improving dialogue and communication with supporters, namely through the usual “communication police officers” with easily identifiable vests, but also dedicated vehicles (see below the loudspeaker truck).

The German police forces intend to buy several vehicles specially prepared for communication with the public, called "loudspeaker truck" (see images below). This vehicle is mainly used by the riot police at assemblies and football matches in some cities. Helpful information can be displayed on the screens and the loudspeakers enable the police to communicate with a large number of persons assembled in public places.



Legend: Police loudspeaker truck

- **Comments**

It is acknowledged that there is a need to improve dialogue and communication between police and the population. The German police forces will implement procedures to enhance this important aspect of their strategy.

An important aspect of communication in such an international event will be the language skills of police officers. There is also a need to further invest in this area of police training.

Recommendation 62 - Police units to be deployed during UEFA EURO 2024 should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters. (status: important)

Recommendation 63 - For the UEFA EURO 2024 tournament, the police forces and other local agencies should commit to opening communication channels with national team SLOs and supporters, in line with the guidance set out in the Recommendation Rec (2021) 1 - [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}), Annex A, Appendix M, and the EU Handbook on Police Liaison with Supporters (12792/16). (status: important)

Recommendation 64 - Supporter feedback should be considered in the risk assessment process before each match. (status: important)

Intent

2. *The Parties shall ensure that the police work in partnership with organisers, supporters, local communities and other stakeholders in making football matches and other sports events safe, secure and welcoming for all concerned.*

Compliance

• Observations

During the visit, the delegation was able to observe that the provisions of Paragraph 3 are implemented by the German authorities and extensive consultation is realised with all stakeholders in the line of the integrated approach model. The German experience in this regard can be considered as a model for other States having in mind the inclusiveness and the availability to share information of all stakeholders.

Police liaising with supporters is of utmost importance, and extensive European experience at a series of major football tournaments over the last decade has established that encouraging police personnel to adopt a welcoming and friendly approach towards supporters can be an effective policing tactic. Adopting such a policy can pose challenges and frustrations for the personnel concerned, especially if this is not routine procedure and when having to manage a diverse assortment of visiting supporters with different cultures and speaking a variety of languages.

For having a successful operation, the authorities should invest in the training of the police personnel in the basic usage of foreign languages, in particular English, which is widely used and understood by European supporters, and that multi-lingual police officers are being identified for crowd management activities and cooperation with the foreign spotters' delegations.

Recommendation 65 - The police officers to be deployed for UEFA EURO 2024 should be trained in the use of English language to facilitate the dialogue with the fans. (status: important).

Recommendation 66 – There should be a structured dialogue between supporters' representatives and police forces at local and national level, with the participation of mediators or third parties, as needed. (status: important).

Recommendation 67 - The effective cooperation between the German NFIP, KOS and FSE in the framework of the UEFA EURO 2024 preparations could serve as a base to relaunch supporters/police dialogue in Germany. (status: important).

Article 10 - Prevention and Sanctioning of Offending Behaviour

Intent

- 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 citizenship.

4. *Where appropriate, and in accordance with national and international law, the Parties shall consider empowering the judicial or administrative authorities responsible to impose 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.*

Compliance

• Observations

As mentioned in their national report, “Germany has a tried and tested system of repressive and danger preventing regulations that has proven its worth in dealing with violent offenders and troublemakers. Necessary adjustments will be taken into account during the legislative process.”

The delegation may interpret that, even if the current system is quite effective, there is still room for improvements in the legal framework, but it is not clear what needs to be improved and what remedies the legislator is envisaging.

With regard to banning orders, the German criminal procedure law establishes the possibility of “prohibiting attendance at sporting events as a secondary penalty or as a condition of probation”, refers the same national report.

Furthermore, and as mentioned above, Germany privileges the civil stadium bans, i.e., applied by the organisers of the competitions, instead of the judicial or the administrative ones.

Moreover, “the club can be sanctioned for the misbehaviour of spectators”, in which case “the sanctions can take the form of a (sporting) point deduction or a fine, for example”, as described in the same national report.

As mentioned in the German reply to the Monitoring Questionnaire 2022, “travelling fans who violate the law can be excluded from venues on the basis of the organisers’ right to determine who should be allowed or denied access to the venue, and they can be excluded from being transported on the basis of the respective transport company’s conditions of transport”.

• Comments

The German law should probably foresee the banning order also as a main penalty, in order to reinforce the general and special crime prevention available arrangements.

In addition, and as a complement to the existing civil law provisions on banning orders, the legislator should consider the possibility to empower the competent judicial and administrative authorities to impose individual banning orders, including travel bans to a foreign country, as additional ways to better prevent and tackle violent and anti-social behaviour in and around stadia, namely in cities or States where there has been a more significant increase of reported incidents.

As mentioned in the German reply to the Monitoring Questionnaire 2022, one of the most important challenges in the country in order to implement the standards of the Saint-Denis Convention is the “refusal of part of the supporters or ultras to comply with measures imposed

under public order law”. This could justify the adoption of a balanced system of banning orders, including judicial and administrative ones as main penalties.

On the other side, whenever possible, the civil sanctions against supporters should be individualised and not applicable to the club.

Moreover, during the tournament, German authorities should adopt fast and simplified procedures to identify, arrest, bring to court and expel violent perpetrators from the tournament and /or the country, while respecting their fundamental rights.

Recommendation 68 - The relevant authorities should consider revisiting the legal and regulatory framework to increase the effectiveness of the provisions on exclusion sanctions, as well as empowering the judicial or administrative authorities responsible to impose these sanctions. (status: important)

Compliance

• Observations

During the discussions, the delegation was informed that no decision was made yet on the sharing of data of banned persons with EURO 2024 GmbH and UEFA, in order to preclude them to buy tickets for the tournament. The sharing of data regarding the risk fans and banned persons between the German NFIP and the NFIPs from the participating, transit and neighbouring countries will be included as an item in the Memorandum of Understanding that will be signed by the Ministries of Interior from the concerned countries.

Recommendation 69 – The German authorities, in close cooperation with EURO 2024 GmbH and the law enforcement authorities from the participating, transit and neighbouring states, should exchange all the necessary information in order to prevent the banned/risk fans involvement in incidents. (status: important)

Compliance

• Observations

During the briefings, the delegation was informed of the presence of at least one State Attorney at the stadium, ready to promptly apply judicial measures in cases involving identified or arrested offenders. This provision is assured for professional matches and all high-risk matches, and it will also be extended to cover all UEFA EURO 2024 matches.

• Comments

This procedure is perceived as effective and showing a commitment with the Convention’s Article 10, addressing effective exclusion and quick preventative and sanctioning judicial actions.

Article 11 - International Co-operation

Intent

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

Compliance

• Observations

After the visit, the German authorities organised in Berlin, on 11-12 December 2023, an international conference gathering all police delegations from the participating, transit and neighbour countries, namely aiming at discussing the provisions of the Joint Declaration of Intent on police cooperation at UEFA EURO 2024, which should be signed in March 2024.

The International Police Cooperation Centre (IPCC) will operate in the premises of a police academy located in the city of Neuss, near Dusseldorf, in North Rhine-Westphalia. As a joint facility of the States and the Federal Government, the IPCC 2024 will act as a central hub for national and international information exchange. During UEFA EURO 2024, the IPCC 2024 will be staffed not only by German personnel but also by liaison officers from other countries, as usual. EUROPOL and UEFA will also be represented at the IPCC.

The German NFIP (ZIS) has been tasked to lead the preparations for the planning and implementation of an International Police Cooperation Centre (IPCC). Extensive consultation with the European partners has been performed by the ZIS in the last two years in various formats, the most important one being the EURO 2024 IPCC sub-working group established under the auspices of the European Group of Policing Football and NFIP experts.

The IPCC EURO 2024 will include more than 600 law enforcement representatives from Germany and the participating, transit and neighbouring countries and will be responsible for the information exchange and the deployment of foreign delegation spotter teams. In April 2024, there will be a staff exercise, that will include only the German liaison officers, to test and, if need be, refine procedures.

With an estimated cost of approximately 10 million Euros this will be probably the biggest IPCC in history, which comes again to demonstrate the inclusiveness and willingness to comprehensively engage with all stakeholders, both from and outside Germany.

Complementary, the delegation was informed as well on an initiative of the Federal Police to request operational support from similar police forces from across Europe as related to security of airports/railway stations, trains, public places etc.

With regard to the exchange of data and information on foreign risk supporters, according to the German legislation, this is possible to be done before the tournament. This topic will be mentioned more in detail in the “Joint Declaration of Intent”.

• **Comments**

Germany has many important migrant communities and the main host cities are very cosmopolitan. For instance, the Turkish diaspora living in Germany has around 4 million persons. The German police forces have an important knowledge of these communities. They are in a better position than the NFIPs of the countries of origin to identify and tackle any possible risk supporters coming from them.

These migrant communities, as well as other vulnerable groups of the society, should also feel integrated and part of the tournament.

Regarding the exchange of personal data of foreign risk supporters before and during the tournament, it is still not clear for us if and how UEFA, the NFIPs and the German IPCC will exchange this data. For instance, can a person subject to a banning order in his/her country still buy a ticket in UEFA's platform?

Recommendation 70 – The Federal Ministry of Interior should look at ways in which supporters who may be subject to banning orders, travel bans or are listed with warrants for criminal issues in another country can be prevented from entering Germany. (status: essential)

Recommendation 71 - The Federal 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)

Recommendation 72 – The German authorities should plan the deployment of foreign police delegations in such a way in which spotters work should not overlap with the other categories of specialised police officers invited by the German Federal Police; and all necessary measures should be adopted in order to ensure that IPCC EURO 2024 should represent the single point of contact as related to information exchange during the tournament. (status: essential)

Intent

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 within the police force (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 applicable domestic and international rules;*
 - c. *facilitate, co-ordinate or organise the implementation of international police co-operation in connection with football matches with an international dimension;*
 - d. *be capable of fulfilling efficiently and promptly the tasks assigned to it.*

Compliance

The German NFIP (ZIS) was set up in 1991, being one of the founding members of the NFIP network, which led to the adoption of the EU Council Decision 2002/348/JHA, of 25 April 2002, concerning security in connection with football matches with an international dimension, which imposed the obligation on the EU Member States to set up this type of international police cooperation structure. It is based at the level of Nord Rhine-Westphalia Police Force and provides service for all Länder police forces and it is also responsible for the international police cooperation aspects on behalf of Germany.

