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Monitoring visit to Türkiye

Istanbul, 8-10 November 2024

Report by the Monitoring Team

(Including the national report and comments by Türkiye)

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DRAFT REPORT OF THE MONITORING VISIT TO TÜRKİYE

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PART 1

NATIONAL REPORT OF TÜRKİYE

I. NATIONAL STATUS

Activities in Türkiye with regards to providing safety and security and developing service standards are carried out in co-ordination through a multi-agency approach. Safety, security and service quality in sports activities are discussed cohesively by including the measures with regards to providing security and preventing violence and disorder before, during and after the competition at sports venues and their surroundings, places where supporters gather temporarily or continuously and arrival and departure routes to the competition venue.

Within the context of this approach, the sports venue concept, which is addressed as part of safety and security measures, defines places where sports competitions and trainings take place, spectator and private spectator areas, locker rooms of athletes and venues available to practice sports within the implementation of the Law No. 6222, places where supporters gather in groups temporarily or continuously before, during and after the competition, arrival and departure routes to the place where competition takes place, vehicles which teams and supporters travel or gather collectively or accommodation centres of sports teams. In this way, safety and security of sports competition are observed through an integrated approach in terms of both time (before, during and after the competition) and space (by including arrival routes in addition to competition venue) aspects.

A multi-agency approach based on the effective participation and cooperation of public authorities, federations, sports clubs and supporters is adopted in safety and security of sports competitions. One of the most important pillars of this method are the Provincial and Sub-Provincial Sports Safety Boards, comprising: the Governor for the cities having teams at the Turkish Football Federation (TFF) Super League, or the Deputy Governor for other cities to which he is appointed by the Governor as the head of the Board; representatives of the municipality; the provincial gendarmerie command; the provincial security directorate; the provincial directorate for youth and sports; the provincial health directorate; the provincial directorate for national education; the relevant federation and amateur sports clubs confederation; a jurist appointed by the Governor; executive board members of different clubs responsible for the stadium safety; and, if needed, representatives of press members and relevant public institutions.

These Boards convene once per month, excluding the situations which require an extraordinary meeting. Boards determine the basic safety and security parameters regarding the organisation of sports competitions in the province or sub-province. Provincial and Sub-Provincial Sports Safety Boards are responsible for the determination of all safety, security and service-related measures, the approval of the Sports Venue Safety Certificate (Safety Certificate), the approval of the Sports Venue Safety Plan (Emergency Plan) created separately for each sports venue, determining the number of spectators at the beginning of the season that can be safely taken to the sports grounds throughout the season.

The Sports Safety Units established within the Provincial and Sub-Provincial Security Directorates and Gendarmerie Commands are at the centre of the security measures and actions

of this multi-agency approach for preventing violence and disorder. The co-ordination of the Sports Safety Units established within the Provincial and Sub-Provincial Security Directorates is provided by the Sections of Sports Safety, which was established as the Central Sports Security Unit (National Football Information Point - NFIP) under the Ministry of Interior, Directorate General of Security, Sports Security Department. In international competitions to be played in our country and international competitions that our National Teams and club teams will play abroad, the necessary cooperation and co-ordination with the police officials of the counter country is provided by the "National Football Information Point - NFIP" established within the Central Sports Security Unit.

The Sports Safety Units established within Provincial and Sub-Provincial Security Directorates act as the secretariats of Provincial and Sub-Provincial Sports Safety Boards and they supervise all processes dedicated to providing competitions' safety. Provincial or Sub-Provincial Sports Safety Units act in cooperation with the Central Sports Security Department, the Competition Safety Chief, the Sports Club Safety Official and the Club Representative responsible for the Fans (or Supporter Liaison Officer – SLO). Competition security officer and his/her assistant are determined by the Provincial Governor of the venue where the competition will be played, in order to co-ordinate all the safety and security procedures (including before, during and after the competition) for the competition. The Member of the Board of Directors responsible for Stadium Safety and the Club Representative responsible for the Fans are determined by the Sports Club.

A Competition Official is appointed to each competition by the TFF in order to ensure co-ordination with the sports clubs, stadium management and local authorities in terms of the Federation rules and to carry out final controls.

One of the most important tools to provide co-ordination relating the competition safety is the Co-ordination Meetings which are held before the competitions under the chairmanship of Competition Safety Chief. Preventive and intervention measures for spectating safety and against violence, measures for spectator health and actions regarding the prevention of factors reducing the game and spectating quality are established in the Law No. 6222 and implemented in the competitions in co-ordination set forth by the relevant law. The operation of this integrated measure and action network is carried out through Co-ordination Meetings. Co-ordination Meetings are held with the co-ordination of Competition Safety Chief and Federation Official with the participation of observer police, referee, and one representative from both clubs, home club officials responsible for safety and accreditation and the official of the sports facility. Safety, security and service issues, compliance of the stadium infrastructure, sportive matters and the safety measures to be taken before, during and after the competition are discussed in the Co-ordination Meeting.

Competition security officer and his/her assistant, in co-ordination with Provincial/Sub-Provincial Security Directorate and Provincial/ Sub-Provincial Gendarmerie Commands on the route, supervises and co-ordinates important security issues such as the security issues until the clubs and their supporters leave their own cities and reach the city where the competition will be played, 7/24 police precaution at the hotels where accommodation will be held,

transportation of the team delegation accompanied by the escort to the competition area, the assembly areas of the spectators, the transportation and dispersal at the stadium, the security of the stands, and the detection and detention of people who act against the law. Competition Safety Report containing deficiencies at the competition venue and liabilities which are not met by the sports clubs is also prepared by the Competition Safety Chief. This Report is submitted to the Federation, Provincial/Sub-Provincial Sports Safety Board and Central Sports Safety Unit (NFIP) by Provincial or Sub-Provincial Sports Safety Unit.

Furthermore, private security personnel are employed by the sports clubs taking part in the competition for the period from pre-competition to the evacuation of spectators and athletes in addition to the security officials appointed by the relevant public authorities for the competition security. Private security guards serve under the command and supervision of the competition safety chief and his/her assistant. Sports clubs also provide club officials other than the private security personnel, to work on the matters related to spectator health and safety.

Provincial or Sub-Provincial Sports Safety Boards determine the number and place of duty of the private security personnel, to whom sports clubs have to provide for the competition venue and spectating area. Sports clubs are obliged to provide a private security service in the competitions. The Member of the Board of Directors Responsible for Stadium ~~Security~~ co-ordinates the private security service in the competition area, which provides the first response for ticket control, body search, guidance, accreditation control and public order, under the knowledge and supervision of the Competition security officer and his/her assistant. The Board Member responsible for Stadium Safety fulfils this duty in co-ordination with the Competition security officer and his/her assistant.

Sports Clubs are responsible for the implementation of numerous measures inside the sports venue, such as the organisation of the competition and operation of several stadiums by coordinating with the local authorities as the host of the competition; appointment of club officials on the matters related to stadium, safety, supporters, ticket, sanitation and technical issues; purchase of service on health/private health; ticket sales; processing accreditation into the system; and communication with the supporters.

The Sports Venue Safety Plan, prepared by Sports Clubs exclusively for each sports venue, regulates risk-based safety and security strategy of sports venues and measures and actions for emergency situations in every aspect based on every identified risk. Sports clubs prepare the Sports Venue Safety Plan by conforming to the criteria determined by the relevant Federation and Sports Safety Unity and coordinating with the relevant public institutions. This Plan is put into practice after being approved by the Sports Safety Board. Additionally, the decision on the safety system and technical equipment to be implemented is made in accordance with the arrangements of the international sports institutions to which the relevant Federation is affiliated.

Sports Clubs are required to appoint a Club Official Responsible for Supporters according to the Law No. 6222. In addition, in accordance with the Club License and Financial Fair Play Instructions of the TFF, sports clubs appoint Supporter Liaison Officers (SLOs) and Disability

Access Officers (DAOs). Club Official Responsible for Supporters and SLOs share details on competition entrance rules, stadium rules, competition program, travel information, team program and information on opponent team's city with the supporters.

Clubs are subject to sanctions of mainly Football Disciplinary Regulations and other regulations and arrangements on the matter of safety and security violations which occur at the competitions. Clubs can make objections against decisions made by the Professional Football Disciplinary Board before the TFF Arbitration Committee for review within 7 days. Safety matters such as fire services' failure to arrive at the competition venue in time or with proper equipment, failure to implement health measures effectively, illegal entrance of supporters in the stadium, breach of accreditation, unpleasant and offensive chants, throwing foreign object to the pitch, deficiency in terms of number of the private security personnel, stadium physical infrastructure deficiency, general health issues are reported by the TFF Competition Official.

In case of insulting and threatening chants in the tribunes, the TFF Competition Official reports this situation and if a breach is detected, in addition to imposing a fine, the Professional Football Disciplinary Board may ban the spectators in the tribune where insulting or threatening chants are made from entering the competition and ban the club to play without spectators depending on the reoccurrence of the breach.

The TFF Competition Official submits these competition reports, which are prepared in accordance with TFF legislation, to the Professional Football Disciplinary Board or the Amateur Football Disciplinary Board based on their relevance. These reports are evaluated in accordance with TFF regulations and arrangements and in case a breach is identified they will be referred to the relevant disciplinary board after the disciplinary dispatch procedures.

Sports Federations are responsible for regulating the rules related to competitions, appointing auditors in order to ensure proper implementation of the rules and conformity of competition officials and sports venues to the relevant criteria and operating disciplinary and arbitration systems.

Furthermore, the "Stadium and Safety Committee Regulation", which is adopted by TFF, provides the benchmarks for the provision of stadium comfort, safety and security in football competitions. The "Stadium and Safety Committee", which is established within the scope of this Regulation, ensures that stadiums' current physical structures are built in line with UEFA and FIFA standards and criteria, inspections on the stadiums of all professional sports clubs in Türkiye are carried out to assess their conformity to Stadium and Safety Classification Criteria, competitions are organised in the suitable stadium in accordance with broadcasting and other designated criteria by classifying (star rating) the stadiums based on pre-identified standard criteria, key criteria required for stadium safety and comfort are identified in co-ordination with the Club Licensing Department, the implementation process of criteria is planned and the stadiums are inspected based on these criteria, and sections of the stadiums in which supporters will not be allowed are determined as a consequence of nonconformity to Stadium and Safety Classification Criteria.

Other important actors playing crucial role in the provision of safety, security and service quality in sports competitions are the Ministry of Health and municipalities. Municipalities are responsible for appointing a Fire Department Official to the Competition in order to assess the fire protection measures for the competition, stationing required fire engines and appliances and inspecting the infrastructure of the sports venue with regards to fire protection system. On the other hand, the Ministry of Health is responsible for appointing a First Aid Official to the Competition in order to assess the health measures for the competition, stationing required ambulances and first aid teams to sports venue's surroundings, and inspecting the infrastructure of the sports venue with regards to first aid system.

When the general law enforcers determine people who violate the Law No. 6222, the judicial process automatically starts, and the final result is clear after the investigation and prosecution process. Authorised prosecutors and specialised courts for investigation and prosecution of sports disputes carry out the necessary work and process, and the finalised sanctions are recorded in the database created by the Ministry of Interior.

II. MAJOR PROBLEMS AND INCIDENTS

In the last decade, the perception and awareness of racism in sports has revealed the need to take action, especially in popular sports disciplines, such as football. Race and ethnicity influence the way sports are accessed and experienced. Reactions to racial inequalities and discrimination (individual, organisational, structural, etc.) require consistent and specific approaches.

All sports fans, supporters, stakeholder public authorities and football movement actors in Türkiye display sensitivity on racism and discrimination related issues in harmony. In this sense, racism and discrimination has never been an issue in sports competitions and sports-related activities in Türkiye. During the UEFA football match played between Paris Saint-Germain vs. Başakşehir FK football clubs on 9 December 2022 in Paris, France, the referee of the match displayed a racist behaviour against one of Başakşehir FK football players. As a consequence of this behaviour, Başakşehir FK and its football players protested against this behaviour, returned to their locker rooms and decided not to continue the match. This protest received a significant support from all public opinion. Although the racist behaviour in this match did not take place in our country, it had an impact in our country as well.

Unpleasant and offensive chants are a frequent problem. However, there has not been any significant increase with regards to this problem. Disciplinary sanctions defined in the Football Disciplinary Regulations may be imposed to the Club's supporters making unpleasant and offensive chants, as mentioned above.

Individuals causing incidents on the football pitch may similarly be imposed with the sanctions defined in the Football Disciplinary Regulations, which are explained below.

(1) Persons violating the rules that ensure the normal course of the match, stadium order, discipline or competition safety, individually or collectively, are imposed to ineligibility or temporary suspension of spectating from one month to two years.

(2) The Disciplinary Board may impose pecuniary fine, stadium closure, and playing behind closed doors collectively to the responsible club for the misdeed of its supporters, members or athletes, or may impose only one of these sanctions based on the severity of the incident.

(3) In addition to above-mentioned sanctions, electronic tickets of the persons entering spectator block or blocks where fans involve in incidents on the pitch, may be blocked and they are banned from spectating Turkish Super League or 1st League competitions, based on the severity and course of the incident. Persons banned from spectating serve their sentence during home games of their team if the penalty is imposed during the home game and during the away games of their team if the penalty is imposed during their away game, accordingly. They serve their sentence during the league or cup competitions depending upon in which competition the penalty is imposed. A card blocking sanction is not imposed to persons with disabilities who cannot involve in the incidents occurred on the pitch.

(4) Incurred loss is compensated by the responsible persons.

In this regard, the following provisions are implemented pursuant to the Article 14 of the Law No. 6222 on Preventing Violence and Disorder at Sports Events;

(1) In case the fans publicly use words and exhibit behaviours in sports venues perceived as threats or insults by those who hear or see them regardless of whether they target or address a specific person as a group or individually, the perpetrators are sentenced to a judicial fine of not less than fifty days without the requirement for a complaint, unless their actions constitute another crime which requires a more severe penalty,

(2) A person who uses words and exhibits behaviours insulting society in sports venues in terms of religion, language, race, ethnicity, gender or sect, is punished with imprisonment from one to three years, unless his/her action constitutes another crime which requires a more severe penalty.

(3) In case the crimes defined in the first and second sub clauses are committed through carrying or hanging a written banner or writing on the walls, the penalty to be imposed is increased by half.

(4) (Add.: 4/7/2019-7182/8 Art.) Provisions of this article are also applied in case the actions specified in the first and second sub clauses are committed through any written, visual, audio or electronic mass media.

On the other hand, the issue that has come to the fore in sports competitions in terms of service and safety quality in recent years has been the COVID-19 pandemic due to the global coronavirus outbreak. Over the past two years, the pandemic has had a negative impact on clubs and on spectator participation at sports events.

In the first year of the pandemics, athletes, club managers, competition officials of the federations, broadcasters, members of the press, private security guards, firefighters, paramedics, first aiders, police and club employees had to undergo a COVID-19 PCR test. Those who tested positive were quarantined and received treatment. The stadium and stadium sections were disinfected, disinfectants were placed in the places where the officials could reach, and the officials were forced to work with masks within the scope of the measures taken.

With the "Instruction on Covid-19 Measures to be Applied in Competitions" issued by the TFF for the 2021-2022 season, the stadium spectator capacity was increased in the Super League, TFF 1st League, TFF 2nd League, TFF 3rd League and Ziraat Turkish Cup 2021-2022 Season competitions. It has been decided that the home team spectators will be accepted in the whole ratio, the guest team spectators will not be accepted to the matches, and those who are in the risk group according to the HES inquiry and those who cannot meet the following conditions will not be admitted to the stadium. According to this Instruction, persons who have completed the vaccination schedule determined by the Ministry of Health, were able to enter the stadium for 180 days after the 14th day following the last vaccination date; and persons who were infected with Covid-19, for 180 days from the completion of their isolation period.

In addition, according to the aforementioned Instruction, persons who have completed 180 days following the completion of the vaccination schedule and persons infected with Covid-19 and 180 days has passed since the completion of the isolation period, are able to enter the stadium tribunes, lodges, the protocol tribune and the press tribune on the condition that they have the reminder vaccinations. A 14-day immunity period is not sought for those who had the reminder vaccinations.

Besides, in the Super League and TFF 1st League competitions, the entrance of the spectators to the stadium is ensured with the tickets purchased through the HES application and e-ticket system. Those who will buy tickets must approve the e-ticket system operator to access their HES code information. Thus, the health situation of those who will enter the stadium will be clear, both in terms of their status of vaccination and Covid.

However, with the positive course of the pandemic, Covid-19 measures were eased as of 3 March 2022. With the statement made by the TFF, and it was decided to admit spectators to the TFF matches without any HES inquiry. In addition, the age limit of 12 applied in stadiums has been abolished. Responsibility for Covid-19 health measures and practices of officials in the red area, athletes and club employees has been transferred to the relevant club officials and medical teams, and it has been decided not to assign Health Measures Controllers at the competitions.

