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

COUNCIL OF EUROPE

CONSEIL DE L'EUROPE

Strasbourg, 5 February 2025 T-S4(2024)24

Monitoring visit to Greece

Athens, 13-15 May 2024

Report

Adopted by the T-S4 Committee by written procedure on 4 February 2025

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PART 1

National report of Greece

I - NATIONAL STATUS

National situation regarding the implementation of the Saint-Denis Convention (Articles 1 to 11)

In the Sport Law 2725/1999, there were specific provisions for a safe and secure environment in sports events, in particular at football matches. Especially after 2002, Article 41 of the Sport Law was significantly amended with provisions regarding:

- 41A: The roles and responsibilities of the Standing Committee for Combating Violence (DEAV). The composition, roles and responsibilities of DEAV were significantly revised with the recent Law 5085/2024;
- 41B: The framework for sport fan clubs, which was significantly reformed with the recent Laws 4908/2022 and 5085/2024;
- 41C: Ticket allocation for sports events which was substantially reformed with Law 5085/2024, in order to provide direct identification of the ticket owners, exploiting the national citizen record (the tickets will be available only through the owner's smartphone, related to Article 41K);
- 41D: Sport body obligations and cooperation with law enforcement, with amendments via Laws 4639/2019 and 5085/2024;
- 41E: Electronic surveillance of sports facilities. Specific details were imposed according to the recommendations of the Saint-Denis Convention and added with Law 5085/2024, mainly regarding the CCTV system and the whole monitoring of the process, the drafting of reports, etc.;
- 41F: Criminal offences related to sport violence, as amended by Law 4809/2021;
- 41G: Disciplinary sanctions to sport bodies and physical persons. It is mainly for professional sport and especially for football;
- 41H: Exclusion measures for those who committed sport-related violence offences;
- 41I: Sanctions for those that violate exclusion measures;
- 41J: Digital database for the fan clubs is a new article; and
- 41K: Identification platform for ticket owners (related to Article 41C).

In addition to the above - mostly security measures -, Article 56A of the Sport Law deals with the classification and licensing of sports facilities.

Moreover, a joint ministerial decree from 26/8/2009 approves the current regulation for the sports events, which is a detailed 12-page document for a multi-agency approach with the necessary involved bodies, persons and steps for organising a sports event ("Sports Events Security Regulation").

It is important that in Law 5085/2024 Article 5, the National Co-ordination Committee was established, according to Article 4 of the Saint-Denis Convention, as it is explicitly stated in the law. This is the first explicit mention on the Saint-Denis Convention after its ratification by the Hellenic Parliament in 2022.

The National Co-ordination Committee is composed of representatives from the Ministry of Education, Religious Affairs and Sports, Ministry of Citizen Protection, Ministry of Interior, Ministry of Justice, Ministry of Digital Governance, Ministry of State, Police, Football Federation, 1st Football League (Super League), Sport Journalist Association and the President of DEAV.

The first duties of the National Co-ordination Committee are to draft a National Strategy and to make proposals to fully align the Greek legislation with the provisions of the Saint-Denis Convention, given that a new Sport Law was drafted to replace Law 2725/1999.

Regarding the specific articles of the Saint-Denis Convention:

Article 1 - Scope: The Saint-Denis Convention applies to professional sports competitions in Greece, which means:

- Football Men's 1st and 2nd division (Super League and Super League 2, respectively);
- Basketball Men's 1st division (Basket League); and
- Volleyball Men's 1st division (Volley League).

This will be the recommendation by the National Co-ordination Committee.

Article 2 - Aim: It is already undertaken in practice, and it will be inserted explicitly in the law.

Article 3 - Definitions: They will be explicitly inserted in the law.

Article 4 - Domestic co-ordination arrangements: The National Co-ordination Committee is established in Article 5 of Law 5085/2024.

Article 5 – Safety, security and service at sports stadiums: Most of these provisions are related to Article 41 of the Sport Law and the Sport Events Security Regulation, as mentioned above.

Article 6 – Safety, security and service in public places: Some measures are already in place with Article 41 and the Sport Events Security Regulation, and the National Co-ordination Committee will take action to fill any gaps.

Article 7 – Contingency and emergency planning: They are described in the Sport Events Security Regulation.

Article 8 – Engagement with supporters and local communities: There are relevant provisions in Article 41B, especially after the last amendment with Law 5085/2024 and the creation of a National Board of Fan Clubs.

Article 9 – Police strategies and operations: They are pretty well established as we have a specific body in the Police for this reason (Sub-Directorate for Combating Violence in Sport Events), which participates in all the functions described in Article 41 and in the Sport Events Security Regulation.

Article 10 – Prevention and sanctioning of offending behaviour: They are mainly described in Articles 41F, 41G, 41H and 41I of the Sport Law, which were recently updated.

Article 11 – International co-operation: The provisions are in place already from 2004 and our National Football Information Point (NFIP) is part of the Greek delegation in the Committee of the Saint-Denis Convention.

Article 12 – Provision of information. The translation of the new legislative framework is under preparation.

II - MAJOR PROBLEMS AND INCIDENTS

Main national issues and incidents review: summary of the most serious recent incidents, and overview of incidents and trends over the last five seasons

Currently, violence inside stadia is fairly limited and serious incidents are pretty rare, and when they occur they are mainly related to attempted pitch invasions or use of political or derogative banners by the fans. However, an increasing number of violent and/or serious incidents take place outside sports venues and some of them are occurring on days and times that are not directly related to a sporting event.

Over the last 5 years, a number of serious sports-related incidents occurred, some of them lethal. A brief summary of these incidents can be seen below:

In January 2020, a 28-year-old Bulgarian fan was killed in Thessaloniki. The Bodef Plovdiv fan, which is affiliated with Thessaloniki's Aris club, one of the city's 3 major clubs, was in the city for vacation but also to watch in person Aris vs PAOK, a major derby that attracts local and national interest from football enthusiasts. In an assault by PAOK fans on seven Bulgarian fans at a random location in the city, he was killed as a result of being run over by a car while trying to flee the fight on foot.

In February 2022, a 19-year-old Aris fan, and two friends were confronted by rival PAOK fans in the Charilaou neighborhood of Thessaloniki on a day that no sporting event involving the two teams was taking place in the city. He was beaten and stabbed in the upper thigh and bled to death while two of his friends were injured. Two more of his party managed to flee the scene. Twelve PAOK fans were arrested by the Police and all of them were convicted in relation to the killing in July 2023.

In January 2023, an improvised explosive device was detonated outside the offices of a Panathinakos Athens fan club, in the suburb of Amarousion, in Athens. The explosion caused limited damage to the door and some of the windows of the offices of the fan club as well to two other apartments of the same building, whose windows were shattered. No injuries were reported as a result of the explosion.

In August 2023, a 29-year-old AEK Athens fan died in violent clashes in Nea Filadelfeia the evening before the soccer match between AEK Athens and Dinamo Zagreb for the UEFA Champions League Qualifiers. Stabbed in the arm by unknown perpetrator(s), He succumbed to his injuries ten minutes later. Police and judicial investigations are still ongoing.

In December 2023, a group of Olympiakos fans left the indoor arena where a volleyball match between Olympiakos and Panathinaikos was taking place, to attack riot police stationed outside the arena with flares and gasoline bombs. Organised football fan groups are believed to have been involved. A 31-year-old police officer was shot in the thigh, suffering severe arterial damage. The police officer was taken to the hospital in a comatose state and underwent a long operation during which he suffered a seizure; he died 3 weeks later, on December 27th. An 18-year-old man has been arrested and charged with firing the flare while the police and judicial investigation is still ongoing examining the involvement of additional fans in the deadly incident.

III - LEGAL FRAMEWORK

Legal framework in the field of safety, security and service at sports events

The legal framework is mainly composed of Article 41, Article 56 of the Law 2725/1999 and the Sport Event Safety Regulation (2009) along with independent articles in various laws.

Article 41A describes the composition and role of the Standing Committee for Combating Violence (DEAV), which is based in the General Secretariat of Sport. The 5 members of DEAV are defined as: a) One (1) retired senior or senior judicial or prosecutorial officer, b) two (2) lawyers who have professional or academic expertise in the field of criminal or sport law, c) one (1) officer of the Hellenic Police, who serves either in the Sub-Directorate for Combating Violence in Sport Events or in the National Football Information Point (NFIP) d) one (1) executive from the Department of Professional Sports Events of the General Secretariat of Sports.

DEAV has also designated observers who monitor the games for violent incidents. Among DEAV duties is the cooperation with the organisers, according to the law, sports associations, federations or professional associations, and the police authorities, regarding the taking of the most special measures of order in the professional sport events and the risk assessment of the games.

Moreover, according to the last amendments by Law 5085/2024, DEAV imposes administrative sanctions to clubs and physical persons for violent incidents, according to the

provisions of Law 2725/1999. In the exercise of this authority, DEAV considers any suitable means, such as available videos and generally audio-visual material, the reports of the police and the reports of the observers.

Article 41B describes the framework for fan clubs allowing only one fan club per professional football team that must be recognised by the team.

Article 41C describes the process for ticketing, in order to secure the identification of the ticket owner. It is complemented with Article 41K that describes the ticket platform, and the whole process is implemented exclusively via the owner's smartphone.

Article 41D describes the framework of Sport bodies obligations and cooperation with law enforcement as it has been amended via Laws 4639/2019 and 5085/2024

Article 41E describes the framework for the surveillance system of the sport events. It was amended with the recent Law 5085/2024 that specifies the zones that the CCTV should cover in a sport facility, according to the recommendations of the Saint-Denis Convention, as well as the minimum specifications of the system.

Article 41F describes the criminal offences related to sport violence, as amended by Laws 4809/2021 and 5085/2024.

Article 41G refers to the disciplinary sanctions to sport clubs and physical persons. It is mainly focused on professional sport and especially football.

Article 41H describes the exclusion measures for those who committed sport-related offences.

Article 41I describes the sanctions for those that violate exclusion measures.

Article 41J is a new article (not initially in Law 2725/199) that describes the digital database for the fan clubs and the relevant processes.

Article 41K is also a new article that describes the platform for ticket owners, which uses the smartphones through a governmental application for strong identification of the ticket owners. This article is also related to Article 41C.

Article 56 of Law 2725/1999, as amended by subsequent legislation, refers to the sport infrastructure and the licensing process. Specifically, Article 56A refers to the classification of sports venues into 10 categories, depending on their size, on the number of spectators, on the hosted events and if they are indoor or outdoor.

Article 56B refers to the licensing process, depending on the classification of the sports venue, and Article 56C refers to the role of the sports venue suitability committee that inspects the venues in order to get the license. In Article 56B, as amended by Law 4908/2022, there is explicit reference to the compliance with the provisions of the Saint-Denis Convention.

In addition to Articles 41 and 56, there is also a joint ministerial decree from 2009 that includes the "Sports Events Security Regulation", a detailed 12-page document that describes the main

stakeholders, the procedures, and the roles and responsibilities for organising sport events. It has provisions mentioning the prerequisites for safe conduct of sports events (license of the facility, and license for the event, fire protection measures, law enforcement presence, stewards, and CCTV system), roles, duties and responsibilities of the stakeholders, cooperation of involved bodies for safe conduct of the sports event, establishment of a Security Co-ordination Group, interoperability and co-ordination, separation of spectators, emergency and contingency plans, stadium evacuation planning, operational plans (pre-game and during the game).

Finally, there are some independent articles in Greek law, not necessarily in Sport Law 2725/1999, that refer to safety, security and service at sports events. For example, Law 4901/2022 includes the ratification of the Saint-Denis Convention and the most recent Law 5085/2024 (Article 6) includes the provision for the National Co-ordination Committee, according to the Saint-Denis Convention.

The primary relevant legislation for the safety, security and service at sports events consists of the following laws:

- Law 2725/1999, mainly articles 41 and 56, as amended by Laws 4639/2019, 4809/2021, 4908/2022 and 5085/2024;
- Law 4901/2022, that ratifies the Saint-Denis Convention; and
- Law 5085/2024, that establishes the National Co-ordination Committee, who will be responsible for aligning the Greek legislation with the provisions of the Convention.

The primary legislation is accompanied with secondary legislation (presidential decrees and ministerial or joint ministerial decrees) that provide the implementation details. One of the main documents of secondary legislation is the 12-page joint ministerial Decree from 26/8/2009 that comprises the "Sport Events Security Regulation" which describes the roles and responsibilities of the stakeholders in professional sports events in a multi-agency approach.

IV - NATIONAL STRUCTURE

National sport structure: roles and responsibilities of stakeholders involved in safety, security and service at sports events

The General Secretariat of Sport, which is the governmental body responsible for Sport in Greece, after the elections of 2023 and through a decision of the Prime Minister, was moved from the Ministry of Culture to the Ministry of Education (it is called now Ministry of Education, Religious Affairs and Sports). In the past, we had a Deputy Minister responsible for Sport and now we have an Alternate Minister responsible for Sport which is an upgrade. Alternate Minister responsible for sport is now Mr. Ioannis Vroutsis and Secretary General of Sport is Mr. George Mavrotas.

Sport in Greece has a pyramidic structure with the General Secretariat of Sport at the top, supervising the activities and functions according to Article 16, paragraph 9, of the Greek

Constitution, where it is explicitly declared that "State has sport under its protection and supervision".

The next level in the pyramid of the Greek sport model consists of the sport federations. They are legal entities of private law and there are 63 of them (as of January 2024). The next level are the sport clubs (almost 6,500) that are linked to the respective federations according to the sport they are related to. In the sport clubs, there are about 570,000 active athletes (end 2023). Professional categories comprise the men's 1st and 2nd division of football, i.e., Super League (14 teams) and Super League 2 (24 teams), the 1st division of men's Basketball (12 teams) and the 1st division of men's Volleyball (9 teams).

Regarding safety and security at sports events, the engaged departments in the General Secretariat of Sport are the following: in the Directorate of Professional Sport there is the Department of Professional Sports Events and the Department of Fan Clubs. In the Directorate of Sports Infrastructures there is the Department of Licensing of Sports Facilities. In the General Secretariat of Sport, it is also based the Standing Committee for Combating Violence (DEAV).

According to the recent Law 5085/2024, DEAV has a more upgraded role regarding the monitoring of the incidents related to sports events, as well as imposing direct administrative sanctions according to the offences. DEAV is a 5-member collective body with a retired prosecutor or judge as a chair, two lawyers specialised in sporst issues, one official of the General Secretariat of Sport and a representative from the Police. There is a direct link between DEAV and the police officers that monitor and report on the professional matches, in order to ensure a quick response to the incidents. DEAV is also responsible for pre-match measures, e.g., to suggest to the Alternate Minister the prohibition of travelling of away team's fans in high-risk games.

In order to combat sport-related violence, there is close collaboration between the Ministries of Education, Religious Affairs abd Sports and the Ministry of Citizen Protection where Hellenic Police belongs to. In the Greek delegation to the Committee of the Saint-Denis Convention the two Ministries participate through their Secretary Generals.

There is a specific service in Hellenic Police that deals with the sport-related violence and relevant offences. This is the Sub-Directorate for Combating Violence at Sports Events, that has departments in Athens and Thessaloniki. In addition, there is the National Football Information Point (NFIP), which is mostly responsible for the international component of fans' issues. In Greece, there is also a specialised Prosecutor (Sport Prosecutor) who also deals with these issues.

There is also the "Sports Events Security Regulation" (2009), according to which the measures before every game of professional sports are scheduled. There is a meeting, usually a couple of days before every game, with the local police, the organising authority, the home and away teams, the fire department and all the main stakeholders, in order to set the security and safety measures for the conduct of the match (how the fans approach, where the police will stand, the co-operation needed with the team security personnel, etc).

The task of aligning the national legislative structure with the provisions of the Saint-Denis Convention will be undertaken by the National Co-ordination Committee, which was very recently established by law (Law 5085/2024, Article 5).

The National Co-ordination Committee is a 11-member collective body and is composed of:

1. A representative of the Ministry of Education, mReligious Affairs and Sports (chair);
2. A representative of the Ministry of Citizen Protection;
3. A representative of the Ministry of State;
4. A representative of the Ministry of Justice;
5. A representative of the Ministry of Interior;
6. A representative of the Ministry of Digital Governance;
7. A representative of the Hellenic Police;
8. A representative of the Hellenic Football Federation;
9. A representative of the Football Super League;
10. A representative of the Sport Journalists Association; and
11. The President of DEAV.

The National Co-ordination Committee can establish working groups or sub-committees for specific tasks.

V - GOOD PRACTICES AND LESSONS LEARNT

Recommended good practices and lessons learnt from national to local levels, in the fields of safety, security and service at sports events

Over the last few years, a number of initiatives have been implemented by the Police, both at the strategic and operational levels. Firstly, the designated Police Unit that is tasked with dealing with sport-related violence has been constantly endorsing good practices on operational matters. For example, a network of "Sports Police Liaison Officers" has been created with two police officers nominated at each Police Local HQs across all 54 administrative prefectures in Greece; said officers, have received specialised training in spotting techniques and intelligence gathering and sharing and they function as the "single point of contact" for fans-related activities between the sports policing units in Athens and Thessaloniki and the local Police.

That said, a more effective co-ordination between the HQs in Athens and the rest of Greece is ensured and crucial bits of intelligence that could potentially help the authorities prevent disastrous events from happening are not lost in the process.