Recommendation 73 – The relevant authorities should consider providing sufficient resources to ZIS in order to fulfil its tasks effectively. (status: important)

Intent

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.*

Compliance

ZIS is preparing an annual report that will include extensive details regarding the prevention and tackling of football and other sports-related violence in Germany since 1992. This will provide a comprehensive overview of the trends and challenges faced by the police forces across Germany during the season. The latest report for the season 2022/2023 was published on 15.11.2023 and it is available online (https://lzpd.polizei.nrw/sites/default/files/2023-11/231106-1zis-jahresbericht-2022-2023-final-stand-06.11.23_0.pdf).

Intent

4. *Each State Party shall notify the Committee on Safety and Security at Sports Events, created by this Convention, in writing, of the name and contact details of its NFIP, and any subsequent changes with regard to it.*

Intent

5. *The Parties shall co-operate at international level in respect of sharing good practices and information on preventative, educational and informative projects and the establishment of partnerships with all agencies involved in the delivery of national and local initiatives, focused on or driven by the local community or supporters.*

Compliance

ZIS is a valuable contributor to the European efforts in preventing and tackling sport-related violence, by attending and providing input to all the relevant meetings of the Saint-Denis Committee, European Group of Policing Football and NFIP Experts (Think Tank), EU Council Working Group on Major Sports Events (MSE), etc. In recognition of this, in November 2023, the head of ZIS, Mr. Oliver Strudthoff, has been elected as management bureau member for the European Group of Policing Football and NFIP Experts.

- **Counterterrorism**

The current challenging geopolitical climate and recent terrorist attacks affecting football matches have boosted the challenges confronting UEFA EURO 2024 preparations, not least in terms of the logistical and resource demands associated with minimising the risk of terrorist incidents during the tournament. Most probably, counter-terrorism risks, including CBRNE, will be one of the most important elements to be taken into consideration in the planning for the UEFA EURO 2024 security by the German authorities and will definitely have an impact on safety, security and service.

Guidance on this matter is included in the [Recommendation Rec \(2021\) 1](#) of the Saint-Denis Committee, which was adopted in April 2021.

SECTION D - Concluding remarks and proposed Action Plan

D.1 Concluding remarks

The delegation would like to recall that the Saint-Denis Committee is committed to providing the governmental and football authorities and other competent agencies in Germany with further support in meeting the challenges that lie ahead.

The Saint-Denis Committee would in particular welcome periodic feedback on the progress made by the authorities in Germany concerning implementation of the recommendations included in this report. The proposed draft Action Plan should preferably be completed by the German authorities before the tournament.

Having in mind the fact that the UEFA EURO 2024 matches are only months away, some of the recommendations should be prioritised in order to contribute to the overall safety, security and service measures adopted for this major event.

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

D.2 Draft Action Plan

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

Saint-Denis Committee

Monitoring visit to Germany (Berlin, 17-19 November 2023)

DRAFT ACTION PLAN

This draft Action Plan forms part of the report of the Council of Europe Saint-Denis Committee monitoring visit to Germany on 17/19 November 2023.

The Action Plan has been prepared with the aim of enabling the authorities in Berlin to:

- demonstrate compliance with the principles and outcomes enshrined in the Saint-Denis Convention;
- reflect the established good practices on safety, security and service contained in Saint-Denis Committee Recommendation Rec(2021)1; and
- ensure that football stadia (and other sports venues) provide a safe, secure and welcoming experience for all spectators during UEFA EURO 2024 matches.

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 preparedness for UEFA EURO 2024 and also for compliance with the Convention and established European good practices. For ease of access, the recommended actions are presented under the relevant Convention's 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 professional football matches but can, where appropriate, also be applied in connection with non-professional football matches and other sports events, where considered necessary or appropriate by the national authorities.

It is recognised 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 Council of Europe's delegation stands ready to provide, on request, support and assistance in taking forward the actions recommended in this Action Plan.

UEFA EURO 2024 – Safety, Security and Service Preparations

Recommendation 1 - (status: essential)

German police authorities should work in close cooperation with EURO 2024 GmbH in order to ensure that an integrated approach as regards safety and security is delivered during UEFA EURO 2024.

Milestones	Timing	Lead Agency	Progress

Recommendation 2 - (status essential)

EURO 2024 GmbH in close cooperation with the German authorities should identify solutions in order to have sufficient number of stewards available during the tournament. The number decided upon should consider the potential impact upon stewards and volunteers caused by the inevitable long working hours due to the length of the tournament

Milestones	Timing	Lead Agency	Progress

Recommendation 3 - (status: important)

The German authorities in cooperation with all stakeholders should organise and deliver a campaign on raising awareness on the danger of using pyrotechnics at football events; the findings of a scientific study in this regard can be used https://de.uefa.com/MultimediaFiles/Download/uefaorg/Stadium&Security/02/48/11/68/2481168_DOWNLOAD.pdf			
Milestones	Timing	Lead Agency	Progress
Recommendation 4 -(status: important) The German authorities in cooperation with all stakeholders should carefully plan the mobility concept in order to ensure a smooth transfer to and from the stadium for the fans			
Milestones	Timing	Lead Agency	Progress
Recommendation 5 - (status: essential) German authorities should implement an overall structure of coordination between the federal, state and local levels within each of the states where stadia are located to ensure that a common standard of spectator safety is applied to all stadia.			
Milestones	Timing	Lead Agency	Progress
Recommendation 6 - (status: essential) German authorities should implement an overall structure of effective coordination, cooperation and communication arrangements between the federal, state and local levels, with clear roles and responsibilities, so as to ensure a swift share of information on risk assessment and a harmonised delivery of safety, security and service standards during the tournament.			
Milestones	Timing	Lead Agency	Progress
Recommendation 7 –. (status: essential) The relevant authorities should develop a government-led multi-agency communication and media strategy. This strategy should involve spokespersons from all public and private agencies involved in the tournament. It should comprise not only information addressed to the mass media, but also dissemination and receipt of information to supporters and the local community. It is also recommended that this media centre is situated within the stadium.			

Milestones	Timing	Lead Agency	Progress
Recommendation 8 – (status: essential)			
It is recommended that the working arrangements at local level are captured in a framework or Terms of Reference document so that complete clarity in terms of agencies involved, primacy, aims and objectives, roles and responsibilities, and ranking of personnel expected to participate in the group are clearly defined.			
Milestones	Timing	Lead Agency	Progress
Recommendation 9 –(status: essential)			
The German federal authorities, in consultation with the EURO 2024 GmbH, should find a legal solution in order to harmonise and facilitate the recruitment of stewards for the tournament.			
Milestones	Timing	Lead Agency	Progress
Recommendation 10 – (status: essential)			
The German federal authorities, in consultation with the EURO 2024 GmbH should develop a policy to be implemented by all stadia to be used for the tournament around the minimum age of entry for children, both accompanied and unaccompanied by adults. Also that the carrying of babes in arms should be risk assessed but in general not allowed on the grounds of the safety and welfare of the child.			
Milestones	Timing	Lead Agency	Progress
Recommendation 11 – (status: essential)			
The German federal authorities should find a legal solution in order to harmonise the standards on the design, infrastructure, licensing, certification and inspection at sports venues.			
Milestones	Timing	Lead Agency	Progress

Recommendation 12 (status: important)

It is recommended that a document or security/stewarding plan is developed for each event, which contains the respective roles, responsibilities and primacy of the police, safety officer, stewards, volunteers, security companies along with the competence expected of each practitioner. See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22;\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22;(0)}).

Milestones	Timing	Lead Agency	Progress

Recommendation 13 (status: important)

In the case of a safety officer and safety management team being used which are not those normally the responsible persons within the venue, a thorough review of the competence of such people should be carried out by a competent authority and if any deficiencies are identified, appropriate amendments made to the safety management arrangements factor and, as a consequence, the maximum safe capacity level set out in the safety certificate.

Milestones	Timing	Lead Agency	Progress

Recommendation 14 – (status: important)

It is recommended that the event organiser develops and sets out a level of service and training expected of personnel supplied by the security company. A contract to this effect such as a service level agreement specifying the numbers, and quality of security staff should be in place. See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}). NB: this level of service and training plan should be consistent across all 10 stadia.

Milestones	Timing	Lead Agency	Progress

Recommendation 15 - (status: important)

Due to the large numbers likely to be needed to demonstrate necessary standards of safety, this process and any training needed to equip stewards with the skills needed should commence immediately. Training, qualification and competence should be evaluated by a third party to ensure the necessary levels of safety management are achieved. Concerns in any of the above areas should result in the appropriate alteration of the stadium management factor and a reduction in the maximum safe capacity level set out in the safety certificate.

Milestones	Timing	Lead Agency	Progress
Recommendation 16 – (status: important)			
To counter the effect of large numbers of stewards who will be new to the stadium, it is recommended that a series of ramped test events with increasing spectator numbers are arranged to allow familiarisation and for testing of systems and procedures at reduced capacity levels.			
Milestones	Timing	Lead Agency	Progress
Recommendation 17 - (status: essential)			
The German federal authorities should ensure that all venues with a dependency of electronic systems within their respective stadia have procedures on place to deal with a systems failure which could be either genuine or with criminal intent.			
Milestones	Timing	Lead Agency	Progress
Recommendation 18 - (status: essential)			
The German federal authorities should ensure that all venues should follow a prescribed model around the design of queuing channels with filter areas to take out those without proper accreditation without impeding the flow of spectators into the stadium. Also that in that design areas are identified outside of the stadium and away from turnstiles for the necessary searching of bags for prohibited items			
Milestones	Timing	Lead Agency	Progress
Recommendation 19 - (status: essential)			
The level of searching to be deployed and rate of flow through searching lanes should be calculated prior to the opening match. As the impact will be to slow the normal speed of entry through a conventional turnstile, additional searching lanes should be provided, which exceed the number of turnstiles in a ratio which reflects the degree of slowdown by searching. Advice and guidance can be found in the Guide to Safety at Sports Grounds (Green Guide), Edition 6.			
Milestones	Timing	Lead Agency	Progress

Recommendation 20 – (status: essential)			
All searching lanes should be served with sufficient numbers of female stewards to reflect the expected demographic of the crowd to help ensure that any delays in the queuing at female or family screening and searching lanes are kept to a minimum.			
Milestones	Timing	Lead Agency	Progress
Recommendation 21 – (status: important)			
The German federal authorities and the EURO 2024 GmbH should ensure similar service standards inside and outside of sports venues, namely in terms inclusiveness, sanitary and refreshment facilities during the tournament.			
Milestones	Timing	Lead Agency	Progress
Recommendation 22 – (status: important)			
Consideration should be given to adoption of UEFA/CAFE and the International Paralympic Committee (IPC) standards listed below and that all existing sporting venues carry out an accessibility audit to enable development of an action plan for improvements to increase diversity and equality.			
a) UEFA/CAFE Standard https://www.cafefootball.eu/en/access-all			
b) IPC Standard https://www.paralympic.org/sites/default/files/document/130902143349868_IPC+Accessibility+Guide_2nd+EDITION_FINAL.pdf			
Milestones	Timing	Lead Agency	Progress
Recommendation 23 - (status: essential)			
The German federal authorities and the EURO 2024 GmbH should agree upon a system of “statements of intent” setting out clearly the roles and responsibilities of the police and the safety management staff, as well as the arrangements for transferring overall responsibility to the police in case of a relevant incident.			