III. LEGAL FRAMEWORK

III.A. Sport-related General Legal Regulations

The Constitution of the Republic of Türkiye (1982) is the ground norm for the arrangements in sports field. Article 59 of the Constitution prescribes that the State shall take measures to develop the physical and mental health of Turkish citizens of all ages and encourage the spread of sports among the masses. Furthermore, the aforementioned Constitutional Article stipulates that it is not possible to resort to jurisdiction against compulsory arbitration decisions, which are the sole application authority against the decisions of sports federations regarding the management and discipline of sports activities.

The most important legal documents in defining the sports services in Türkiye are the Youth and Sports Services Law, dated 21/5/1986 and numbered 3289, and the Sports Clubs and Sports Federations Law, dated 22/4/2022 and numbered 7405. Youth and Sports Services Law No. 3289, binds sport in Türkiye to the legal legislation in a comprehensive and detailed way by regulating many titles such as the provision of sports services in the local area, the local budgeting of sports services, the conditions of sports personnel, the use of facilities, awards and sponsorship, the financial rights of athletes, immovable; and Law No. 7405 regulates Sports Clubs and Sports Federations, establishment of sports clubs, sports joint-stock companies and sports federations, their bodies, establishment of supreme boards, income and expenses, budget and expenditure principles, duties, authorities and responsibilities, audits, forms and conditions of any assistance to be provided, and other related issues.

Additionally, the Presidential Decree No. 1 on the Presidential Organisation, which was issued on Official Gazette No. 30474, dated 10.07.2018, undertakes a major role in regulating sports as a policy and strategy in Türkiye.

The Ministry of Youth and Sports is mandated to supervise the implementation of sports activities in line with plans, programs and legislation, ensure its development and popularisation, identify rules and procedures regarding the establishment of sports organisations and execute relevant works for identifying policies to be implemented in the sports field.

Activities of other sports disciplines except for football are carried out by the affiliated and independent sports federations, which are established within the scope of Law No. 3289. Football activities, on the other hand, are carried out by TFF, pursuant to the Law No. 5894 on the Establishment and Duties of the Turkish Football Federation. TFF is an autonomous legal entity subject to the private law provisions and is responsible for carrying out any kind of football activity in line with national and international rules, regulating and developing these activities and representing Türkiye both inside the country and abroad. Rules of football discipline are comprised by the legislation which is regulated by TFF through regulations and arrangements.

Sports federations are established as legal entities operating relevant sports activities in line with national and international legislation. In the first paragraph of Article 26 of the Law No. 7405 on Sports Clubs and Sports Federations, the relevant matter is adjudicated as follows: “Sports federations are established by law or Presidential decree to carry out activities related to sports and acquire legal personality with the publication of the law or Presidential decree in the Official Gazette.”

Procedures and principles regarding the establishment, bodies, establishment of supreme boards, revenues and expenditures, budget and expenditure principles, duties, powers and responsibilities, audits, forms and conditions of any assistance to be provided to them, and other related matters, of sports joint stock companies and sports federations are regulated under the Law on Sports Clubs and Sports Federations numbered 7405. In article 5 of this law, the compulsory organs of sports clubs are listed as follows: general assembly, executive board, and supervisory board. In addition, it is specified that other bodies can be established for appropriate purposes, provided that the duties, powers and responsibilities of these compulsory bodies are not transferred.

At this point, within the scope of paragraph 5 of Article 5 of the Law No. 7405: “Those who have been sentenced to deprivation of rights for one year or a total of two years in the last five years by arbitration boards, disciplinary boards of the Ministry, penal or disciplinary committees of sports federations or international organisations to which sports federations are affiliated, and those who have been sentenced to imprisonment for 1 year or more, will automatically be dismissed from their positions such as membership at the management, audit, discipline and other boards in the sports club, its subsidiaries and affiliates in the status of sports joint-stock company, and cannot take a position at the organs of sports clubs and sports joint-stock companies other than the general assemblies”.

Regulations on the Sports Federations regulating the rules and procedures with regards to the meeting of the general assemblies of other federations excluding TFF, formation of their council, opposition to be made to their list of delegation, formation of the list of nominees to their executive, supervising and disciplinary boards, execution of their elections, counting the votes, determining the rules of procedures of the supervising boards, determining the rules of procedure and the duties of the executive, supervising and disciplinary boards, determining the rules of procedures of and working conditions sought for the general secretariat and also determining the rules and procedures regarding in-kind and cash aid to be provided by the Ministry of Youth and Sports, entered into force after being issued in the Official Gazette No. 32612 and dated 25.07.2024.

III.B. Legislation for Preventing Violence and Disorder at Sports Events

Rules and procedures regarding measures to be taken and sanctions to be imposed in order to ensure peace and safety, physical integrity and public order through preventing the use of explosive, inflammable, combustible, sharp and bladed objects as a consequence of extreme competition and fanaticism and also through preventing violence and disorder and unpleasant chants which are derogatory slogans and behaviours insulting personal rights, family and moral values and contradicting the spirit, rules and principles of sports in places where sports competitions are organised and their surroundings before, during and after the competition, were firstly regulated by the Law No. 5149 on Preventing Violence and Disorder at Sports Events, which is issued in the Official Gazette No. 2455, dated 7.5.2004.

However, Law No. 6222 on “Preventing Violence and Disorder at Sports Events” was enacted in 2011 as a consequence of problems faced in the implementation of Law No. 5149, emergence of the need for harmonising the sports legislation with international legislation and as a result of the fact that persons violating laws were receiving administrative fines instead of judicial penalties, a dedicated organisation for sports jurisdiction did not exist, physical infrastructure for inspecting spectator ban system did not exist, there were no dedicated responsible persons for the matters such as first aid and fire protection, mechanisms inspecting and certifying the physical infrastructure of sports venues and approving emergency plans did not exist, the requirement for more effectively fighting against discrimination, racism, match fixing, incentive pay and organised crimes in sports emerged. Law No. 6222 on “Preventing Violence and Disorder at Sports Events”, which was amended by the Law No. 7182 and dated 12 July 2019 and issued in the Official Gazette No. 27905 and dated 14.04.2011, is the prominent regulation in the field of safety and security at sports.

The “Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events”, also known as the “Saint-Denis Convention”, which was opened for signature in Saint-Denis (France) on 3 July 2016 and signed by our country at the meeting held in Hungary/Budapest on 29 November 2016, entered into force on 1 November 2017 following the ratification by 3 states.

The Convention has become a part of our domestic law through “the Law on Approval of the Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events” dated 12 March 2020 and numbered 7225, also approved by our country, within the framework of the provision “international agreements duly put into effect have the force of law” in the last paragraph of article 90 of our Constitution.

In addition, within the framework of Article 11 of the Convention, which calls the Parties to share the general information related to football matches of international dimension with the aim of maximising cooperation, sharing experiences and participating in the development of good practices, to act as a direct and sole point of contact, the General Directorate of Security, Department of Security, Sections of Sports Security (Central Sports Security Unit) has also been appointed as the “National Football Information Point” (NFIP).

III.B.1. Law No. 6222 on “Preventing Violence and Disorder at Sports Events”

Scope and Aim of the Law: The Law No. 6222 on “Preventing Violence and Disorder at Sports Events” regulates the safety measures to be implemented at sports venues and their surroundings, at places where supporters gather collectively, either temporarily or continuously, at arrival and departure routes to the competition venue and at camp sites of the teams; match fixing, incentive pay and other prohibited actions and behaviours and sanctions to be imposed against these; duties and responsibilities of sports clubs, sports club executives, athletes and other officials, law enforcers or private security personnel, referees, supporters, supporter organisations, supporter representatives, sports federations, printed, visual or audio mass communication institutions and members of these institutions and also other relevant persons and institutions in preventing violence and disorder at sports events.

Measures on the Safety and Order of the Competition Venue and Spectating Area: Home clubs are obliged to take precautions determined by relevant sports federations and international sports federations on allocating an independent section to the away team supporters where the competition takes place and ensuring that no contact is allowed between the sections of opposite team supporters with regards to competition venue and spectating area safety and order. Furthermore, they are also obliged to implement the decisions taken by Provincial and Sub-Provincial Sports Safety Boards for ensuring safety of the competition. Required equipment is set up in order to ensure safety in the competition venue and spectating area and identify persons violating this Law, and the places at which cameras and similar equipment are set up, and their numbers are determined by the Provincial and Sub-Provincial Sports Safety Board.

Competition Safety Chief and Competition Safety Deputy Chief are assigned by the Local Authority and tasked with coordinating all persons and institutions related to the competition on implementing and inspecting the safety measures to be taken for the sports competitions. Competition Safety Chief can always decide to increase the number of law enforcement officers in the tribunes. It is regulated that Co-ordination Meetings are held on competition safety under the chairmanship of Competition Safety Chief before the competition.

Electronic Ticket Application: Tickets enabling spectators to enter spectating areas for the top league and the league one tier below it, are issued electronically through this arrangement. Tickets are sold through dedicated electronic cards for every person and individuals may enter sports competitions as spectators only through their dedicated cards. The home club is responsible for controlling these persons entering the sports competitions as spectators. If the competition is played in a neutral ground, both clubs bear this obligation and if it is a national competition, the relevant federation bears this obligation.

Prohibited Items: It is prohibited to bring prohibited items such as firearms, whether they are registered or not, other prohibited weapons prohibited to possess and sharp, razor-sharp, bladed and wounding object, even if they are not prohibited to possess, or explosive, inflammable, combustible, corrosive objects, drugs and stimulants in competition venue, spectating and

private spectating areas and in the vehicles with which teams or supporters travel collectively. Private security personnel may search spectators through technical devices or by hand if needed in the entrance of the sports venue under the supervision of law enforcement officers, in order to ensure the safety of the event.

Threatening and Insulting Chants: In case supporters display clear expressions or behaviours, individually or collectively, which may be perceived as a threat or insult by the persons hearing these expressions or seeing these behaviours, and provided that their actions do not require a more severe penalty, a punitive fine will be imposed to perpetrators without seeking complaints or paying attention to whether they have targeted one specific person. Persons displaying discriminating expressions and behaviours with regards to religion, language, race, ethnicity, genders or sects are sentenced to imprisonment.

The Law No. 6222 regulates many subjects under different titles, such as the establishment of Provincial and Sub-Provincial Sports Safety Boards, measures regarding safety and order of the competition venue and spectating area, safety of the competition venue, training field and spectating area, event safety, obligation of supporters' organisations, club official responsible for supporters, provision of spectating safety, match-fixing and incentive pay, prohibited items, bringing prohibited items into the sports venue and disturbing event order, threatening and insulting chants, illegal entrance in the venue and spectating area, entering confined areas, creating uproar and damaging facilities, aggravating factors of the crime and deprivation of rights, ban from spectating, Federations' authority to impose sanctions, referees, observers, pitch commissaries and representatives. Information has been provided only on the provision which the team deems important.

III.B.2. Secondary Legislation on Prevention Violence and Disorder at Sports Events

The Provincial and Sub-Provincial Sports Safety Boards are entrusted with the duty and authority of inspecting sports venues pursuant to the sub-clause (1) of Article 5 of the Regulation on the implementation of Law No. 6222. Sports Safety Boards have the authority of deciding whether the sports venue is complying to spectator admission by assessing the outcomes of their inspections in terms of spectator safety and health; approving the Sports Venue Safety Certificate, if no deficiency is identified, or submitting the deficiency to the Federation if it is identified, and disallowing the organisation of any competition in the sports venue until the deficiency is compensated.

It is stipulated by the sub-clause four of Article 20 titled "safety systems at sports venues" of the Regulation, that the Ministry of Youth and Sports will prepare the declaration and accept documents and "standard forms" to be prepared for similar matters and sports venue safety certificate for technical equipment to be installed at the sports venue, first aid, fire protection and the sports venue's structural durability, by receiving opinions of relevant ministries and federations. "Sports Venue Safety Certificate Forms" have been prepared pursuant to this

arrangement and duties, responsibilities and competences of relevant stakeholders are updated periodically.

Although it is not directly related to the field of safety and security, disciplinary boards have been restructured based on the “Sports Disciplinary Regulation” which became effective after it was issued in the Official Gazette No. 30830, dated 13.7.2019. In addition to this, apart from the athletes, the coach, trainer, other technical and administrative officers, health care team, private security, club employees and other sports-related officials in the sports club, regardless of the nature and duration of their work, are determined as club officers and subject to the provisions of the Regulation. Furthermore, sports federations which are established in accordance with Annex 9 of the Law No. 3289, put disciplinary regulations into effect. However, with the entry into force of the Law No. 7405, the acts that will constitute a disciplinary violation and the basic procedures and principles of the disciplinary proceedings will be rearranged in a regulation to be issued by the Ministry in accordance with paragraph 5 of Article 32 of the said law and with the publication of the said regulation, sports federations will also rearrange their disciplinary instructions in this context. Disciplinary hearings are conducted before the TFF within the scope of its own Statutes and regulations, Football Disciplinary Regulations in particular, due to the fact that TFF is independent and autonomous.

It is aimed to ensure discipline in the amateur and professional football activities, determine the establishment, working rules principle, actions leading to disciplinary violation and sentence to be imposed and execution of sentence for these actions through Football Disciplinary Regulations In this regard, disciplinary violations are defined and sentences to be imposed for these violations are determined in the Regulations.

Additionally, the “Stadium and Safety Committee Regulation” adopted by TFF, provides basic parameters for the provision of stadium comfort, safety and security at football events. The “Stadium and Safety Committee”, established within the context of this Regulation has the following responsibilities:

- Ensuring that stadiums’ current physical conditions and comfort and safety to be provided within stadiums meet the modern standards; and ensuring that stadiums are built in line with UEFA and FIFA standards and criteria;
- Inspecting the stadiums of all Professional sports clubs in Türkiye with regards to their conformity to Stadium and Safety Classification Criteria;
- Classifying (star rating) the stadiums based on pre-identified standard criteria and ensuring that broadcasting is performed, and competitions are held in stadiums complying to pre-identified criteria;
- Identifying key criteria, planning the implementation process of the criteria and inspecting the stadiums based on these criteria in co-ordination with Club Licensing Department; and
- Determining the sections of the stadiums in which supporters will not be allowed as a consequence of nonconformity to Stadium and Safety Classification Criteria and submitting the decision of disallowing spectators in the Stadium to the Executive Board until the deficiencies are compensated.

IV. NATIONAL STRUCTURE

The sports structure of Türkiye is established comprehensively and in detail by different legislation. While the Ministry of Youth and Sports and its provincial organisations are the public pillars of this structure, sports organisations and clubs constitute a sports movement conforming to both national and international sportive dynamics.

IV.A. Ministry of Youth and Sports

The duties of protecting youth and developing sports, which are entrusted to the Government by the Constitution, fall within the remit of the Ministry of Youth and Sports.

4 Deputy Ministers, 8 General Directorates, 2 Departments, 3 Independent Departments, 1 Office of Press and Public Relations, 1 Office of Private Secretary, 1 affiliated institution (Spor Toto Organisation) and 81 Provincial and Sub-Provincial Directorates of Youth and Sports at the provincial level, are within the organisational structure of the Ministry of Youth and Sports. In addition to general organisational structure of the Ministry, the Sportive Evaluation and Development Board, the Central Sport Disciplinary Board with its new structure, the Arbitration Board and Provincial Sports Disciplinary Boards responsible for disciplinary works and operations at the provincial level are also performing their duties.

The duties and responsibilities of the Ministry of Youth and Sports are prescribed by Article 184 titled “Duty”, of the Presidential Decree No. 1; and duties of the Ministry in the sports field are as follows:

- a) Supervising the implementation of sports activities in line with plans, programs and legislation; and taking measures which encourage their development and popularisation;
- b) Performing required works in order to identify policies to be implemented in sports field, coordinating, evaluating and inspecting the works with regards to organisation, independency of federations, sports facilities, training, sponsorship, protection of athletes’ health and international organisation;
- c) Determining the rules and principles regarding the establishment of sports organisations and other matters; and
- ç) Supporting successful athletes and trainers along with youth and sports clubs.

In summary, the Ministry of Youth and Sports is the competent public authority for ensuring that sports activities are implemented in line with plans, programs and legislation, developed and popularised.