Moreover, the key role of the sports policing unit of the police is constantly highlighted as extremely important and co-ordination between the Unit and other departments of the Police is encouraged and promoted both during policing football operations but also on other days, when no games or sporting events are taking place. The sports policing unit relies heavily on intelligence gathering and analysis and, on several occasions, they have been very successful in preventing attacks or clashes between rival fans. Additionally, it plays a major role in conducting criminal investigations in cases where fans are involved in criminal activities.

For example, in March 2022 the sports policing unit officers arrested four members of a hooligan gang over a slew of felonies, as part of a wider investigation by prosecuting authorities into sport-related violence. The group was active from April 2019 until September 2021 in Athens and Piraeus and the perpetrators acted in groups of 15 to 40 people, attacking fans of rival teams and others with knives, bats, iron rods and petrol bombs. During the investigation, the officers of the Unit subpoenaed the suspects' telephone records to establish links between the members of the gang.

As far as the intelligence function of the Unit is concerned, it heavily emphasises on:

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

It is worth noting that, over the last few years, a number of specialised trainings for match commanders have been organised in Athens, aiming at establishing a common operational understanding of policing of sporting events and ensuring that they can effectively carry out their roles in accordance with national legislation. In this regard, a designated table-top exercise took place in late February 2024 that involved match commanders and other police officers across Greece.

Last but not the least, the Hellenic Police Academy has incorporated a specialised training course on sport-related violence into its training programs to ensure that all police personnel (newly recruited and experienced alike) are aware of the phenomenon and that the appropriate police response is in accordance with national and European standards.

VI - ANNEXES

Annexes (e.g., organisational chart, laws in place, links to sites of stakeholders with further relevant information)

Legal framework

All the following texts are being translated in English and will be sent to the CoE secretariat. Below are the links in Greek:

The Sport Law 2725/1999 in its current form: https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999

Article 41 - Anti-violence measures at sports events in the Sport Law 2725/1999, with the most recent applicable provisions:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41|193520

Article 41A - Roles and responsibilities of the Standing Committee for Combating Violence (DEAV):

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Α|193532

Article 41B - Framework for sport fan clubs:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Β|729271

Article 41C - Ticket allocation for sport events:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Γ|193552

Article 41D - Sport body obligations and cooperation with law enforcement:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Δ|729285

Article 41E - Electronic surveillance of sport facilities:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Ε|943243

Article 41F – Criminal offences related to sport:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41ΣΤ|729290

Article 41G - Disciplinary sanctions to sport bodies and physical persons:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Ζ|193597

Article 41H - Exclusion measures for those having committed sport-related offences:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41η|729303

Article 41I - Sanctions for those that violate exclusion measures:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41θ|506365

Article 41J - Digital data base for the fan clubs is a new article:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41Ι|777778

Article 41K - Identification platform for ticket owners (related to article 41C):

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_41ΙΑ|943233

Article for sport facilities licensing:

Article 56 of Law 2725/1999, as amended by subsequent legislation - Sport infrastructure and the licensing process:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_56|193698

Article 56A - Classification of sports venues:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_56Α|193710

Article 56B - Licensing process:

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_56Β|193713

Article 56C - Sports venue suitability committee (inspection and licensing):

https://www.kodiko.gr/nomothesia/document/193286/nomos-2725-1999#Άρθρο_56Γ|339118

The ratification of the Saint-Denis Convention:

https://www.kodiko.gr/nomothesia/document/776790/nomos-4901-2022

The establishment of the National Co-ordination Committee, according to the Saint-Denis Convention, by Law 5085/2024, article 5:

https://www.kodiko.gr/nomothesia/document/943067/nomos-5085-2024#Άρθρο_5|943079

The Sports Events Security Regulation (2009):

https://www.e-nomothesia.gr/kat-athlitismos/ya-38404-2009.html

PART 2

Report by the Monitoring Team

SECTION A - Executive Summary

The Council of Europe monitoring visit to Greece was held by a team appointed by the Committee of the Saint-Denis Convention (T-S4) (hereafter referred to as the "Committee" and the "Convention", respectively), comprising experts in the three pillars of the Convention: safety, security and service. Due to previous engagements, UEFA was not able to be represented to join the visiting team.

In July 2016, Greece was one of the first countries to sign the Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No. 218) followed in 2023 by its ratification, with an entry into force on 1 June 2023. Greece had undertaken a consultative visit on 30 March – 2 of April 2017 by the Standing Committee of the Council of Europe's Spectator Violence Convention (T-RV, ETS No. 120), to help support the Greek Authorities in the endeavour for ratification of the new Convention.

After the ratification of the Convention, the Greek Authorities requested a further monitoring visit, due to significant changes within Hellenic law and the formation of a national co-ordination committee with full stakeholder commitment.

This visit occurred after successive major sport-related incidents involving national and foreign supporters, as well as the police, over the last year, which namely caused the death of a Greek supporter and a police officer in the streets of Athens. In December 2023, the death of this police officer with a pyrotechnic device, after a women's volleyball match in Athens, was considered by the Hellenic government as the last drop of a series of tragic incidents around sports events. As a response to this later incident, the Government decided to lock-down the stadia between December 2023 and February 2024.

This challenging context led to the adoption of a law in February 2024, which reinforces or establishes draconian security measures to tackle violence at sports events, namely by: maintaining the collective ban of away supporters at high-risk matches – not only football – in force since 2013; imposing heavy fines or closed-door matches to clubs when their supporters use or throw missiles into the pitch, like pyrotechnics; upgrading the CCTV system and their control at football and basketball stadiums; making obligatory the admission of supporters with electronic tickets that allows for person identification (through mobile phones); and upgrading the functions of the Standing Committee against Violence (DEAV) among others.

The visiting team (hereafter referred to as the "team") welcomes the comprehensive efforts made by the current Greek government to tackle the endemic violence. Notably, the team appreciates the revision of the existing laws and regulations and the drafting of the new law in February this year, following the ratification of the Saint-Denis Convention.

This visit to Greece was the second monitoring visit of the Committee since it was established in April 2021, and is part of its 2022-2025 multiannual programme of monitoring visits.

On that note, it should be underlined that this visit was not just a visit to follow-up the one held in 2017 but also a full monitoring visit to assess the current situation in Greece, as Party to the Convention since June 2023, and support the national authorities in addressing their challenges.

This is why it is called a “monitoring visit”, rather a “follow-up visit”. Notwithstanding, this report will consider the report and comment on the recommendations of the T-RV visit held in 2017, in order to assess the actual state of implementation and any actions taken. In response, it was agreed that the Committee would task a delegation of experts, to undertake this visit and propose new recommendations in respect of the safety, security and service arrangements in connection with football (and other sports) events held in Greece. The 2017 recommendations are included within the body of this report and will be highlighted, where the previous recommendations are complete, have not been implemented or if a new recommendation is similar or the same.

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

- demonstrating compliance with the Convention;
- demonstrating compliance with established good practices set out in the Committee’s Recommendation Rec (2021)1 ensuring that football stadia (and other sports venues) provide a safe, secure and welcoming experience for all spectators.

The visit was duly organised on 13-15 May 2024. This report and its recommendations set out the outcome of that visit. For ease of reference, the term “football events" is used throughout the report, however, the team’s observations and findings can also be applied to other major and international sports falling within the scope of the Convention.

This report compares the current safety, security and service arrangements in connection with football and other sports events played in Greece with the core principles and outcomes enshrined in each of the policy articles contained in the Convention and established good practices on safety, security and service (Part 2, Section C).

The report pays tribute to the organisers of the visit, who ensured that the team was able to meet with, *inter alia*, high level representatives of the Ministry of Education, Religious Affairs and Sports, Ministry of Citizen Protection, Hellenic Police, Hellenic Football Federation, Hellenic Football Super League, Hellenic Basketball Federation, Hellenic Basketball Super League, Hellenic Olympic Committee, Standing Committee for Combating Violence (DEAV), Olympiacos FC, AEK FC and Panathinaikos FC. The team also met and was accompanied by the Deputy Minister of Sports, Mr. Ioannis Vroutsis and the Secretary General of Sport, Mr. George Mavrotas, who were the co-organisers of the visit. The meetings were supplemented by observation of the stadium safety, security and service arrangements at a match of the Football Super League, at the Olympiacos venue (Karaiskaki Stadium), between Olympiacos and AEK, as well as two Football Super League stadiums and a Basketball venue at the Olympic Stadium.

The composition, roles and responsibilities of DEAV were significantly revised with the recent Law 5085/2024, providing powers to fine clubs up to 1 million euros for violent acts during a professional sports match such as the use of pyrotechnics, throwing of missiles and hate speech. This new law also includes an article to impose matchday tickets that will only be available through the owner’s smartphone along with the requirements in professional sport competitions for CCTV system and the monitoring of this process.

Another major change implemented in the last few months is the formation of a new National Co-ordination Committee, enacted by this law. Following the meeting with all members of this committee, the team were impressed that all members are fully committed to implementing an integrated approach, as detailed in the Convention.

It is worth mentioning that, in April 2024, following the death of a fan and one police officer in December 2023, as mentioned above, the Greek police arrested 60 Olympiakos ultras, which has been described as one of the most important police operations in the area of football-related violence; this rapid police reaction, together with the implementation of a new nominative e-ticketing system and extended powers of the DEAV as an independent authority at central level are positive developments and they can be considered as a good sign of the Greek authorities' commitment and strong determination to address violence at sport events in a structured manner, targeting the troublemakers involved in incidents related to sport events.

The above-mentioned tragic events determined the football matches to be played behind closed doors for 2 months and the authorities to adapt to the new reality by providing an immediate answer to this outburst of violence, which became chronic in the recent years in Greece. While this can be considered a positive first step, it is clear that the initial operation should be expanded to national level and continued for an appropriate period of time, until the level of violence is reduced. It would be beneficial to complement the targeting of violent offenders with an approach of dialogue and engagement with fan representatives with the aim of creating a welcoming environment during their attendance to sport fixtures.

In the light of these events, the Hellenic authorities have adopted a significant number of specific measures to tackle criminality linked to sporting events, among which the team would like to highlight the following:

a) Updating the specific legal framework related to the fight against sport-related violence, by implementing some of the most important provisions of the Convention. It is worth mentioning as a very good point that a National Co-ordination Committee (composed of 11 members), chaired by a representative of the Ministry of Education, Religious Affairs and Sports, and including representatives of various ministries (Ministry of Citizen Protection, Ministry of State, Ministry of Justice, Ministry of the Interior, Ministry of Digital Governance), representatives of the Hellenic Police, representatives of the football authorities (Football Federation and Football Super League), a representative of the Sports Journalists Association and the President of the Standing Committee for Combating Violence (DEAV), is active.
   Points to be noted: 1) this is a very good practice that should be promoted; and 2) more clarity is needed regarding the establishment of local co-ordination committees, their composition, roles and responsibilities;
b) The National Co-ordination Committee is also tasked to draft a specific national strategy around the concept of an integrated multi-agency approach to safety, security and service at sports events.
   ;

c) Increase of the sanctions' threshold for non-compliance with safety and security legal provisions;
d) Implementation of a new policy for the certification of sports venues and a new approach to the monitoring of safety and security conditions related to the specific infrastructure of sports events.
Points to be noted: There is a need for greater clarity with regard to the standards and procedures for the certification of sports facilities in Greece;
e) Use of new technologies for the benefit of law enforcement agencies and sports bodies (high-performance CCTV systems as a mandatory condition for certification, nominative e-ticketing system and interconnected databases).
Points to be noted: *1) The CCTV systems at sports venues is a very good practice that should be promoted; 2) the e-ticketing system is not yet fully in place and doesn't yet include all types of banning orders applied at national level*;
f) Implementation of a new policing approach based on a zero-tolerance policy with regard to violence, racism and discrimination in the context of sport. The new approach includes valid elements of a dedicated policing strategy, as a network of "sports police liaison officers" has been created at national level (2 dedicated police officers for each of the 54 local police headquarters in Greece), whose members have been trained and specialised in monitoring and intelligence & evidence gathering on fans-related activities. They have also participated in joint training sessions (organised in Athens) along with match commanders and NFIP staff, in order to achieve a common operational understanding of sports event policing and to ensure that they can effectively carry out their complementary roles in accordance with the legal framework. The Hellenic NFIP has 4 active positions, staffed by officers who are not exclusively responsible for sports policing and international police cooperation in relation to sports events. At national level, a compendium (manual) of specific SOPs for the policing of sports events is being drafted and implemented in accordance with the new legislation in force. A specific point to be emphasised in relation to this manual and the general police approach is that the new operational philosophy establishes that the actual police investigation of sports crimes should be immediate in all cases, rather than being carried out at a later stage (after the sports event or police operation have ended). In addition, a specialised training course on sport-related violence has been included in the *curricula* of the Hellenic Police Academy for the training of new officers, and at ministerial level there is a confirmed intention to translate the Council of Europe MOOC (e-learning course) of the Saint-Denis Convention.
Points to be noted: *1) The police fill the gaps created by the lack of a professional stewarding system, even though there are regulations in force regarding the employment, training and certification of "private security services" (as laid down in Law 2518/1997/A164, amended by several other laws in 2004 and 2012). This type of personnel has to be trained and certified by the Hellenic Football Federation in accordance with its specific regulation on football (Stadiums and match security and protection regulation) and the UEFA team licensing regulation. As a recommendation to speed up the process of steward training, the Greek authorities could ask the Cypriot authorities to exchange best practices on this issue, as they have already implemented*

such a system. As was observed during the Olympiacos vs. AEK match and as informed by police representatives, the police and not the "stewards" are dealing with the spectators' body search; it is recommended that this approach be gradually reversed and that in due course the stewards will start to carry out these specific tasks of body search.

The Football Governing Bodies noted that the stadium infrastructure across all of Greece was a limiting consideration which prohibits the implementation of improvements to meet the service provision. Also, although the Government set minimum safety standards through its licensing every 2 years, there is no incentive for football clubs to aspire to a desirable safety and service standard.

Other countries throughout Europe also have this issue, with some of the football stadiums in the lower positions of the football pyramid with poor infrastructure. To intensify the clubs to improve the infrastructure, the Football Authorities have implemented a stadium grading system, whereby for each club to gain promotion, they must not only win the particular football league but also meet the criteria set out in the grading improvements to the next level (an example of this process is the UK FA National League System ground grading documents (thefa.com)). In the implementation of such a system, the main barrier are the stadium size, location and ownership, which is either the state, municipality or private ownership. To address this issue, the Football Federation could set a desirable standard and then it is up to the club, if it aspires for promotion, to address the infrastructure problems.

In order for the team to see first-hand the operational effects of the new legislation and enforcement powers, they were invited to a high-profile match which had the potential to be Football Super League title decider. The match was held at the Georgios Karaiskakis Stadium, in Piraeus (south of Athens), which has a capacity of 33,000, and although there was no away support, the stadium was approximately 80% full.

The stadium infrastructure and safety systems such as CCTV, public address, turnstile monitoring, fire alarms, and backup generators appeared to be all effective and in accordance with the T-S4 Recommendation Rec (2021)1(https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}). A deviation from the T-S4 recommendations is the lack of a fully integrated approach with both the safety management of the stadium and the Police commanders in the above-mentioned stadium. For this recommendation to prevail, the club safety management and Police should be housed in the same control room to support each other and provide swift control, command, communication and co-operation to address minor or major incident. It is understood that Greek Law states that the Police are solely responsible for matchday security, and this is the reason why both the Safety Management and Police have separate control rooms in different locations of the stadium, although they do have protocols for control and command, to address matchday incidents.

The team spoke with the DEAV inspector at the match, who had a checklist of misdemeanours, along with a Football Super League Safety Delegate, who monitors safety and security and provides feedback to the sport's governing body and provides advice to the matchday operation.

It was apparent during the match that the behaviour of the fans had significantly improved since the introduction of the new sanctions by the DEAV along with the introduction of high-definition CCTV cameras. There was only one pyrotechnic following the end of the match, however throughout there appeared to be no anti-social behaviour.

There were 390 security/stewards and 240 Police in attendance for this match, and although the team was not able to ascertain the deployment plan or training of staff for the private security company, it is understood that all security staff are licensed and have a robust training regime in general security, however this is not specific to stadium safety, security and service.

The 2017 consultative visit team also attended a football match at the Oaka stadium, however the current team did not have the opportunity to visit this stadium. Therefore, the matchday recommendations from the 2017 visit relating to this stadium may still be relevant but this report does not make comments on them.

The team visited the President and General Director of the Hellenic Basketball Federation (HBF) and representatives of the Professional Basketball League, along with a visit to the now Panathinaikos venue, within the Olympic Stadium premises, with a 20,000 capacity. It was clear that the club, federation and League all have embraced the essences of the Convention and consider safety, security and service aspects of their sport are all integrated.

A very relevant strategy (Social & Environmental Responsibility Strategy 2024-2028) is being implemented by the HBF to promote, among other things, the responsibility and accountability of sports clubs and the principles of sport such as equality & inclusion and health & well-being of all participants in basketball events. This SER strategy is included in the Annex below.

The representative of Panathinaikos BC presented to the team a highly appreciated model of integrated approach to safety, security and service, which is fully in line with the vast majority of the Convention's provisions. It is extremely important that this model of good practice be extended and replicated nationwide, as it represents a genuine success in the current environment of Greece.