Milestones	Timing	Lead Agency	Progress
Recommendation 24 - (status: important) The relevant authorities should identify and implement systems for ensuring the provision of adequate and appropriate training at both the theoretical and practical level for such safety officers, supervisors and safety stewards, and establish, document and monitor procedures for ensuring that those who have been trained are then assessed as being competent to perform their allocated tasks. (See https://www.coe.int/en/web/sport/t-s4-recommendations#[%22133417550%22:(0)] Annex A, Appendix 33)			
Milestones	Timing	Lead Agency	Progress
Recommendation 25 - (status: desirable) The delegation recommends that a national network be established to enable stadium Safety Officers to share information along with sharing expertise and good practises. (ESSMA, the European Stadium & Safety Management Association is the European network for this practice http://www.essma.eu/.)			
Milestones	Timing	Lead Agency	Progress
Recommendation 26 – (status: important) The German federal authorities and the EURO 2024 GmbH should launch a public campaign, before and during the tournament, to raise the awareness of the fans about the risks associated to the use of pyrotechnics at football matches, in accordance with the recent scientific studies on this matter (https://www.uefa.com/MultimediaFiles/Download/uefaorg/Stadium&Security/02/48/11/68/2481168_DOWNLOAD.pdf).			
Milestones	Timing	Lead Agency	Progress
Recommendation 27 - (status: important) The relevant authorities should take preventative measures to attempt to prevent the use of pyrotechnics in the stadium during UEFA EURO 2024 matches.			

Milestones	Timing	Lead Agency	Progress
Recommendation 28 - (status: important) For UEFA EURO 2020 matches, all fire officers, police officers, stewards, private security, staff of the stadium authorities and all other persons working at the stadium, especially the key decision makers, should be briefed and trained on the UEFA pyrotechnic policy and guidelines and the action required to be taken by them to ensure that the proper procedures are used and the proper action taken to ensure the safety of all persons if pyrotechnics incidents occur in UEFA EURO 2024 matches.			
Milestones	Timing	Lead Agency	Progress
Recommendation 29 – (status: essential) The German federal authorities and the EURO 2024 GmbH should adopt effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns.			
Milestones	Timing	Lead Agency	Progress
Recommendation 30 - (status: important) The German federal authorities and the EURO 2024 GmbH should implement the national action plans and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour during the tournament, namely by benefiting from the campaign of the EU-CoE joint project on “Combating hate speech in sport”, of which Germany is a partner, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes (ex: FARE).			
Milestones	Timing	Lead Agency	Progress
Recommendation 31 – (status: important) It is recommended that the relevant authorities make use of legislation and develop contingency plans to tackle any racist or discriminatory behaviour in sports stadia. Also, to recognise the importance of education in helping solve this issue by developing educational programs of awareness.			
Milestones	Timing	Lead Agency	Progress

Recommendation 32 – (status: important)

For UEFA EURO 2024 matches, all police officers, stewards, private security and staff of the stadium authorities deployed or likely to be deployed within the stadium footprint, especially the key decision makers, should be briefed and trained on the UEFA guidelines and the action required to ensure that the proper procedures are used and the proper action taken if any incidents of racism or discrimination occur in UEFA EURO 2024 matches.

Milestones	Timing	Lead Agency	Progress

Recommendation – 33 (status: important)

The relevant authorities should put measures in place to refuse entry into the stadium for spectators who display or carry with them racist or other discriminatory leaflets, symbols or banners and that the relevant authorities continue to apply zero tolerance in respect of any kind of discrimination inside the stadium, fan zones and public spaces during UEFA EURO 2024 and beyond.

Milestones	Timing	Lead Agency	Progress

Recommendation – 34 (status: important)

The German federal authorities and the EURO 2024 GmbH should equip and train police, stewards and volunteers in an appropriate manner, namely in foreign languages.

Milestones	Timing	Lead Agency	Progress

Recommendation – 35 (status: important)

The delegation recommends that a document or stewarding plan is developed for each event which contains the respective roles and responsibilities of the police, stewards, volunteers, security companies along with the competence expected of each practitioner. (see [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}) Annex A, Appendix 41)

Milestones	Timing	Lead Agency	Progress

Recommendation – 36 (status: important)

The German federal authorities and the EURO 2024 GmbH should ensure the quality of private companies who shall provide safety and service at fan zones and other similar areas.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 37 (status: essential)			
The German authorities should ensure a partnership approach across the 10 host cities, in order to actively engage the municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations in dealing with safety, security and service.			
Milestones	Timing	Lead Agency	Progress
Recommendation - 38 (status: essential)			
The relevant authorities should:			
<ul style="list-style-type: none"> a. review and determine the appropriate pre-entry searching regime to be applied during the tournament and the measures required to mitigate entry delays (e.g., effective signage en-route to the stadia, explanatory communications to visiting supporters, pre-match entertainment etc.); b. consider the response to be adopted should delays on entry generate safety risks; c. once the arrangements have been reviewed, the outcome should feature in stadium contingency plans designating responsibility for determining whether or not to weaken security checks in the event of an emerging safety scenario; and d. as with other contingency plans, the arrangements should be subject to a multi-agency table-top exercise. 			
Milestones	Timing	Lead Agency	Progress
Recommendation - 39 (status: essential)			
The relevant authorities should implement an information system to communicate the following:			
<ul style="list-style-type: none"> a. At the entrances of the fan zone: expected time of entry (queuing + security controls), similar to what can be found in airports; and b. In the city: inform fans when the fan zone reaches full capacity in order to avoid large queues and associated problems. 			
Milestones	Timing	Lead Agency	Progress

Recommendation – 40 (status: important)			
The local authorities and EURO 2024 GmbH should ensure that there are sufficient and adequate fan zones, fan meeting points and fan walks and that there are effective crowd management arrangements. Appropriate safety and security preparations should be developed. To cater for the possibility of rival supporters gathering in close proximity, alternative back-up locations should be identified to provide separate areas for rival supporters to gather to help manage any risks.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 41 (status: essential)			
The local authorities and EURO 2024 GmbH should ensure that fan zones and meeting points are designed to allow for comfortable conditions for the expected number of visitors at peak periods.as fans may be within the area for a number of hours, consideration should be given to additional comfort space needed to allow for fans sitting down or taking refreshment whilst inside the area. The design should be founded on crowd modelling principles which should predict prime viewing areas and allow for cross movement of fans. Entry and exit points should be designed using the same principles with direction given by well positioned signage.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 42 (status: essential)			
Sufficient numbers of staff should be deployed to ensure that large corridors remain accessible to move from one TV screen to another, to avoid significant congestion around the screens that the closest from the main entry points.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 43 (status: important)			
In relation to open public viewing areas, extensive guidance and good practices on the preparatory and operating arrangements on large scale public viewing areas is set out in the Recommendation Rec (2021) 1 of the Saint-Denis Committee on Safety, Security and Service at Football Matches and other Sports Events.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 44 (status: important).			

<p>The relevant authorities should take account of the good practice contained in the Council of Europe Recommendation Rec (2021) 1 of the Saint-Denis Committee on Safety, Security and Service at Football Matches and other Sports Events in developing plans for organised and spontaneous fan areas and public viewing from fan zones.</p>			
Milestones	Timing	Lead Agency	Progress
<p>Recommendation – 45 (status: essential)</p> <p>The German authorities and EURO 2024 GmbH should have an effective mobility plan, namely by facilitating the circulation of fans in public transport networks in host cities and within the country.</p>			
Milestones	Timing	Lead Agency	Progress
<p>Recommendation – 46 (status: important)</p> <p>German authorities should consider the implementation of a special and temporary legal provision for the UEFA EURO 2024 event to facilitate a quicker process for authorising fan walks, addressing the legitimate aspirations of fans while ensuring efficient planning and public order maintenance.</p>			
Milestones	Timing	Lead Agency	Progress
<p>Recommendation – 47 (status: important)</p> <p>A risk register highlighting all perceived risks relating to the tournament should be developed. The register should clearly set out all identifiable risks, their causes, impact, mitigation. The register should also identify the ownership of all risks.</p>			
Milestones	Timing	Lead Agency	Progress
<p>Recommendation – 48 (status: important)</p> <p>A detailed command and control structure should be documented to provide details of the role of each party within the safety management operation and their specific responsibilities. This is considered to be essential to develop a clear hierarchical structure for clarity of who is in overall command of the event. See https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)} – Annex A. All key decision makers should be located together in the same room.</p>			
Milestones	Timing	Lead Agency	Progress

Recommendation – 49 (status: essential)			
The safety management should work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans, in the stadiums and other relevant premises, and that they are tested and refined in multi-agency table-top exercises.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 50 (status: essential)			
Once developed, the contingency plans in each stadium should be tested in multi-agency table-top exercises designed to identify any gaps in the contingency arrangements. Such exercises should involve all parties engaged in the delivery of the event and incorporate a selection of differing scenarios which could occur either before, during or after a match.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 51 (status: essential)			
The relevant bodies should ensure that the procedures based on technologies, like the ticketing and accreditation, should have a redundant system to ensure business continuity, so as mitigate the impact of technical failures of cyberattacks. Namely, with regard to electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 52 (status: important).			
The relevant authorities should ensure that the needs of supporter organisations are taken into account, from the planning to the delivery of tournament and associated events.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 53 (status: important)			
The fan embassies have proved to be an efficient tool during previous major sport tournaments and could provide both intelligence to police and also communication to visiting fans. For that purpose, the local authorities should liaise closely with FSE (Football Supporters Europe)			

and take note of the UEFA social responsibility project “Respect Fan Culture – Fans Embassies at UEFA EURO 2024.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 54 (status: important)			
The relevant authorities should provide all visiting supporters with clear, useful and easily accessible information written both in English and in the language of the visiting supporters.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 55 (status: important)			
The relevant authorities should ensure that the needs of local communities are taken fully into account in the planning and delivery of the tournament with associated events and initiatives designed and delivered to provide all local communities with reassurance and encouragement to participate in the festivities.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 56 (status: important)			
The relevant authorities should carry out a post event debrief of the coordination between public authorities, tournament organisers, and supporter organisations, in order to develop guidelines so that good practice can be replicated at other tournaments.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 57 (status: important)			
The relevant authorities should support, consult and involve KOS fan project organisation and other relevant similar organisations in the drafting and delivery of the safety, security and service strategy for UEFA EURO 2024.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 58 (status: important)			