The Directorate General for Sports Services is the service unit of the Ministry responsible for sports. The duties and responsibilities of the Directorate General according to Article 189 of the Presidential Decree No. 1 are as follows:

- Performing required works in order to identify the main policies to be implemented in sports field, identifying the needs for sports facilities and planning;
- Ensuring that sports culture is developed, popularised and encouraged and taking all necessary precautions on this matter;
- Performing works regarding athlete training and popularisation of sports, providing in-kind and in-cash aids to successful athletes and trainers or enabling them to receive these aids, rewarding these successful athletes and trainers and performing works and operations regarding the provision of pension and National Athlete Certificate to the athletes who represented Türkiye in international competitions and ranked top three;
- Ensuring that sports facilities are barrier-free, developing sports training programs and complementary technologies, providing required equipment, broadcasting in order to provide information and raise awareness with regards to disabled persons, educating sportsman on this issue, cooperating with other institutions on this matter with the aim of enabling disabled persons to do sports and popularising it;
- Carrying out out-of-school sports activities and activities in other sports fields, ensuring the development of these activities and providing equipment and similar materials for these activities within the bounds of possibility;
- Ensuring that international rules and all regulations are implemented in sports competitions;
- Talent searching school-age children, identifying the ones who have the potential to become athletes and directing them to the sports field suitable for their talents;
- Performing works and operations with regards to establishing, operating and naming all sports facilities and training centres;
- Performing necessary works regarding the identification of policies related to the protection and development of athletes' health, taking necessary measures on this matter, performing works and operations regarding the establishment of health research centres, ensuring that athletes undergo health screening, providing information regarding the substances threatening athletes' health and supporting institutions to this end;
- Carrying out the insurance operations of athletes or having these operations done;
- Cooperating with national and international institutions in this field of work;
- Ensuring that sports executives, trainers, employees and referees are trained;
- Determining the sports disciplines, performing works and operations regarding the establishment and annulment of sports federations;
- Performing works and operations regarding the establishment and general assembly of independent sports federations;
- Providing assistance to the federations and sports clubs and performing works and operations regarding their budget;
- Taking the necessary precautions for popularising sports disciplines in the country which are not subject to any federation, carrying out activities in these disciplines and ensuring that clubs are carrying out activities in these sports disciplines;
- Performing works and operations with regards to allowing sports federations and clubs to organise or participate in the national and international competitions and to evaluating the results of these competitions;

- Performing works and operations with regards to registry, visa and transfer of athletes, sports clubs and sports incorporated companies and acting in co-ordination with federations on this matter; and
- Implementing relevant services such as permits and warrants regarding the establishment of private sports facilities; and determining the standards and inspecting these facilities.

The Directorate General for International Organisations and Foreign Relations is the service unit of the Ministry responsible for the international relations of the Ministry. The duties and responsibilities of the Directorate General according to Article 189 of the Presidential Decree No. 1 are as follows:

- Following international developments in Ministry's field of work and maintaining the international relations of the Ministry;
- Acting as a competent authority for holding international organisations, international communication and contacts, holding meetings, conferences, seminars, organisation and similar activities both within the country and abroad, and ensuring required co-ordination;
- Performing works and operations with regards to fulfilling financial obligations to the international organisations such as membership fees, subscription fees and relevant services;
- Performing works with regards to determining the rules and principles of purchasing, selling and renting for holding international organisations, operating the dedicated account opened for this purpose;
- Implementing and coordinating the projects and international exchange programs, which are implemented with international organisation in the field of youth and sports;
- Performing works and operations with regards to the international cooperation and protocols falling under the field of work of the Ministry;
- Performing works regarding the visits of guests to our country; and
- Assessing and evaluating the project proposals and drafts, submitted by international organisations or other countries either directly or through an institution, based on the policy of the Ministry.

IV.B. Turkish Football Federation

Activities of other sports disciplines except for football are carried out by the affiliated sports federations of the Ministry and independent sports federations, which are established within the scope of Law No. 3289. Football activities on the other hand, are carried out by TFF.

TFF is an autonomous legal entity subject to private law provisions and is responsible for carrying out any kind of football activity in line with national and international rules, regulating and developing these activities and representing Türkiye both inside the country and abroad, pursuant to the Law No. 5894 on the Establishment and Duties of the Turkish Football Federation.

TFF performs its works and operations in accordance with this Law and TFF Statutes, and also ensures order and discipline in football competitions through TFF Regulations regulated in accordance with TFF Statutes.

For example, actions leading to disciplinary violations and sentences to be imposed to these actions are defined in the Football Disciplinary Regulations so as to ensure discipline in the amateur and professional football activities.

Furthermore, assessments with regards to inspect whether the stadiums of all professional clubs conforming to the Stadium and Safety Classification Criteria and other works and operations defined in the Regulations are made by bringing the physical structures, comfort and safety of stadiums to the modern standard through “Stadium and Safety Committee Regulations”.

It is inspected whether there is any matter violating the Football Disciplinary Regulations and other TFF arrangements within the scope of the reports of competition officials in order to prevent incidents occurring at the competitions and in case there is violation, the violating persons and clubs are referred to the Professional Football Disciplinary Board. The Professional Football Disciplinary Board and the Amateur Football Disciplinary Board decide the sanctions to be imposed, which are defined in the Football Disciplinary Regulations and relevant TFF arrangements, within the limits determined by TFF Statutes.

IV.C. Directorate General for Security of the Ministry of Interior

The Directorate General for Security of the Ministry of Interior co-ordinates the implementation of security measures regarding sports events organised in Türkiye at national and international levels in accordance with the standards.

Measures regarding sports security are taken by a central organisation (the Central Sports Security Unit - National Football Information Point, or NFIP) and the Sports Security Branch Offices which have councils in 81 provinces. Sports security-related business and operations are carried out with a total of 965 expert personnel, 12 of which are in the central organisation and 953 in the Sports Security Branch Offices in 81 provinces.

Central Sports Security Unit: The Central Sports Security Unit operating under the Security Department of the General Directorate of Security, established within the Provincial and Sub-Provincial Security Directorates, is the unit coordinating the Sports Security Units and functioning as Turkish National Football Information Point (NFIP Türkiye).

Provincial Security Directorates: The Provincial Security Directorates provide contribution to Sports Safety Boards by making risk assessment regarding events.

Provincial/Sub-Provincial Sports Security Units: Provincial Sports Security Units take necessary precautions for preventing persons banned from spectating from entering competition venues and spectating areas. Supporters and supporter groups are observed before and after the competition within the context of preventing violence and disorder at sports events and Event Security Chief and his/her Deputy/Deputies take necessary measures with Sports

Club Safety Official in co-ordination with Club Official Responsible for Supporters with the aim of preventing incidents threatening the event safety and security.

Observer Police (Spotters): Observer Policemen perform their duties with civilian clothing under the command of the Competition security officer and his/her assistant.

They observe supporters and supporter groups who may commit crimes, identify persons committing wrongful acts through cameras and similar tools and refer these persons to the unit which will take legal action.

IV.D. Sports Jurisdiction

Arbitration Board of the Ministry of Youth and Sports

The Arbitration Board of the Ministry of Youth and Sports, established within the scope of Law No. 3289 on Youth and Sports Services, performs the duty of evaluating and rendering definitive judgment on the decisions taken by the Executive Board of the Federation and to the disciplinary or punishment boards on the conflicts arising between the federation and clubs, athletes, referees, managers and coaches, clubs and managers, coaches, athletes and clubs with regards to the works and operations of the sports federations based on the objection of the relevant persons to the decision.

The Arbitration Board of the Ministry of Youth and Sports has the mandate on sports disciplines other than football and it is independent and impartial. Unless the members of it resign or deemed retired from their duties, a new member cannot be appointed. Decisions of the Arbitration Board are final apart from the conditions of correcting the errors of fact or retrial. The Arbitration Board takes its decision in accordance with laws, rules of the national and international federations, procedural provisions of the law and file contents, witness statements, expert examining, and all evidence based on the principles of justice and equity.

Disputes arising between the Ministry and sports federations, excluding matters related to the supervision of sports federations (except TFF), are resolved by a commission to be formed with the participation of representatives of the Ministry and sports federations under the chairmanship of a member to be determined by the Arbitration Board, and objections to the decisions of this commission are assessed and finalised by the Arbitration Board pursuant to the Article 33 of the Regulation on Sports Federations.

Central Sports Disciplinary Committee

The Central Sports Disciplinary Board was established within the scope of additional article 9 of the Youth and Sports Services Law No. 3289. In case of detection of the federation president and members of the management, discipline and supervisory board in violation of sports ethics and discipline, as a result of their referral by the Ministry of Youth and Sports, it is authorised to decide on them by conducting a disciplinary investigation.

TFF Arbitration Committee

The TFF Arbitration Committee is an independent and impartial obligatory arbitration authority pursuant to the Law No. 5894 on the Establishment and Duties of the Turkish Football Federation. It is the supreme legal board of TFF and the final decision-making authority with regards to the conflicts defined in TFF Statutes and relevant regulations. The Arbitration Committee, regulated by TFF Statutes and pursuant to the Law No. 5894, evaluates the decisions of the boards and units of TFF, which have the decision-making authority in accordance with TFF Statutes and relevant regulations, and render a final judgment on their decisions independently. The Board renders the final judgment on the application made to it and this judgment cannot be resorted to the jurisdiction.

The decisions of the Board of Arbitration regarding the management and discipline of football activities are final and no judicial action can be taken against these decisions. Against its other decisions, it can file an action for annulment in accordance with Article 439 of the Code of Civil Procedure, within one month from the notification of the decision.

TFF Disciplinary Boards

In accordance with the Law No. 5894 on the Establishment and Duties of the Turkish Football Federation, the disciplinary committees, which are considered among the first-degree legal committees of the TFF, are the first-degree decision-making authority regarding the discipline of football activities. The Provincial Disciplinary Boards consist of the Amateur Football Disciplinary Board and the Professional Football Disciplinary Board.

V. GOOD PRACTICE EXAMPLES

V.A. Functioning Mechanism of Safety Measures

All competitions are evaluated based on three risk categories (A – High Risk, B – Medium Risk, C – Low Risk), considering that many factors such as social, political, cultural, economic and environmental developments and changes occurring in society, hostilities between societies and/or fans arising from the past, the possibility of political or terrorist propaganda in sports venues, weather conditions, negative environmental factors such as earthquakes, floods, fires, etc., terrorist attacks, social media, setbacks which may occur in the mass media, transportation and accommodation problems, epidemics/pandemics, language problems in communication, etc., may affect sports organisations in a positive or negative way and measures are separately planned including the period of before, during and after the competition by taking account of the factors such as the condition of social facilities, the condition of equipment and materials, financial resources, trained people, etc., and also the key elements such as health, transportation, technical services, communications, press, etc. in addition to safety and security with the aim of preventing possible incidents that may lead to violence and disorder due to the reasons such as supporter incidents happened before,

supporters' desire for ranking these incidents up in the tribunes, rankings of the team in the league table, statements of the team officials, status of the competition, application of the clubs and federation that led to discontent among supporters, etc.

High level measures are taken, starting from the first point of departure, at airports, railroad terminals, bus terminals, highways, city/district centres and way stations on the highways, at the places where supporters gather collectively or in groups and at arrival and departure routes to the stadiums, in order to keep supporter movement under control and prevent unpleasant incidents between supporters before competitions.

Objects and properties of the supporters and supporters themselves are searched meticulously, in accordance with the legislative arrangements, through the road applications carried out by provincial/sub-provincial security directorates and provincial/sub-provincial gendarmerie commands, during their travel starting from their first point of departure, throughout their travel route.

All necessary measures are planned and implemented for both the visiting team, starting from their arrival to the city, at the hotel they are camping, training field, arrival and departure routes to the stadium and at airports and on highways; and for the home team as well, at team's facility, arrival and departure routes to the stadium until they arrive to their facilities after the competition.

Measures regarding the safety of referees, statesmen visiting stadium to watch the competition, political party leaders and persons who have political, social, cultural and economic status are taken at the highest level.

It is ensured that supporters will be dispersed in a way that they do not face with the members of teams and each other; and all movements of the visiting team are observed at their arrival point by ensuring co-ordination, as is ensured in their arrival to the city of the home team. Similarly, it is ensured that both teams travel safely by escorting the visiting team to the airport and the home team to their facility.

Social media accounts are inspected in terms of competition safety through virtual policing before the competition. Persons sharing violent contents are identified and charges brought against them.

The "Sports Safety Guide", which also includes the checklist to be used by the Competition security officer and his/her assistant and other responsible personnel, has been prepared and disseminated in all provinces with the aim of providing unity in implementing safety measures before, during and after the competition.

In addition to policing measures, leaflets, banners and posters have been prepared for the purpose of informing public opinion and leaflets are disseminated by Provincial Security Directorates to the supporters at the stadium entrance before the matches. Posters are hung on the billboards at squares, avenues and shopping malls located in the city centres receiving a vast number of supporters, and on the tribunes in the stadiums. Additionally, images of the

posters and banners are shared by the Directorate General for Security of the Ministry of Interior through their social media accounts.

Activities with regards to receiving public support and raising public awareness have been carried out through police radio and social media accounts.

It is ensured that two public service advertisements, which are prepared with the cooperation of the Directorate General for Security of the Ministry of Interior and Directorate General of TRT (public TV), are broadcasted in national televisions, radio channels and scoreboards in the stadiums.

Work with regards to establish the “Sports Safety” branch was finalised and “Instructions for the Personnel in the Security Services Class Sports Safety Branch” entered into force in 26.06.2024 after being approved by the Directorate General for Security.

Furthermore, as educational activities; 1070 personnel have been provided with “Basic Training Course for Sports Safety” since 2017 and 575 personnel who have received courses are currently performing their duties in 81 provinces. Additionally, 153 personnel have been provided with “Crime Research Training” through social media to facilitate their virtual patrolling duties and 70 personnel have been given “training of trainers for sports safety” and these trainings are still in progress.

Personnel working at the Sections of Sports Security receive “Sports Safety Electronic Data Bank Seminar” regarding the sports safety. A total of 874 personnel has received Sports Safety Electronic Data Bank Seminar since 2018.

"Biometric Fingerprint Module Training" was given to 124 personnel working at the Police Headquarters of the Sections of Sports Security in 2021, with regards to the obligations of individuals sentenced to "bans from spectating sports events" to apply to the law enforcement.

In 2024, the "Sports Security Judicial Procedures Seminar" was organised in two terms for 238 personnel working at the Sections of Sports Security.

Work is under way to ensure that all personnel are trained and branched by carrying out course planning for our personnel who have not received Sports Security Basic Training.

V.B. International Safety and Security Activities

One of the Turkish police commissioners was elected as the member of executive board of the NFIP Network/Think tank and perform active duty after receiving votes from 20 out of 34 countries voted in October 2023 in the election of the execute board comprising 4 persons, held in Madrid, Spain in October 2023.

As a consequence of our activity in the board, a Sports Safety Workshop was held on 26-28 November 2019 by UEFA for the first in our country within the scope of EPIC (Event Policing and International Cooperation) project implemented for enhancing the efficiency of National

Football Information Point (NFIP) and also of relevant international police cooperation arrangements to this end.

60 Competition security officer and his/her assistant from 48 provinces of ours, Chair and Deputy Chair of the European Union Group of Football Safety and Security Experts (Think Thank), Chairman of UEFA Stadium and Security Committee, UEFA Safety and Security Advisor, UEFA experts, TFF Safety Co-ordinator and TFF Stadium and Safety Chief participated in the workshop and ideas were exchanged on the matters which are risk factors in football matches, violence and disorder in football, torches and inflammable objects, exemplary good practices for sports safety, stadium safety and security management, stakeholders responsible for sports safety, and practices on ban from spectating.

Our country hosted successfully the UEFA 2019 Super Cup Final played in Istanbul between the UEFA Champions League champion Liverpool FC football team of England and the UEFA Europa League champion Chelsea FC football team of England; the 5th Islamic Solidarity Games held in Konya in 2022; and the UEFA 2023 Champions League final, which is UEFA's most prestigious organisation at the club level, played between Manchester City FC team of England and FC Internazionale Milano team of Italy, at the Istanbul Atatürk Olympic Stadium, within the framework of effective security measures.

NFIP – National Football Information Point, performing works with regards to providing security in international sports organisations and competitions within Central Sports Security Unit actively undertakes the duty of ensuring necessary cooperation and co-ordination activities with the Council of Europe member States.

In 2021, a total of 52 personnel were assigned as the security co-ordinator abroad, 3 of whom with our National Team at the EURO 2020 European Football Championship, 2 at the International Police Cooperation Centre (IPCC) established in The Hague, Netherlands, 2 at the 32nd Summer Olympics and Paralympic Olympic Games held in Tokyo, Japan; and 45 at 19 international matches.

81 personnel were assigned as the security co-ordinator abroad at 33 international matches in 2022 and 96 personnel were assigned at 33 international matches in 2023.

2.264 personnel were assigned to Qatar in order to ensure security at the 2022 FIFA World Cup held in Qatar on 20 November – 18 December 2022.

In 2024, a total of 118 personnel were assigned as the security co-ordinator abroad, 29 of whom with our National Team at the UEFA 2024 European Football Championship including 4 armed personnel, 2 at the IPCC established in Neuss/Germany, 4 at the Mobil Sports Security Unit established to work under the Centre, 1 at the Frontier and Train Station Public Order Cooperation Centre, 20 at the Frontier and Train Station Public Order Units, 2 at the EURO Finals organised in Berlin/Germany, 2 at the Summer Olympics and Paralympic Games held in Paris/France and 58 at the 18 international matches.

Our effective work on safety and security in sports, within the framework of our membership in the Saint-Denis Convention, has been implemented in our country as of July 1, 2020. It is

carried out in a more intense and comprehensive manner within the scope of the Convention. Under the co-ordination of the Ministry of Youth and Sports, the delegation formed with the representatives of the Ministry of Internal Affairs, General Directorate of Security (NFIP Türkiye) and the TFF "Integrated Safety, Security in Football Matches and Other Sports Competitions" and within the scope of the Saint-Denis Committee, which was established as the monitoring body of this Convention.