Returning to the general context, it should be stressed that the vast majority of stakeholders met in Greece during the visit identified and highlighted violence associated with sports events as a social problem. They also stressed that some of the most organised groups of ultras had a significant negative impact on the owners, staff and players of football and basketball clubs in particular and on the sports authorities in general. Ongoing pressure from some of the ultras was particularly evident in relation to ticketing, stewarding, CCTV surveillance and the use of pyrotechnics.

Sports authorities felt that football clubs were under constant threat from some of the ultras, especially after the COVID-19 period. In this context, along with the entry into force of the new legal framework and the strong commitment of the Greek authorities to implement the

zero-tolerance approach to violence, the majority of sports clubs have declared that they want to distance themselves from the ultra's groups.

Taking this into account, it is crucial that the sports authorities are supported by the police in their efforts to empower non-risk supporters and to promote the inclusion of supporters who have changed their misbehaviour. This may be a process that will take time, given that the attitude and behaviour of some of the ultras towards the police in the post- COVID period has been mainly hostile, expressed in direct attacks on police personnel with pyrotechnics and Molotov cocktails during several conflict situations. This process is and will continue to be affected by the level of training and professionalism of the safety officers employed by the clubs.

Most of the conclusions presented were drawn during the visits to the AEK, Olympiacos and Panathinaikos football stadia, the HFF HQ and the Olympiacos - AEK match on 15 May. It should also be mentioned that, in preparation for the final of the Conference League, which took place at the OPAP Arena in Athens on 29 May 2024, UEFA, in cooperation with the Hellenic Football Federation and the European Group of Policing Football and NFIP experts, organised a series of training sessions (football policing, joint security training, TTX exercise and steward training), which were attended by the relevant safety and security stakeholders (law enforcement agencies, LOS, federation, etc.). The training events were a real success and the authorities were interested in setting up a similar model to be replicated nationwide and delivered by Greek experts.

The report stresses that the aim of the visit is to constructively support the authorities and other relevant stakeholders in Greece to develop and implement a strategy designed to demonstrate compliance with the Convention and provide a safe, secure and welcoming environment at football matches and other sports events.

To assist this process, the report is presented in a thematic structure that reflects the 11 policy Articles of the Convention and provides an assessment of the action necessary to assist the authorities in Greece to adopt and implement policies and practices that are consistent with the intent of its Articles.

In preparing this report, the team was mindful of the fatal incidents in 2023 which acted as a catalyst for the Government to reinforce the sports safety and security laws with very robust and far-reaching sanction, along with new committees to help set a strategic framework for improvements in safety, security and service. The Government should be commended in this endeavour as it seems from the team's perspective that the Government, Policing, Football Authorities and clubs are in complete collaboration in solving the violence and anti-social behaviour in football, the one missing component in this endeavour being the dialogue with the fan groups.
The overall conclusion set out in the report is that there is room for a review of the current safety, security and service arrangements at football events in Greece, and the implementation of the new legal framework will be required if the authorities and partner agencies are to be

able to demonstrate compliance with the Convention and associated good practice. This conclusion is reflected throughout the report and its 58 recommendations. These recommendations are set out in the form of a draft action plan which highlights, *inter alia*, the need for:

- developing a Strategy and Action Plan for the newly formed National Co-ordination Committee;
- improved stadium safety licensing and stadium safety management operating arrangements;
- an obligation for all stadiums hosting professional football matches to have a designated, trained and assessed as competent stadium safety officer, tasked with responsibility for all in-stadia safety and security;
- more effective arrangements for ensuring that all stadium safety and security personnel, and supporter liaison officers (SLOs), are trained and assessed as competent to undertake their various tasks;
- a review of policing football operations to ensure that strategic and tactical decisions reflect established European good practice; and
- more effective inclusion and, importantly, exclusion (banning order) arrangements.

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

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

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

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

***

SECTION B - Visit Background and Explanation

B.1 Structure of the Report

In addition to the foregoing executive summary (Part 2, Section A), this report comprises three sections and four appendices, which together provide the main observations and recommendations of the monitoring visit (hereafter described as the "visit") undertaken on 13-15 May 2024 by a team of the Committee (hereafter described as the "team").

The Section B in Part 2 provides essential background to, and an explanation of, the visit and its purpose, while Section D summarises the report's key conclusions in a draft action plan designed to assist, and be completed and updated by, the authorities in Greece and sent to the secretariat of the Committee on an annual basis. This Action plan highlights the 58 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 Convention and established European good practices. In reality, timescales are inevitably influenced by a number of factors, not least of which is the need to establish enabling legislative provisions.

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

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

- Recommendation Rec (2021)1 of the Committee;

The report is augmented by a number of appendices, including:

- Compliance with Policy Articles of the Convention;
- Social & Environmental Responsibility Strategy 2024-2028 (Hellenic Basketball Federation); and
- 2017 Safety Recommendations of the T-RV Standing Committee's report.

For ease of reference, the term "football" events is used throughout the report, however, where appropriate, the team's observations and findings can also be applied to other major national and international sports events designated by the Ministry of Education, Religious Affairs and Sports as falling within the scope of the Convention.

B.2 Purpose of the Visit

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

The visit was formally requested by the Greek Government, in accordance with the Committee's Guidelines on Monitoring, which recommend this criterium as the main priority for the holding of monitoring visits.

The primary aim of this visit was to assess arrangements for safety, security and service that have been implemented since the T-RV consultative visit in 2017, and 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 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 team 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 major sports events in Greece.

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

The team is grateful to the Greek Secretary General of Sport for providing translated copies of the new main changes of the legal requirements.

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

In submitting this report, the team wishes to stress that its purpose is to support the authorities and other relevant stakeholders in Greece through the provision of external and expert observation in respect of football safety and security that are not a negative expression of a disapproval or flaws but meant to provide constructive feedback.

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 team fully acknowledges the wide variations in the constitutional, judicial, policing, cultural, and historical circumstances, and the equally varied character and severity of football-related incidents and risks, which exist among and within each national State. This precludes universal application of definitive models of good practice. The reality is that the wide range of established good practices set out in Recommendation Rec (2021)1 of the

Committee invariably need to be customised to meet national imperatives and circumstances (T-S4 Recommendations - Sport (coe.int))

B.3 Visit Itinerary

Although the duration of the visit was short and focused exclusively on Athens, the visit organisers in Greece were able to provide an intensive and meaningful itinerary comprising a series of meetings with high level representatives of the Ministry of Education, Religious Affairs and Sports, Ministry of Citizen Protection, Hellenic Police, Hellenic Football Federation, Hellenic Football Super League, Hellenic Basketball Federation, Hellenic Basketball Super League, Hellenic Olympic Committee, Standing Committee for Combating Violence (DEAV), AEK F.C, Panathinaikos FC and Olympiacos FC. The team also met with the Sport Minister, Mr Ioannis Vroutsis. The meetings were supplemented by observation of the stadium safety, security and service arrangements and policing operations in connection with the match Olympiacos FC versus AEK FC held at the Olympiacos Stadium.

The team would also have liked to meet with the supporters' representatives, who are a key stakeholder for the Convention, and to have discussions on dialogue, collaboration and on socio-educational prevention projects for fans.

Monday 13/5

09:15 Departure from the hotel

10:00 Visit to the Sport Minister and the Secretary General of Sport

11:00 Meeting with the Head of the Sport facilities Licensing Department in the Ministry of Sport

12:00 Meeting with DEAV (Standing Committee for Combating Violence in Sport)

13:00 Light Lunch (Ministry of Education, Religious Affairs and Sports)

14:15 Departure

15:00 Visit to Football Club AEK

16:30 Visit to Football Club Panathinaikos

18:00 Visit to Football Club Olympiacos

Back to the hotel

Tuesday 14/5

09:10 Departure from the hotel

09:30 Visit to Hellenic Football Federation and Super league (Association

of first Division Football clubs will be also in the meeting)

11:00 Visit to Hellenic Basketball Federation, Basket League (Association

of first Division Basketball clubs will be also in the meeting)

13:00 Light Lunch (Hellenic Basketball Federation)

14:00 Visit to the Ministry of Citizen Protection - Meeting with Secretary General of Public Order, Chief of the Hellenic Police, Head of the Sub- directorate of Combating Violence in Sporting Events and NFIP

Back to the hotel

Tuesday 14/5 (cont.)

19:45 Departure from the hotel

20:00 Official Dinner at Attikos House Restaurant

Wednesday 15/5

09:45 Departure from the hotel

10:30 Visit to the Hellenic Olympic Committee

11:30 Meeting with National Co-ordination Committee (the new body emerged from the Saint Denis Convention)

13:00 Departure for the hotel

16:00 Departure for the match

20:00 Match Olympiacos – AEK (Karaiskaki Stadium – Piraeus)

B.4 Committee Delegation

The team comprised:

- National delegations:
    - Mr. Rodrigo Cavaleiro, Vice-Chair of the Saint-Denis Committee (team leader)
    - Mr. Anton Cernat, Chair of the Advisory Group on Monitoring, Head of National Football Information Point, Romania

- Observer: Mr. Ronan Evain, CEO, Football Supporters Europe (FSE)

- Rapporteur: Mr. Rick Riding, Independent Event and Stadia Safety Advisor
- Secretariat: Mr. Paulo Gomes, Head of the Saint-Denis Unit and Secretary of the Saint-Denis Convention; and Mrs. Marie Françoise Glatz, Secretary of the Saint-Denis Convention.

B.5 Supporting Documentation

To assist the visit, the authorities of Greece provided a National Report (Part 1) containing a range of important background information. This proved to be of assistance prior to and during the visit, not least in terms of outlining the legislative, regulatory, strategic and operational framework governing the safety, security and service arrangements in connection with football events in Greece.

B.6 Status of the Report

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

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

To support States adopt, and demonstrate compliance with, each Article, the Committee has adopted 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 the three pillars of the Convention. Moreover, the Committee adopted in 2022 two additional recommendations on a model national strategy - Rec (2022)1 - and on a model national legislative and regulatory framework – Rec(2022)2.

This report, therefore, focuses on the extent to which the current legal and operating arrangements in Greece are in compliance with the content of both the Convention and the three above mentioned Recommendations.

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

SECTION C - Compliance with Policy Articles of the Convention

Article 1 - Scope of the Convention

Intent (Safety and Service)

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.

Compliance:

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

- **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 sports 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.

2017 Recommendation 1 : The (proposed new) legal framework should specify that all professional football matches played in Greece are subject to the Articles of the Convention. In addition, the Ministry of Culture and Sport should consider and clarify in law what other sports events, if any, are subject to the Convention. *(status: desirable)*

2024 Comment: Complete. The new law specifically notes the Convention and its adoption for all professional sports.

Article 2 - Aim 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, recognize 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.*

Compliance:

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

2017 Recommendation 2: The (proposed new) legal framework should include a generic commitment to delivering an integrated multi-agency approach to safety, security and service in connection with football-related events (inside and outside of stadia and irrespective of the timing and location). *(status: desirable)*

2024 Comment: Complete. The multi-agency National Co-ordination Committee is now established.

Article 3 – Definition of Terminology used in the Convention

Intent

The aim of Article 3 is to encourage worldwide usage of established safety and security terminology.

Compliance:

- **Observations**

The team observed that the concepts of safety and security are somehow confusing and not clearly understood by most stakeholders, namely due to the difficulty to distinguish them in the Greek language.

- **Comments**

The legal framework should incorporate the definitions of safety, security and service, as referred to in the Convention, and ensure that safety and security are clearly understood and implemented as different concepts by all relevant stakeholders.

The National Co-ordination Committee should, as a first step, in the framework of its multi-agency communication and media strategy, work on a large campaign to explain the multi-agency integrated approach to all stakeholders and general public.

2017 Comment: 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.

2017 Recommendation 3: The (proposed new) legal framework should incorporate the definitions set out in Article 3 of the Convention, (status: desirable)

2017 - To enhance awareness of Council of Europe terminology, it would also be desirable to stress in the (proposed new) strategy, that the integrated approach encompasses events inside and outside of stadia, given their overlapping character and impact, and embraces all aspects of an event flow approach which commences with spectators making their arrangements for attending a match and concludes when they have returned home after the match. Whilst the event flow model was designed for international matches, the same logic and flow should be applied to domestic matches. Again, it is recommended that a version of an event flow model is incorporated within the national strategy.

2024 Comment: The above recommendation should be a consideration of the National Co-ordination Committee's Strategy.

2017 Recommendation 4 : The (proposed new) strategy should highlight that the integrated approach encompasses events inside and outside of sports venues throughout the period of an event*. (status: desirable)*

2024 Comment: The above recommendation should be a consideration of the National Co-ordination Committee's Strategy.

Article 4 – National Co-ordination Arrangements

Intent

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 services, and to allow the sharing of updated information on risk assessment.*
3 *The Parties shall ensure that the co-ordination arrangements involve all key public and private agencies responsible for 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 practices.*
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 strategic and operational levels.*

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:

The National Co-ordination Committee falls under the Ministry of Education, Religious Affairs and Sports, whereas the responsibility for local co-ordination lays with the Interior Ministry (one of the 11 committee members that disseminate responsibility to the Municipal Authorities regionally).

- **Observations**

Greece has currently the Standing Committee for Combating Violence (DEAV), which was established by the law of 1999 (Article 41-A). This administrative body, chaired by a renowned and experienced public prosecutor, became nowadays more competent at operational level: it analyses the incidents reported both by its match observers and the police, and, consequently, applies administrative sanctions in a short notice (4 to 7 days, in average), like fines and/or matches played behind closed doors.

DEAV has a group of 300 observers that are deployed to stadia and arenas, aiming at reporting on possible incidents, in combination with the police. These observers have a 3-year mission, and they are selected based on their long experience as ex-players, referees or coaches. It is foreseen that these observers follow an education scheme in the future.

DEAV's scope covers five different sports, including amateur competitions, according to a police risk assessment made on a weekly basis. DEAV is competent for sanctioning both the clubs and the groups of spectators – not individuals. However, these later can also be prosecuted for criminal offences and sanctioned by a court. DEAV publicises its decisions and, where applicable, sends evidence to prosecutors for criminal procedure.

Based on the police risk assessment, DEAV may recommend collective travel bans. Moreover, if there is a recurrence of incidents, DEAV can double or triple the amount of the fines. There are several automatic sanctions: for instance, if a spectator enters without ticket, the specific gate will be closed, without spectators. In case there are several gates where this type of incident was reported, DEAV closes the entire stadium. This body is only competent for the stadium/arena and the outer perimeter, and only for national competitions. Results in tackling violence through these repressive measures are not so good at the lower levels and amateur competitions.

Clubs and individuals can request the revision of administrative sanctions taken by DEAV or appeal to an administrative court, but so far courts have rejected these appeals. DEAV invites clubs to defend themselves, by presenting evidence within 7 days. Likewise, if a person is identified, he/she will be invited to explain, within the same delay, but only in case of serious incidents. Over the last three months, DEAV already applied more than 100 decisions. Currently, the fines applied by DEAV against clubs are between 20.000 and 30.000 Euros. DEAV can also decide to close a stadium or arena proactively. In four months of implementation of the new law, it has been observed that the behavior of supporters has changed and there were no more serious incidents, but it is still too soon to conclude if these measures have a sustainable impact.

Complementary to DEAV and aiming at complying with Article 4 of the Convention, the Greek law of February 2024 established, in its Article 4, a National Co-ordination Committee. This multi-agency body comprises 11 members, representing 6 Ministries and 5 organisations. It will be competent notably for: drafting the national strategy; proposing the revision of the regulation on safety and service, established by the 2009 law; revising the venue licensing requirements, including fire protection systems and requirements for persons with disabilities; and proposing an exclusion strategy and a new digital ticketing system.

At the end of the visit, the team had a meeting with this Committee, which met informally for the first time, while waiting for the formal appointment of its members. This body will be broken down from national to regional and local levels, as established by the Convention.

- **Comments:**

The team highlights the fact that Greece has a national multiagency administrative body (DEAV), with an operational profile, competent for applying sanctions in a short notice to clubs and supporters. Given the particularly challenging context of the adoption of the law of February 2024, the team understands that, in a first instance, the Greek government had to reinforce and/or adopt more repressive measures to effectively tackle sport-related violence and disorder.

The collective bans on away fans at high-risk matches, notably at football and basketball matches, have been in force for more than a decade. The Greek authorities estimate that, as long as serious incidents continue to occur, the conditions are not met to de-escalate and come to a normal situation, where stadia and arenas have tribunes with home and away spectators and supporter groups.

Further measures include sanctions to clubs - fines or playing matches behind closed doors -, following the infringement of the law by their supporters – for instance, using a pyrotechnic in the tribune or throwing it into the pitch. As far as the team understood, this sanction applied to clubs is based on the objective (and not subjective) responsibility of the clubs, and it seems that the sanctions are applied automatically as set by the law.

According to international best practices in this field, the clubs should have a subjective responsibility when there is evidence that they did not comply with their legal obligations to train and equip their safety staff, to educate their supporters and to take all the necessary preventative and deterring measures to detect and seize forbidden items, like pyrotechnics. As the responsibility for an illicit behavior should always be the consequence of guilt, under normal circumstances it is difficult to justify an objective responsibility of a club for infringements committed by their supporters, without seeking to prove that the club did not respect its legal obligations.