The German authorities should carefully plan the police resources needed for the UEFA EURO 2024 security (including sufficient reserves) and ensure the coordination between the Länder in achieving this objective.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 59 (status: essential)			
In accordance with European good practice, during UEFA EURO 2024 policing tactics, profile and equipment should be determined on the basis of: ongoing dynamic risk analyses; graded deployment, with protective equipment used only where necessary; and early targeted and proportionate interventions to prevent the escalation of risk.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 60 (status: essential)			
The relevant police authorities should keep developing and training the 3D approach and, in particular, the de-escalation concept, if possible, through joint exercises between the different State police forces.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 61 (status: important)			
The German police authorities should further invest in adopting a policy of dialogue with the supporters involving all the deployed police officers.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 62 (status: important)			
Police units to be deployed during UEFA EURO 2024 should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 63 (status: important)			

For the UEFA EURO 2024 tournament the police forces and other local agencies should commit to opening communication channels with national team SLOs and supporters in line with the guidance set out in the Recommendation Rec (2021) 1 – https://www.coe.int/en/web/sport/t-s4-recommendations#%22133417550%22:(0), Annex A, Appendix M, and the EU Handbook on Police Liaison with Supporters (12792/16).			
Milestones	Timing	Lead Agency	Progress
Recommendation – 64 (status: important) Supporter feedback should be considered in the risk assessment process before each match			
Milestones	Timing	Lead Agency	Progress
Recommendation – 65 (status: important) The police officers to be deployed for UEFA EURO 2024 should be trained in the use of English language to facilitate the dialogue with the fans.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 66 (status: important) There should be a structured dialogue between supporters’ representatives and police forces at local and national level, with the participation of mediators or third parties, as needed.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 67 (status: important) The effective cooperation between the German NFIP, KOS and FSE in the framework of the UEFA EURO 2024 preparations could serve as a base to relaunch supporters/police dialogue in Germany.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 68 (status: important)			

The relevant authorities should consider revisiting the legal and regulatory framework to increase the effectiveness of the provisions on exclusion sanctions, as well as empowering the judicial or administrative authorities responsible to impose these sanctions.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 69 (status: important)			
The German authorities in close cooperation with EURO 2024 GmbH and the law enforcement authorities from the participating, transit and neighbouring states should exchange all the necessary information in order to prevent the banned/risk fans involvement in incidents.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 70 (status: essential)			
The Federal Ministry of Interior should look at ways in which supporters who may be subject to banning orders, travel bans or are listed with warrants for criminal issues in another country can be prevented from entering Germany.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 71 (status: important)			
The Federal 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.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 72 (status: essential)			
The German authorities should plan the deployment of foreign police delegations in such a way in which spotters work should not overlap with the other categories of specialised police officers invited by the German Federal Police; and all necessary measures should be adopted in order to ensure that IPCC EURO 2024 should represent the single point of contact as related to information exchange during the tournament.			
Milestones	Timing	Lead Agency	Progress
Recommendation – 73 (status: important)			
The relevant authorities should consider providing sufficient resources to ZIS in order to fulfil its tasks effectively.			

Post scriptum

Following the recommendations made by the visiting team in this report, and based on the experience and the feedback received on the UEFA EURO 2024 tournament, the team presents a list of what went well during the event and which could be considered as good practices for future major sporting events, broken down in the three pillars of the Saint-Denis Convention:

1) Safety

- 1) Technologies: mobile ticketing – UEFA continued to implement their exclusive mobile ticketing policy, which proved to be effective not only in ensuring a smooth and effective access to the host venues, but also providing a useful insight regarding the crowd itineraries and flows, which facilitated crowd management and added value to the mobility concept and contributed to adapting in real time the safety, security and service concept.
- 2) Crowd management and control – crowd management was ensured at the highest standards with valuable contributions from all stakeholders involved.
- 3) Homologation of EURO overlay – the approval of the specific operational, infrastructure and technical overlay to set up at the EURO venue footprint to deliver matches was effective. This is always a huge task and needs a lot of preparation by all stakeholders and partners and some flexibility by local authorities to approve the changes, including late changes, compared to a regular Bundesliga match setup.
- 4) Accreditations with background screening – in the current geopolitical context this measure should be mandatory for all major sport events and the host country relevant agencies should ensure that the process is fast, auditable and comprehensive.
- 5) First Aid medical services – the structure and deployment of the First Aid medical services proved to be effective. Furthermore, the ‘Get trained, save lives’ campaign to educate football fans in CPR skills, launched by UEFA and European Resuscitation Council campaign, educated thousands of fans and provided in-person training to teams, officials, volunteers and staff in basic CPR skills at UEFA EURO 2024.
- 6) Response to severe weather and heat protection measures – extreme weather conditions were recorded in connection with some of the EURO 2024 fixtures, but good contingency plans were put in place in order to minimise their impact on safety, security and service.

2) Security

- 1) International police cooperation: one of the success factors for the security measures was the extensive international police cooperation which was greatly facilitated by the German authorities. With more than 300 foreign police spotters being deployed during the tournament and with uniformed police supporting the Federal Police as well, all the conditions were met in order to ensure a safe, secure and welcoming environment for all fans attending.
- 2) Design, setting up and functioning of the International Police Cooperation Centre (IPCC): the planning for the IPCC EURO 2024 was a 4-year exercise in which the NFIP network invested a lot of efforts under the coordination of the German NFIP (ZIS). A dedicated IPCC subgroup was established, which provided advice and support for the design and setup of the IPCC EURO 2024.
- 3) Coordination and information flow: there was an excellent coordination and flow of information between IPCC and Tournament Operations Centre (TOC). The IPCC EURO 2024 acted as an information hub for law enforcement during the tournament, and by hosting 3 UEFA liaison officers it ensured an excellent and timely information exchange with TOC, which was appreciated both by police and UEFA management.
- 4) Reported incidents: there was a relatively low number of incidents reported by the law enforcement and the organiser: 136 incidents, 51 matches, 2.7 million spectators.
- 5) Stadium bans: a total of 96 tickets were invalidated due to requests from police / authorities; and 201 house bans issued by the venue lawyers on-site during the tournament.
- 6) Public order operations: the German authorities deployed sufficient police resources in order to cover all the hotspots during the tournament. This effective deployment in conjunction with the foreign police spotters were at the core of the successful public order approach for the EURO 2024.
- 7) Cyber Security protection operations: the structure and operation of the Cyber Security Protection arrangements proved to effectively prevent and tackle different cyber security threats and risks.
- 8) Communication teams (Police): the German police used extensively its communication teams which proved to be very effective in communication and de-escalation.

3) Service

- Human Rights policy: initiatives like the Human Rights Declaration, Human Rights Board, Grievance Mechanism, Rapid Response Mechanism, fan welfare coordinators for human rights, UEFA match observer scheme, and online abuse monitoring were effective and are good practices that should be replicated in future major events.
- Combi-ticket (36 hours): the combi-ticket contributed to the effective implementation of the mobility concept and provided the fans with good quality service in connection with their journey to and from the stadium.
- Volunteers: a joint programme by UEFA & host cities, which included 16.000 volunteers, was very important in ensuring that the fans received a good level of service.
- Accessibility: was ensured through audits in cooperation with AccessibALL experts and providing Easy Access seats, adequate wheelchair spaces, accessible toilets, dedicated parking, quality assistance services, a wheelchair loan service and shuttle services at all stadiums. Furthermore, a survey was carried out to evaluate the perception of the overall accessibility experience. Audio-descriptive commentary (ADC) was offered at all matches and a remote service was accessible through the official UEFA EURO 2024 app, allowing visually impaired fans anywhere in the world with an internet connection to listen in. Whenever possible, the service was offered in German as well as the languages of the two competing nations. Moreover, the EURO 2024 event guide featured a dedicated accessibility page.
- Diversity and inclusion: all-gender entrances and toilets, and a diverse mix of EURO 2024 GmbH staff and volunteers was ensured, representing a range of ages, genders and ethnicities to create an inclusive and representative tournament. Inclusivity was also a key focus of the volunteer programme, which featured disabled volunteers working alongside chaperones.
- Fan zones: they were contributing to the success of the tournament and managed to attract both the ticket and non-ticket holders and to provide an enjoyable experience for all fans.
- Fan embassies and information points: they provided on the spot real time relevant information and support to fans, which facilitated their journey and contributed for their positive experience.
- Fan walks: they contributed to the festive atmosphere reaching in some case more than 100.000 participating fans, without major disruption to the mobility and safety and security.
- Supporter Liaison Officers (SLOs): they were successfully integrated in the safety, security and service plans and provided added value in relation with the fan experience.

ANNEXES

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

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 co-ordination arrangements are established to identify, analyse and evaluate the risks pertaining to safety, security and service, and allow the sharing of updated information on risk assessment.
3. 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.
4. 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.
5. 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 stadiums

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 the competent public authorities put in place regulations or arrangements to guarantee the effectiveness of stadium licensing procedures, certification arrangements and safety regulations in general and ensure their application, monitoring and enforcement.

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 stadiums provide an inclusive and welcoming environment for all sections of society, including children, the elderly and those with disabilities, and incorporate, in particular, the provision of appropriate sanitary and refreshment facilities and good viewing conditions 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. creating 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 the stadium.

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 agencies responsible for safety and security.

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;

- 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, created by this Convention, in writing, of the name and contact details of its NFIP, and any subsequent changes with regard to it.
- 5. The Parties shall co-operate at international level in respect of sharing good practices and information on preventative, educational and informative projects and the establishment of partnerships with all agencies involved in the delivery of national and local initiatives, focused on or driven by the local community or supporters.

PART 3

Comments by Germany

(of 12 March 2025)

Introduction

The German delegation is grateful for the opportunity to comment on the Report on the monitoring visit to Germany. Bearing in mind that the official German comments will be part of the monitoring report, the German side analysed the report very thoroughly and with maximum attention. Although the report will be published after UEFA EURO 2024, the preparations for which were one of the main evaluation aims of the visit, the report as a whole should serve as a foundational document for further discussion within the Saint-Denis Convention.

Germany appreciates the efforts of the Secretariat of the Saint-Denis Convention and the fruitful discussion in connection with the monitoring report. The Preamble and the Post Scriptum of the report are welcomed and help in the understanding of the report as a whole.