All actors of sports in our country were informed by the Ministry of Youth and Sports about the content of the Saint-Denis Convention and the new approaches it brings. In addition, under the co-ordination of the Ministry of Youth and Sports, the Türkiye delegation to the Saint-Denis Committee provides active support to meetings and studies within the scope of the Convention. In addition, it takes part with its representatives in three Advisory Groups ("Monitoring", "International Cooperation" and "Legal Issues") established within the framework of the Committee and contributes to the work of these advisory groups.

V.C. Reforms Introduced by the Amendments Made to the Law No. 6222

In order to prevent violence and disorder at sports events, the scope of the concept of sports field has been expanded and the places where the fans gather in groups continuously and temporarily before, during and after the competition, the routes to and from the places where the matches will be held, the vehicles that the fans travel collectively, the places where the teams camp are included in the concept of the sports field. The special viewing areas, which were introduced as a new concept, and the places where fan groups watch the matches in digital environment outside the competition area were defined.

All kinds of crimes, which have threatening and insulting nature and are committed through printed, visual or audio electronic mass communication tools, have been brought under the scope of the Law without seeking complaints and it is enabled to impose procedural action to especially the social media users sharing contents which encourage violence.

Imprisonment sentences and punitive fines have been increased in order to fight against criminals and hooliganism and to make punishments more deterrent.

In this regard, while punitive fines were imposed to persons accessing competition venue, locker rooms, corridors, athletes' exit tunnels without authorisation earlier, one-to-three-year imprisonment sentence is started to be imposed to these crimes with the new arrangement and in case they violate the course or safety/security of the competition, sentence given to these persons has been changed from three months to one year to one to three years.

Similarly, ban from spectating for one year has been gradually increased to two years for the repetition of the offence for the second time and to five years for the third time. Sentence imposed to persons committing an offence while covering their face completely or partially has been increased by half and punitive sanctions have been introduced to the black-market ticket sales.

It is aimed to increase the efficiency of safety measures taken, ensure peaceful spectating of the matches through the fight against persons involved in violence incidents in sports and to draw more spectators, families in particular, to the tribunes in this way through these arrangements.

VI. ANNEXES

Links

Law No. 6222 on Preventing Violence and Disorder at Sports Events

<https://www.mevzuat.gov.tr/MevzuatMetin/1.5.6222.pdf>

Law No. 7405 on Sports Clubs and Sports Federations

<https://www.mevzuat.gov.tr/MevzuatMetin/1.5.7405.pdf>

Law No. 3289 on Youth and Sports Services

<https://www.mevzuat.gov.tr/mevzuatmetin/1.5.3289.pdf>

Law No. 5894 on the Establishment and Duties of the Turkish Football Federation

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=5894&MevzuatTur=1&MevzuatTertip=5>

Regulation on the Implementation of the Law on Preventing Violence and Disorder at Sports Events

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=20124018&MevzuatTur=3&MevzuatTertip=5>

Sports Disciplinary Regulation

<https://www.resmigazete.gov.tr/eskiler/2019/07/20190713-4.htm>

Statutes of Turkish Football Federation

<https://www.tff.org/Resources/TFF/Documents/TFF-KANUN-STATU/TFF-Statusu.pdf>

Stadium and Safety Committee Regulations

<https://www.tff.org/Resources/TFF/Documents/TALIMATLAR/Stadyum-ve-Guvenlik-Komitesi-Talimati.pdf>

Football Disciplinary Regulations

<https://www.tff.org/Resources/TFF/Documents/TALIMATLAR/Futbol-Disiplin-Talimati.pdf>

Turkish Football Federation Accreditation Regulations

<https://www.tff.org/Resources/TFF/Documents/TALIMATLAR/Akreditasyon-Talimati.pdf>

Turkish Football Federation Broadcasting Regulations

<https://www.tff.org/Resources/TFF/Documents/TALIMATLAR/Yayin-Talimati.pdf>

Club Licensing and Financial Fair Play Regulations

<https://www.tff.org/Resources/TFF/Documents/TALIMATLAR/Kul%C3%BCp-Lisans-ve-Finansal-Fair-Play-Talimat%C4%B1.pdf>

Regulations on the Board of Representatives

<https://www.tff.org/Resources/TFF/Documents/TALIMATLAR/Temsilciler-Kurulu-Talimati.pdf>

Turkish Football Federation Super League and TFF 1st League Broadcasting Instructions

<https://www.tff.org/Resources/TFF/Documents/INSTRUCTIONS/Super-Lig-TFF-1-Publication-Instruction.pdf>

Instructions of Sports Federations

<https://shgm.gsb.gov.tr/Federasyonlar/28/3/Federasyonlar>

PART 2

REPORT BY THE MONITORING TEAM

SECTION A - Executive Summary

The monitoring visit to Türkiye was held by a team appointed by the Committee of the Saint-Denis Convention (T-S4), (hereafter referred to as the “team”, the “Committee” and the “Convention”, respectively), comprising experts in the three pillars of the Convention: safety, security and service. An UEFA safety and security expert was invited to join the visiting team as an observer.

The Turkish authorities had requested in 2019 a monitoring visit in the framework of the European Convention on Spectator Violence (ETS No. 120), but this visit was postponed until late 2022, due to the COVID-19 sanitary crisis.

Türkiye signed the Saint-Denis Convention on 29 November 2016, ratified it on 25 May 2020 and the Convention entered into force in Türkiye on 1 July 2020.

Following the initiation of the work of the Saint-Denis Committee and its advisory bodies, including the Advisory Group on Monitoring, in April 2021, the Turkish authorities reiterated their request for a monitoring visit to be held in the framework of the Saint-Denis Convention, scheduled early 2023, on the occasion of a high-risk derby match in Istanbul. Unfortunately, due to a major earthquake that occurred in the Southeast of Türkiye late February 2023, the visit had to be postponed for the 2nd semester of 2024.

The monitoring visit to Türkiye was held on 8-10 November 2024, on the occasion of the Super League derby match between Galatasaray-Samsunspor teams, in Istanbul.

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

- demonstrating compliance with the Saint-Denis Convention; and
- demonstrating alignment with established good practices set out in the Saint-Denis Committee’s Recommendations Rec (2021)1, Rec (2022)1 and Rec (2022)2, ensuring that football stadiums and other sports venues provide a safe, secure and welcoming experience for all spectators and other participants.

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 events 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 held in Türkiye 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 visit program provided the team with the chance to engage and interact with the relevant stakeholders from Türkiye in the field of the Convention and thus have access to all the information needed in order to assess the compliance with the provisions of the Convention.

The team pays tribute to the organisers of the visit who ensured that it was able to meet with, *inter alia*, high level representatives of the Ministry of Youth and Sports, Ministry of Interior Directorate General for Security / National Football Information Point (NFIP), Ministry of Justice, TFF, Professional Football League (Turkish Union of Clubs), professional football clubs (Beşiktaş, Galatasaray, Fenerbahçe, İKAS Eyüpspor - İkas Eyüpspor representative could not attend to the Coordination Meeting due to being on duty in an away match -, Kasımpaşa, Rams Başakşehir Football Club) and their Safety officers, Supporter Liaison Officers (SLO) and Disability Access Officers (DAO).

The team would like to express its gratitude to the Turkish authorities for their hospitality, openness and availability to share information. In particular, the team would like to thank Mr. İnanç Özçakmak and Mr. Bulent Perut for their efforts in organising this visit in a comprehensive manner, that allowed it to meet with all relevant stakeholders. Secondly, the team would like to thank the members of the Turkish NFIP and the representatives of the TFF and the football clubs for the fruitful discussions and the provided information in connection with the organisational practices and policies related to football and other sports events in Türkiye.

The program included a visit to the derby match Galatasaray vs Samsunspor, played on 10 November 2024. The match was categorised as B (medium) risk level and as deployment references the team can mention 1231 police officers and 1000 stewards. Additionally, 120 police spotters were deployed.

For this specific match, the expected attendance was 47.000 for home fans and 2.500 for away fans. Information related to away fans was provided in due time to Istanbul police regarding the travel with 20 coaches up to the stadium. Information was confirmed afterwards underlining that information exchange was accurate for that specific match. The stadium's safety installations and the technology successfully supported the policing operation for this match. In this sense, 878 CCTV cameras (including the cams installed above turnstiles, used for matching the ID photo from the fan card Passolig with the actual photo of the person taken during the access through the turnstile) were used for monitoring the ingress, behaviour during the match and egress of the spectators.

The video recordings are to be kept for 30 days by the organising club and up to one season by the TFF. The stadium gates can be locked automatically using an electronic magnetic system. A special police room is provided at the stadium in which the offenders can be presented to the Public Prosecutor. Beside the stadium CCTV cameras, another 2 video camera systems are used during the match operations (police body cams and hand-held ones). There are 3 safety and security layers in place on the stadium footprint: the first, the visual ticket check by police; the second one the body check and mobile ticket check; and, lastly, the Passolig turnstile system.

The stadium location offers strategic advantages since it is built on the top of the hill. Access to the stadium can be ensured via auto means, stairs and a special train line linked to a close by shopping mall. The stadium increased its policy on service by providing heaters for the spectators installed on the roof. As regards sustainability and reducing the carbon footprint, the stadium is producing its own energy with solar panels installed on the roof.

The competition security officer could manage this match very well even though two other parallel big events were taking place within the city centre on the same day, one of them being

a match Istanbul BB vs Besiktas (an historical rival of Galatasaray) and the other match was Fenerbahçe vs Sivasspor.

The competition security officer chose a high-profile police tactics, as a deterrent factor on one side and as an advanced protective factor for all the participants at the event, since in that occasion a commemoration of Mustafa Kemal Atatürk, Founding Leader of the Republic of Türkiye, was being held.

To help support the understanding of the safety and security preparations for this match, the team also attended the co-ordination meeting prior to the match.

Football is a huge part of the Turkish culture and one of the most important cities in this field is Istanbul, where 6 major football clubs are active, comprising an important number of fans.

Türkiye implemented a specific legal framework on sports events management, the latest updates being in force since July 2019. The related Turkish legislation is targeting specific actions to be taken prior, during and after sports events within, in close proximity and on the routes to and from the sport arena.

The sport orientated legislation (in particularly the Laws No. 3289, No. 5894, No. 6222 and No. 7405) is designed in direct and organic relation with the country's territorial and administrative division – 81 provinces and 922 sub-provinces. Each province has a Provincial Sports Safety Board in charge of the implementation of the legal and administrative rules and regulations. Regarded as a de-centralised system, this seems to be highly efficient at local level, even though there are missing or not clear links to a unique and central authority in charge of the co-ordination of national policies and co-ordination of the provincial offices. Moreover, the national co-ordination should be entitled to draft a national strategy designed to provide a clear and structured approach as regards safety, security and service at football matches. The national co-ordination body should ensure an alignment of the national policies and actions performed by the main stakeholders in implementing safety, security and service measures in connection with sports events.

The provincial governor is responsible for convening a monthly meeting and, if necessary, extraordinary meetings of the provincial sports safety board, during which the necessary arrangements are convened with the matches to be played for the coming month. This can be subject to updates taking into consideration any new information or risk assessments, which can be discussed during extraordinary meetings of the provincial sports safety board.

The composition, roles and responsibilities of the TFF were significantly revised with the Law of May 16, 2009, establishing a “Stadium and Safety Committee” to provide criteria, inspection, monitoring and certification of stadiums along with disciplinary measures and a disciplinary Board, Club Licensing Committee, Ethics Committee and Dispute Resolution Committee.

In light of the incidents that affected Turkish football and sports in general before 2011, the authorities decided to adopt a tougher approach, based on the security pillar, which produced the expected results and determined a significant reduction of violence and antisocial behaviour in connection with sports events. Apparently, a key success element was the implementation

of the e-ticketing system – Passolig – for the first 2 football leagues in Türkiye, which imposed the obligation for all fans to pre-register and to be in the possession of the Passolig card.

The Turkish authorities have also adopted a significant number of specific measures to tackle criminality linked to sports 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.

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 provincial sports safety units, their composition, roles and responsibilities and training regarding venue inspection, setting a safe capacity and auditing safety management provisions.

- b) Implementation of a new system 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 regards to the standards and procedures for the certification of sports facilities in Türkiye.

- c) 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) These systems are a very good practice that should be promoted; It was apparent during the match that the behaviour of the fans had significantly improved since the introduction of the e-ticketing system – Passolig – for the first 2 football leagues in Türkiye, which imposed the obligation for all fans to pre-register and to be in the possession of the Passolig card.

- d) Implementation of a new policing approach based on a zero-tolerance policy with regards to violence, racism and discrimination in the context of sport and Sports Police Department is broken-down in one NFIP unit in each province, thus ensuring better knowledge of the fan groups at local level.

It is once again important to recall that the aim of the visit is not to criticise but to support and assist the authorities and other relevant stakeholders in Türkiye to provide a safe, secure and welcoming environment at football matches and other sports events and develop and implement a strategy compliant with the Convention.

To support this process, the report is presented in a thematic structure that reflects the policy Articles of the Convention and provides an assessment of the action necessary 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 multiple incidents up to 2011 which acted as a catalyst for the Government to reinforce the sports safety and security laws with very robust and far-reaching sanctions, 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 for the first time the Government, policing, football authorities and clubs are in complete collaboration in addressing the violence

and anti-social behaviour in football. The one missing component in this endeavour is a more consistent dialogue with the fan groups.

The overall conclusion set out in the report is that there is a need to ensure the balance between Safety, Security and Service to reinforce the Safety and Service pillars. This conclusion is reflected throughout the report and its 53 recommendations. These recommendations are set out in the form of a draft action plan which highlights, *inter alia*, the need for:

- a Strategy and Action Plan for the recommended 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-stadiums safety and security;
- more effective arrangements for ensuring that all stadium safety and security personnel, and supporter liaison officers and disability access officers, are trained and assessed as competent to undertake their various tasks; and
- a review of policing football operations to ensure that strategic and tactical decisions reflect established European good practice.

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

The Committee is wholly committed to providing the governmental and football authorities, and other competent agencies in Türkiye with further support in meeting the challenges that lie ahead. The Committee would also welcome periodic feedback on the progress made by the authorities in Türkiye concerning the 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 counterparts in Türkiye who provided highly 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 two appendices, which together provide the main observations and recommendations of the monitoring visit (hereafter described as the “visit”) undertaken on 8-10 October 2024 by a team of the Council of Europe’s Saint-Denis Committee.

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 Türkiye according to the Guidelines on Monitoring. This draft Action Plan highlights the 53 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 policy Article of the Convention and provides recommendations on measures that Türkiye can apply in order to achieve 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 Recommendations Rec (2021)1, Rec (2022)1 and Rec (2022)2 of the Committee.

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

- The Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events – (CETS No 218) - Compliance with policy Articles

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 Youth and Sports as falling within the scope of the Convention.

B.2. Purpose of the Visit

The Saint-Denis monitoring visit to Türkiye 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 Youth and Sports Ministry of Türkiye, in accordance with the Committee's Guidelines on Monitoring, which recommend as a priority the holding of monitoring visits in the context of preparations of major sports events.

The primary aim of this visit was to assess arrangements for Safety, Security and Service that Türkiye has implemented since the ratification of the Saint-Denis Convention on 1 July 2020, 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 principles and 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 football and other sports events in Türkiye.

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

The team 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 not be wholly indicative of the wider situation in Türkiye.

The team wishes to stress that the purpose of the visit and ensuing report is to support the authorities and other relevant stakeholders in Türkiye through the provision of external and expert observation in respect of football safety, security and service.

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

Moreover, the team fully acknowledges the wide variations in the historical, cultural, constitutional, judicial and policing circumstances, and the equally varied character and severity of football-related incidents and risks, which exist among and within each 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 Recommendations Rec (2021)1, Rec (2022)1 and Rec(2022)2¹ invariably need to be customised to meet national imperatives and circumstances.

¹ **T-S4 Recommendations** : <https://www.coe.int/en/web/sport/t-s4-recommendations>.

B.3. Visit Itinerary

Although the duration of the visit was short and focused exclusively on Istanbul, the visit organisers in Türkiye were able to provide an intensive and meaningful itinerary comprising a series of meetings with high level representatives of the Ministry of Youth and Sports, Ministry of Interior / Directorate General for Security / National Football Information Point (NFIP), Ministry of Justice, TFF and the five main clubs of the Super League.

The team would have liked to also meet the supporters' groups, who are a key stakeholder for the Convention, and to have discussions on dialogue, collaboration and on socio-educational prevention projects for fans. The clubs' SLOs and DAOs ultimately gave a good account of those.