Also under normal circumstances, the subjective responsibility of the clubs – arising from the violation of their legal obligations in terms of prevention, deterrence, and response to illicit acts of their supporters -, should go along with the subjective responsibility of the concrete person that committed the offence. For instance, in the case of missile throwing, both the club and the concrete supporter who threw the item into the pitch should be sanctioned if they violated their

legal obligations – subjective responsibility -, be it by the administrative or by the judicial authority, where applicable.

The team may understand that, against the backdrop of the current Greek context, it makes sense to apply such highly repressive measures as the collective bans against away supporters and, if that is the case, the imposition of an objective responsibility to the clubs for offences committed by their supporters. However, these measures, since they impose important restrictions to the rights of clubs and supporters and should be considered exceptional in terms of the general principles of law - like the principles of guilt, *in dubio pro reo* and proportionality -, these measures should therefore be limited to the time and place strictly necessary.

The "normalisation" of the use of collective sanctions should not create a feeling of unfairness among the vast majority of supporters by imposing too frequently matches behind closed doors or imposing travel bans against all away supporters. Another side effect of the collective measures it that, in the mid-long term, the police may lose their competence to manage supporter groups at sport events, and this competence is absolutely necessary if Greece aims to organise national and international major sports events.

This said, the Greek authorities should, based on the regular assessment of the evolution of the sport-related violence, and as soon as the new technological arrangements are fully in place and effective, consider revising such collective measures when the situation on the ground has improved, and gradually return to normal, namely by enabling away fans to attend high-risk matches and applying individualised sanctions to fans who misbehaved.

The Greek authorities should also consider limiting the use of collective measures to the most serious events and the ones where the perpetrators cannot be identified. Experience from other European countries demonstrate that this will act as an incentive for clubs to participate to the identification of the perpetrators, with the incentive of not risking stadium or stand closure when they i) have developed appropriate match-day operations and security measures, and ii) participated to the identification of the perpetrators.

Notably, the team recommends that the relevant authorities ensure that individuals who committed offences also receive appropriate sanctions, such as effective exclusion arrangements, appropriate to the character and location of the risk, besides the clubs. This is of utmost importance to avoid that the more radical supporters take more influence over their club boards, namely avoiding that they blackmail their club by threatening to throw an object /pyro on the pitch and thus make the club being heavily punished by DEAV, if they don't get enough tickets or other sources of income from the club board, as it seems to be the case currently.

The European landscape shows that different sanctioning systems coexist (judicial, administrative and sports/civil) and that the different public and private stakeholders have a complementary role to play in preventing and tackling violence and misbehavior. Sanctions can and should be applied simultaneously by the judicial, administrative and/or sport authorities.

Therefore, the new Greek National Co-ordination Committee should ensure that the sports authorities contribute, through their internal regulations, to sanction misbehavior of their supporters, while complying with their legal obligations to educate, inform, welcome and surveil their supporters when attending a match, be it in their venue or at other venues they attend.

The team commends the Greek authorities for having imposed the implementation of effective CCTV systems at major sports venues and, gradually, a digital ticketing system connected to the national ID card platform, to avoid anonymity, and therefore, the sense of impunity, of spectators. This new digital ticketing system is available through a mobile phone app and a pilot phase was launched on the 9th of April 2024 – currently, there is a hybrid system, with digital and paper tickets. Around 15.000 supporters have already bought their tickets through this app. It applies to the Football Super League and, next year, to the Basketball Super League as well.

These technological arrangements should enable the Greek public and sports authorities to better identify the spectators at sports venues, thus enabling them to collect evidence and prosecute those spectators who misbehave, through the available procedures - disciplinary, administrative and judicial. In other words, the new technologies should enable the Greek authorities to gradually move from collective sanctions to individualised ones, which would be perceived by clubs and spectators as more proportionate, thus fairer and more legitimate.

The team also commends the Greek government for having established, above and as a complement to the existing DEAV, a new National Co-ordination Committee, under the aegis of the Ministry of Education, Religious Affairs and Sports and with a multi-agency composition. One of the first and most important tasks of this new body will be to draft, propose, implement, evaluate and refine a national strategy on safety, security and service at sports events. Another challenge will be to break down these co-ordination arrangements from the national to regional and local levels.

The team further considers that the National Co-ordination Committee should accompany all its work with actions of communication and awareness-raising, as part of its multi-agency media and communication strategy, to proactively explain and promote the new national strategy from the start.

The team also would encourage this Committee to establish, without delay, thematic working groups or subcommittees, namely one comprising representatives from local communities and supporters, as mentioned in Article 5.4 of the 2024 law establishing the National Co-ordination Committee.

Moreover, the team highlights the fact that the new Government created a separate Ministry of Sport, 8 months ago, and that a closer cooperation between the Ministries of Citizen Protection and of Sport is being developed, which enables better co-ordination and the overall reinforcement of the multiagency integrated approach.

In a nutshell, the team very much welcomes the establishment of domestic co-ordination arrangements, through the National Co-ordination Committee, as the body responsible for implementing the multi-agency integrated approach and lead all stakeholders towards necessary improvements at major sport events.

This initiative stands as a pioneering effort among the States Parties to the Convention and sets a benchmark for best practices that should be emulated by other nations. It embodies the core principles of the Convention, particularly its multi-agency integrated approach. By bringing together diverse stakeholders under the umbrella of the National Co-ordination Committee, Greece showcases a commitment to fostering collaboration and synergy across governmental

departments, law enforcement agencies, sporting bodies, and civil society organisations. It not only enhances the safety, security and service at sports events but also promotes a culture of multi-agency integrated approach, aligning closely with the overarching objectives of the Convention. Moreover, the composition of the Committee itself may undergo refinement, incorporating additional public or private stakeholders deemed crucial for a comprehensive response. This could involve the inclusion of permanent or ad-hoc representatives based on the topics under consideration. Such evolution might even give rise to the establishment of thematic working groups overseen broadly by the national committee, further enhancing the effectiveness and adaptability of Greece's approach to sport events management.

Recommendation 1 – The Greek authorities should fully implement in due time the new structure of co-ordination, from national to local level, namely aiming at adopting a national strategy and, according to the evolution of the risks and threats, updating the legal, regulatory and administrative frameworks. (status: essential)

Recommendation 2 - The newly established National Co-ordination Committee should establish a working group comprising representatives from local communities and supporter representatives. (status: important)

Recommendation 3: The relevant authorities should develop a government-led multi-agency communication and media strategy. (status: essential)

Recommendation 4: The working arrangements at local level should be 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. (status: essential)

Recommendation 5: The Greek authorities should define the Terms of Reference for the selection and recruitment of the observers of the Standing Committee for Combating Violence in Sport (DEAV) and ensure that, in due time, they are properly trained to perform their roles and responsibilities. (status: important)

2017 Recommendation 5 : The Greek authorities should establish and lead a national co-ordination group, comprising expert and influential representatives of governmental, public and private (i.e., football) agencies and other as appropriate or necessary, tasked to develop and deliver a multi-agency integrated approach to safety, security and service in connection with football events. *(status: essential)*

2024 Comment: Recommendation complete.

2017 Recommendation 6: The national co-ordination group should commission the preparation of a national multi-agency strategy document setting out the key components of a (new) integrated approach to safety, security and service. *(status: essential)*

2024 Comment: The new National Co-ordination Committee are aware that the first task is to produce a national strategy, with Guidance from T-S4 Recommendation (2022)1 1680a834a1 (coe.int).

Local Co-ordination

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

2017 Recommendation 7 : The national co-ordination group should i) designate a municipal or regional authority to establish a local multi-agency group tasked to oversee and co-ordinate preparations for football events held in their locality and ii) provide guidance on the structure, role, and membership of such groups, taking into account established European good practice. (status: desirable)

2024 Comment: Outstanding and covered by Recommendations 1 and 2 of this report.

This process is documented in the Sporting Events Safety and Security Regulation Article 6 "Cooperation for holding safe sporting events - Establishment of a Security Co-ordination Group".

However, the team was not able to ascertain if the local multi-agency integrated strategy was in place or if it was effective.

2017 - The new Legal and Regulatory Framework

A crucial element of Article 4 centres on the need for the national co-ordination to undertake the implementation of the new law.

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

In these circumstances, it would be desirable to reflect the outcome of the proposed review the new Law in 2025 following its first year of implementation .

2017 Recommendation 8 : The national co-ordination group should review the current legal framework, and identify the legal amendments necessary to ensure that it:

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

2024 Comment: Although the National Co-ordination Committee is established, the strategy to fulfil this recommendation is still outstanding.

2017 Comment: Communications and Media Handling Strategy

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

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

2024 Comment: 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.

2017 Recommendation 9 : The national co-ordination group should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. *(status: important)*

2024 Comment: The Ministry of Digital Governance have a seat on the National Co-ordination Committee and therefore partly cover this recommendation. However, 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.

2017 Recommendation 10 : The national co-ordination group should consider establishing an independent public authority tasked to: develop stadium safety standards, covering physical infrastructure, technical equipment and safety management arrangements; monitor application; assess effectiveness; and issue stadium safety certificates. (status: important)

2024 Comment: Still outstanding recommendation.

Article 5 - Safety, Security and Service in Sports stadiums

Intent

5.1. 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**

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

The new legislation, adopted in February 2024, aims at reinforcing the safety and security at sports venues. Even if it is still too soon to assess the real impact of this legislation on the ground, the fact is that there was no major incident at major sports events in Greece since it entered into force.

The high-definition CCTV systems are already in place, at least in the main stadia and arenas. Together with the digital ticketing system, they will definitely contribute for safer and more secure sports venues. The CCTV systems in place must be functional three days before the match. If the system is not functional, the game will be played behind closed doors. The system is inspected by the police and they report to DEAV even during and after the game.

- **Comments**

Under a context of successive serious incidents in and around major sports events, the team can understand that the priority of the Government was to reinforce the safety and security pillars, to control the situation in the short term. However, in the long term, it would be important to complement these measures with the service pillar measures, so as to ensure a balanced integrated approach, as advocated by the Convention.

Recommendation 6: The Greek authorities should seek to ensure an integrated approach, by progressively investing in the service pillar (status: important)

Intent

5.2. 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.

5.3. 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.

Independent Stadium Safety Authority

Intent:

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

Compliance:

The 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. Article 56c of Law 2725/1999 states that a Regional "Suitability Control Committee" is established with a competent Regional Governor for the purpose of inspection of stadiums and the licencing and certification function.

All sports facilities are divided into categories, depending on their type (indoor or outdoor, swimming centres, shooting ranges, etc.), size (mainly spectators' capacity) and category of events that can be organised in them (amateur, professional, national or international competitions). There are different licensing criteria for each category of facility, which relate to the specifications and rules of each sport, as well as the safety (first aid, fire safety, design/infrastructure for crowd management and safe evacuation, safety standards for each sport, design/infrastructure for preventing incidents of violence or offending behaviour, separation of moving zones for spectators and athletes, railings and other dividers, etc.).

The criteria are documented in the Joint Ministerial Decision n.408113/21902/2725/603/4-10-2017.

The inspection team consists of an engineer, a doctor, a policeman, a fireman and a representative of the inspected venue, each of whom has expertise in a specific area. They don't get any special training for this kind of inspections; however, the instructions are quite detailed.

Unfortunately, a suitability ontrol committee was not met by the monitoring team.

- **Observation:**

The Greek legislation has provisions in the field of design, infrastructure, licensing, certification and inspection of sports venues.

Stadiums and arenas are owned either by the Government, the municipalities, and the athletic union, and only one stadium is private (2nd division). The user of the venue (club) is responsible for managing it.

According to the football authorities that the team met with, the match-day revenues are low – namely due to the fact that only home fans can attend the matches – and, therefore, it is difficult for clubs to upgrade infrastructures without financial support from the State. This is especially the case outside the 5 big clubs of Athens and Thessaloniki, which enjoy significantly bigger fanbases thanPoli the rest of the football ecosystem.

The existing licensing of stadiums is set out in legislation and "sets out procedures for testing, certification and monitoring, as well as supervision", as mentioned in the Greek national report.

Stadiums are inspected by the Suitability Committee. There are different criteria and requirements for every category of venues, including three pillars. The safety license is issued for periods of 2, 3 or 5 years. This committee includes five specialities. There is one committee for each region, but all have guidelines. Sports venues are supposed to meet minimum standards to be granted a safety license, since there are significant discrepancies in terms of the quality of sport infrastructures.

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

- **Comments:**

Due to the fact that there is a significant difference in the quality of infrastructures of stadia and arenas across the country, which reflects the financial gaps between major and minor clubs, the team can understand that it is difficult for minor clubs to meet the same licensing and certification requirements. However, there should always be minimum safety requirements to deliver a safety license.

If there are different standards and requirements according to the different municipalities, 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 all of Greece.

The team welcomes the ministerial decision not to license a sports venue if the minimum safety conditions are not met.

The Greek Suitability Inspection teams would benefit from specific training as detailed in the INTERPOL Guidance (INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf).

Recommendation 7 - The Greek authorities should find a solution in order to harmonise the standards on the design, infrastructure, licensing, certification and inspection at sports venues. (status: essential).

5.4 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

- **Observation:**

At the match that the team attended, it was observed that there was a diverse demography, and several families attended the match in a convivial atmosphere.

The Olympiacos stadium seemed to have a sufficient and qualitative offer of refreshment areas and toilets, as well as sufficient physical conditions for persons with disabilities.

- **Comments:**

The high quality of the facilities that the team could observe in the AEK and Olympiacos stadia, as well as in the Olympic arena in Athens, should be the reference for improvements in other sports venues across Greece.

Recommendation 8: The Greek authorities should ensure similar service standards at major sports venues (stadia and arenas), namely in terms of inclusiveness, sanitary and refreshment facilities, namely by replicating the good practices of the basketball association and league. (status: important)

Recommendation 9: Consideration should be given to adoption of UEFA/CAFE and the 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://documents.uefa.com/v/u/UEFA-Guidelines/Access-for-All-UEFA-and-CAFE-Good-Practice-Guide

b) IPC Standard
https://www.paralympic.org/sites/default/files/document/160307102314920_IPC+Accessibility+Guide.pdf

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. The new compulsory e-ticket system needs careful planning and implementation with robust contingency plans for system failure.

Digital Ticketing Platform - The Greek government is currently implementing a new digital ticketing platform for professional football and basketball competitions. According to the Greek Secretary General for Digital Governance, this system will function with the digital wallet developed by the Greek Government, in alignment with European Union directives. The recent enactment of rules regarding the creation of a European Digital Identity paves the way for the introduction of a personal European Digital Identity Wallet in 2026, which will benefit all EU citizens and residents. This European Digital Identity Wallet, to be issued by all EU Member States as a mobile application, will allow EU citizens and residents to securely identify themselves electronically, accessing digital public and private services across Europe. The digital wallet system to be implemented in Greece will ensure that each mobile phone is associated with a single authenticated user, linked to the ticket purchasing platform. The purchased ticket will then be uploaded to the digital wallet (app wallet). For individuals under 15 years old, a guardian will be required to purchase and store their digital ticket. At the turnstiles, an NFC reader will verify the correspondence with the mobile phone, ensuring secure access.

Recommendation 10 - 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)

Observations: Another critical aspect of enhancing security within professional competitions is the implementation of Closed-Circuit Television (CCTV) systems adhering to a defined standard, which is now a mandatory requirement for all clubs and stadiums in Greece.

Comments: These CCTV systems are equipped with high-resolution cameras, serving both as a deterrent and significantly augmenting the ability to identify individuals involved in illicit activities. By ensuring uniformity and high-quality footage across all venues, this standardisation not only improves surveillance capabilities but also fosters a safer and more secure environment for all stakeholders involved in professional sports competitions. Moreover, these systems facilitate convenient crowd management and enable minute-by-minute monitoring of operations, both inside and outside the stadium, enhancing overall operational efficiency and safety measures. In particular, the employment of PTZ (Pan-Tilt-Zoom) cameras, renowned for their high resolution and wide-angle recording capabilities, stands out, as they enable post-incident review by allowing operators to rewind the footage and zoom into specific areas with assurance that detailed images of that moment are captured.

Recommendation 11 - 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)}, (status: important)

Recommendation 12 - 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 13 - 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)}. NB: this level of service and training plan should be consistent across all of Greece. (status: important)

Recommendation 14 – The National Co-ordination Committee 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)

2017 Recommendation 11 : The national co-ordination group should make provision for the (proposed) independent public "stadium safety authority" to issue stadium safety certificates and monitor compliance with its conditions. (status: important)

2024 Comment: Outstanding.

The National Co-ordination Committee should review the current arrangements and consider the merits of establishing a sub-committee with the Football Federation and Leagues, the Licensing Authority the Ministry of the Interior (Municipality) to develop stadium safety standards (covering physical infrastructure, technical equipment and, importantly, safety management arrangements), monitor application of these standards, and assess their effectiveness.

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

2017 Stadium Safety Certification

Compliance: This is a crucial requirement. Irrespective of the age or physical infrastructure of a stadium, effective safety management arrangements should still be able to provide a safe environment for all visitors. The importance of the stadium safety certificate is that it provides

a blueprint for how this can be achieved. On the basis of discussions and observations during the visit, the delegation is not convinced that this core objective is being achieved.