It is pointed out that not only the authorities, but also the tournament organisation and the association should be mentioned as addressees in the preamble.

In fact, the need for more clarification and explanation by the German authorities to some recommendations of the monitoring report remain substantial. This mostly are related to

- The federal system of the Federal Republic of Germany according to our Constitution (Basic Law);
- The legal system and philosophy in many parts of the report; and
- Recommendations containing basic standard practices that are already in place in Germany.

At the meeting of the Committee of the Saint-Denis Convention on 24 April 2024, the German delegation expressed its position and its concern that the publication of the monitoring report in its current form would result in substantial questions and unnecessary discussions at an unfavourable time.

In a fruitful further discussion of the report between the Secretariat of the Saint-Denis Convention, the Monitoring Team and the German Delegation the decision was made to incorporate a Preamble; furthermore, a Post scriptum in connection with the UEFA EURO 2024 was added. The German Delegation appreciates this procedure and its outcome.

While reading the monitoring report, the delegation had the impression that every specific aspect of the Saint-Denis Convention was incorporated into a recommendation without checking whether the point in question is already standard practice in Germany or whether it was addressed during the monitoring visit.

Because all stakeholders have received the current version of the national report, the findings that Germany views critically were also available to these stakeholders for their current projects and planning (e.g. regarding UEFA EURO 2024).

History

In an email of 14 February 2024, the Secretariat of the Saint-Denis Convention (T-S4) sent the report on the monitoring visit of the Council of Europe (Saint-Denis Committee), which took place from 17- 19 November 2023. The aim of the visit was to determine the degree to which the Saint-Denis Convention is being implemented in Germany and how prepared Germany was for the 2024 UEFA men's European Football Championship (UEFA EURO 2024). The visit took place for the friendly match between the national teams of Germany and Türkiye at the Berlin Olympic Stadium on 18 November 2023. With regard to the general conditions of the visit, we refer to the Council of Europe's report PART 2 – Report by the Monitoring team, B.1 – Purpose of the Visit.

Germany requested in advance that the monitoring visit be moved until after UEFA EURO 2024 had taken place, because Germany only fully ratified the Saint-Denis Convention in March 2023. Over the course of the discussions, Germany ultimately agreed to the visit. The German delegation was astonished to learn that an intended monitoring visit to France that was scheduled to take place before the Olympic Summer Games in Paris was not conducted.

The delegation visit was constructive and very professional. A particular challenge of the visit was presenting the implementation status of the Convention and the preparatory measures for UEFA EURO 2024 in a comprehensive and understandable manner in the short amount of time available. With presentations by the public authorities and organisations involved in the tournament, Germany tried to provide as thorough and well-founded an overview as possible.

Everyone present during the visit must have known that not every piece of information could be provided in this context. In order to better acquaint the delegation with the host city of Berlin, a tour of the city was organised, with visits to some of the locations that are relevant to the tournament. The monitoring visit ended with a detailed tour of the Berlin Olympic Stadium and other locations that are significant to the tournament. The delegation also observed the measures of the police and organiser at the international match between Germany and Türkiye.

On the last day of the visit, there was an opportunity to conduct a brief evaluation with many of the stakeholders. The assessments provided by the monitoring delegation during the visit and brief evaluation were extremely helpful and Germany very much welcomed the points contained in them as improvements that need to be made.

System

From the German perspective, the report must be clarified and explained at certain points, where the recommendations are not in line with the Constitutional order of the Federal Republic of Germany as well as with legal philosophy and tradition.

The visit itself was able to provide valuable insights on the basis of which Germany is already implementing measures.

One example is the justified criticism of the insufficient street lighting around the Berlin Olympic Stadium at night. This shortcoming has already been addressed by the responsible authorities.

Listed below are the passages of the Council of Europe’s report which have been reviewed by Germany.

There are also passages listed which Germany cannot support. The German comments will quote the original text from the report, followed by the German statement. These comments will be highlighted in italic.

Part II – Report by the Monitoring Team

SECTION A - Executive Summary

Thanks to the Federal governance system in Germany, there is a solid foundation for the safety and security approach of the law enforcement authorities. In order to ensure sound levels of coordination and cooperation between all stakeholders involved, there will be a need to monitor the different approaches in the Länder in legislation, policing strategies and operations and resources available will need to be monitored to ensure that levels of spectator safety, security and enjoyment of the event are consistent from region to region. In this respect, minimum levels of service should be set with **external verification to ensure that those standards are being met.**

□ Comment by Germany:

The inexperience with and lack of knowledge of Germany’s federal system and the structures and processes this entails is demonstrated here. In a federally structured system, each federal state has the competence to pass any necessary legislation, regulations and rules, and is also (legally) responsible for doing so. Germany does not see a need to evaluate potential differences in legislative and executive measures, especially those of non-governmental institutions.

As described above, competences and responsibilities are clearly regulated. Basic requirements and needs, as well as living conditions and experiences, are very similar throughout Germany, and, historically, there is a comparable understanding of the law and the role of the government in all regions of the Federal Republic of Germany. As a result, the content of the adopted laws and regulations is very similar or comparable. The national process for ratifying international treaties guarantees that international treaties like the Saint-Denis Convention are incorporated into the legal frameworks of the federal states.

Key to this is the vital support needed by trained and qualified stewards, whose numbers will be required in many thousands across all of the stadia, the fan meeting points and fan zones throughout the tournament. The German authorities, whilst confident in their ability to meet the required numbers, must also recognise that in most recent major tournaments, last minute concerns have been raised over difficulties experienced in getting to the required stewarding levels.

□ Comment by Germany

The engagement and deployment of stewards and/or other service staff is primarily the responsibility of the organisers and is not a task of the government. The DFB in particular has

done a lot to train this staff in the past. With regard to UEFA EURO 2024, all government stakeholders have addressed the issue within the scope of their legal responsibilities.

SECTION B – Visit Background and Explanation

B.1 - Purpose of the Visit

For future visits, it would be preferable to have a better balance between time for presentations and time for questions and answers. Also, for future visits, the host authorities should endeavour to provide **a complete** national report at least 8 weeks before the visit. Further, the report when received was incomplete causing further difficulties for the delegation.

Following the team's recommendations, Germany will present an Action Plan to the Committee, as part of the visit report, as per the Monitoring Guidelines (paragraph 5.9).

☐ **Comment by Germany**

The CoE recognises that hosting and organising a monitoring visit is accompanied by the challenge of the ongoing organisation of the upcoming event as well as current political and societal developments and tasks.

As explained in the introduction, Germany had very little time for planning and preparations. It needs to be taken into consideration that preparations for the monitoring visit were taking place at the same time as preparations for UEFA EURO 2024 as well as day-to-day duties and, in particular, while dealing with the challenges in connection with Russia's war of aggression against Ukraine and the tense situation in the Middle East.

With this report, Germany does not see itself being able to draft an Action Plan based on the proposed recommendations.

*Germany believes the addition of "a complete" would be sensible here and proposes the following rewording in this section: "**a complete** national report at least 8 weeks..."*

Furthermore, we propose deleting the following passage:

"Further, the report when received was incomplete causing further difficulties for the delegation. Following the team's recommendations, Germany will present an Action Plan to the Committee, as part of the visit report, as per the Monitoring Guidelines (paragraph 5.9)."

B.2 - General comments

Another challenge identified during the visit was the fact that the police concept for the matches in Berlin was not shared yet with EURO 2024 GmbH in order to have an integrated approach for the UEFA EURO 2024. The delegation is aware that some of the police planning elements and information can be sensitive or confidential and cannot be shared with private stakeholders, but a minimum of information should be provided to all actors **involved**.

□ *Comment by Germany*

See the preamble to the report of the monitoring team.

Recommendation 1

German police authorities should work in close cooperation with EURO 2024 GmbH in order to ensure that an integrated approach as regards safety and security is delivered during UEFA EURO 2024.

□ *Comment by Germany*

See the preamble to the report of the monitoring team.

Recommendation 2

The stewarding remains the top challenge mentioned by the German authorities. Difficulties are encountered as regards making available a sufficient number of qualified stewards for the UEFA EURO 2024. Furthermore, the fan zones and fan meeting points will require also stewarding, that will put even more pressure on the stewarding companies.

EURO 2024 GmbH, in close cooperation with the German authorities, should identify solutions in order to have sufficient number of stewards available during the tournament. The number decided upon should consider the potential impact upon stewards and volunteers caused by the inevitable long working hours due to the length of the tournament. (status: essential)

□ *Comment by Germany*

This was certain and was a common task of the authorities and the organiser.

Recommendation 4

The German authorities in cooperation with all stakeholders **should carefully plan the mobility concept** in order to ensure a smooth transfer to and from the stadium for the fans (status: important)

□ *Comment by Germany*

See the preamble to the report of the monitoring team.

Mobility concepts have already been developed for each stadium – also taking into account the regular movement on matchdays of the Bundesliga.

There are coordinated mobility strategies for each UEFA EURO 2024 venue. These strategies are based on traffic management plans that are implemented for the regular football matches that take place every week in the Federal Republic of Germany. These strategic preparations and their implementation are not limited to the match locations, but are organised across Germany.

B.7 - Status of Report

Recommendation 5

German authorities should implement an overall structure of coordination between the federal, state and local levels within each of the states where stadia are located to ensure that a common standard of spectator safety is applied to all stadia. (status: essential)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

In addition, we wish to point out the responsibility of the organiser in terms of stadium-related measures. The organiser has determined these measures with the host cities in concrete agreements.

Cross-venue working groups on different topics ensure coordination and arrangements between the individual venues. In addition, the organiser has developed and presented a criteria catalogue for the stadium operators.

Recommendation 6

German authorities should implement in due time an overall structure of effective coordination, cooperation and communication arrangements between the federal, state and local levels, with clear roles and responsibilities, so as to ensure a swift share of information on risk assessment and a harmonised delivery of safety, security and service standards during the tournament. (status: essential)

☐ **Comment by Germany**

This already exists to some extent. In addition, Germany does NOT organise special structures, as it is able to rely on common processes and communication channels.

Recommendation 7

The relevant authorities should develop a government-led multi-agency communication and media strategy. This strategy should involve spokespersons from all public and private agencies involved in the tournament. It should comprise not only information addressed to the mass media, but also dissemination and receipt of information to supporters and the local community. It is also recommended that this media centre is situated within the stadium. (status: essential)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Press sovereignty and media communication are carried out in accordance with the respective legal responsibilities. Coordination with other related and affected public authorities and stakeholders is standard practice and is set out in the strategy. From Germany's perspective, media work should take place in a location where most of the information is available and where

the decisions are made. The information given to the media has to be authorised by the competent person. Therefore, the stadium may not be a suitable location.