1st Day		
19:00 – 21:00	<ul style="list-style-type: none"> - Briefing of the monitoring team - Briefing meeting between the monitoring team, Head of T-S4 National Delegation and his team - Dinner 	The Hotel where the monitoring team stays
2nd Day		
09:15	Transfer to TFF Riva Facilities	
10:00 – 12:00	Meeting with the representatives of the public authorities: <ul style="list-style-type: none"> - Ministry of Youth and Sports, - Ministry of Interior / Directorate General for Security / National Football Information Point (NFIP), and - Ministry of Justice 	TFF RİVA Facilities
12:00 – 13:30	Lunch	TFF RİVA Facilities
13:30 – 14:00	Visit to TFF Match Operation Centre (VAR Headquarters)	TFF RİVA Facilities
14:30 – 17:00	Meetings with representatives of the following organisations: <ul style="list-style-type: none"> - Turkish Football Federation, - Professional Football League (Turkish Union of Clubs), - Professional football clubs (Beşiktaş, Galatasaray, Fenerbahçe, İKAS Eyüpspor, Kasımpaşa, Rams Başakşehir Football Club) and their Safety Officers, Supporter Liaison Officers (SLO) and Disability Access Officers (DAO), - Supporters' representatives (Federation and/or most relevant clubs) 	TFF RİVA Facilities
3rd Day (Match Day)		
09:00	Departure to Ali Sami Yen Sports Complex Rams Park Stadium	

10:00 – 11:00	Attending to co-ordination meeting of the 2024-2025 Trendyol Super League competition to be played between Galatasaray vs Samsunspor	Ali Sami Yen Sports Complex Rams Park Stadium
11:00 – 12:00	Stadium tour (Information on available infrastructure, safety management and operations)	Ali Sami Yen Sports Complex Rams Park Stadium
12:30 – 14:00	Visit to the gathering places of the supporters' groups and lunch	Vadi İstanbul
14:45 – 15:45	Observation of match preparations	Ali Sami Yen Sports Complex Rams Park Stadium
16:00 – 18:00	2024-2025 Trendyol Super League Galatasaray-Samsunspor Competition	Ali Sami Yen Sports Complex Rams Park Stadium
18:00 – 19:00	Briefing meeting between the monitoring team, Head of T-S4 Turkish Delegation and his team	Ali Sami Yen Sports Complex Rams Park Stadium

B.4. Monitoring Team

The team comprised the following members and areas of expertise:

- National delegates to the Committee:
 - Mr. Adrian Dinca, Chair of the Saint-Denis Committee and team leader (Security);
 - Mr. Anton Cernat, Chair of the T-S4 Advisory Group on Monitoring (T-S4 MON), head of the Romanian delegation to the Saint-Denis Committee and Head of the Romanian NFIP (Security);
- Observers to the Committee: Mr. Alfredo Mena Lorenzo, Senior Safety and Security Expert, UEFA (Safety and Service);
- Rapporteur: Mr. Rick Riding, Independent Event and Stadiums Safety Advisor (Safety); and
- Secretariat: Mr. Paulo Gomes, Head of the Saint-Denis Unit and Secretary of the Saint-Denis Convention, Council of Europe.

B.5. Supporting Documentation

To assist the visit, the authorities of Türkiye 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 Türkiye.

B.6. Status of the Report

The aim of this report is to support and assist the authorities in Türkiye 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 a multi-agency integrated approach to safety, security and service in connection with football and other sports 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 Türkiye are in compliance with the content of both the Convention and the above-mentioned three 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 - Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events (CETS No. 218)

Compliance with Policy Articles

Article 1 - Scope of the Convention

Intent

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

Compliance

The legal framework requires the Ministry of Youth and Sports to maintain a schedule of all professional national and international football matches played in Türkiye, along with any other sports events which the Turkish Law No. 6222 designates as being subject to the Convention.

Comments

Integrated Approach to Safety, Security and Service

The Saint-Denis Convention is based on three interrelated pillars (safety, security and service) creating a safe, secure and welcoming environment for all of those attending, participating and/or working at a sports event. The weight of each of those pillars could vary depending on the context, the peculiarities, the risks as well as the level of maturity of the organisational structure which includes private and public entities.

The three pillars are not static and the level of flexibility in their implementation is different. The safety pillar, which is the basic one and needs to be developed in a high level, comprising the physical (infrastructure) and the safety management elements, ensures the crowd

management in a way that each and every individual has a way in and out and a stay in the venue (ingress, circulation and egress model) and avoiding situations in which he or she is exposed to risks that could compromise life or physical integrity.

The security pillar adds a bit of flexibility, since it tackles human-caused risks, such as terrorism, criminality, violence (in very multiple ways), etc. The implementation of this pillar is based on the development of a dynamic risk assessment, which would determine the measures needed to keep the event in a secure way.

The third pillar is service, which is much more flexible but keeping in any case a high level of importance, since a good service is a contributor to improve safety and security.

The definition of the term “**service**” is given by Article 3 of the Convention: “*The term ‘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’.*”

Therefore, once the safety pillar is widely covered in Türkiye (top tier football stadiums are modern in design, keeping a high level of safety elements) and security is also covered by the active and effective role of legislation (mainly Law No. 6222), police forces and private security, the service pillar presents areas of improvement both for domestic and international matches. This has been the normal evolution across the last 40 years, moving from violence prevention (Convention on spectator violence, of 1985) to considering spectators as active actors in creating the safe, secure and welcoming environment (Saint-Denis Convention, of 2016). It is clearly accepted that a good level of service creates a virtuous circle with the other two pillars. In short, supporters treated with respect are far more likely to respond in kind. This is especially the case when crowd management operations (inside and outside of venues) are perceived to be appropriate and proportionate, rather than indiscriminate or abusive, in character.

The perception of the service pillar by those attending a sports event is heterogeneous and depends on the needs of a particular individual. It is different at a domestic match, where the vast majority of fans are locals and very familiar with the stadium, or at an international match, in which fans don’t have that knowledge and are looking for an international standard of the service element which they could be familiar with and is in line with their expectations when travelling abroad.

Observation

The match observed - Galatasaray vs Samsunspor of the Super League -, gave the team the opportunity to monitor the level of service at the stadium, being significantly different for the local and the away fans, which is understandable, based on the primacy of the security element.

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 demonstrate that this approach is crucial in helping to reduce risks associated with sports events, because all three pillars are inter-related and overlap. No 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.

The team observed that TFF acts as national co-ordination committee, with provisional Sports Safety Boards providing the regional multi-agency approach.

This process appears to work very well, although a multi-disciplinary national committee would be able to identify emerging trends or threats at a national level and set national strategic solutions to issues.

Recommendation 1: The Turkish authorities should designate a national co-ordination body that will include all the relevant stakeholders and be responsible for drafting the national strategy and policies in the field of safety, security and service. (status: important)

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, 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.*

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 and other sports events (inside and outside of sport venues).

Article 3 – Definitions

Intent

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

Compliance

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

It is recognised that in some languages the terms "safety" and "security" share a common definition. As a consequence, attempting to explain the three pillars can pose difficulties. However, international 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 stadiums 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, provincial and local level.

Recommendation 2: The legal framework (Law No. 6222) should incorporate the definitions set out in Article 3 of the Convention. (status: desirable)

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

Recommendation 3: The National co-ordination committee's strategy should be developed to highlight that the integrated approach encompasses events inside and outside of sports venues throughout the period of an event. See [T-S4 Recommendation Rec\(2022\)1 on a Model structure of an S4 national strategy](#). (status: desirable)

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.*

Comments

The aim of Article 4 (paras. 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, secure and welcoming.

Observation

Local co-ordination in Türkiye is ensured via the Provincial Sports Safety Boards. These are functional in each of the 81 provinces and are led by the local Governor or the deputy and comprise representatives of the public authorities with responsibilities in the area of safety and security as well as club and sport organisations representatives. Provincial Sports Safety Boards meet once a month in ordinary and, if necessary, extraordinary meetings, and they determine, *inter alia*, the level of risk for first and second league (in the top league and the league below it) matches and consequently the number of police and stewards to be deployed. Three levels of risk are envisaged: low (C), medium (B) and high risk (A). In the case of new information or changes in the initial risk assessment, the Provincial Sports Safety Board can update the risk level for a specific match.

From the discussions, the team understood that the national co-ordination role is mainly carried out by the TFF from the safety perspective and the Ministry of Interior, via Türkiye NFIP, regarding security.

By bringing together diverse stakeholders under the umbrella of the National co-ordination committee, this will showcase a commitment to fostering collaboration and synergy across governmental departments, law enforcement agencies, sports 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 this type of Committee 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 this approach to sports events management.

Recommendation 4: The Turkish authorities should review their current provincial multi-agency approach and establish a new structure of co-ordination, from national to local level, 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 5: When established, the National co-ordination committee should set up a working group comprising representatives from local communities and supporter representatives. (status: important)

Recommendation 6: 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)

Local Co-ordination

As stated in the National Report “*Provincial and Sub-Provincial Sports Safety Boards comprising Governor for the cities having teams at the TFF Super League or Deputy Governor for other cities who is appointed by Governor as the head of the board, representatives of municipality, provincial gendarmerie command, provincial security directorate, provincial directorate for youth and sports, provincial health directorate, provincial directorate for national education, relevant federation and amateur sports clubs confederation, a jurist appointed by the Governor, executive board members of different clubs responsible for the stadium safety, and, if needed, representatives of press members and relevant public institutions. These Boards convene once per month excluding the situations which require an extraordinary meeting. Boards determine the basic safety and security parameters regarding the organisation of sports competitions in the Province or Sub-Province. Provincial and Sub Provincial Sports Safety Boards are responsible for the determination of all safety, security and service-related measures, the approval of the Sports Venue Safety Certificate (Safety Certificate), the approval of the Sports Venue Safety Plan (Emergency Plan) created separately for each sports venue, determining the number of spectators at the beginning of the season that can be safely taken to the sports grounds throughout the season*”.

Comment

Communications and Media Handling Strategy

Whilst not featured in the Convention, it is important to ensure that the ethos, principles and safety, security and service 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 committee 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.

An important aspect that should be addressed by these different structures and strategies is the communication and media policy. The digitalised society we live in 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 co-ordinated manner, with supporters and the whole community, in particular in case of a crisis.

Recommendation 7: The National co-ordination committee should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. (status: important)

Article 5 - Safety, Security and Service in 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

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 stadiums. This is likely to incorporate a number of interrelated strategic, practical and legal changes to the current stadium safety management arrangements in Türkiye. The key elements are featured below.

Comments

The legislation - Law No. 6222, adopted in 2011 and updated in 2019 - aims at reinforcing the safety and security at sports venues. Although there have been some troublesome incidents, the fact remains that there was no major incident at major sports events in Türkiye since it entered into force.

The high-definition CCTV systems are already in place, at least in the main stadiums and arenas. Together with the digital ticketing system, they will definitely contribute to safer and more secure sports venues.

Under a context of successive serious incidents in the past 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. However, 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 8: The Turkish 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.*

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.

Independent Stadium Safety Authority

Compliance

The existing provisions in the field of design, infrastructure, licensing, certification and inspection are foreseen in the legislation on stadiums, the provincial authority being competent to enforce and inspect. Articles 3 and 4 of Law No. 6222 and Law No. 3289 state that a "Provincial Sports Safety Board" is established with a competent Provincial Governor for the purpose of inspection of stadiums and the licencing and certification function.

Comments

Provincial Sports Safety Boards consist of the Governor or Deputy Governor as the chair, representatives of the municipality, provincial gendarmerie command, provincial directorate of security, provincial directorate of youth and sports, provincial directorate of health, provincial directorate of the national education, relevant federation, an amateur sports clubs federation, a legal expert appointed by the Governor, executive board members of who are in charge of the safety of different stadiums which belong to different sports clubs and, if necessary, press members and the representatives of the public institutions.

All sports facilities are divided into categories, with different standards for the top two football leagues and for the top leagues in basketball, volleyball and handball. It was unclear to the team if 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 and inspection regime are documented in the Law No. 6222 and regulation on implementation of the Law No. 6222 (see below the observations).

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.

The stadium infrastructure and safety systems such as CCTV, public address (PA), turnstile monitoring, fire alarms, and backup generators appeared to be all effective and in accordance with the [T-S4 Recommendation Rec \(2021\)1, Annex A - Safety](#).

The Ministry of the Interior have also published an excellent guide for sports security which covers much of the roles and responsibilities of key personnel, along with a checklist to be followed before, during and after each event.

It was noted that many stadiums in Türkiye are newly renovated or newly constructed. The Building Code in Türkiye (Yapı Yönetmeliği) are updated periodically to reflect advancements in technology and lessons from past disasters, such as earthquakes.

This Building Code includes:

a. Seismic Design Regulations:

According to the Regulation on Buildings to be Built in Earthquake Zones published in the Official Gazette No. 26454, dated 06.03.2007, Türkiye Building Earthquake Code (TBEC 2018):

- Is mandatory for all construction due to Türkiye's high seismic risk;
- Focuses on designing earthquake-resistant buildings with ductile materials;
- Requires soil surveys and site-specific seismic hazard assessments;
- Specifies structural reinforcement methods for stadiums; and
- Seismic Isolation Systems are encouraged for critical infrastructure for stadiums.

b. Fire Safety Regulations:

Regulation on Fire Protection of Buildings (Binaların Yangından Korunması Hakkında Yönetmelik):

- Governs fire prevention, suppression, and evacuation measures;
- Requires fire-resistant materials, sprinkler systems, and smoke evacuation systems; and
- Establishes minimum width and number of emergency exits.

c. Accessibility Standards:

Regulation on Accessibility in Buildings (Erişilebilirlik Yönetmeliği):

- Venues must accommodate people with disabilities, including ramps, elevators, and tactile surfaces.

d. Structural Design and Materials:

- Standards specify minimum requirements for concrete, steel, wood, and masonry; and
- Structural integrity is assessed for loads like wind, snow, and seismic forces.

Licensing and Permits

New venues or alterations require building permits from local municipalities or provincial authorities (provincial directorate of environment and urbanisation).

Detailed architectural, engineering, and environmental plans must be submitted for approval. Periodic inspections during construction ensure compliance with approved plans.

Turkish building codes, influenced by international safety standards, require that all spectators can evacuate within 8-10 minutes in case of an emergency. FIFA and UEFA recommend evacuation within 8 minutes for football stadiums.

Factors Influencing Evacuation Time

Exit Width and Count: Adequate exits must be provided, with a minimum width of 1.2 meters per 1,000 spectators.

Staircases and Ramps: These must be designed to handle maximum flow without congestion.

Zoning: Stadiums are divided into sections with independent evacuation routes to prevent bottlenecks.

Emergency Pathways

Pathways leading to exits must remain clear and well-lit.

Evacuation routes should lead to open spaces or designated safety zones outside the stadium.

Inspection and Compliance

Stadiums in Türkiye undergo regular inspections by local and national authorities and the Ministry of Youth and Sports to ensure compliance with evacuation time requirements.



Map of new stadiums built since 2000²

Observation

The Licensing and Certification system is prescribed in Turkish Law; however, no provincial Licensing and Inspection representative met the team.

Stadiums and arenas are owned by the Government. The user of the venue (club) is responsible for operational management along with infrastructure maintenance and repairs.

The existing licensing of stadiums set out in the legislation and “sets out procedures for testing, certification and monitoring, as well as supervision”, as mentioned in the Türkiye National Report Part 1).

The “Turkish Football Federation Stadium and Security Committee Instructions, First Part”, in Article 13, sets out the details of each venue inspection for football. This is also reiterated for other sports by the Ministry of Interior “Sports Safety Guide” (See Appendix B).

Stadiums are inspected by the Stadium and Security Committee. The safety license (S & G certificate of conformity) is issued for a period of 1 year. There is one committee for each province, 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 sports infrastructures.

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

² Courtesy of Wikipedia https://en.wikipedia.org/wiki/List_of_football_stadiums_in_Türkiye.

Comments

Due to the size of Türkiye and its 81 provinces, it is assumed there could be significant difference in the quality of infrastructures of stadiums 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 in the field of licensing, certification and inspection of sports venues according to the different provinces, then there is a need to ensure that levels of safety of spectators at all venues are of the highest standards.

Although many venues are relatively new, the venues have different ages and layouts. The level of safety, security and service quality delivered to all participants and spectators should be the same across all of Türkiye.

The team welcomes Article 13 of the TFF “Stadium and Security Committee Instructions, First Part Regulations” for the decision not to license a sports venue if there are deficiencies or the minimum safety conditions are not met.

The Turkish Suitability Inspection teams would benefit from specific training, as detailed in the INTERPOL Guidance.³

Recommendation 9: The Turkish authorities should 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

The match visit confirmed to the team that there was an inclusive and welcoming environment with families and facilities available for persons with disabilities.

Observation

At the match that the team attended, it was observed that there was a diverse demography, with several families and young women attending the match in a convivial atmosphere, which contributes for reducing tensions in and around the stadium.

³ [INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf](#).

The 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

Recommendation 10: Consideration should be given to the adoption of UEFA/CAFE⁴ and the International Paralympic Committee (IPC) standards listed below and that all existing sports 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

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 UEFA mandatory requirement for all clubs and stadiums of categories 3 and 4⁵.

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: A document or security/stewarding plan should be developed for each event, which contains the respective roles, responsibilities and precedence of the police, safety officer, stewards, volunteers, private security companies along with the

⁴ CAFE's official name is now « AccessibALL».