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

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

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

2017 Recommendation 11 : The national co-ordination group should make provision for the (proposed) independent public "stadium safety authority" to issue stadium safety certificates and monitor compliance with its conditions. *(status: important)*

2024 Comment: There is in place a "Suitability Licensing team" and sports facilities are divided into categories, depending on their type (indoor or outdoor, swimming centres, shooting ranges, etc.), size (mainly spectators' capacity) and category of events that can be organised in them (amateur, professional, national or international competitions). There are different licensing criteria for each category of facility, which relate to the specifications and rules of each sport, as well as the safety (first aid, fire safety, design/infrastructure for crowd management and safe evacuation, safety standards for each sport, design/infrastructure for preventing incidents of violence or offending behaviour, separation of moving zones for spectators and athletes, railings and other dividers, etc.).

The inspection team consists of an engineer, a doctor, a policeman, a fireman and a representative of the inspected venue, each of whom has expertise in a specific area. They don't get any special training for this kind of inspections, but the instructions are quite detailed.

The inspection report is submitted to the body that provides the license: the municipal authorities for the small venue categories, the regional authorities for the large ones and the General Secretariat of Sports for the Olympic facilities.

National safety and infrastructure

One key issue highlighted in the meeting with football stakeholders was the responsibility for infrastructure improvement at stadiums across Greece. Most of the country's stadiums are owned by the municipality or State (with a few privately owned), who do not charge any fee to the clubs for the use of the stadium. The clubs believe that although they are responsible for the service and maintenance cost, any physical improvement to the stadium should be met by the

municipality or State. The legislation is also unclear of where this responsibility lays, which has stifled improvement in the past. It is recommended that this issue is clarified as soon as possible.

The current biennial safety licence process includes an inspection regime carried out by construction, fire, mechanical and electrical engineers employed by the local Police Authority. There appeared to be an inconsistency and no accountability of a clear minimum standard of safety conditions which would secure a safe physical environment.

The team recommends that a standard template of a general safety certificate/license with generic minimum condition is agreed at national level, which would provide consistency for safety standards. At a local level, a multi-agency safety advisory group could be set up to ensure compliance with these standards which would ensure accountability of meeting the agreed standard. This Safety Advisory Group would have the responsibility to advise the club and stadium management on complying with the conditions of the license/certificate (See Interpol Guide on the checklist of measures to be taken by the organisers of professional sporting events and by the public authorities: INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf)

The team was unable to ascertain whether and, if so, what account the license inspection took of the safety management of the stadium, including matters such as the inexperience of the safety officer, in determining the safe capacity of the event. It would appear as though the stated capacity is based upon the holding capacity of the venue (i.e. the numbers of spectators that it can physically accommodate) and this is not reviewed in response to changes of circumstance or any assessment or observation from the relevant agencies.

Recommendation 15. The team recommends that the local suitability licensing authority (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that it can physically hold, having regard to its design and condition, but also the numbers that can be safely managed, in other words, the quality of the safety management.

The UK Guide to Safety at Sports Grounds 6th Edition (Green Guide) is the international recognised standard for setting a safe capacity within a stadium and detailed design criteria (https://sgsa.org.uk/physical-factors/calculating-safe-capacity/)

Alternately, the Greek Standards ELOT EN 13200- 1 ΕΛΟΤ EN 13200-1 E2 | ΕΛΟΤ (elot.gr), 2019, Spectator facilities General characteristics for spectator viewing area and ELOT EN 13200-7 Spectator facilities Part 7: Entry and exit elements and route. ELOT EN 13200-7 | ELOT (status: important)

Recommendation 16. The team also recommends the training of the Suitability Licencing staff to evaluate the process to determine the safe capacity of the stadium and each sector, based on the evacuation capacity of each sector and the quality of the safety management of the stadium. (status: important) See INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf . (status: important)

Safety Management

The effectiveness of the stadium safety management arrangements determines whether or not participants and spectators will be provided with a safe, secure and welcoming environment within a stadium. One core principle of safety management centres on the efficacy of control room operations. European experience evidences the need for control room operating arrangements to ensure close and immediate contact between the police, stadium safety officer, and other agencies involved in delivering a safe event.

The Olympiacos stadium benefits from the provision of 2 match control rooms. Upon inspection, the main match day room was used by the Police and Fire Officer only with CCTV monitors. The stadium other control room contains CCTV cameras, PA system, turnstile monitoring, fire alarm system, and no emergency telephone system. There is an 8-channel radio system although no recordings and incident loggist from the stadium management team. For each football game, the Police takes a lead role in ensuring safety at the stadium.

Three days prior and in the morning of each game, there is a multi-agency meeting which includes meeting with stadium operators, security companies, police, fire and ambulance services and football authorities, also producing a report and actions to be completed prior to the match.

A pre-match meeting between all parties is also arranged to ensure all safety planning, checks and records are in place and all actions identified have been rectified. This process provides assurances to not only the Match Commander, who takes lead responsibility, but also assurances to all Ministries, policing bodies, ambulance and safety management. There is a high reliance on the competence of the Police Match Commander, the Super League Security Officer and the DEAV Delegate to report on any safety and security issues.

As long as there is continual professional development and structured training for these officers the process is commendable. It may be worth reviewing this process to enable a more integrated approach to ensuring match day safety assurance.

Although the Police Match Commander takes a lead role in ensuring match day safety for the main Athens Stadium, the team was not clear if this match day safety process is consistent with other large public sporting events across Greece. Clarity of the role and responsibilities of the various policing agencies and the stadium safety officer should be provided in the relevant legal framework. In practice, it was clear from the visit that the police take the lead on all matters relating to security and safety. Whilst this clarity in respect of lead responsibility is welcome, it is important to evaluate and set out the hierarchical structure to define divisions and limits of responsibility in accordance with European good practice of integrated command.

Recommendation 17 – A detailed command and control structure should be documented to provide details on the practicalities of each party within each of the control rooms and their specific responsibility. (See Recommendation Rec (2021) 1 Annex A Safety https://rm.coe.int/annex-a/1680a45e6f) (status: important)

2017 Comment: Stadium Safety Officers

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

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

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

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

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

2017 Recommendation 12 : The national co-ordination committee should make provision for the issue of a stadium safety certificate to be subject to a stadium having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadia safety, security and service matters. *(status: important)*

2024 Recommendations – Outstanding.

Recommendation 18. - The Club Safety Officer/representative should be provided with a detailed job description which clearly sets out the functions of their post. The T-S4 Recommendation Rec(2021)1 (Annex A on Safety) and its good practices may be used to compile a checklist of functions necessary for the role. The team recommends the National Co-Ordination Committee to set the minimum areas of competence to be demonstrated by such safety officers, supervisors and safety stewards, taking into account both the core functions of each group and the variety of roles that they may perform, having regard to the checklists in the Saint-Denis Committee's Recommendation on this subject (See T-S4 Rec (2021) 1 https://rm.coe.int/annex-a/1680a45e6f Appendices 33) and the Annex D (checklist) https://rm.coe.int/annex-d/1680a45e72. (status: important)

Recommendation 19. - The National Co-Ordination Committee 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 T-S4 Rec (2021) 1 https://rm.coe.int/annex-a/1680a45e6f Appendices 33). The team 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)

Intent

5.4. 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

Including in the Law are appropriate sanitary and refreshment facilities for all users, parking facilities, inclusive environment for people with disabilities, good viewing conditions for all spectators etc. The criteria are described in the Joint Ministerial Decision n.408113/21902/2725/603/4-10-2017.

Intent

5.5. 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

The operational plans are covered by Law in by the "Sporting Events Safety and Security Regulation. Chapter C, Articles 12 to 15".

It was not clear for the team if there are "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 grey zone (between the public and private area, 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 some cases, although issues such as criminality and public order, by their very nature, will always be first responsibility of the police forces.

Recommendation 20: The Greek authorities 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 21: 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 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)} Appendix 33). (status: important)

Recommendation 22: The team 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)

5.5.a. The use of pyrotechnics

Compliance

- **Observations**

The adoption of a recommendation for action to prevent the use of pyrotechnics inside sports venues at the national level should be considered, as it sets procedural standards for the police forces in this field. DEAV and the Football Federation should launch an awareness-raising campaign, addressed to spectators, to deter the use of pyros, both inside and outside of stadia, before and during matches.

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

The new high-definition CCTV technologies implemented at major stadia and arenas will enable the safety management and the police to better identify and prosecute the individual perpetrators in the stands and in the outer perimeters, thus avoiding anonymity and the feeling of impunity.

However, this reinforcement of preventive and deterring measures inside and around the sports venues usually produces a “displacement” effect, meaning that the use of pyrotechnics and other violent or disorderly behaviour may increase outside of venues, somewhere around the city, thus requiring more preventative action by municipal authorities and the police.

- **Comments:**

It is important that all sports organisations apply the same policy and train their teams – safety officers, stewards, referees and players - on how to deal with pyrotechnics thrown into the pitch. It is also important that private security companies, firefighters, and other relevant stakeholders are aware and apply these safety procedures.

On the preventative side, the Greek authorities could envisage launching a public campaign on the risks associated to the use of pyrotechnics at sports events.

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, in particular when the new technologies are in place and running effectively.

Recommendation 23: The Greek authorities should launch a public campaign to raise the awareness of the fans about the risks associated to the use of pyrotechnics at football matches and other sports events.

Recommendation 24: For major football and other sports events, all fire officers, police officers, stewards, private security, staff of the stadium authorities, referees, players 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. (status: important)

2017 Comment: Preventing and Countering the Use of Pyrotechnics in Stadia

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

Compliance: Greece is not alone in experiencing significant problems associated with the use of pyrotechnics in and around stadia. Confronting this issue will not be easy for any State. However, the findings of an independent scientific study of the health and safety risks associated with the use of all pyrotechnical devices in stadia (commissioned by UEFA) are unequivocal: "no safe use of pyrotechnics is possible in spectator areas within football stadia". The study also stressed that this risk is applied to all participants at a football event including safety and security personnel and players and officials.

2017 - Recommendation 17 : Based on the findings of this study and on the European model strategy which is currently being drafted by EU, the national co-ordination group should aim at reviewing the steps necessary to deter, prevent and counter the use of pyrotechnics in stadia. *(status: important)*

2024 Comment: Partially Complete.

5.5.b. Any violent or other prohibited behaviour

Compliance

- **Observations**

The new law, which entered into force in February 2024, was focused on tackling serious incidents and disorder around major sports events. Even if it is still too soon to assess its real impact, the Greek authorities observe that there were no serious incidents at major sports venues since it was enacted.

The establishment of Standing Committee for Combating Violence in Sport (known as DEAV) appears to be a positive practice as it allows swift implementation of administrative sanctions. According to the information provided to us, in the event of an incident during a match (such as the throwing of pyrotechnics onto the pitch), there is nearly immediate punishment (for example, the following match played behind closed doors), applied within approximately 4 days, with the club to which the fan belongs as the target (based on the club's subjective responsibility). In cases where the perpetrator is identified, DEAV will continue to impose sanctions on the club, with the court being responsible for further punishment to the individual perpetrator.

According to the Greek authorities, within approximately 3 months, this Committee has already issued over 100 decisions, with an average of 5 to 15 cases for analysis per week. Based on the testimonies the team collected during the monitoring visit, the work of DEAV is supported by a network of approximately 300 observers who are on the ground during sporting events and report incidents.

- **Comments**

During the visit, the team heard various testimonies regarding the effectiveness of these punitive measures. The majority of our counterparts, including public representatives and sports sector stakeholders such as club representatives and the Hellenic Basketball Federation, noted that these swift sanctions were visibly impacting sports events in Greece positively, leading to an immediate reduction in serious incidents (even a significant decrease in the use of pyrotechnics and object throwing). This overall positive assessment would need to be reassessed after a few months, given that the return of spectators to stadia took place less than 3 months before the visit. However, a different stance was expressed by the President of the Hellenic Football Federation, who indicated that such sanctions on clubs could lead to organised fan groups to blackmail club management, negotiating conditions beforehand to avoid incidents that would result in stadium closures.

The team understands the need to enforce strong punitive measures that mobilise clubs to contribute and develop actions leading to a reduction in episodes of violence, holding them accountable for the behavior of their supporters. Additionally, the team recognises the necessity of taking firm measures following serious incidents. However, the team recommends that after the implementation of these urgent and necessary measures, efforts should be made to gradually prioritise the application of deterrent sanctions and the enforcement of banning orders specifically targeting fans who commit offenses (criminal or administrative).

Moreover, complementary measures should be developed to achieve a better balance in the safety and service pillars, enhancing the quality of service provided to fans. This transformation aims to shift the nature of the audience in the medium to long term, empowering and including the majority of supporters while excluding those responsible for risky behaviors. In practice, this aligns with the strategy already being developed by the Hellenic Basketball Federation.

The team salutes the fact that the situation inside sports venues has calmed down, the general climate has changed, families are returning to the stadia, and the overall context has clearly improved in terms of safety and security, but notes that it is too early to assess the long-term impact of the newly introduced measures.

Recommendation 25: The Greek authorities should consolidate effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns, while progressing steadily towards a more balanced integration with the service pillar. (status: essential)

5.5.c. Any racist or other discriminatory behaviour

Compliance

- **Observation:**

During the visit, the team did not observe any incidents related with racist or other discriminatory behaviour.

- **Comments:**

Greek authorities are one of the direct beneficiaries of the European Union / Council of Europe joint project on "Combating hate speech in sport", implemented by the Sport Division of the Council of Europe, and will be able to draft a national strategy on this topic.

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.

Recommendation 26: The Greek authorities should draft and implement a national strategy on combating hate speech and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour, namely benefiting from the campaign of the EU-CoE joint project on "Combating hate speech in sport", of which Greece is an active partner, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes. (status: important)

Recommendation 27: The relevant authorities should put measures in place to refuse entry into the venue 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 and public spaces on the occasion of major sports events. (status: important)

5.6. 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 State level, police forces are well trained, equipped and experienced in dealing with major national and international events.

Like other European countries, Greece has been facing, since the aftermath of the COVID-19 pandemic period, difficulties in selecting and recruiting a sufficient number of qualified stewards for sports events.

The fact that private security officers have low salaries, low qualifications and minimum training are obstacles to recruit skilled persons for this important job, avoiding an important turnover in this field.

The team was informed that stewards for major sports events are provided by private security companies, that they are trained and qualified as private security officers but, so far, they did not receive specific training for working in the context of sports events.

With regard to venue safety managers, it seems that they are recruited based on their experience as former police commanders and that they did not receive specific training so far.

Furthermore, the team was informed that, so far, police and stewards do not receive common training and do not hold joint exercises, although they have a complementary role during match-days.

The provision of qualified safety managers and stewards should be complemented by the new technologies – namely because these technologies need to be operated by qualified people -, which, as mentioned above, will have a preventive effect and enable identifying the perpetrators and individualising the sanctions.

- **Comments**

Safety officers and 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.

The police should have a vested interest that the safety managers and stewards are more qualified, better trained and equipped and that they hold common exercises with the police on a regular basis, so that police can be more concentrated in their security missions instead of complementing or overlapping with the work of the stewards, as the team could observe at the entrance of the Olympiacos stadium.

Recommendation 28 : The Greek authorities should improve recruitment, accreditation, training and assessment of safety managers and stewards, whenever possible complemented by regular common training and exercises with the police. (see appendixes 33, 36 and 41 of Recommendation Rec (2021)1, Annex A on Safety) and Recommendation Rec (2022) 2 (Annex 2) on a model regulatory framework on stewarding and private security at sport events. (status: essential)

Recommendation 29: The Greek authorities should equip and train police and stewards in an appropriate manner, namely in foreign languages. (status: important)

Recommendation 30: A document or stewarding plan should be developed for each event, which contains the respective roles and responsibilities of the police, stewards/private security companies along with the competence expected of each practitioner. (see T-S4 Recommendation Rec (2021)1, Annex A, Appendix 41) - https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)} (status: important)

Recommendation 31: The event organiser should develop and set out a level of service and training expected of personnel supplied by the private security company. A contract to this effect such as a service level agreement specifying the numbers, and quality of safety staff should be in place. (See Recommendation Rec (2021)1, Annex A - https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}). (status: important)

2017 Comment: Stadium Stewards

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

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

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

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

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

2017 Recommendation 13 : The national co-ordination group should make provision for ensuring that all stadium stewards are trained by persons, assessed as competent to train and accredit stewards as being able to undertake their varied tasks effectively. *(status: essential)*

2024 Comment: Outstanding.

Article 6 - Safety, Security and Service in Public Places

Intent

6.1. 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**

The police carry out risk assessment on a regular basis, which is notably the basis for DEAV to apply collective travel bans for away supporters.

- **Comments:**

As new technologies become more effective in preventing and tackling spectator violence and misbehaviour inside sports venues, it is likely that incidents are displaced to the vicinity of these venues and to the city centers, this requiring stronger partnerships between municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations, aiming at mitigating this “displacement” effect.

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.