Recommendation 8

It is recommended that the working arrangements at local level are captured in a framework or Terms of Reference document so that complete clarity in terms of agencies involved, primacy, aims and objectives, roles and responsibilities, and ranking of personnel expected to participate in the group are clearly defined.

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Documents (host city strategy/security strategies) and definitions regarding this exist and are standard.

Article 5 - Safety, Security and Service in Sports stadiums

One of the difficulties seems to be the lack of harmonised provisions regarding the vetting check of candidates to stewards across the 16 federal States.

☐ **Comment by Germany**

The public authorities are trying to counteract this by centralising procedures and increasing the use of technological and human resources. The harmonising of processes is regularly discussed at operative level.

Also, all stadia should develop a common standard to determine the minimum age of entry for spectators.

☐ **Comment by Germany**

As a rule, the organiser is responsible for making such rules for entry to its event. Moreover, it is the responsibility of the child's guardian (parent) to determine whether they are old enough to visit the stadium. The Youth Protection Act (Jugendschutzgesetz, JuSchG) defines what events are suitable from what age. Public authorities act in accordance with their mandate if the overall conditions put the child's well-being at risk (e.g. noise, particular conditions of the location). According to the rules of the DFB, a seat must be provided for every spectator regardless of age due to the requirements in the event of an evacuation.

Recommendation 9

The German federal authorities, in consultation with the EURO 2024 GmbH, should find a legal solution in order to harmonise and facilitate the recruitment of stewards for the tournament. (status: essential)

□ **Comment by Germany**

Legislation based on individual cases is not permitted under German law (legislation in Germany must be abstract and general). As Germany understands it, the government sets out the framework for the private security industry. The organiser is responsible for actually recruiting stewards.

Recommendation 10

The German federal authorities, in consultation with the EURO 2024 GmbH should develop a policy to be implemented by all stadia to be used for the tournament around the minimum age of entry for children, both accompanied and unaccompanied by adults. Also that the carrying of babes in arms should be risk assessed but in general not allowed on the grounds of the safety and welfare of the child. (status: essential)

□ **Comment by Germany**

See above regarding minimum age.

Compliance

□ **Comments**

If there are different standards and requirements according to the different local authorities, in the field of licensing, certification and inspection of sports venues, then there is a need to ensure harmonisation of these standards and requirements.

□ **Comment by Germany**

The local authorities are responsible for the establishment and operation of venues. The model ordinance for places of assembly (Muster-Versammlungsstättenverordnung, MVStättV) provides a nationwide framework for the establishment and operation of venues. As mentioned above, Germany has a structure of expert committees in which the necessary coordination measures are agreed. In general, harmonisation of laws and prescriptions from the Länder by the Federation without having legal competence would be unconstitutional. A federal harmonising act would be illegal.

Recommendation 11

The German federal authorities should find a legal solution in order to harmonise the standards on the design, infrastructure, licensing, certification and inspection at sports venues. (status: essential)

□ **Comment by Germany**

As mentioned above, there is a model ordinance for places of assembly. There are documents tailored to each stadium regarding this. In addition, the DFB has established certain requirements for clubs and stadium operators in this regard.

Recommendation 12

It is recommended that a document or security/stewarding plan is developed for each event, which contains the respective roles, responsibilities and primacy of the police, safety officer, stewards, volunteers, security companies along with the competence expected of each practitioner.

See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}), (status: important)

☐ *Comment by Germany*

This procedure is already in place in Germany and is the subject of a legal provision.

Recommendation 13

In the case of a safety officer and safety management team being used which are not those normally the responsible persons within the venue, a thorough review of the competence of such people should be carried out by a competent authority and if any deficiencies are identified, appropriate amendments made to the safety management arrangements factor and, as a consequence, the maximum safe capacity level set out in the safety certificate. (status: important)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

This is also already standard practice.

Recommendation 15

Due to the large numbers likely to be needed to demonstrate necessary standards of safety, this process and any training needed to equip stewards with the skills needed should commence immediately. Training, qualification and competence should be evaluated by a third party to ensure the necessary levels of safety management are achieved. Concerns in any of the above areas should result in the appropriate alteration of the stadium management factor and a reduction in the maximum safe capacity level set out in the safety certificate. (status: important)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

This is also standard practice in Germany. In particular when it comes to football matches, the DFB has made every effort to increase training and professionalisation through its QuaSOD programme. Checks on the effectiveness of the security personnel are carried out by the local authorities.

Recommendation 16

To counter the effect of large numbers of stewards who will be new to the stadium, it is recommended that a series of ramped test events with increasing spectator numbers are arranged

to allow familiarisation and for testing of systems and procedures at reduced capacity levels.
(status: important)

□ ***Comment by Germany***

Conducting tests and exercises is widespread practice in Germany.

Recommendation 17

The German federal authorities should ensure that all venues with a dependency of electronic systems within their respective stadia have procedures on place to deal with a systems failure which could be either genuine or with criminal intent. (status: essential)

□ ***Comment by Germany***

See the preamble to the report of the monitoring team.

In a digital world, it is crucial that electronic systems function correctly. According to Germany's legal interpretation, the operator and organiser are primarily responsible for equipping and operating these systems. They are also responsible for providing potential back-up systems.

The threat prevention authorities are responsible for taking preparatory measures to counteract the negative impacts of any system failures.

Recommendation 18

The German federal authorities should ensure that all venues should follow a prescribed model around the design of queuing channels with filter areas to take out those without proper accreditation without impeding the flow of spectators into the stadium. Also that in that design areas are identified outside of the stadium and away from turnstiles for the necessary searching of bags for prohibited items (status: essential)

□ ***Comment by Germany***

Potential for improvement in this regard was in fact identified at the match between Germany and Türkiye during the monitoring visit. The responsible authorities and organisers have taken note of the problem.

Compliance

□ **Observations**

At the entrance to the friendly match in Berlin, the delegation noticed that very young children were allowed to enter with their parents. It was not possible to clarify, on the spot, if there was a legal or regulatory minimum age and, if so, which age.

□ ***Comment by Germany***

See above regarding minimum age.

Recommendation 21

The German federal authorities and the EURO 2024 GmbH should ensure similar service standards inside and outside of sports venues, namely in terms inclusiveness, sanitary and refreshment facilities during the tournament. (status: important)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

These aspects are all governed by the model ordinance for places of assembly and the local administrative regulations on establishing and operating venues.

Compliance

☐ **Observations**

It was not clear if the German Government and EURO 2024 GmbH will write down “statements of intent” setting out the roles and responsibilities of namely the police and the safety management personnel.

☐ *Comment by Germany*

The roles of the police and other government agencies and the organiser are clearly legally defined. Furthermore, the organiser has concluded contracts with the host cities and stadium operators on tasks and responsibilities.

Recommendation 23

The German federal authorities and the EURO 2024 GmbH should agree upon a system of “statements of intent” setting out clearly the roles and responsibilities of the police and the safety management staff, as well as the arrangements for transferring overall responsibility to the police in case of a relevant incident. (status: essential)

☐ *Comment by Germany*

In order to ensure efficient and constructive cooperation between UEFA, the DFB and the host cities, UEFA and the DFB have developed a special host city programme. In a declaration of guarantee, the host cities have pledged to UEFA that they will ensure security for the event and take appropriate measures in this regard.

The declaration of guarantee includes areas for action related to event security, such as:

- *Prevention measures and cooperation at national and international level (sharing information and findings, etc.);*
- *Public security and order (both in general and in terms of managing large crowds, especially on match days);*
- *Traffic security at major traffic hubs (airports, train stations, bus stations, etc.);*
- *Measures to combat terrorism and prevent threats;*
- *Operations in the fan zone;*
- *Pedestrian areas/fan walks; and*

- Venues (the stadium in cooperation with the stadium operator, UEFA and the security manager of the DFB).

Recommendation 24

The relevant authorities should identify and implement systems for ensuring the provision of adequate and appropriate training at both the theoretical and practical level for such safety officers, supervisors and safety stewards, and establish, document and monitor procedures for ensuring that those who have been trained are then assessed as being competent to perform their allocated tasks. (See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}) Annex A, Appendix 33) (status: important)

□ Comment by Germany

See the preamble to the report of the monitoring team.

Traditionally, Germany has extensively conducted tests and exercises. For example, the head of the Federal Office of Civil Protection and Disaster Assistance (BBK) carried out table-top exercises at all of the tournament locations. The special operational teams prepared for UEFA EURO 2024 in a three-day table-top exercise.

The following is an example of the exercises in the federal state of Berlin: In order to strengthen their own confidence, in coordination with SenInnSport III B 3, the Berlin police added emergency situations in connection with events for UEFA EURO 2024 to their annual training programme for 2023. Depending on the operational situation, the local directorates, the Directorate for Operations and Traffic of the Berlin police and the Berlin Criminal Police Office implement their respective plans in a timely manner with the involvement of the fire brigade. From 29 to 31 August 2023, the Directorate for Operations and Traffic, together with Directorate 2 (West) and the Berlin fire brigade, conducted a table-top exercise for UEFA EURO 2024. The exercise was led by representatives of the Federal Academy of Civil Protection and Civil Defence (BABZ). A corresponding preparatory seminar of the BABZ took place from 19 to 22 June 2023 at the Kruppstraße facility (1st public order support force battalion). An initial assessment by the instructor showed that more training was needed in the area of communication and in the understanding of roles. Depending on the individual scenario, for example “damaging incident in the stadium”, other stakeholders also took part in the exercises (e.g. the Senate Department for Higher Education and Research, Health and Long-Term Care, transport companies BVG and S-Bahn Berlin GmbH, the Federal Police, 1. FC Union football club, Pankow district office). Based on the guidelines for work and exercises with coordination groups (LÜKO DFB), EURO 2024 GmbH planned a group coordination exercise in which leaders from the areas of security and technology in particular (with the involvement of the Berlin police and fire brigade where appropriate) were to train for situations that can arise in connection with events at the venues (such as public transport failures). This exercise was scheduled to take place in Berlin on 23 and 24 April 2024; we do not have any details on how the exercise went.

In addition, there is new information on the plans of mobility partner Deutsche Bahn AG. The planned disaster management exercise in Directorate 1 (North) involving forces of police unit A

17 and the Reinickendorf district office had to be cancelled on 17 April 2024 due to a police operation in the Tegel arrival centre.