⁵ UEFA Stadium Infrastructure Regulations, Article 28:

<https://documents.uefa.com/r/PxVtjcYr9Ntgwd0wYgq2xw/c8WnGJrmtF6JYtqiosvoww>.

competence expected of each practitioner. See [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#). (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 private security company. A contract to this effect such as a service level agreement specifying the numbers and quality of private security staff should be in place. See [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#). NB: this level of service and training plan should be consistent across all of Türkiye. (status: important)

National safety and infrastructure

Provincial and Sub-Provincial Sports Safety Boards are responsible for the determination of all safety, security and service-related measures, the approval of the Sports Venue Safety Certificate (See Appendix B - Safety Certificate), the approval of the Sports Venue Safety Plan (Emergency Plan) created separately for each sports venue, and determining at the beginning of the season the number of spectators that can be safely taken to the sports grounds throughout the season.

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.

As noted in the Ministry of the Interior Sports Safety Guide (See Appendix B) “(4) *Sports safety committees convene once a month in ordinary and extraordinary cases and determine the safety measures to be taken in all sports competitions to be held in Provinces and Sub-Provinces. In these boards, decisions are taken by the majority of the votes of the representatives attending the meeting. (5) The duties, powers and responsibilities of the Provincial and Sub-Provincial Sports Safety Board are as follows:*

- a) *To ensure the establishment of technical infrastructure and the assignment of expert personnel in order to ensure security in sports competitions within the framework of national and international rules;*
- b) *To ensure co-ordination between institutions and organisations responsible for sports safety;*
(...)
- h) *To inspect fire protection, first aid for spectators, structural strength, internal and external evacuation areas and emergency lighting systems in accordance with the*

legislation and the rules determined by the relevant federation and the international rules to which it is subject, and to ensure that the deficiencies detected as a result of the inspections are eliminated;

- i) To carry out inspections of the sports fields where professional football competitions and the top league competitions in basketball and volleyball are held every year before the start of the leagues, to evaluate the results of the inspections in terms of audience safety and health and to decide on the suitability of the admission of spectators to the relevant sports field and to approve the sports field safety certificate if there are no deficiencies, in case of deficiencies, to notify these deficiencies to the federation and until the deficiencies are eliminated not to allow competitions to be held in the field of sports; and*
- j) In order to ensure the safety of spectators in matches held in the top league and a lower league in the field of football, to determine the competition first aid officer from the health directorate and the competition fire brigade officer from the fire brigade directorate regarding spectator health and first aid”;*

At the local level, this multi-agency safety advisory group (Safety and Security Committee) must ensure compliance with these standards, which would ensure accountability in 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 sports events and by the public authorities.⁶

The Sports Safety Guide (Appendix B) also states, “c) (Amended: 4/7/2019 – 7182, art. 3) In the viewing areas, the seats of the audience are numbered. Ticket sales are made by associating them with the seat number. Ticket sales can also be made by associating them with the numbered area that is arranged so that the audience can watch standing. This practice is decided by the Ministry after receiving the opinion of the relevant federation and the Ministry of Internal Affairs. Spectators over capacity or without tickets cannot be admitted to the viewing areas”.

This article promotes the issue of standing in seated areas which any seated terracing is not specifically designed for, as there are serious risks of progressive crowd collapses. To address this issue, the UK SGSA has published guidance on how to convert seating areas into seating and standing areas.⁷

The team was unable to ascertain whether and, if so, the license inspection took into account 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

⁶ [INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf](#).

⁷ “SG01: Safe standing in seated areas” - (<https://sgsa.org.uk/wp-content/uploads/2024/01/SG01-Safe-standing-in-seated-areas-July-2022.pdf>)

can physically accommodate) and this is not reviewed in response to changes of circumstance or any assessment or observation from the relevant agencies.

Recommendation 14: The Provincial Sports Safety Boards (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that the stadium 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 risks of persistent standing in seated areas may also have an effect on the maximum safe capacity.

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/>

Alternatively, the European Standards EN 13200-1, 2019, Spectator facilities General characteristics for spectator viewing area <https://genorma.com/en/standards/en-13200-1-2019> and EN 13200-7 Spectator facilities Part 7: Entry and exit elements and route. <https://genorma.com/en/standards/en-13200-7-2014> (status: important)

Recommendation 15: The licencing staff should be trained on 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)

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.

A few days prior and in the morning of each game, there is a multi-agency meeting which includes stadium operators, private 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 co-ordination meeting between all parties is also arranged to ensure that all safety planning, checks and records are in place and that all issues identified have been rectified. This process provides assurance to not only the competition security officer and his/her assistant, who takes lead responsibility, but also to all Ministries, policing bodies, ambulance and safety management, that there is an integrated multi-agency approach. There is a high reliance on the competence of the competition security officer and his/her assistant.

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 competition security officer and his/her assistant take a lead role in ensuring match day safety and security for the main Istanbul Stadium, it was not clear for the team if this match-day safety process is consistent with other large public sports events across Türkiye. 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 16: 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 [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#) (status: important)

Stadium Safety officers

Intent

Article 5.6 of the Convention requires each State to ensure that stadium safety and security personnel are trained and equipped to undertake all of their activities effectively.

Compliance

In Türkiye, the role of the safety officer is embraced by a competent police match commander. This competition security officer and his/her assistant primary role is focused on security, crime and disorder. The role of the stadium safety officer is absolutely crucial to making football stadiums safe, secure and welcoming. For that reason, it is recommended that the issue of a stadium safety certificate should be subject to the stadiums having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadiums safety, security and service matters.

There is a need to clarify 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 competition security officers and their assistants.

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.

Recommendation 17: 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-stadiums safety, security and service matters. (status: important)

Recommendation 18: The national co-ordination committee should set the minimum areas of competence to be demonstrated by 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, Annex A – Safety](#), Appendix 33, and [Annex D - Checklist](#). The club safety officer/representative should be provided with a detailed job description which clearly sets out the roles and responsibilities of their post. The [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#) and its good practices may be used to compile a checklist of functions necessary for the role. (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 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 Recommendation Rec \(2021\)1, Annex A – Safety](#). A national network should 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

- 5.5. *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

It was not clear for the team if there are “statements of intent” setting out the roles and responsibilities of 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 in writing, 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 Turkish 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 relevant incident. (status: essential)

Intent

5.5.a. The use of pyrotechnics

Compliance

- a) According to Article 12 of the Law No. 6222, titled “Prohibited Substances”⁸, pyrotechnics are prohibited to bring in the competition venue, spectating and private spectating areas, training areas and the vehicles through which teams and supporters travel collectively.

After the introduction of the Law No. 6222, the use of pyrotechnics and the racist and discriminatory behaviour at sports events in Türkiye dropped to very low levels, demonstrating the positive impact of the introduction of the Passolig system. This was observed by the team also during the match Galatasaray vs Samsunspor, when no pyrotechnic device was used by both sets of fans. Having in mind that the use of pyrotechnics is the most prominent category of incidents as regards football events across Europe, both in police and UEFA statistics, achieving such unprecedented level of success in preventing their use is a good practice that can be a model for other countries.

5.5.b. Any violent or other prohibited behaviour

Compliance

Observations

Article 14 of the Law No. 6222 titled “Threatening and Insulting Chants” along with Article 12 ensures that all violent and threatening behaviour are sanctioned by law.

The law, which entered into force in 2011, 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

⁸ Prohibited substances(1)

ARTICLE 12 – (1) (Amended: 4/7/2019-7182/6 art.) Competition, viewing, special viewing and training areas and vehicles where teams or fans travel together;

- a) Firearms, even if licensed, and other weapons that are prohibited from being possessed,
- b) Although not prohibited in possession, cutting, crushing, bruising or piercing tools and explosive, flammable, combustible or corrosive substances,
- c) Narcotic or stimulant substances,

are prohibited to bring in. The procedures and principles regarding the introduction, use and sale of alcoholic beverages in competition, spectator and training areas are determined by the relevant federations.

Turkish authorities observe that there were no serious incidents at major sports venues since it was enacted.

There is also an official and law enforcement officer responsible for supporters according to Article 9 of the Law No. 6222 on Preventing Violence and Disorder at Sports Events titled “Club representative responsible for fans”.

Comments

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 behaviour 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 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 behaviours.

The team welcomes the fact that the situation inside sports venues has calmed down, the general climate has changed, families are returning to the stadiums, 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 21: The Turkish authorities should consolidate effective policies to prevent, deter and respond to violent behaviour, including 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

Recommendation 22: The Turkish authorities should draft and implement a national strategy on combating hate speech in sport and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour (see, for instance, the EU-CoE joint project on “Combating hate speech in sport”, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes). (status: important)

Recommendation 23: The relevant authorities should 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. The relevant authorities should put measures in place to identify and refuse entry into the venue for spectators who display or carry with them racist or other discriminatory leaflets, symbols or banners. (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 State level, police forces are well trained, equipped and experienced in dealing with major national and international events.

The principles and procedures regarding the private security services complementing the public safety are identified by the Law No. 5188 of 2002 (Law On Private Security Services).

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.

Before the match, the team observed many stewards controlling effectively the supporters that were arriving from the metro station to the stadium, including effective body searches. Women stewards were sufficient in number and effective.

Although Law No. 7405 does state the following:

“Certification of sports elements

ARTICLE 44 - (1) Sports administrators, coaches, trainers, referees and similar sports personnel; professional standards, principles of national technical and professional qualifications, inspection, measurement, certification and certification procedures are carried out exclusively by the Ministry in cooperation with the Vocational Qualifications Authority. The procedures and principles regarding this are determined by the regulation to be issued by the Ministry.”

The police fill the gaps created by the lack of an extensive stewarding system, even though there are regulations in force regarding the employment, training and certification of "private security services". This type of personnel is trained and certified by the Ministry of Interior in accordance with its specific regulation on football in Law. After training, candidates must pass a licensing exam administered by the Turkish Ministry of Interior. Candidates are required to obtain a Private Security Identification Card to be legally recognised as private security personnel. This ID card needs to be renewed regularly, typically every five years.

Specific Skill Requirements include strong communication skills, as private security personnel need to interact with the public and law enforcement. Observation and crisis management skills are needed for effective response during emergencies and knowledge of emergency protocols and procedures.

As was observed during the match and as confirmed by police representatives, the police and 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.

Safety supervisors or managers in the private security sector are required to meet higher qualifications than entry-level security personnel. These positions involve greater responsibility, including overseeing private security teams, ensuring compliance with regulations, and managing safety protocols. Here are the primary qualifications and requirements.

Basic and Advanced Security Training

Supervisors and managers must have completed basic security training and may require additional advanced courses. Many employers prefer supervisors and managers to complete specialised training in leadership, conflict resolution, risk assessment, and team management.

Crisis and Emergency Management Certification: knowledge of crisis management, emergency response protocols, and risk assessment is essential. Some institutions offer certifications in these areas to prepare supervisors for crisis situations.

Supervisors and managers, like all security personnel, must pass the Private Security Examination administered by the Ministry of Interior. In-depth knowledge of Turkish private security laws and regulations is essential, as supervisors and managers must ensure that their team complies with legal standards. Familiarity with labour laws, occupational health and safety laws, and other relevant regulations in Türkiye is also important, especially when managing teams.

Strong interpersonal and communication skills are critical for security supervisors and managers. They need to handle interactions with staff, clients, and possibly law enforcement. Conflict resolution and negotiation skills are important for de-escalating potential conflicts and handling employee's concerns. Knowledge of security technology and monitoring systems is increasingly important. Managers should be familiar with the systems their organisation uses, such as CCTV, alarm systems, and access control systems. Skills in reporting software and incident tracking tools are also necessary to document incidents accurately and manage security records.

Supervisors and managers in security are often required to participate in continuous professional development through refresher courses and additional certifications.

Some companies may require participation in seminars or workshops on security innovations, new regulations, or advanced leadership skills. Certified Security Supervisor (CSS) or Certified Security Manager (CSM) through international security bodies can boost credentials.

It is considered that the generic training and qualification of stewards and managers in Türkiye is comprehensive, well managed and monitored by the Ministry of the Interior (Law No. 5188 on Private Security Services, dated 10/6/2004). However, an additional sports ground specific module could be developed by the Ministry of Youth and Sports, with the TFF, to improve the unique attributes for the integrated approaches in safety, security and service, required for sports ground personnel.

Recommendation 24: The relevant authorities should identify and implement systems for ensuring the provision of adequate and appropriate sports ground specific 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 [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#), Appendix 33. (status: important)

Furthermore, the team was informed that 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 new technologies, 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 particular 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 on their security missions, instead of complementing or overlapping with the work of the stewards, as the team could observe at the entrance of the Ali Sami Yen stadium.

Recommendation 25: The Turkish 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 [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#), appendixes 33, 36 and 41, and [T-S4 Recommendation Rec \(2022\) 2 \(Annex 2\)](#) on a Model regulatory framework on stewarding and private security at sports events. (status: essential)

Recommendation 26: 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 – Safety](#), Appendix 41. (status: important)

Recommendation 27: 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 competences of safety staff, should be in place. See [T-S4 Recommendation Rec \(2021\)1, Annex A – Safety](#). (status: important)

Comments

Stadium Stewards

Article 5.6 of the Convention 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 evident that the primary work 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 a proposed national co-ordination committee to review the current arrangements with a view to ensuring that stadium stewarding training and accreditation arrangements comply with established international good practice.

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

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

Recommendation 28: A proposed national co-ordination committee 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)

Article 6 - Safety, Security and Service in Public Places

Intent

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

Compliance

Observations

Provincial Sports Safety Boards carry out risk assessment on a regular basis, as determined by Law No. 6222.

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 centres, thus 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.*

Compliance

The Turkish sports law range now covers the entire journey from home to the stadium and back.

The team was informed that the sport police (spotters) are trained based on a common training standard which refers to the main competences that they need to be in possession of in order for them to fulfil their tasks accordingly. The majority of police spotters have already been trained in the light of the above-mentioned standard ensuring a uniformed approach across Turkish police forces.

Recommendation 29: The Turkish authorities should continue to further invest in the training of police spotters, including English language courses for those being deployed abroad for operational support missions in connection with international dimension football and other sports matches. (status: important)

Comment

Audit of Stadium Safety and Security

In addition to the actions proposed above, the national co-ordination committee, in partnership with the TFF, 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 stadiums hosting professional football matches. The aim would be to assess the specific improvements required in each stadium to demonstrate compliance with international standards and good practices. This should include monitoring of stadium safety management operations. This proposed audit would also inform the development of enhanced technical, operating, and safety management standards by the proposed independent "stadium safety authority".

Recommendation 30: The TFF 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 stadiums hosting professional football matches, in order to inform the development of enhanced technical, operating and safety management standards. (status: desirable)

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

The Police carry out exercises for emergency incidents and evacuation; however, the exercises were not multi-agency including the clubs' safety management teams.

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 and mitigated. Notably, it is important to ensure business continuity, through redundant systems, in case the electronic systems fail. This is the case, for instance, with the electronic ticketing and turnstiles in sports venues, for which there should be a plan B in case there is a power failure or a cyber-attack.

Recommendation 31: 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 – Safety](#). All key decision makers should be located together in the same room. (status: important)

Recommendation 32: 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. (status: essential)

Recommendation 33: 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)

Recommendation 34: 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. With regard to electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)

Article 8 - Engagement with Supporters and Local Communities

Intent

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

Keeping in mind that Türkiye is a country with experience in international football matches, including the organisation of finals, and with a long list of clubs in UEFA's competitions every season, the following bullet points are recommendations on how to develop a service-oriented approach to football as a reference to other sports in which Türkiye is also a successful participant country:

- Service-oriented approach at all levels, starting with the legislation in which references to the service element would pave the way for an effective implementation in the safety and security operations.
- Police forces being aware of the scope and importance of this element both for domestic and international matches. To reach this goal, a long-term education program for all levels of police officer is considered as an effective way and would show the will of the political level on the real development of a service pillar.
- National Association and clubs, as key actors, should make real the measures to bring to football (sports in general) this element, through measures that put the fan in the centre, such as:
 - Implementing communication channels with fans, promoting the fan associations, and interacting with the SLO and DAO collecting fan expectations, needs, demands and complaints, if this is the case.
 - Creating discussion places to gather all the stakeholders with fan associations including authorities that could get first-hand information on the expectations of fans and also to open a dialogue to explain, guide, advise fans on key messages regarding safety and security.
- Private security and stewards, whose interaction with fans is of paramount importance and on many occasions is the unique interaction with the safety and security elements.

Well trained safety and security staff gives one of the best images for fans at the stadium, including the surrounding areas. To be strict in the performance of the duties is not contradictory with being polite, respectful, and professional.

The service pillar is an investment in safer and more secure football events, and this pillar has special importance in international matches when supporters visiting a foreign country perceive the event as a hostile environment due to the absence of the service pillar on many occasions.

To this regard, early communication with the visiting club or National Association, involving police forces via the NFIP network, is also relevant as far as the service element is concerned.