2017 Recommendation 14: The national co-ordination group should make provision ensuring that the in-stadia role of the police and other public authorities is clear, both in law and operating arrangements, and widely understood by all safety and security practitioners. (status: essential)

2017 Comment: In-stadia Role of Partner Agencies

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

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

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

2024 Comment: Outstanding.

2017 Comment: Stadium Technical Facilities

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

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

2017 Recommendation 15: The national co-ordination group should commission an expert view on the efficacy of current stadia CCTV and other technical facilities in order to determine what improvements are necessary to meet stadium safety needs and police evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality *(status: important)*

2024 Comment: Partial complete CCTV in all professional sports venues.

2017 Comment: Audit of Stadium Safety and Security

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

2017 Recommendation 16: The national football authorities should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all or selected stadia hosting professional football matches in order to inform the development of enhanced technical, operating and safety management standards. *(status: desirable)*

2024 Comment: Outstanding.

Intent

> *6.1.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**

For most spectators travelling to, or egressing from, a spectator facility, in order to connect with a public transport hub, a car park or local amenities, their journey will involve passing through routes or areas that lie beyond the outer perimeter of the spectator facility.

This external zone, which may consist of a network of routes and areas, or in some locations a single expanse of land, is referred to as Zone Ex.

Although the routes or areas that make up external areas (Zone Ex) do not, in most locations, fall within the jurisdiction of the ground spectator facility management, they will either be part of the public realm or under private ownership, clearly, they are key to the safe and secure arrival and departure of spectators.

It is therefore vital that planning for the movement of people through Zone Ex involves the input of all relevant external organisations, such as the police, local authorities, highway agencies and, where applicable, the owners of private property.

Within such a multi-agency approach, it is important to establish which organisation or agency has the lead responsibility for co-ordinating the management of Zone Ex on an event day, and for this role to be recorded in the Transport plan and Operations Manual and in the spectator facilities safety management structure.

Further details can be found in the UK Guide to Safety at Sports Grounds (see links below):

- https://sgsa.org.uk/document/greenguide/
- https://sgsa.org.uk/physical-factors/zone-ex/

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**

During the match day at the Olympiacos stadium, the safety manager briefly presented two command and control rooms: one for the safety management and one for the police. It was not clear for the team if they have the good practice of organising joint simulation exercises and crisis management meetings and have a crisis communication strategy in place.

- **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 all the main stadiums and arenas, as well as in the fan zones – for instance, at international competitions -, and that they are tested and refined through joint exercises.

Furthermore, it goes without saying that the new and advanced technologies currently being implemented 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 ant 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 sports venues, for which there should be a plan B in case there is a power failure or a cyber-attack.

Recommendation 32: 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 T-S4 Recommendation Rec(2021)1, Annex A - https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)} –. All key decision makers should be located together in the same room. (status: important)

Recommendation 33: 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 sports venues and other relevant premises, and that they are tested and refined in multi-agency table-top exercises. (status: essential)

Recommendation 34: 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 engage 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)

2017 Recommendation 18 : The national co-ordination group should review the current arrangements for preparing and testing comprehensive multi-agency stadium contingency and public authority emergency plans for incidents at or nearby stadia hosting football events. (status: important)

2024 Comment: The Police carry out exercises for emergency incidents and evacuation, however the exercises were not muti agency including the clubs' safety management teams.

Article 8 - Engagement with Supporters and Local Communities

Intent

8.1. 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 co-ordination bodies already established, or to be established, aim at ensuring that all relevant stakeholders work together in the different stages, from planning to delivery. However, it is recommended that supporter representatives have the possibility to be part of these bodies or be heard by them, as part of a balanced multi-agency integrated approach.

Different initiatives aimed at ensuring effective dialogue and communication should be envisaged by the Greek sports authorities, like the development of Supporter Liaison Officers (SLO) and Disability and Access Officers (DAO), as established by UEFA regulations. The team noted that the role and missions of the SLO was wrongly understood until recently as a supporter representative rather than a point of contact between the supporters and the club, and welcomed the wish expressed by several interlocutors to redefine the role of the SLOs in Greek football, in accordance with existing European good practices.

Moreover, currently, there are no regular communication channels between football clubs, the League, the Football Association and supporter representatives, except for ticketing issues. The team noted that there are currently no national representative bodies for supporters in Greece but encourages Greek public authorities and sports' governing bodies to look into alternative forms of dialogue with supporters and supporters' representatives.

The new legal provision that only allows one official supporter group per club might be difficult to be formalised and put in practice, besides the fact that it may hinder the fundamental freedom of association, as enshrined in the European Convention on Human Rights (Article 11).

The team commends the work of the Hellenic Basketball Federation and League, which have developed several good practices in the field of training of supporters, which should be replicated by other sports, namely football. These include programmes for the education of children and families, as well as for the education of youngsters and young adults by coaches – this later includes 900 clubs and 3.000 coaches, for all ages.

Moreover, the Hellenic Basketball Federation (HBF) submitted recently to FIBA their Corporate Social Responsibility (CSR) Strategy (available at https://www.basket.gr/csr/). The Hellenic Basketball CSR strategy is the first of its kind to be implemented within the FIBA's federation structure and is based on: i) the relevant FIBA regulatory frameworks; ii) the practices of the FIBA Foundation; iii) the commitments arising from the adoption of the UN SDGs; iv) the commitments arising from the HBF's participation in the UN Sports for Climate Action Framework; and v) the UNICEF policy on the protection of children's rights.

Service is a key factor in basketball competitions, and the arena of the Olympic Stadium, leased by Panathinaikos FC, is a good example of the effort made by the organisers to provide a welcoming environment for all spectators. Next year, the away fans could be authorised to come back to basketball arenas, which is a clear sign that the safety and security conditions are back to normal. Football authorities should take on board these good practices.

- **Comments:**

The team welcomes the progress made by the Hellenic Basketball Federation and League, which could be seen as a "driving sport" in the reforms that currently occur at sports events in Greece, like: developing fan diversity; excluding troublemakers from the arenas; offer more service to the supporters and raise the quality of the service facilities; invest in education for children and youth; develop a sense of ownership of the administration of the clubs; and develop a CSR strategy.

In particular, the team acknowledges the excellent social-educational initiatives and the CSR Strategy of the Hellenic Basketball Federation and recommends them as good practices to be replicated by other sports in Greece and elsewhere, notably football.

Moreover, supporter representatives and local communities and businesses should be included in the national, regional and local co-ordination and cooperation instances, at least at some stage, to give them a sense of belonging and co-accountability throughout the different stages of the organisation of sports events.

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

Public and sports authorities need to further invest in creating channels of communication with supporter groups, even if, so far, the most important ones are not officially recognised as such.

Recommendation 35: The relevant authorities should ensure that the needs of supporters are taken into account from the planning to the delivery of sports events and develop structures of dialogue and consultation with supporters and supporters' representatives. (status: important)

Recommendation 36: The relevant authorities should ensure that the needs of local communities are taken fully into account in the planning and delivery of the sports event. (status: important)

Recommendation 37: The relevant sports authorities should consider establishing in their regulations the need for the top divisions' clubs to appoint Supporter Liaison Officers (SLO) and Disability and Access Officers (DAO). (see T-S4 Recommendation Rec (2021)1, Annex C (Service) (status: important)

Recommendation 38: The good practices in the field of dialogue and communication with the different segments of spectators, currently being implemented by the basketball authorities, should be replicated by other sports, where applicable (status: important).

2017 Recommendation 19: The national co-ordination group should encourage all stakeholders to review and expand their supporter liaison activities and, in so doing, review the current Supporter Liaison Officers (SLOs) arrangements to ensure compliance with the role and remit set out in the UEFA SLO Handbook, taking into account the observations and suggestions of SD Europe. (status: important)

2024 Comment: Recommendation is still outstanding.

2017 Comment - Community Engagement: European experience demonstrates the importance of developing and implementing a range of social and preventative projects designed to lure young supporters away from negative fan behaviour, not least through promoting a culture of tolerance and respect for others irrespective of team supported and other manifestations of diversity.

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

2017 Recommendation 20 : The national co-ordination group should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination. (status: desirable)

2024 Comment: Recommendation is still outstanding.

8.2. 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:**

Nothing to be mentioned.

1 *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:**

The Greek authorities should strive to strengthen the service pillar, namely through improving dialogue and communication with supporters and the local communities and implementing social-educational projects aiming at educating the new generation of supporters, as it is already being done by the Hellenic Basketball Federation and League.

- **Comments:**

Recommendation 39: The relevant Greek authorities should develop preventative and educational projects with children and young supporters, whenever possible using players as role models, replicating the basketball good practices to other main sports. (see Recommendation Rec (2021)1, Annex C (Service) appendix 5 and the development of socio-preventative measures, on the basis of the experience of the *fanprojekt* in Germany, Poland and Switzerland.) (status: important)

Recommendation 40: The sports authorities should be encouraged to develop relations with all categories of supporters, to encourage inclusion for the majority in a transparent and constructive way. (see Recommendation Rec (2021)1, Annex C (Service)) (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:**

The Greek Police has been investing in training of police officers and on updating its tactics doctrine. A CEPOL course on policing of major sports events and international police cooperation was held in Athens late last year. The Greek Police is currently drafting a new manual and a circular order on police tactics for major sports events, building on lessons learned and on the new legislation.

Moreover, the anti-riot units, which have a large experience, carry out constant training on tactics, and are developing cooperation with the French and German counterparts. Recently, the police carried out a table-top exercise, which involved 400 police officers.

So far, the police do not provide training to stewards nor hold joint exercises with them. Training of safety officers and stewards is ensured by the Football Federation.

As of next season, and based on the current context, the police will adopt a zero-tolerance policy regarding sport-related violence and disorder.

- **Comments:**

The team salutes the fact that the Greek Police keeps investing in the training of their police officers, namely on international police co-operation and on public order tactics. The team also

underscores the fact that the police will soon deliver a specific manual and guidelines on tactics for policing major sporting events, which should be considered as a good practice.

However, the police should also consider delivering specific training for match commanders, spotters and football intelligence officers, as well. More specifically, a national network of spotters should be set up and trained based on European good practices.

In particular, the team welcomes the table-top exercise carried out on a big scale by the police, for the first time in Greece, and encourages multi-agency cooperation for future exercises, to develop joint plans on safety and security.

The team further welcomes the participation of the Greek authorities in the EU/CoE joint project on “Combating hate speech", of which Greece is one of the main direct beneficiaries.

The Greek Ministry of Citizen Protection should ensure that the deployment of police officers for football matches is risk-based and graded, as detailed in Annex B (Security) of the T-S4 Recommendation Rec (2021)1 of the Committee.

In the long-term, the Ministry of Citizen Protection should consider modifying the law, so as to insert an obligation for the sport event organiser (club, federation, league) to cover the costs of police deployed to the inside of the stadium or arena, as it is the case in various European countries, following debates in the national Parliaments.

Regarding police deployment, during the team’s observation at the Olympiacos vs. AEK match, we noticed a significant police presence despite the absence of visiting club supporters. This included a visible public order unit equipped with protective gear, indicating, at a certain level, a high-profile policing approach.

The team did not attend any police briefing for this match, so we were not briefed on any risk assessment issues or specific threats. Nonetheless, it is worth noting that this match is a legendary Greek derby between two of the most prominent local and national teams.

Additionally, the team’s attention was drawn to the extensive searches conducted by police personnel at various entrances. Remarkably, these searches were not limited to entrances associated with heightened risk but were also observed at entrances where the spectator profile appeared low risk, with many families present among the crowd. This proactive policing strategy, although commendable in its thoroughness, raises questions regarding resource allocation and the balance between security measures and spectator experience.

The team was informed of the establishment of specialised units for sports events, along with the development of a comprehensive manual specifically tailored for policing sports events. Additionally, according to what we were told by the Police, training sessions for police spotters are being conducted, and tabletop exercises are being implemented, all of which contribute significantly to enhancing the overall preparedness and effectiveness of law enforcement during sporting events.

Recommendation 41: In accordance with European good practice, policing tactics, profile and uniform should be determined on the basis of: ongoing dynamic risk analysis; graded deployment, with protective equipment used only where necessary; and early targeted and proportionate interventions to prevent the escalation of risk. (status: essential)

Recommendation 42: The police should ensure regular specialised training for match commanders, spotters and football intelligence officers, in accordance with European good practice, and envisage common training and exercises with safety personnel (status: important)

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:**

See observations above.

- **Comments:**

It is acknowledged that there is a need to improve dialogue and communication between police and the supporter groups, namely through the SLO and DAO figures that should be created in the future by the Greek sports authorities.

Recommendation 43: Police units to be deployed should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters, including with foreign visiting supporters – with a focus on deploying English-speaking police officers. (status: important)

Recommendation 44: Police forces and other local agencies should commit to opening communication channels with SLOs and DAOs – when they are established - and supporters, in line with the guidance set out in the T-S4 Recommendation Rec (2021) 1 - https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}, Appendix M, and the EU Handbook on Police Liaison with Supporters (12792/16). (status: important)

Recommendation 45: Supporter feedback should be considered in the risk assessment process before each match (status: important)

Note:

The principles underlined in Article 9, and, in more depth, emphasised in the T-S4 Recommendation Rec(2021)1, and on the Note 8243/05 from the Netherlands delegation to the

EU Police Cooperation Working Party, dated April 20, 2005 (below) should guide the training and police operations during sports events:

"Principles:

1. Balance

The most effective way of policing public order is to maintain a 'balance' between the perceived levels of risk and the nature of policing deployment. If balance is achieved, there is an emergent "self-policing" culture among fans. This brings about a marginalisation and isolation of 'hooligan' elements, a lack of support for (and even active suppression of) 'anti-social' activity among the fans and a generalised avoidance of conflict.

If balance is not achieved there are corresponding consequences: a perception of the inappropriateness of police action and increased support for 'anti-social' activity and the emergence of uniform and generalised aggression.

2. Assessment

For a successful public order management to help decrease the likelihood of incidents, it is crucial that police tactics fit closely with relevant risk assessments. It is of great practical importance to know and assess the social identities of the various (sub)groups of fans, their values and standards, aims and goals, their sense of what is right and proper, their stereotypes and expectations of other groups, their history of interaction with these groups and anything (dates, places, objects, forms of action) that has particular symbolic significance.

3. Communication

To avoid potential conflict situations, it is important to communicate with fans in a proactive way. Where possible this is best done by persons who are known and trusted by fans. At any rate it is important to communicate with fans in a manner (and in a language) they understand and to do so in an unequivocal way.

4. Facilitation within limits

At every stage of the operation, tactical options should take account of - and where feasible facilitate - the intentions and aims of the fans, as far as these are reasonable and legitimate. If it is necessary to impose limits on fans behaviour, it is important to make clear the reasons behind and what alternative means are available through which legitimate aims of the fans can be achieved.

5. Differentiation

Differentiation between (groups of) fans actually posing a danger and those that do not is a consideration that must be built into every tactical or strategic decision relation to football fans, i.e. into training, planning, equipping, briefing and operating. A police performance should be used that matches tactical choices made in this respect.

Tactical options:

- Primarily a preventive approach, secondarily a repressive approach;
- Targeted and rapid interventions to clearly set behavioural limits in order to avoid escalation (and the necessity for more high profile, more generally repressive measures);
- Confidence and determination among police officers (based on good briefings and exchange of information, good agreements on responsibility and competence, decentralised and quickly accessible backup);
- Small surveillance units in regular uniform, who are easily approachable and actively contact fans;
- Decentralised intervention units (with their specific tools such as riot police vehicles, dogs, water cannons) are kept away from the street scene for as long as possible;
- Fast information flow from the proper information teams and use of the knowledge and skills of the foreign police services;
- Use of the "community policing approach" of international cooperation in addition to the traditional "criminal intelligence/ investigation" approach. In the "community policing approach" the focus is on public order management (rather than criminality) and there is an open and direct interaction with fans. Working wherever possible on a basis of "know and be known", the focus is not just on individuals, but on actual behaviour of fans."

Recommendation 46 – The Greek authorities should update and maintain the current system of peer review of football policing operations in order to identify more best practices and learning points. (status: important)

2017 Comment: It is not uncommon across Europe for some individuals active in supporter groups to use this as a shield for engaging in criminal activity. The delegation has no evidence to suggest that this is the case in Greece but considers that it would be prudent for the sports police (NFIP) to liaise with the criminal police regarding any possible linkage.

2017 Recommendation 21 : The Ministry of Interior should ensure that: policing football operations take into account established good practice and are in compliance with the Council of Europe Convention's obligations and take full account of the key role played by the sports police. *(status: important)*

2024 Comment: Recommendation still outstanding.

2017 Recommendation 22 : The Ministry of Interior should review current policing football operations with a view to adopting a strategic and tactical policy of identifying and gathering evidence in respect of individuals and/or groups posing increased safety or security risks. *(status: important)*

2024 Comment: Recommendation still outstanding.

2017 Comment: The Ministry of Interior should also ensure that all police match commanders are aware of established good practices in respect of reducing risk through effective liaison

with supporters, taking into account the various supporter liaison options set out in the Recommendation Rec (2015)1.The aim throughout should be to demonstrate a commitment to effective liaison as a means for marginalising the influence of risk groups and avoiding the empowerment of individuals and groups whose behaviour poses safety risks inside and outside of stadia.

***2017 Recommendation 23 : The Ministry of Interior should ensure that all police match commanders are aware of established good practices in respect of reducing risk and marginalising the influence of risk groups through effective liaison with supporters, taking into account the various supporter liaison options** set out in the Recommendation Rec (2015)1**.** (status: important)*

2024 Comment: Recommendation still outstanding

2017 Comment: The Ministry of Interior should liaise with the Council of Europe regarding the delivery of a national policing football training event for police trainers and key practitioners with a view to adapting the training to meet the needs of the Hellenic Police. Thereafter Police academies and Police training centres should incorporate the training into their training programs in order to ensure that all police personnel (newly recruited and experienced alike) are aware of their role and duties in accordance with the European standards.