On 27 April 2024, the Berlin fire brigade led a disaster management exercise for a scenario on a fan train. This exercise involved Directorate 1, Directorate 2, the Directorate for Operations and Traffic, the Federal Agency for Technical Relief (THW) and members of other relief organisations. Furthermore, on 25 May 2024, the UEFA EURO 2024 Project Group used this year's DFB Cup final as a rehearsal for operations in response to scenarios that could arise during the tournament in the Host City Operations Centre (HCOC); the evaluation is ongoing.

The planned events are accompanied by BABZ seminars on prominent topics such as communication, interorganisation and emergency mental health services.

Recommendation 25

The delegation recommends that a national network be established to enable stadium Safety Officers to share information along with sharing expertise and good practises. (ESSMA, the European Stadium & Safety Management Association, is the European network for this practice <http://www.essma.eu/>). (status: desirable)

☐ **Comment by Germany**

The DFB already runs such expert networks.

Compliance

☐ **Comments**

The German authorities and UEFA EURO 2004 GmbH should also assess the risks associated with new ways of using pyrotechnics, such as the remote ignitions.

☐ **Comment by Germany**

Pyrotechnics play a special role in Germany, also outside the context of football. Pyrotechnics have become an important topic in the police force not only because of their use during football matches, but also because they are taken into consideration in every decision-making process for similar situations (e.g., public gatherings, New Year's Eve). Numerous training documents on handling IEDs, including pyrotechnic products, have now been published and can be accessed internally as digital files. Seminars on the topic can also be booked on the education portal.

Compliance

☐ **Comments**

With regard to the increasing use of drones, be it over or around stadia, German authorities should use specialised police units in all host cities to deter the use of such devices and intervene quickly and in an exemplary manner. International police experience should also be beneficial for the German Police authorities.

□ **Comment by Germany**

The German police authorities are well aware of the dangers associated with drones and other unmanned aerial systems, particularly in the context of events. Each relevant police station deals differently with the possibilities of detection and threat aversion. The police have acquired adequate command, control and operational means for this. In this context, it should be mentioned that the topic of drones is reflected in the police framework strategy for policing UEFA EURO 2024.

Other new or renewed threats and risks that need to be addressed are cybercrimes, CBRNE (chemical, biological, radiological, nuclear and explosive), transnational organised crime and terrorism, since this third major international event and its many soft targets presents itself as an opportunity for perpetrators.

□ **Comment by Germany**

All security authorities in the Federal Republic of Germany carefully analyse world events, the security situation abroad, technical developments and the resulting threats to public safety and order. The necessary police measures, including police reconnaissance measures, are carried out on the basis of the relevant situation assessments.

Recommendation 29

The German federal authorities and the EURO 2024 GmbH should adopt effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns. (status: essential)

□ **Comment by Germany**

See the preamble to the report of the monitoring team.

Averting danger, in particular preventing and responding to violent behaviour, is by law one of the primary tasks of the German police. Please note the following details regarding Berlin:

The Berlin police provide internal and external information on common crimes in connection with major events:

<https://www.berlin.de/polizei/aufgaben/praevention/artikel.1445589.php>

The host city of Berlin is promoting the tournament under the motto “Berlin ki(e)ckt” (<https://www.berlin.de/sen/inneres/presse/pressemitteilungen/2023/pressemitteilung.1395319.php>) and publishes information in various places, including on the UEFA EURO 2024 website (<https://uefaeuro2024.sportmetropole.berlin/host-city-berlin/>), via the marketing agency “visitBerlin“ (<https://www.visitberlin.de/de/euro-2024>) and via the federal state’s own organisation “Kulturprojekte Berlin” (<https://kulturprojekte.berlin/projekte/euro-2024-berlin/>).

Recommendation 30

The German federal authorities and the EURO 2024 GmbH should implement the national action plans and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour during the tournament, namely by benefiting from the campaign of the EU-CoE joint project on “Combating hate speech in sport”, of which Germany is a partner, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes (e.g., FARE).

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

Programmes and special operative processes preventing and combating hate speech are already in place at the different administrative levels and in sport federations and NGO's.

Recommendation 31

It is recommended that the relevant authorities make use of legislation and develop contingency plans to tackle any racist or discriminatory behaviour in sports stadia. Also, to recognise the importance of education in helping solve this issue by developing educational programs of awareness. (status: important)

☐ *Comment by Germany*

If racist or discriminatory behaviour or crimes occur, the German law enforcement authorities will take action in accordance with the principle of public prosecution. The level of awareness of the police authorities, but also of the DFB and the clubs is very high in this regard. In addition, there are a number of prevention campaigns in order to strengthen social cohesion.

Recommendation 32

For UEFA EURO 2024 matches, all police officers, stewards, private security and staff of the stadium authorities deployed or likely to be deployed within the stadium footprint, especially the key decision makers, should be briefed and trained on the UEFA guidelines and the action required to ensure that the proper procedures are used and the proper action taken if any incidents of racism or discrimination occur in UEFA EURO 2024 matches. (status: important)

☐ *Comment by Germany*

This recommendation is certainly reasonable, but it neglects the responsibility and legally responsible role of the organiser due to German Law. This means that on the other hand, UEFA needs to know what incidents, content, etc., are defined as racist or discriminatory action on the basis of national legislation.

Recommendation 33

The relevant authorities should put measures in place to refuse entry into the stadium for spectators who display or carry with them racist or other discriminatory leaflets, symbols or banners and that

the relevant authorities continue to apply zero tolerance in respect of any kind of discrimination inside the stadium, fan zones and public spaces during UEFA EURO 2024 and beyond. (status: important)

□ ***Comment by Germany***

Entry checks are primarily a task of the organiser. In addition, as explained above, it is the task of the law enforcement authorities to intervene and take police measures in the event of criminal acts such as racism and discrimination.

Compliance

□ **Comments**

Even if the police forces are well trained and equipped, with regard to the safety management there is a concern regarding the lack of candidates to stewards, the different screening requirements and the need to train them adequately in due time, as well as the recruitment and training of the planned 16.000 volunteers.

□ ***Comment by Germany***

See above.

See also previous comments regarding stewarding services.

Recommendation 34

The German federal authorities and the EURO 2024 GmbH should equip and train police, stewards and volunteers in an appropriate manner, namely in foreign languages. (status: important)

□ ***Comment by Germany***

See the preamble to the report of the monitoring team.

It can be assumed that the authorities involved and the organiser will equip staff in accordance with their tasks and train and educate them for the tasks they are to perform.

Recommendation 35

The delegation recommends that a document or stewarding plan is developed for each event, which contains the respective roles and responsibilities of the police, stewards, volunteers, security companies along with the competence expected of each practitioner. (see [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}) Annex A, Appendix 41) (status: important)

□ ***Comment by Germany***

This is a given.

See the preamble to the report of the monitoring team.

The creation of basic strategies and task descriptions for events is the basis for licensing the venue and a prerequisite for receiving approval to hold the event.

Recommendation 36

The German federal authorities and the EURO 2024 GmbH should ensure the quality of private companies who shall provide safety and service at fan zones and other similar areas. (status: important)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

It is mandatory for the competent authorities to conduct checks of the effectiveness of the deployed security personnel.

Recommendation 37

The German authorities should ensure a partnership approach across the 10 host cities, in order to actively engage the municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations in dealing with safety, security and service. (status: essential)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Networks of all relevant stakeholders at the different levels were established in time. This was also explained more broadly during the visit.

Recommendation 38

The relevant authorities should:

- a) review and determine the appropriate pre-entry searching regime to be applied during the tournament and the measures required to mitigate entry delays (e.g., effective signage en-route to the stadia, explanatory communications to visiting supporters, pre-match entertainment, etc.);
- b) consider the response to be adopted should delays on entry generate safety risks;
- c) once the arrangements have been reviewed, the outcome should feature in stadium contingency plans designating responsibility for determining whether or not to weaken security checks in the event of an emerging safety scenario; and
- d) as with other contingency plans, the arrangements should be subject to a multi-agency table-top exercise. (status (essential))

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Points a - d will be answered together. From Germany's point of view, this recommendation refers to aspects that are standard practice in Germany. Regardless of where the responsibility lies (public authority or organiser), the scenarios which the report addresses are regularly planned and implemented if necessary. As already mentioned, exercises are conducted extensively in Germany.

Recommendation 40

The local authorities and EURO 2024 GmbH should ensure that there are sufficient and adequate fan zones, fan meeting points and fan walks and that there are effective crowd management arrangements. Appropriate safety and security preparations should be developed. To cater for the possibility of rival supporters gathering in close proximity, alternative back-up locations should be identified to provide separate areas for rival supporters to gather to help manage any risks. (status: essential)

Recommendation 41

The local authorities and EURO 2024 GmbH should ensure that fan zones and meeting points are designed to allow for comfortable conditions for the expected number of visitors at peak periods. As fans may be within the area for a number of hours, consideration should be given to additional comfort space needed to allow for fans sitting down or taking refreshment whilst inside the area. The design should be founded on crowd modelling principles, which should predict prime viewing areas and allow for cross movement of fans. Entry and exit points should be designed using the same principles with direction given by well positioned signage. (status: essential)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

This comment addresses recommendations 40 and 41 together. These aspects of establishing event zones are common practice and meet German standards. Planning and running the zones of interest (fan zones, etc.) was a task for the local authorities that was taken very seriously.

Recommendation 42

Sufficient numbers of staff should be deployed to ensure that large corridors remain accessible to move from one TV screen to another, to avoid significant congestion around the screens that are the closest from the main entry points. (status: important)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Reference here is made to public screening events which did not take place during the visit. In this regard, the recommendation that “large corridors remain accessible to move from one TV screen to another” does not refer to any concrete reality.

Recommendation 45

The German authorities and EURO 2024 GmbH should have an effective mobility plan, namely by facilitating the circulation of fans in public transport networks in host cities and within the country. (status: essential)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

As already mentioned, mobility plans have been created for all relevant fields. The mobility strategy of the host city of Berlin for UEFA EURO 2024 was presented and explained in detail during the monitoring visit.

Recommendations 46

German authorities should consider the implementation of a special and temporary legal provision for the UEFA EURO 2024 event to facilitate a quicker process for authorising fan walks, addressing the legitimate aspirations of fans while ensuring efficient planning and public order maintenance. (status: important)

☐ **Comment by Germany**

Legislation based on individual cases is not permitted under German law. In addition, it should be noted here that the issue of fan walks in particular not only constitutes a legal aspect, but that it must be assessed primarily according to police tactics. The local conditions (distance to the stadium, interference with main traffic routes at the venue, etc.) and in particular the situation assessments for the expected behaviour of the fans must be taken into account.

Compliance

☐ **Observations**

Although the federal law foresees the need to have contingency and emergency plans, it was not clear for us if each of the 10 stadiums of the tournament have contingency and emergency plans, as well as the fan zones and the 24 team-base camps and other relevant premises.