In the end, the service element is the way to take into consideration the fair expectations of fans attending a sports event, which exceeds the 90 minutes of a football match. Therefore, it includes information in advance, high level of professionalism from all the staff working for the event, including those focused on safety and security on the side of the authorities and on the side of the organiser, good conditions in the stadium facilities for spectators, good signage, assistance in case of need, but not limited to these points, any action that could contribute to a better experience of a spectator in a safe, secure and welcoming environment.

Recommendation 35: The Turkish authorities should develop a multi-dimensional strategy on the service pillar involving all the key actors (public and private) as a long-term project. (status: important)

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. 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.

While the safety and security pillars are the foundation of the Turkish system, it seems that the service element is not addressed at the same level. This can determine some concerns in the fan groups that can result in incidents both outside and inside sport grounds.

During the visit, the team had the opportunity to discuss with the SLO's of the Super League clubs from Istanbul. Some concerns were raised, such as the impact of the Passolig system on the service element, but it was concluded that, overall, its benefits are more substantial than its flaws. Some of the SLOs attending were not exclusively dedicated to this function in their club, but undertaking as well other tasks (e.g., protocol).

Turkish authorities have designed and delivered prevention programs, such as "Peace and Protection Through Sports Project", which is carried out in cooperation with the Barça Foundation, and the "Sports for Solidarity Project" with Olympic Refugee Foundation (See Appendix A).

In contrast with the football matches played in Türkiye, those played abroad by the Turkish teams and attended mainly by Turkish citizens from the diaspora are marked by significant incidents, including the use of pyrotechnics. This situation is causing reputational harm for the Turkish fans and needs to be addressed in more detail by engaging more with the fan clubs

abroad and the local authorities from the respective countries, in order to reduce the number of incidents associated with Turkish spectators.

Recommendation 36: The TFF should continue to further invest in the implementation of the SLO concept and their training at the level of Turkish football clubs. (status: important)

Recommendation 37: The TFF should further invest in developing an integrated SLO national system at least for the first 2 football leagues; the TFF co-ordinator should be responsible for the training and certification of SLOs at national level. (status: important).

Recommendation 38: The TFF and Turkish football clubs participating in the UEFA competitions should liaise more closely with their fan clubs abroad and local authorities in order to prevent incidents caused by the Turkish citizens from the diaspora. (status: important)

Recommendation 39: The Turkish authorities should promote and implement policies aimed at fostering dialogue and engagement with supporters and local communities. (status: important)

Moreover, supporter representatives, 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 cities' security and mobility plans decision-making process.

It has been reported that there are regular complaints from foreign supporters that the transfer from the airport to the city and stadium and back is rather problematic. However, during the match day visit it was observed that the Galatasaray stadium metro supply was quite effective, as the supply was adapted to the higher demand.

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.

These authorities could ensure the support and involvement of the local communities by informing them about and promoting their participation in the event, making special use of the know-how and skills of local fans and making sure that local fan groups and fan cultures are taken into consideration in the planning. Prior and genuine involvement of local fans have shown that they can prevent many conflicts. They could also make proper arrangements, in close co-ordination with the organiser and police, for local transport to facilitate the influx of supporters, ensure the smooth circulation of supporters, by whatever means of transportation is chosen; and travel options should be available in all price categories.

Recommendation 40: 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)

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 the 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, educational, crime prevention 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 dissatisfied 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 team during the visit.

Recommendation 41: 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 42: Provincial Sports Safety Boards should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination. (status: desirable)

Article 9 - Police Strategies and Operations

Intent

- 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

In Türkiye, the policing strategies are managed by the Ministry of Interior, mainly via the Turkish NFIP, which plays an important role in defining and implementing them. This is in line with the current European best practices, which mention the fact that each NFIP should be a source of expertise at national level and provide advice in defining the policing strategies.

It is considered good practice that the Sports Police Department is broken-down in one NFIP unit in each province, thus ensuring better knowledge of the fan groups at local level.

Observations

The police do not provide training to stewards nor hold joint exercises with them. Training of safety officers and stewards is ensured by the TFF.

The team welcomes the fact that the Turkish Police keeps investing in the training of their police officers, 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 sports events, which should be considered as a good practice.

However, the police should also consider delivering specific training for competition security officers (or match commanders) and their assistants.

In particular, a table-top exercise carried out on a big scale by the police, for the first time in Türkiye would be welcome, and multi-agency cooperation for future exercises to develop joint plans on safety and security encouraged.

In the long-term, the Ministry of Interior should consider modifying the law, so as to insert an obligation for the sports 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 Galatasaray vs. Samsunspor match, a significant police presence was noticed, despite only 3,000 visiting club supporters. This included visible water cannons, 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, and thus was not briefed on any risk assessment issues or specific threats. Nonetheless, it is worth noting that this match was a high-profile game between the top two clubs. 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 information provided, 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 sports events.

Some of the policing good practices are the search of convoys of buses of visiting supporters, to deter the possession of pyrotechnics; the close monitoring of social media by police spotters,

on a daily basis, to prevent incidents in and around stadiums; and the segregation of organised groups of supporters outside of stadiums, during the entire journey.

The new legal framework, along with the implementation of new best practices extracted from the Saint-Denis Convention and from operational support missions abroad (including Qatar), led to the decision of the Turkish authorities to appoint a unique competition security officer and his/her assistant for each venue within all 81 provinces. This will allow continuity and consistency as regards this police category of personnel and prevent incidents that can be caused by the lack of experience and training (see Hillsborough example).

Recommendation 43: The Turkish police should invest in developing customised training packages for competition security officers and their assistants, including regular refreshment training. (status: important).

- b. 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

With a network comprising more than 1.000 sport police spotters across the 81 provinces, the Turkish NFIP is in the position of having the necessary means to implement an intelligence-led system that relies on the spotter's work; this is materialised in a positive manner in the risk assessments – both initial and continuous.

The team observed the police deployment for the match in Istanbul and can conclude that significant resources were allocated in order to cover all the areas of interest, both inside and outside the stadium footprint. Whilst in some European countries this deployment can be considered as excessive, the circumstances in Türkiye (including the terrorist threat) can lead to the conclusion that this approach is legitimate and adapted to the current realities.

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

Recommendation 44 – The Turkish police should adopt a policy of dialogue with the supporters, involving all the deployed police officers. (status: important)

Observations

See observations above.

Comments

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

Recommendation 45: 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 46: 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, Annex C - Service](#). (status: important)

Recommendation 47: Supporter feedback should be considered in the risk assessment process before each match. (status: important)

Recommendation 48: The Turkish authorities should update and maintain the current system of peer review of football policing operations in order to identify additional best practices and learning points. (status: important)

Intent

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

The team observed a very close and consolidated cooperation between the Turkish police and TFF and the clubs, which result in the adoption of robust and substantive safety and security measures for the football matches. Police liaising with supporters is of outmost importance and extensive European experiences at a series of major football tournaments over the last decade have established that encouraging police personnel to adopt a welcoming and friendly approach towards supporters can be an effective policing tactic. Adopting such a policy can pose challenges and frustrations for the personnel concerned, especially if this is not routine procedure and when having to manage a diverse assortment of visiting supporters with different cultures and speaking a variety of languages.

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

More than a decade ago, the situation in Türkiye in relation with safety and security was altered by a number of serious incidents involving mainly violence and pyros. On top of that the continuous terrorist threats completed a negative picture of the Turkish context in relation with the management of mass events. It should be mentioned as well that, later on, in 2021, amongst the measures adopted in order to tackle sport-related violence, was the collective away fans ban for the Istanbul derbies, which is no longer in place.

The appetite for committing crimes or offences was strongly decreased by using several actions and tools, among them being the implementation of an electronic ticketing system which proved to be a driving tool for change. The system is named Passolig and is mandatory for the football clubs in the top football league and the league below. Basically, the system means that fans are required to register in a database, managed through a commercial bank by the TFF, and provide their personal details, which are later on included in a bank card. Tickets are uploaded on this card, which is used as the only tool to access the stadium. The ticket can be transferred to another card owner and trackability of this process is possible. The system is used also as a marketing tool for the enrolled fans who are attending regularly football matches in Türkiye. For foreign fans, the tickets are sold using their passport. A fan can only buy one ticket for a match, with the exception of tickets for children up to 7 years old.

The Passolig cards are used at the turnstiles at the entrance of the stadium and the stewards have the possibility to check the image of the card owner with the real footage taken by a camera placed above the turnstile. The system had two major effects: changing the spectators' demography (more families, women and children are present at sports events) and significant decrease of attendance for known offenders and, consequently, reduction of the number of incidents.

In accordance with the current statistics provided by the Turkish authorities (e.g. 2023-2024 season), the ratio police / stewards used for safety and security measures at sports events is 65% / 35%. Although this ratio might seem unbalanced, the number of recorded incidents during the season is very low (only 2 incidents were recorded during the mentioned season). The stewards used for football matches are certified with a requirement to renew their certification each 5 years and police personnel used for football matches is paid by the organising club in relation with the risk level for the respective match. The figures connected to this specific payment are 3 times the normal daily allowance for police officers; the number of police officers for B category matches is 2/3 from the total number of the stewards and for C is 1/2 of the number of stewards. Taking into account the specific and sensitive national context, it can be considered that this is an adequate approach in managing sports events.

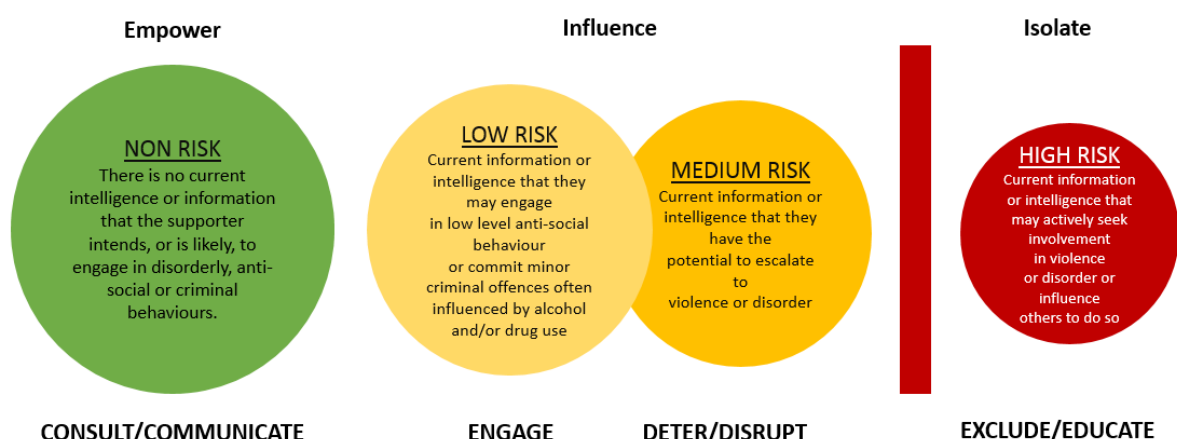
The banning orders are issued by the public prosecutor in the investigation phase and by the court in the prosecution phase, following an evidence package provided by the police forces. The banning order system implemented in Türkiye is very robust and it includes a deterrent factor in case of reoccurrence. For minor or first offence, a prosecutor can apply a 1 year banning order, while for serious or reoccurrence offence the banning order will be extended to 3 years and for a further offence to 5 years. During the last season, 5300 banning orders (from which 5183 for football only) were imposed in connection with 453 sports events.

The Passolig system is interconnected with the banned persons database, which makes it impossible for these persons to buy tickets. Moreover, another good point identified during the visit in Türkiye is the possibility and the commitment of Turkish authorities to apply sanctions for online crimes (a person who uses insulting words and behaviours against segments of society in sports fields by discriminating religion, language, race, ethnic origin, sex or sect), including banning orders. All banned individuals have to be present at the police station during their team matches; if case of no show, the ban is extended with one more year.

The statistical perspective is showing that the most common offences committed in relation with sports events are chants containing threats or insults, followed by carrying or using forbidden items (this category includes pyrotechnics), and public disorder comes in third place. The use of pyrotechnics against a person is categorised by the prosecutors as weapon assault and it is more thoroughly punishable by the law.

Recommendation 49: The Turkish authorities should analyse the feasibility of implementation of the Passolig system to other sports as well. (status: important).

A balanced and sustainable national strategy to prevent sport-related violence should take into account the fact that there are three 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)⁹:



Article 11 - International Co-operation

Intent

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

Compliance

The Turkish NFIP was established in 2006 and uses the NFIP network platform in order to share their experience and contribute to the development of the best practices and procedures at European level and beyond. Turkish police spotters' delegations are often deployed abroad, and also foreign police delegations are invited in Türkiye in order to support the local police operations. This is of utmost importance in dealing both with the Turkish fans abroad and also with the foreign visiting fans and demonstrates the commitment of the Turkish NFIP to promote and foster the international police cooperation in this field. During UEFA EURO 2024

⁹ Source: [EU Handbook on international police cooperation and security management of football matches with an international dimension](#), p. 65 (updated on 13 June 2024).

in Germany, the Turkish Ministry of Interior provided operational support via the deployment of Turkish spotters, which proved to be very useful from the perspective of the German hosts.

Recommendation 50: The Turkish NFIP should further invest in promoting the international police cooperation via the deployment/hosting of spotters for European matches. (status: essential)

Observations

The team highlights the fact that the composition of the Turkish 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 Turkish authorities and the more effective implementation of the Convention at national level.

Comments

The Turkish 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 communities and supporters.

Recommendation 51 : The Ministry of Interior should continue to ensure that the head of the NFIP participates in all meetings of the Saint-Denis Committee, while the Ministry of Youth and Sports should ensure that an official working in the area of sports safety should attend the Committee meetings. (status: desirable)

Intent

2. *The Parties shall, without prejudice to existing national provisions, in particular the allocation of powers among the different services and authorities, set up or designate a national football information point within the police force (NFIP). The NFIP shall:*
 - a) *act as the direct and single contact point for exchanging general (strategic, operational and tactical) information in connection with a football match with an international dimension;*
 - b) *exchange personal data in accordance with the applicable domestic and international rules;*
 - c) *facilitate, co-ordinate or organise the implementation of international police co-operation in connection with football matches with an international dimension;*
 - d) *be capable of fulfilling efficiently and promptly the tasks assigned to it.*

Compliance

The Turkish NFIP is formed of 17 officers, a size which can be considered as adequate in order to fulfil its tasks effectively, as far as the team was informed. It is part of the wider European

NFIP network, and it brings the non-EU perspective to the work done in this format, with undoubtable benefits that contribute to a better understanding of the challenges and best practices from an overarching pan-European perspective.

Recommendation 52: The Turkish 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 53: The Turkish 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

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 Turkish NFIP is preparing an annual report that is including extensive details regarding the prevention and tackling of football and other sport-related violence in Türkiye. This is providing a comprehensive overview of the trends and challenges faced by the police forces across Türkiye during the season. Some relevant facts and figures were presented to the team during the visit in Istanbul, which contributed to the drafting of this report and demonstrated the overarching perspective that the Turkish NFIP has on the football policing operations and associated challenges and trends in this regard.

Intent

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

SECTION D - Concluding Remarks and Draft Action Plan

D.1. Concluding Remarks

In conclusion, it is important to once again stress that the report and accompanying draft Action Plan is intended to:

- assist and support the authorities in Türkiye in developing a balanced multi-agency 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, security and service arrangements are compliant with the Articles of the Convention and the good practices contained in Recommendations Rec (2021)1, Rec(2022)1 and Rec(2022)2 of the Committee.

The Committee is committed to providing the governmental and football authorities, and other competent public and private agencies in Türkiye, 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 Türkiye concerning the implementation of the recommendations in this report.

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 Türkiye

**REPORT OF THE MONITORING VISIT
DRAFT ACTION PLAN**

The draft Action Plan has been prepared to enable the authorities in Türkiye to:

- achieve compliance with the principles and outcomes enshrined in the Convention;
- reflect the established good practices on safety, security and service contained in the Saint-Denis Committee's Recommendations; and
- ensure that football stadiums (and other sports venues) provide a safe, secure and welcoming experience for spectators and other participants.

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 Convention and established European and international good practices. For ease of access, the recommended actions are presented under the relevant policy Article of the Convention.

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 draft 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 draft Action Plan.