***2017 Recommendation 24 : The Ministry of Interior should ensure that police personnel engaged in the preparations for, and operations during, football events receive appropriate and specialist training in European policing football good practices.** (status: important)*

2024 Comment: Recommendation still outstanding

2017 Comment: The Ministry of Interior should ensure that the Greek sports police, notably the National Football Information Point (NFIP), is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the CETS No. 218 and secondly play a key role in delivering the proposed comprehensive exclusion strategy.

2017 Recommendation 25 : The Ministry of Interior should ensure that the Greek sports police, notably the National Football Information Point (NFIP), is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the CETS No. 218 and secondly play a key role in delivering the proposed comprehensive exclusion strategy. (status: important)

***2017 Recommendation 26 : The Ministry of Interior should ensure that, on a risk assessment basis, funding is provided to deploy police delegations to, and host incoming police delegations from, countries whose national and club football teams are competing against teams from Greece in European competition and other international matches.** (status: important)*

2024 Comment: Recommendation still outstanding.

Intent

9.2. 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**

From the T-S4 annual monitoring questionnaire, the total number of reported incidents and sanctions is difficult to understand without a breakdown of the type of incidents.

- **Comments:**

Due to the lack of clarity in the data shared with the delegation, it is difficult to assess the reality of the number and seriousness of the incidents recorded by the police concerning football.

Recommendation 47 – The Greek authorities should improve the collection and/or communication of police statistics, especially with regard to the categories of incidents. (status: important)

Recommendation 48 – The Greek police authorities should continue to invest in the development of intelligence gathering and dynamic risk assessment systems in order to adopt a risk-based deployment of forces. (status: important)

Intent

9.3. 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**

Police liaison with supporters is of paramount importance, and extensive European experience at a number of major football tournaments over the past decade has shown that encouraging police personnel to adopt a welcoming and friendly approach to supporters can be an effective policing tactic. Adopting such a policy can be challenging and frustrating for staff, especially if it is not routine and they have to deal with a diverse range of visiting supporters from different cultures and speaking different languages.

Recommendation 49 - Police units deployed at sport events should be encouraged to interact proactively with supporters and to adopt a welcoming and friendly but firm attitude towards them. (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

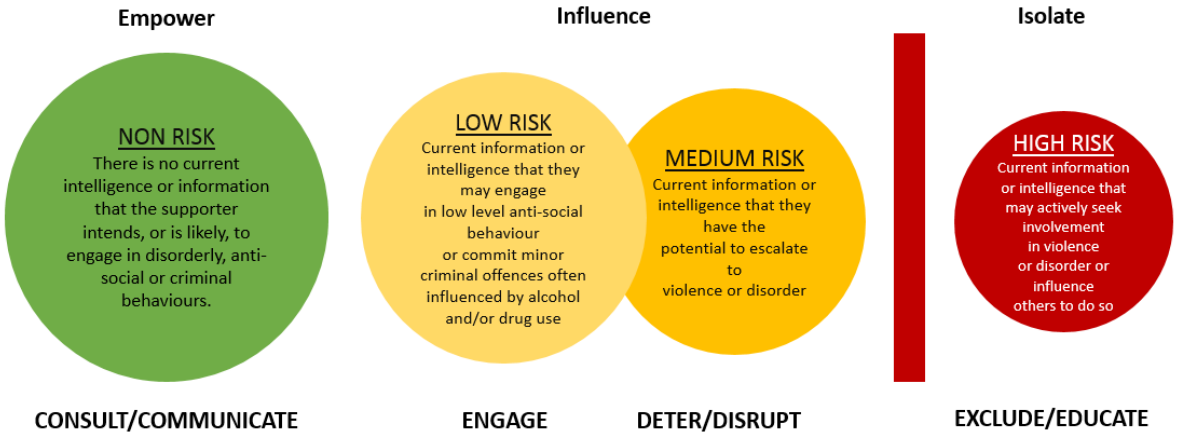
- **Observations**

As said above, the Greek Government, given the specific context of sport-related violence, continues to privilege strict repressive measures like the collective bans against away supporters, responsibility of clubs for offences committed by their supporters, heavy fines and matches played behind closed doors, until the situation comes back to normal. Basketball should be, next season, the first sport where away supporters will be authorised to come back to arenas.

The new technologies being implemented at major sports venues will enable authorities to identify individual perpetrators and prosecute them, instead of punishing exclusively their clubs, as it is the case now. Therefore, the number of banning orders is currently extremely low, if we take into account the serious incidents occurred over the last year: for instance, in the Basketball League, there are only 10 bans in force.

A balanced and sustainable national strategy to prevent sport-related violence should take into account the fact that there are four categories of supporters and there is a need for public and private authorities to address them with different tools: firstly, the vast majority of supporters are non-risk and it is important to empower them, in order to reinforce their positive influence on the other supporters; secondly, the risk-prone supporters are a minority that needs to be influenced to become non-risk ones; and, thirdly, the tiny minority are known risk supporters,

whose influence should be minimised, and they need to be isolated and excluded from sports events (see image below):



Source: EU Handbook on international police cooperation and security management of football matches with an international dimension, p. 65 (updated on 13 June 2024).

- **Comments**

The new National Co-ordination Committee should review the exclusion strategies, with a view to introducing a more effective banning orders system, taking advantage of the recent installation of CCTV in all stadia of the top league, and the implementation of the digital ticketing system, as detailed in Annex B on security of the T-S4 Recommendation Rec (2021)1 of the Saint-Denis Committee.

It is of utmost importance that the new digital ticketing system be linked with a national register of banning orders, to prevent banned persons from buying tickets. Moreover, the list of banned persons should be centralised - if it is not already the case - and should be regularly communicated to relevant authorities, first and foremost the police, in order to be effectively enforced on the ground.

Moreover, the team encourages the Greek authorities to create a network of sport prosecutors and magistrates, to raise awareness of sport/related violence and criminality and be part of the MARS international network of prosecutors and magistrates responsible for sport, recently created by the Council of Europe.

Recommendation 50: The new National Co-ordination Committee should review the exclusion strategy, with a view to introducing a more effective banning orders system, taking advantage of the recent installation of CCTV and the implementation of the digital ticketing system, as detailed in Annex B (Security) of the T-S4 Recommendation Rec (2021)1 of the Committee. (status: essential)

Recommendation 51: The relevant authorities should ensure that the new digital ticketing system is connected to a centralised register of banning orders and that police - notably the NFIP - and other relevant public authorities have access to this register on a permanent basis, to enforce the bans effectively. (status: essential)

Recommendation 52: The Greek authorities are encouraged to create a network of prosecutors and magistrates responsible for sport, to raise awareness of sport-related violence and criminality and be part of the international network of magistrates and prosecutors (MARS), recently created by the Council of Europe. (status: important).

Recommendation 53: The Greek authorities should further invest in refining the actual exclusion system, which ensures that the troublemakers are not able to attend sporting events. The issued banning orders should be collected by a single central body or implemented in a single database, based on clear rules applicable to all sports, national and international, for use by all interested parties. (status: essential)

2017 Recommendation 27 : The national co-ordination group should review the current exclusion process with a view to introducing more effective arrangements, taking into account European models of good practice which have delivered high levels of success in deterring football related violence and misbehaviour, preventing repeat offending, and transforming the behaviour of excluded persons. (status: essential)

2024 Comment: Recommendation still outstanding.

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. (…)*
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 and supporters.*

Compliance

- **Observations:**

The team highlights the fact that the composition of the Greek delegation to the Saint-Denis Committee is a good practice to be followed by other States Parties to the Convention, both with regard to its high-level and its multi-agency composition. This highly facilitates the

cooperation between the Committee and the Greek authorities and the more effective implementation of the Convention at national level.

- **Comments**

The Greek authorities should maintain regular and long-term close co-operation with the Saint-Denis Committee in respect of international events, share experiences and participate in the development of good practices, in particular 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 and supporters.

The Greek National Football Information Point (NFIP) should be regularly resourced, trained and equipped, to effectively undertake its roles and responsibilities, as set out in Article 11.2 of the Convention.

Moreover, the NFIP should be the body in charge of collecting the list of banned people and should play an active role in delivering the national exclusion strategy.

Finally, the NFIP should be more clearly integrated in the decision-making process and strategic policy of the Greek police with regard to policing of major sports events.

Recommendation 54: The Greek authorities should ensure that all police commanders and their personnel engaged in the preparations for, and operations during major sports events keep receiving appropriate and specialist training in European policing football good practices. (status: important)

Recommendation 55: The Greek National Football Information Point (NFIP) should be provided with sufficient resources (human and financial) to to effectively undertake its roles and responsibilities. The NFIP should be regularly informed of the list of banning orders. (status: essential)

2017 Recommendation 28 : The Ministry of Interior should continue to ensure that the head of the NFIP participates in all meetings of the Council of Europe Standing Committee while the Ministry of Sport should ensure that an official working in the area of sports safety should attend Council of Europe Standing Committee meetings. *(status: desirable)*

2024 Comment: Recommendation still outstanding

Intent

11.2 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 Greek NFIP is part of the NFIP network that carries out its tasks in accordance with the provisions of the EU Council Decision 2002/348/JHA of 25 April 2002 concerning security in connection with football matches with an international dimension. It is based at the level of the Greek National Police and provides services to all local police forces in Greece and is also responsible for international police cooperation aspects. Given the scale of the problem of football and other sport-related violence in Greece, the resources allocated to the Greek NFIP (4 police officers who also have other duties) are not sufficient.

Recommendation 56 - The Greek police authorities should continue to invest in the development of the national network of police spotters and in their training. (Status: important)

Recommendation 57 - The Greek NFIP should organise annual meetings of its national network of spotters, mainly after the end of the football season, in order to address emerging challenges and points for attention. (Status: important)

Recommendation 58 - The Greek NFIP should work closely with the other police departments responsible for organised crime in order to prepare evidence packages for the prosecution of football troublemakers. (Status: important)

Intent

11.3. 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

The team salutes the recent implementation of a new policing approach based on a zero-tolerance policy with regard to violence, racism and discrimination in the context of sport. The new approach includes valid elements of a dedicated policing strategy, as a network of "sports police liaison officers" has been created at national level (2 dedicated police officers for each of the 54 local police headquarters in Greece), whose members have been trained and specialised in monitoring and intelligence & evidence gathering on fans-related activities.

They have also participated in joint training sessions (organised in Athens) along with match commanders and NFIP staff, in order to achieve a common operational understanding of sports event policing and to ensure that they can effectively carry out their complementary roles in accordance with the legal framework.

The Hellenic NFIP has 4 active positions, staffed by officers who are not exclusively responsible for sports policing and international police cooperation in relation to sports events.

Intent

11.4. 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

11.5. 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

The Hellenic NFIP 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.

SECTION D - Concluding Remarks and Draft Action Plan

D.1 Concluding Remarks

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

- assist and support the authorities in Greece in developing an integrated approach to safety, security and service at football events based on established good practice customised to fit national circumstances; and
- assess the extent to which the current safety and security arrangements are compliant with the policy Articles of the Convention and the good practices contained in Recommendation Rec (2021)1 of the Committee.

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

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

D.2 Draft Action Plan

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 Greece (Athens, May 2024)

REPORT OF THE MONITORING VISIT:

DRAFT ACTION PLAN

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

- demonstrate compliance with the principles and outcomes enshrined in the Convention;
- reflect the established good practices on safety, security and service contained in 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.

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

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

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

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

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

Article 4 - National and Local Co-ordination Arrangements

Recommendation 1: The Greek authorities should fully implement in due time the new structure of co-ordination, from national to local level, namely aiming at adopting a national strategy and, according to the evolution of the risks and threats, updating the legal, regulatory and administrative frameworks. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 2: The newly established National Co-ordination Committee should establish a working group comprising representatives from local communities and supporter representatives. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 3: The relevant authorities should develop a government-led multi-agency communication and media strategy. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 4: The working arrangements at local level should be 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. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 5: The Greek authorities should define the Terms of Reference for the selection and recruitment of the observers of the Standing Committee for Combating Violence in Sport (DEAV) and ensure that, in due time, they are properly trained to perform their roles and responsibilities. (status: important)

Milestones	Timing	Lead Agency	Progress

Article 5 Safety, Security and Service in Sports stadiums

Recommendation 6: The Greek authorities should seek to ensure an integrated approach, by progressively investing in the service pillar. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 7: The Greek authorities should find a solution in order to harmonise the standards on the design, infrastructure, licensing, certification and inspection at sports venues. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 8: The Greek authorities should ensure similar service standards at major sports venues (stadia and arenas), namely in terms of inclusiveness, sanitary and refreshment facilities, namely by replication the good practices of the basketball association and league. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 9: Consideration should be given to adoption of UEFA/CAFE and the 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://documents.uefa.com/v/u/UEFA-Guidelines/Access-for-All-UEFA-and-CAFE-Good-Practice-Guide** **b) IPC Standard https://www.paralympic.org/sites/default/files/document/160307102314920_IPC+Accessibility+Guide.pdf**			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 10: 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 11: 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)}. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 12: 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 13: 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)}. NB: this level of service and training plan should be consistent across all of Greece. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 14: The National Co-ordination committee 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 15: The team recommends that the local suitability Licensing authority (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that it can physically hold, having regard to its design and condition, but also the numbers that can be safely managed, in other words the quality of the safety management. (status: important)

The UK Guide to Safety at Sports Grounds 6th Edition (Green Guide) is the international recognised standard for setting a safe capacity within a stadium and detailed design criteria. https://sgsa.org.uk/physical-factors/calculating-safe-capacity/
Alternately the Greek Standards ELOT EN 13200- 1 ΕΛΟΤ EN 13200-1 Ε2 | ΕΛΟΤ (elot.gr), 2019, Spectator facilities General characteristics for spectator viewing area and ELOT EN 13200-7 Spectator facilities Part 7: Entry and exit elements and route. ELOT EN 13200-7 | ELOT

Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 16: The team also recommends the training of the Suitability Licencing staff to evaluate the process to determine the safe capacity of the stadium and each sector, based on the evacuation capacity of each sector and the quality of the safety management of the stadium (See INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 17: A detailed command and control structure should be documented to provide details on the practicalities of each party within each of the control rooms and their specific responsibility (See Recommendation Rec (2021) 1 Annex A Safety https://rm.coe.int/annex-a/1680a45e6f). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 18: The Club Safety Officer/representative should be provided with a detailed job description which clearly sets out the functions of their post. The (T-S4 Recommendation Rec(2021)1 Annex A on Safety) and its good practices may be used to compile a checklist of functions necessary for the role. The Team recommends the National Co-Ordination Committee to set the minimum areas of competence to be demonstrated by such safety officers, supervisors and safety stewards, taking into account both the core functions of each group and the variety of roles that they may perform, having regard to the checklists in the Saint-Denis Committee's Recommendation on this subject (See

T-S4 Recommendation Rec (2021) 1 https://rm.coe.int/annex-a/1680a45e6f Appendices 33) and the checklist https://rm.coe.int/annex-d/1680a45e72. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
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Recommendation 19: The National Co-Ordination Committee 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 (See T-S4 Recommendation Rec (2021) 1 https://rm.coe.int/annex-a/1680a45e6f Appendices 33). The Team 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 20: The Greek authorities 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 21: 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 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)} Appendix 33). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 22: The team 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**
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Recommendation 23: The Greek authorities should launch a public campaign to raise the awareness of the fans about the risks associated to the use of pyrotechnics at football matches and other sports events, 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 24: For major football and other sports events, all fire officers, police officers, stewards, private security, staff of the stadium authorities, referees, players 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. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 25: The Greek authorities should consolidate effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns, while progressing steadily towards a more balanced integration with the service pillar. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 26: The Greek authorities should draft and implement a national strategy on combating hate speech and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour, namely benefiting from the campaign of the EU-CoE joint project on "Combating hate speech in sport", of which Greece is an active partner, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 27: The relevant authorities should put measures in place to refuse entry into the venue 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 and public spaces on the occasion of major sports events. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 28 : The Greek authorities should improve recruitment, accreditation, training and assessment of safety managers and stewards, whenever possible complemented by regular common training and exercises with the police (See appendixes 33, 36 and 41 of T-S4 Recommendation Rec (2021)1, Annex A on Safety, of the Committee) and recommendation Rec (2022) 2 (Annex 2) which provides a model of regulatory framework on stewarding and private security at sport events. (status: essential)