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

The object of the evaluation visit was Berlin and especially the efforts of Berlin as a host city, not the status of any of the other 9 host cities or other facilities. In general, emergency and rescue plans are mandatory under German law for all major venues, especially where large numbers of people gather or where members of the public are present.

Recommendation 47

A risk register highlighting all perceived risks relating to the tournament should be developed. The register should clearly set out all identifiable risks, their causes, impact and mitigation. The register should also identify the ownership of all risks. (status: important)

☐ *Comment by Germany*

The elements of the “risk register” referred to here can be found in the situation assessment in accordance with the actions of the German police authorities and are part of the police commander's operation order, which is binding for the deployed police forces. Non-police danger prevention authorities work according to an analogous system.

Recommendation 48

A detailed command and control structure should be documented to provide details of the role of each party within the safety management operation and their specific responsibilities.

This is considered to be essential to develop a clear hierarchical structure for clarity of who is in overall command of the event. See [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}) – Annex A. All key decision makers should be located together in the same room. (status: important)

☐ *Comment by Germany*

As stated above, structures and tasks are presented clearly within a given area of responsibility, for example in a police operation order. Interfaces with other authorities or organisations (hosts) are identified and the cooperation is defined and coordinated. Communication among the key parties, especially on the match day, is ensured.

Recommendation 49

The safety management should work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans, in the stadiums and other relevant premises, and that they are tested and refined in multiagency table-top exercises. (status: essential)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

These processes are all standard practice in Germany. Regarding the necessity of carrying out exercises, please refer to our comments above.

Recommendation 50

Once developed, the contingency plans in each stadium should be tested in multi-agency table-top exercises designed to identify any gaps in the contingency arrangements. Such exercises should

involve all parties involved in the delivery of the event and incorporate a selection of differing scenarios which could occur either before, during or after a match. (status: essential)

□ *Comment by Germany*

Regarding the carrying out of exercises, please refer to the comments above.

Recommendation 51

The organiser should ensure that the procedures based on technologies, like the ticketing and accreditation, should have a redundant system to ensure business continuity, so as to mitigate the impact of technical failures of cyberattacks. Namely, with regard to electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)

Recommendation 52

The relevant authorities should ensure that the needs of supporter organisations are taken into account, from the planning to the delivery of tournament and associated events. (status: important)

Recommendation 53

The fan embassies have proved to be an efficient tool during previous major sport tournaments and could provide both intelligence to police and also communication to visiting fans. For that purpose, the local authorities should liaise closely with FSE (Football Supporters Europe) and take note of the UEFA social responsibility project “Respect Fan Culture – Fans Embassies at UEFA EURO 2024”. (status: important)

□ *Comment by Germany*

See the preamble to the report of the monitoring team.

Cooperation with supporter organisations is good practise in operating major tournaments and is a standard part of regular work in Germany.

Recommendation 58

The German authorities should carefully plan the police resources needed for the UEFA EURO 2024 security (including sufficient reserves) and ensure the coordination between the Länder in achieving this objective. (status: important)

□ *Comment by Germany*

See the preamble to the report of the monitoring team.

The planning and deployment of police officers at major events is a core component of police work in a country with 84 million inhabitants where many events of various sizes, and with varying threat assessments, are carried out.

Recommendation 59

In accordance with European good practice, during UEFA EURO 2024 policing tactics, profile and uniform should be determined on the basis of: ongoing dynamic risk analyses; graded deployment, with protective equipment used only where necessary; and early targeted and proportionate interventions to prevent the escalation of risk. (status: essential)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

Recommendation 59 addresses, in broad strokes, universally valid conventional principles for police action. The Council of Europe can safely assume that in this area, in which the State has the ability to infringe on the rights of citizens for purposes of threat aversion and law enforcement, the Federal Republic of Germany as a democracy under the rule of law has stringent legal and statutory requirements.

Recommendation 60

The relevant police authorities should keep developing and training the 3D approach and, in particular, the de-escalation concept, if possible, in joint exercises between the different State police forces. (status: essential)

☐ *Comment by Germany*

The topic of conducting exercises has already been addressed multiple times.

Recommendation 61

The German police authorities should further invest in adopting a policy of dialogue with the supporters involving all the deployed police officers. (status: important)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

Dialogue and communication with the public are an essential component of the work of the German police, who understand their role as a force serving the community. This also means that communication is pursued and carried out in an active and institutionalised way.

Recommendation 62

Police units to be deployed during UEFA EURO 2024 should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters. (status: important)

☐ *Comment by Germany*

See the preamble to the report of the monitoring team.

It is incumbent upon police officers – not only during football tournaments – to behave in a friendly and welcoming manner. In a European society, it should be taken as a matter of course that police officers will behave in a friendly and welcoming manner.

Recommendation 63

For the UEFA EURO 2024 tournament, the police forces and other local agencies should commit to opening communication channels with national team SLOs and supporters, in line with the guidance set out in the Recommendation Rec (2021) 1 - [https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:\(0\)}](https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}), Annex A, Appendix M, and the EU Handbook on Police Liaison with Supporters (12792/16). (status: important)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Measures to carry out such a dialogue format have been established and are being applied.

Recommendation 66

Develop a structured dialogue between supporters' representatives and police forces at local and national level, with the participation of mediators or third parties, as needed. (status: important).

☐ **Comment by Germany**

See above. Various forms of dialogue between authorities and supporters' organisations are taking place. Such dialogue also occurs regularly at the initiative of the DFB and the Deutsche Fußball Liga (DFL).

Recommendation 67

The effective cooperation between the German NFIP, KOS and FSE in the framework of the UEFA EURO 2024 preparation could serve as a base to relaunch supporters/police dialogue in Germany. (status: important).

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

There are good relations in this area and the ZIS (NFIP Germany) is a member of the KOS advisory board. Beyond this, Germany would like to note regarding this recommendation that, especially in relation to spectators, there are major differences between a European football championship and ordinary football matches in Germany.

Compliance

☐ **Comments**

The German law should probably foresee the banning order also as a main penalty, in order to reinforce the general and special crime prevention available arrangements.

□ **Comment by Germany**

The lists of possible penalties in the German Criminal Code are exhaustive.

In addition, and as a complement to the existing civil law provisions on banning orders, the legislator should consider the possibility to empower the competent judicial and administrative authorities to impose individual banning orders, including travel bans to a foreign country, as additional ways to better prevent and tackle violent and anti-social behaviour in and around stadia, namely in cities or States where there has been a more significant increase of reported incidents.

□ **Comment by Germany**

The options for responses presented here have long been a standard part of existing provisions that are applied in police law (Germany's federal states are responsible for general police law).

On the other side, whenever possible, the civil sanctions should be individualised and not applicable to the club or, at least – if that is not the case -, the club should have the right to be compensated by the individual perpetrators, as it is usual in civil law.

□ **Comment by Germany**

It is difficult to understand this comment in its present wording, as it conflates the organisational jurisdiction of the DFB with civil law in general.

Moreover, during the tournament, German authorities should adopt fast and simplified procedures to identify, arrest, bring to court and expel violent perpetrators from the tournament and /or the country, while respecting their fundamental rights.

□ **Comment by Germany**

See the preamble to the report of the monitoring team.

Germany has prepared for UEFA EURO 2024 within the scope of the applicable possibilities permitted by the Code of Criminal Procedure and by general police law regarding the use of accelerated procedures.

Recommendation 68

The relevant authorities should consider **revisiting** the legal and regulatory framework to increase the effectiveness of the provisions on exclusion sanction, as well as empowering the judicial or administrative authorities responsible to impose these sanctions. (status: important).

□ **Comment by Germany**

Regarding measures under criminal law, please refer to our comments above. The available legal instruments are considered sufficient.

Recommendation 69

The German authorities, in close cooperation with EURO 2024 GmbH and the law enforcement authorities from the participating, transit and neighbouring states, should exchange all the necessary information in order to prevent the banned/risk fans involvement in incidents. (status: important)

□ ***Comment by Germany***

See the preamble to the report of the monitoring team.

Such information will be used to the extent that this is legally possible in Germany and for the relevant international partners.

Recommendation 70

The Federal Ministry of Interior should look at ways in which supporters who may be subject to banning orders, travel bans or are listed with warrants for criminal issues in another country can be prevented from entering Germany (status: essential)

□ ***Comment by Germany***

As is usual in advance of international football tournaments, the participating, neighbouring and transit countries have been requested to use the options available under their respective national laws to prevent potentially violent problematic fans from entering Germany. Beyond this, the reintroduction of police border checks has been requested and approved for UEFA EURO 2024.

Recommendation 71

The Federal 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)

□ ***Comment by Germany***

See the preamble to the report of the monitoring team.

This recommendation neglects the constitutional and legal division of responsibilities in Germany.

Recommendation 72

The German authorities should plan the deployment of foreign police delegations in such a way in which spotters work should not overlap with the other categories of specialised police officers invited by the German Federal Police; all necessary measures should be adopted in order to ensure that IPCC EURO 2024 should represent the single point of contact as related to information exchange during the tournament (status: essential)

□ ***Comment by Germany***

See the preamble to the report of the monitoring team.

As part of the monitoring visit, the ZIS (NFIP) extensively informed all relevant partners about the establishment and operations of the IPCC in Neuss and about the deployment of police spotters.

Recommendation 73

The relevant authorities should consider providing sufficient resources to ZIS in order to fulfil its tasks effectively. (status: important)

☐ **Comment by Germany**

See the preamble to the report of the monitoring team.

Germany considers the ZIS to have had sufficient and appropriate resources available. We would be interested to know on what basis the CoE delegation made this recommendation.

SECTION D - Concluding remarks and proposed Action Plan

D.1 Concluding remarks

Having in mind the fact that the UEFA EURO 2024 matches are only months away, some of the recommendations should be prioritised in order to contribute to the overall safety, security and service measures adopted for this major event.

☐ **Comment by Germany**

As previously stated, the report in its present form was made available to all agencies and organisations involved in the monitoring report so that the findings can be incorporated into the further planning process.

DRAFT ACTION PLAN (December 2023)

☐ **Comment by Germany**

Germany currently considers itself to be unable to prepare the desired Action Plan because, as explained above, many of the requested measures either are impossible for us for reasons of constitutional law or are already common practice in Germany.

Draft Action Plan - Recommendation 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 24, 31, 33, 35, 45, 46, 47, 48, 49, 50, 58, 59, 60, 61, 62, 63, 66, 67, 68, 70, 72, 73.

12 March 2025

Signed on order,

Christoph Lipp