Milestones	Timing	Lead Agency	Progress

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Recommendation 29: The Greek authorities should equip and train police and stewards in an appropriate manner, namely in foreign languages. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 30: A document or stewarding plan should be developed for each event, which contains the respective roles and responsibilities of the police, stewards/private security companies along with the competence expected of each practitioner (See https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)} Appendix 41). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 31: The event organiser should develop and set out a level of service and training expected of personnel supplied by the private security company. A contract to this effect such as a service level agreement specifying the numbers, and quality of safety staff should be in place. (See https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}, Annex A). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
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Article 7 – Contingency and Emergency Planning			
Recommendation 32: 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 T-S4 Recommendation Rec(2021)1, Annex A - https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)} –. All key decision makers should be located together in the same room. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 33: 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 sports venues and other relevant premises, and that they are tested and refined in multi-agency table-top exercises. (status: essential)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 34: 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Article 8 - Engagement with Supporters and Local Communities			
Recommendation 35: The relevant authorities should ensure that the needs of supporters are taken into account from the planning to the delivery of sports events and develop structures of dialogue and consultation with supporters and supporters' representatives. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 36: 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 37: The relevant sports authorities should consider establishing in their regulations the need for the top divisions' clubs to appoint supporter liaison officers (SLO) and disability and access officers (DAO) (see T-S4 Recommendation Rec (2021)1, Annex C on Service. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 38: The good practices in the field of dialogue and communication with the different segments of spectators, currently being implemented by the basketball authorities, should be replicated by other sports, where applicable. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 39: The relevant Greek authorities should develop preventative and educational projects with children and young supporters, whenever possible using players as role models, replicating the basketball good practices to other main sports (See T-S4 Recommendation Rec (2021)1, Annex C on Service). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 40: The sports authorities should be encouraged to develop relations with all categories of supporters, to encourage inclusion for the majority in a transparent and constructive way, namely via supporters charters (See T-S4 Recommendation Rec (2021)1, Annex C on Service). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Article 9 - Police strategies and operations			
Recommendation 41: In accordance with European good practice, 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)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 42: The police should ensure regular specialised training for match commanders, spotters and football intelligence officers, in accordance with European good practice, and envisage common training and exercises with safety personnel. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 43: Police units to be deployed should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters. (status: important)			

Milestones	Timing	Lead Agency	Progress
Recommendation 44: Police forces and other local agencies should commit to opening communication channels with SLOs and DAOs – when they are established - and supporters, in line with the guidance set out in the T-S4 Recommendation Rec (2021) 1 - https://www.coe.int/en/web/sport/t-s4-recommendations#{%22133417550%22:(0)}, Appendix M, and the EU Handbook on Police Liaison with Supporters (12792/16). (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 45: Supporter feedback should be considered in the risk assessment process before each match. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendations 46: The Greek authorities should update and maintain the current system of peer review of football policing operations in order to identify more best practices and learning points. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 47: The Greek authorities should improve the collection and/or communication of police statistics, especially with regard to the categories of incidents. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 48: **The Greek police authorities should continue to invest in the development of intelligence gathering and dynamic risk assessment systems in order to adopt a risk-based deployment of forces. (status: important)**			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 49: Police units deployed at sport events should be encouraged to interact proactively with supporters and to adopt a welcoming and friendly but firm attitude towards them. (status: important).			
Milestones	**Timing**	**Lead Agency**	**Progress**
Article 10 - Prevention and Sanctioning of Offending Behaviour			
Recommendation 50: The new National Co-ordination Committee should review the exclusion strategies, with a view to introducing a more effective banning orders system, taking advantage of the recent installation of CCTV and the implementation of the digital ticketing system, as detailed in Annex B on security of the T-S4 Recommendation Rec (2021)1 of the Saint-Denis Committee. (status: essential)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 51: The relevant authorities should ensure that the new digital ticketing system is connected to a centralised register of banning orders and that police - notably the NFIP - and other relevant public authorities have access to this register on a permanent basis, to enforce the bans effectively. (status: essential)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 52: The Greek authorities are encouraged to create a network of prosecutors and magistrates responsible for sport, to raise awareness of sport-related violence and criminality and be part of the international network of magistrates and prosecutors (MARS), recently created by the Council of Europe. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

Recommendation 53: The Greek authorities should further invest in refining the actual exclusion system, which ensures that the troublemakers are not able to attend sporting events. The issued banning orders should be collected by a single central body or implemented in a single database, based on clear rules applicable to all sports, national and international, for use by all interested parties. (status: essential)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Article 11 - – International Co-operation			
Recommendation 54: The Greek authorities should ensure that all police commanders and their personnel engaged in the preparations for, and operations during major sports events keep receiving appropriate and specialist training in European policing football good practices. (status: important)			

Milestones	Timing	Lead Agency	Progress
Recommendation 55: The Greek National Football Information Point (NFIP) should be regularly resourced, trained and equipped, to effectively undertake its roles and responsibilities. The NFIP should be regularly informed of the list of banning orders. (status: essential)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 56: The Greek police authorities should continue to invest in the development of the national network of police spotters and in their training. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 57: The Greek NFIP should organise annual meetings of its national network of spotters, mainly after the end of the football season, in order to address emerging challenges and points for attention. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**
Recommendation 58: The Greek NFIP should work closely with the other police departments responsible for organised crime in order to prepare evidence packages for the prosecution of football troublemakers. (status: important)			
Milestones	**Timing**	**Lead Agency**	**Progress**

APPENDICES

Appendix A

Compliance with 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;

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 well-being of individuals and groups who attend, or participate in, a football match or other sports event, inside or outside of the stadium, 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 event, inside or outside of a stadium;

c. “service measures” shall mean any measure designed and implemented with the primary aim of making individuals and groups feel comfortable, appreciated and welcome when attending a football match or other sports event, inside or outside of a stadium;

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 match or other sports event, inside or outside of a stadium;

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 matches or other sports events safe, secure and welcoming, inside and outside of stadiums;

f. “integrated approach” shall mean recognition that, irrespective of their primary purpose, safety, security and service measures at football matches and other sports events invariably overlap, are interrelated 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 planning and operational activities must 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 match or other sports event held inside or outside of a sports stadium.

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 services, and to allow the sharing of updated information on risk assessment.
3. The Parties shall ensure that the co-ordination arrangements involve all key public and private agencies responsible for 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 practices.
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 strategic and operational levels.

Article 5 – Safety, security and service in sports 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 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:
   – the 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 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.
7. The Parties shall encourage their competent agencies to highlight the need for players, coaches or other representatives of participating teams to act in accordance with key sporting principles, such as tolerance, respect and fair play, and recognise that acting in a violent, racist or other provocative manner can have a negative impact 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 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;
   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 shall 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 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.
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.

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 practices, 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 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.
3. 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.

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 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.

Article 11 – International co-operation

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.
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.

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 and supporters.

Appendix B

Social & Environmental Responsibility Strategy 2024-2028

Hellenic Basketball Federation (HBF)



Social &
Environmental Respc

Appendix C

The following recommendations from the 2017 visit are included below and are either generic to Greek venues or specific to the OAKA stadium, which the visiting team were unable to visit.

They have been included here for the Greek Authorities to reflect upon and determine if they have been implemented or the new recommendations have superseded them.

2017 Safety Recommendations

National Recommendations

1. It is felt that the management at each venue should be responsible and accountable for safety at the venues and their management procedures once established should not be changed without first going through a period of consultation with all interested parties.

2. Pending the establishment of the proposed independent stadium safety authority, each region in Greece should establish a safety team approach consisting of senior representatives from emergency services, stadium managers and operators, sports federations which meets regularly and at least annually and covers all sports venues to which spectators are admitted.

3. Initially Greece should aim to prepare a set of generic venue regulations or conditions of entry that outline the standards of behaviour that are acceptable in the sports grounds. They should then carry out a programme of education and information to inform clubs, sports' governing bodies and most importantly spectators that there are to be changes implemented and that such antisocial behaviour is not acceptable and will no longer be tolerated.

4. A training program and vocational work-related qualifications should be established for Event Safety Managers and Safety Stewards.

5. Each venue must have a dedicated safety control point from which the event may be safety managed, monitored and controlled.

6. Each venue should have a standard operating procedures manual and contingency plans which complement those major incident plans prepared by the emergency services.

7. Each sports venue should set a maximum safe capacity based on an assessment of the physical condition and safety management systems in place. In setting this capacity figure we recommend the principles contained in the UK Guide to Safety at Sports Grounds are followed and once determined in no circumstances should a larger number of spectators be admitted.

8. Each venue must have a robust access control system to determine the level of attendance.

9. It is an essential element of ensuring safety that the sports venues are regularly inspected and monitored by competent and independent persons. It is recommended that each region in Greece carry out a detailed survey and inspection of each venue at least annually.

10. It is our view that the fire service should be given the responsibility to undertake a detailed fire safety risk assessment of all public sports venues. It is also suggested that this approach could be extended to public venues. In addition, whenever there is a requirement for venue managers determine the maximum safe spectator capacity this capacity is discussed and agreed to by the fire service.

11. We recommend that serious consideration is given to the introduction of new primary "public safety" legislation which will provide an overarching legal framework that places responsibility of safety on the owners or operators of sports venues to which the public are admitted. It may also prove advisable if a similar framework covered all public venues e.g. cinemas, theatres and all public entertainment venues.

12. As well as the public safety legislation consideration should be made to the preparation of legislation and regulations to make anti-social behaviour at sports events unlawful.

13. The responsibility for the management of safety at the stadium should rest clearly and identifiably with the stadium management team and the responsibility for control of public order with the police.

OAKA Stadium recommendations

1. It is essential that a safe maximum capacity for the stadium be agreed by all parties involved at the Stadium and that this limit should then not be exceeded. The stadium may use the template provided by the SGSA to evaluate these capacities.

2. Currently the police carry out both safety and security functions inside and outside of the stadium. We suggest that this is a role for trained stadium safety personnel to carry out supported as necessary by police officers.

3. A controlled entry management system should be introduced that ensures all spectators enter only through turnstiles and the number is monitored at a central control point to ensure the capacity for each section is not exceeded. The turnstile monitoring system should be monitored from the Stadium control room.

4. The structure should be assessed by a competent structural engineer as part of an overall annual survey of the stadium.

5. We strongly recommend the stadium management have access to an effective CCTV system that covers the whole stadium and which can be operated from a stadium safety control room

and is available to both the police and safety management team.

6. It is recommended that an emergency evacuation time for each enclosure is determined and that there are sufficient number of exit gates to allow the safe evacuation of the seating enclosures within the emergency evacuation time.

7. There should be a consistent and coordinated system of signs to direct spectators to the appropriate entrance and then by stages to their viewing positions. Signage including emergency exit routes should be clearly visible from all areas of the ground. These signs should be clearly distinguished from signs providing information; they should be placed at such a height that they may be seen over the heads of other spectators. They should also be placed in both lateral and transverse directions to enable spectators entering the Stadium from any point to decide quickly which direction to take to reach their intended destination. A review of the existing stadium signage should be included.

8. The fire detection and alarm system and operation needs reviewing. Consideration should be given to ensure the system can be monitored during events by stadium safety staff from a central control point or room.

9. We recommend that consideration should be given to the installation of a modern public address system which is linked to a stadium control room and can be used by stadium managers to enhance safety arrangements.

10. It is our recommendation that a multi-agency safety control room to accommodate the Event Safety Officer, the Police Commander, communications officers and other representatives of the other safety related agencies likely to be present is installed at all venues.

11. The stadium management should appoint an Event Safety Officer who has overall responsibility for the management of safety at the stadium. They should also engage its own Event Safety Stewards to undertake safety related tasks.

12. Stadium management should prepare a series of safety management systems and procedures that enable the safety officer and safety stewards to properly discharge their duties and responsibilities.

13. It is essential that an effective management system is implemented that clearly identifies responsibilities, lines of communication and control.

14. There is a need for a recognised person or body to be responsible and accountable for the overall safety arrangements at each Stadium. This should include a rigorous system of inspection of the stadium by experienced and competent specialists that ensures the stadium remains in a satisfactory condition.

15. It is suggested that all the changes suggested for each stadium are linked to a common theme of improving spectator safety and comfort.

PART 3

Comments from the Greek authorities

on the report by the monitoring team

Introduction

First of all, the Greek authorities would like to frankly thank the Council of Europe and the Saint Denis Secretariat for the cooperation and especially the visiting team for the fruitful and the constructive report regarding the visit. We think that the comments and the recommendations are in the right direction and their implementation will be beneficial for our sport environment, especially regarding major sports events with thousands of spectators.

The Greek authorities would like to ascertain the Council of Europe for the determination of the Greek Government to apply the provisions of the Saint-Denis Convention leading to an integrated approach for Safety, Security and Service at football matches and other major sports events.

It is true that, in Greece, regarding the three "S", Security, Safety and Service, more work has been done to the first, i.e., Security, with all the relevant measures taken with the last legislation being mostly oriented to Security issues. The issues of Safety and Service that have to do more with the sport facilities and the integrated procedures have only recently given increased importance and priority. That's why the Greek delegation greatly appreciates the "Balance S4" joint project.

Scheduled actions

After the entry into force of Law 5085/2024 last February, a significant improvement regarding the incidents inside the stadia has been observed. The activation and upgrade of the Standing Committee against Sport Violence (DEAV), the new measures regarding the CCTV systems and the electronic ticket with simultaneous personal identification via the mobile phone are the measures that contribute more to the order before, during and after the games.

The implementation of these provisions has already started, and we would like to describe some of the steps taken after the visit in Athens of the Council of Europe last May.

1. **Official representation of Supporters**

Regarding the comments and recommendations of article 8 of the Convention, we have to point out that the 31st of August was the deadline for registration of the official fan clubs. The registration was made digitally in a specifically designed platform designed by the Ministry of Digital Governance and owned by the Ministry of Sport, while the Ministry of Citizen Protection will also have access to it. Eight (8) fan clubs were officially registered (fan clubs of Olympiacos, Panathinaikos, AEK, PAOK, Aris, OFI, Panseraikos and Iraklis).

A meeting of the Minister and the Secretary General with the representatives of the 8 officially registered and recognized fan clubs was held on September 17th 2024. https://minsports.gov.gr/gia-proti-fora-sto-idio-trapezi-oi-ekprosopoi-ton-8-nomimon-leschon-filathlon-me-ton-gianni-vroutsi/

The next steps are those 8 officially recognized fan clubs to establish a panhellenic federation that it will be the official institutional body of the supporters in Greece and possibly participate in

relevant Pan-European bodies like, e.g., Football Supporters Europe (FSE). The Panhellenic Federation of Supporters will also have representatives in the National Coordination Committee.

2. Licensing of Sport Facilities

The new common ministerial decree that will replace the previous one from 2017 describes the licensing procedures for sport facilities and it has explicitly taken into account the Saint-Denis provisions. More specifically:

2.1 In the classification of the sports facilities, it is explicitly mentioned which groups of sports facilities are within the domain of the Saint-Denis Convention. In particular, the sports facilities of the following groups are considered to be within the domain of the Saint-Denis Convention:

Group C1: Outdoor venues from 500 to 5,000 spectators, where international or professional division matches are held.

Group C2: Outdoor venues with 5,000 spectators or more, regardless of match category.

Group E2: Indoor venues with over 1,000 spectators, where national division matches are held.

Group F: Indoor venues with over 1,000 spectators, where international or professional division matches are held.

2.2 The obligation of all the sport facilities that belong to the Saint-Denis Convention's domain to have a safety officer.

2.3 The obligation of all the sports facilities that belong to the Saint Denis Convention's domain to have an evacuation plan, the main parts of which are provided in the appendix and follow the structure of the Saint-Denis Convention's recommendations.

2.4 The specifications of the separating elements in the stadia's areas to be closer to the specifications of the Guide to Safety at Sport Grounds (v.6) of the Sports Grounds Safety Authority (purchased last September).

3. National Coordination Committee

Two meetings of the National Coordination Committee have already been held (the first on July 9th and the second on October 1st) and the first decisions deal with the following issues:

1. The translation of some relevant documents in Greek, more specifically the three recommendations of the Saint-Denis Committee and the toolkit of 16 factsheets, as well as the educational 8-module e-learning course on the Saint-Denis Convention.

2. The update of the Uniform Safety Regulation for Sport Events (it is in the form of Common Ministerial Decree and stands from 2009 with very little modifications) and adjust it to the provisions of the Saint-Denis Convention.

3. The development of a National Strategy for an integrated approach on Safety, Security and Service at Sport Events, in accordance with the Saint-Denis Convention.

4. The determination and implementation of the framework for the education of stewards in football and other major sports events, driven by the Hellenic Police, taking into account the relevant guidelines of the international federations.

5. The design and implementation of an effective framework for the banning orders (exclusion measures) in collaboration with the Ministry of Justice and the Ministry of Digital Governance, in order to "black list" the banned persons (persons that are under restrictive terms regarding their admission to football or more general sports events, either before or after trial) from purchasing electronic tickets, or from entering the sports facilities (where there are no electronic tickets).

6. Opening a dialogue with the supporters' official representatives, as described in paragraph 1.

4. Accessibility Committee in the General Secretariat of Sport

Within the General Secretariat of Sport an accessibility committee is designated with people from the technical department and the paralympic committee, in order to visit the 17 national sports facilities and provide a report for each one of them regarding the use of these facilities by persons with disabilities (as athletes or as spectators). The accessibility committee will provide the report on the 17 national sports facilities by the end of 2024.

5. General Legislative initiatives for Safety, Security and Service

The electronic ticket through the mobile phone for ticket-holder's identification is also applied to professional basketball, after the legislation that passed last July.

Some functional details for the operation of the Standing Committee against Sport Violence (DEAV) have already been legislated (fines' range for the amateur clubs, fine tuning of the deadlines for administrative procedures, etc.)

Conclusively, we would like to thank once again the Council of Europe and the Secretariat of the Saint-Denis Convention and to express our commitment to the compliance of the provisions of the Convention, which will be beneficiary for our sport ecosystem.