Article 1 – Scope of the Convention			
Recommendation 1: The Turkish authorities should designate a national co-ordination body that will include all the relevant stakeholders and be responsible for drafting the national strategy and policies in the field of safety, security and service. (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 3 – Definitions			
Recommendation 2: The legal framework (Law No. 6222) should incorporate the definitions set out in Article 3 of the Convention. (status: desirable)			
Milestones	Timing	Lead Agency	Progress
Recommendation 3: The national co-ordination committee’s strategy should be developed to highlight that the integrated approach encompasses events inside and outside of sports venues throughout the period of an event. See T-S4 Recommendation Rec(2022)1 on a Model structure of an S4 national strategy. (status: desirable)			
Milestones	Timing	Lead Agency	Progress
Article 4 - National and Local Co-ordination Arrangements			
Recommendation 4: The Turkish authorities should review their current provincial multi-agency approach and establish a new structure of co-ordination, from national to local level, 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 5: When established, the national co-ordination committee should set up a working group comprising representatives from local communities and supporter representatives. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 6: 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 7: The national co-ordination committee should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 5 - Safety, Security and Service in Sports stadiums			
Recommendation 8: The Turkish authorities should seek to ensure an integrated approach, by progressively investing in the service pillar. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 9: The Turkish authorities should harmonise the standards on the design, infrastructure, licensing, certification and inspection at sports venues. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 10: Consideration should be given to the adoption of UEFA/CAFE and the International Paralympic Committee (IPC) standards listed below and that all existing sports 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 11: A document or security/stewarding plan should be developed for each event, which contains the respective roles, responsibilities and precedence of the police, safety officer, stewards, volunteers, private security companies along with the competence expected of each practitioner. See T-S4 Recommendation Rec(2021)1, Annex A – Safety. (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 private security company. A contract to this effect such as a service level agreement specifying the numbers and quality of private security staff should be in place. See T-S4 Recommendation Rec(2021)1, Annex A – Safety. NB: this level of service and training plan should be consistent across all of Türkiye. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 14: Provincial Sports Safety Boards (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that the stadium 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 risks of persistent standing in seated areas may also have an effect on the maximum safe capacity. 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/ Alternatively, the European Standards EN 13200-1, 2019, Spectator facilities General characteristics for spectator viewing area https://genorma.com/en/standards/en-13200-1-2019 and EN 13200-7 Spectator facilities Part 7: Entry and exit elements and route. https://genorma.com/en/standards/en-13200-7-2014 (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 15: The licencing staff should be trained on 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 16: 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 T-S4 Recommendation Rec(2021)1, Annex A – Safety . (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 17: 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-stadiums safety, security and service matters. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 18: The national co-ordination committee should set the minimum areas of competence to be demonstrated by 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, Annex A – Safety , Appendix 33, and Annex D - Checklist . The club safety officer/representative should be provided with a detailed job description which clearly sets out the roles and responsibilities of their post. The T-S4 Recommendation Rec (2021)1, Annex A – Safety and its good practices may be used to compile a checklist of functions necessary for the role. (status: important)			
Milestones	Timing	Lead Agency	Progress
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 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 Recommendation Rec (2021)1, Annex A – Safety . A national network should 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 Turkish 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 relevant incident. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 21: The Turkish authorities should consolidate effective policies to prevent, deter and respond to violent behaviour, including through public campaigns, while progressing steadily towards a more balanced integration with the service pillar. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 22: The Turkish authorities should draft and implement a national strategy on combating hate speech in sport and adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour (see, for instance, the EU-CoE joint project on “Combating hate speech in sport”, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 23: The relevant authorities should 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. The relevant authorities should put measures in place to identify and refuse entry into the venue for spectators who display or carry with them racist or other discriminatory leaflets, symbols or banners. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 24: The relevant authorities should identify and implement systems for ensuring the provision of adequate and appropriate sports ground specific 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 T-S4 Recommendation Rec(2021)1, Annex A – Safety, Appendix 33). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 25: The Turkish 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 T-S4 Recommendation Rec (2021)1, Annex A - Safety, appendixes 33, 36 and 41 and T-S4 Recommendation Rec (2022) 2 (Annex 2) on a Model regulatory framework on stewarding and private security at sports events. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 26: 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 - Safety, Appendix 41 - (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 27: 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 competences of safety staff, should be in place. See T-S4 Recommendation Rec (2021)1, Annex A – Safety . (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 28: A proposed national co-ordination committee should make provision for ensuring that all stadium stewards are trained by persons assessed as competent to train and accredit stewards as being able to undertake their varied tasks effectively. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 29: The Turkish authorities should continue to further invest in the training of police spotters, including English language courses for those being deployed abroad for operational support missions in connection with international dimension football and other sports matches. (status: important)			

Milestones	Timing	Lead Agency	Progress
Article 6 - Safety, Security and Service in Public Places			
Recommendation 30: The TFF 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 stadiums hosting professional football matches, in order to inform the development of enhanced technical, operating and safety management standards. (status: desirable)			
Milestones	Timing	Lead Agency	Progress
Article 7 – Contingency and Emergency Planning			
Recommendation 31: 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 - Safety. All key decision makers should be located together in the same room. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 32: 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. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 33: 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)			
Milestones	Timing	Lead Agency	Progress

Recommendation 34: 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. 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
Article 8 - Engagement with Supporters and Local Communities			
Recommendation 35: The Turkish authorities should develop a multi-dimensional strategy on the service pillar involving all the key actors (public and private) as a long-term project. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 36: The TFF should continue to further invest in the implementation of the SLO concept and their training at the level of Turkish football clubs. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 37: The TFF should further invest in developing an integrated SLO national system at least for the first 2 football leagues; the TFF co-ordinator should be responsible for the training and certification of SLOs at national level. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 38: The TFF and Turkish football clubs participating in the UEFA competitions should liaise more closely with their fan clubs abroad and local authorities in order to prevent incidents caused by the Turkish citizens from the diaspora. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 39: The Turkish authorities should promote and implement policies aimed at fostering dialogue and engagement with supporters and local communities. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 40: 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 41: 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)			
Milestones	Timing	Lead Agency	Progress
Recommendation 42: Provincial Sports Safety Boards should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination. (status: desirable)			
Milestones	Timing	Lead Agency	Progress
Article 9 - Police Strategies and Operations			
Recommendation 43: The Turkish police should invest in developing customised training packages for competition security officers and their assistants, including regular refreshment training. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 44: The Turkish police should adopt a policy of dialogue with the supporters, involving all the deployed police officers. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 45: 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)			
Milestones	Timing	Lead Agency	Progress

Recommendation 46: 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, Annex C - Service. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 47: Supporter feedback should be considered in the risk assessment process before each match. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 48: The Turkish authorities should update and maintain the current system of peer review of football policing operations in order to identify additional best practices and learning points. (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 10 - Prevention and Sanctioning of Offending Behaviour			
Recommendation 49: The Turkish authorities should analyse the feasibility of implementation of the Passolig system to other sports as well (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 11 - International Co-operation			
Recommendation 50: The Turkish NFIP should further invest in promoting the international police cooperation via the deployment/hosting of spotters for European matches. (status: essential)			
Milestones	Timing	Lead Agency	Progress

Recommendation 51: The Ministry of Interior should continue to ensure that the head of the NFIP participates in all meetings of the Saint-Denis Committee, while the Ministry of Youth and Sports should ensure that an official working in the area of sports safety should attend the same Committee meetings. (status: desirable)			
Milestones	Timing	Lead Agency	Progress
Recommendation 52: The Turkish 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 53: The Turkish 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 - Sports Education Programmes



Ministry of Youth and Sports

CONCEPT NOTE

Sports for Solidarity Project

The project, which is implemented subject to the International Olympic Committee (IOC) in cooperation with the Olympic Refugee Foundation and the Ministry of Youth and Sports, was launched in 2019. The project was planned for a two-year period at the beginning; however, it was decided to extend it for a three-year period as of 2022 and to move to the second phase.

The Olympic Refugee Foundation (ORF), the Association for Social Development and Aid Mobilisation (ASAM), the United Nations High Commissioner for Refugees (UNHCR) and the Turkish National Olympic Committee are the partners of the Project.

The project aims to ensure the social cohesion of the asylum-seeking youth and the Turkish youth through sports. The project is implemented in Adana, Ankara, Bursa, İzmir, Mersin and Şanlıurfa, which are the provinces hosting the most asylum seekers. Sports courses, awareness-raising seminar, sports festival, youth camps and training of the coaches are organised within the scope of the Project.

As of today, a total of 15.780 young people has participated in the sports courses, 7.504 and 8.277 in first and second phases, respectively, and it is expected that this number will reach to 20.000 by the end of May 2025. Individuals in need of sport and with vulnerability among the youth benefitting from the Project and their families are also identified and directed to the relevant protection mechanisms through the sports-based activities carried out in the Project.

The success of the project, foundation of which was laid in 2019 and touched the lives of thousands of children throughout this period, makes news both at the national and international media. The Project was presented as a good practice example at the Global Refugee Forum held in Switzerland in December 2023. Additionally, this Project stands out as being the first and only project the IOC

funded in Türkiye and as the project which received the highest fund support (5.300.000 USD) by IOC, if other countries are included.

A work visit was paid to the ORF Headquarters on 24 September 2024 in order to review the current status of the Project and to discuss the matters regarding the future of the Project.









Ministry of Youth and Sports

CONCEPT NOTE

Peace and Protection Through Sports Project

Project on Supporting Peace and Protection Through Sports Among the Youth Under Temporary or International Protection and Youth From the Host Communities in Türkiye

The Project is carried out in cooperation with the UNHCR Representation in Türkiye and the Ministry of Youth and Sports and is funded by the Barça Foundation. The first phase of the Project was launched in 2024, and the second phase is planned to continue until mid-2026.

The Project is aimed to reach the children/youth of the refugees and host communities, facilitate the training of the grass-root sports through the local capacities of the Ministry of Youth and Sports in Manisa and İzmir provinces, build the capacities of both refugee youth and the youth of the host communities who benefit from the Project and ensure social cohesion among them. In this regard, sports courses are organised for a four-month period in addition to various activities.

The first target group of the project is **1000 young people** who are at the age of 8-16 and live in Manisa and İzmir, have International Protection Application/Status, benefit from the Temporary Protection, and also youth from the host communities.

The UNCHR Representation in Türkiye aims to build a bridge between refugees and the host communities through this Project, together with the Ministry of Youth and Sports (MoYS), which is a key public institution responsible for carrying out relevant activities regarding sports and youth capacity-building. For this reason, sports trainings and tournaments will be organised in four branches (football, basketball, volleyball and handball) which are determined for youth and, additionally, young people receive awareness-raising trainings on topics such as society-based protection, personal development and conflict resolution.

UNHCR will also provide “Sports Toolkit For Protection” trainings to the local staff of MoYS’ and the relevant peers of youth of the communities through child protection policy, confidentiality policy, ethics and working with refugees. The project also aims to focus on raising awareness and strengthening social cohesion among the targeted beneficiary peers within the framework of community-based protection efforts.

The Project budget is 200.000 Euros.

Sportive trainings of the Project started in March 2024. The Project was put into practice in Manisa and İzmir provinces.





Appendix B - Sports Safety Certificate and Guide

Turkish versions



Stadium Safety
Certificate_Turkish.ç



Türkiye_Sports
Safety Guide.pdf

English versions



Türkiye_Stadium
Safety Certificate_24F



Türkiye_Sports
Safety Guide_EN_17I

Note:

1. The sample safety certificate attached may be enhanced by the following recommendations:

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 17: 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-stadiums safety, security and service matters. (status: important)

2. The sample safety certificate attached refers to a “sports ground safety plan”. However, there is no reference of what safety documents or processes need to be included in this plan. The UK SGSA provides detailed guidance of the contents of a “Sports Grounds Safety Plan” or an “Operations Manual”. A national co-ordination committee could standardise these plans to provide consistent standards of safety throughout the country. (<https://sgsa.org.uk/safety-management/operations-manual/>).

3. The Sports Safety Guide, on page 26, explains the security officer and steward training regime. This advice may be enhanced by the following recommendations:

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 private security company. A contract to this effect such as a service level agreement specifying the numbers and quality of private security staff should be in place. See T-S4 Recommendation Rec(2021)1, Annex A – Safety. NB: this level of service and training plan should be consistent across all of Türkiye. (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 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 Recommendation Rec (2021)1, Annex A – Safety. A national network should 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)

4. The Sports Safety Guide, on page 28, explains the role of Club representative responsible for fans. This advice may be enhanced by the following recommendations:

Recommendation 36: The TFF should continue to further invest in the implementation of the SLO concept and their training at the level of Turkish football clubs. (status: important)

Recommendation 37: The TFF should further invest in developing an integrated SLO national system at least for the first 2 football leagues; the TFF co-ordinator should be responsible for the training and certification of SLO at national level. (status: important)

Recommendation 38: The TFF and Turkish football clubs participating in the UEFA competitions should liaise more closely with their fan clubs abroad and local authorities in order to prevent incidents caused by the Turkish citizens from the diaspora. (status: important)

Recommendation 39: The Turkish authorities should promote and implement policies aimed at fostering dialogue and engagement with supporters and local communities. (status: important)

5. The Sports Safety Guide, on page 61, explains the inspection regime by the “Sub-Provincial Sports Safety Board” and states: “ö) To determine the number of spectators that can be safely admitted to sports areas throughout the season at the beginning of the season”. This advice may be enhanced by the following recommendation:

Recommendation 14: The provincial Sports Safety Boards (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that the stadium 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 risks of persistent standing in seated areas may also have an effect on the maximum safe capacity.

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/>

Alternatively, the European Standards EN 13200-1, 2019, Spectator facilities General characteristics for spectator viewing area <https://genorma.com/en/standards/en-13200-1-2019> and EN 13200-7 Spectator facilities Part 7: Entry and exit elements and route. <https://genorma.com/en/standards/en-13200-7-2014> (status: important).

PART 3

COMMENTS BY TÜRKİYE

ON THE REPORT BY THE MONITORING TEAM

Ongoing Developments in Safety and Security at Sports Events in Türkiye

The Ministry of Youth and Sports, the Ministry of Interior, the Ministry of Justice, General Directorate of Security, the Turkish Football Federation (TFF), and the Turkish Clubs Association are jointly working to improve the legal, regulatory, and operational frameworks related to safety and security at sports events in Türkiye. These efforts aim to further enhance current practices in line with modern challenges and international standards.

As part of these efforts, a new ticketing system is being finalised under the coordination of the TFF and the Ministry of Interior. The system will link match tickets to the national biometric ID cards (chip enabled identity cards), with the primary objective of more effectively identifying individuals involved in violence and disorder and preventing them from entering sports venues. This innovative approach has already been introduced to clubs in the professional leagues, and initial feedback from club representatives has been largely positive.

In parallel, a national workshop was recently organised to address implementation challenges related to Law No. 6222 on the Prevention of Violence and Disorder in Sports. This event brought together representatives from the Ministries of Youth and Sports, Interior, and Justice, along with the Clubs Association Foundation, to evaluate enforcement issues and explore practical improvements. A follow up coordination meeting is scheduled for 24–26 July 2025 to further discuss updates to Law No. 6222, current safety and security protocols, and enforcement practices in light of evolving needs.

In addition to the initiatives outlined above, evaluations and responses to international recommendations have been prepared, reflecting Türkiye's current legal framework, operational practices, and institutional coordination mechanisms.

In Türkiye, all matches in the top two professional leagues are assessed through Provincial Sports Security Boards, which bring together relevant local authorities, including law enforcement, club representatives, local government, and emergency services. These boards function as effective multiagency coordination platforms where match related risks are systematically evaluated based on updated intelligence, and appropriate security measures are decided accordingly.

While the maximum safe capacity is determined by the Provincial Sports Safety Boards, a capacity that can be safely managed for visiting team spectators is allocated. In addition, buffer zones are created in the stands for security personnel to prevent contact between fans, and the sizes of these zones are determined by the Provincial Sports Safety Boards and communicated to the relevant institutions and clubs prior to ticket sales.

Efforts are also underway to enhance national level alignment to respond to emerging threats and meet international standards. Legal and administrative frameworks are being reviewed, and a more cohesive national strategy is being developed. As part of the inclusive governance model, each Provincial Sports Security Board includes a supporter liaison officer (SLO) or a club representative responsible for supporter matters. Their participation ensures the voice of supporters is integrated

into planning and risk assessment processes, contributing to balanced decisions and stronger community level engagement.

These boards, established by law and convened under the authority of the provincial governor, act as the primary mechanism for local level planning, risk assessment, and matchday operations coordination. Key stakeholders involved include club management, police forces, municipalities, fire and health services, and IT/ticketing officials responsible for access control and surveillance. Meetings follow structured agendas with formal minutes, and while not formalised through a 'Terms of Reference' document, roles and responsibilities are clearly defined by national sports legislation and consistently implemented across all provinces.

Türkiye remains open to adopting further documentation practices such as formal frameworks or written terms of reference to reinforce role clarity and stakeholder accountability.

Proactive and coordinated communication is recognised as critical for the successful implementation of an integrated safety and security strategy. Although a national level multiagency media and communication strategy has not yet been institutionalised, effective practices are already in place. These include:

- Regular public briefings and safety guidance by the Ministry of Interior, the TFF, and law enforcement bodies via press releases, websites, and social media;
- Joint statements issued by provincial authorities ahead of high risk or high attendance matches; and
- Direct communication by clubs and their SLOs with supporters regarding safety messages, often in coordination with local police.

Türkiye acknowledges the value of developing a nationwide communication strategy to unify messaging and promote the principles of the integrated approach and is committed to incorporating this into future strategic development phases.

Türkiye supports the integrated approach to football safety and security, with a strong emphasis on the 'service' pillar, aligned with the Council of Europe's Convention (CETS No. 218) and international good practices. Law No. 6222 not only covers enforcement but also embeds preventive, educational, and service oriented elements.

Key service-based implementations include:

- Designated fan zones, signage, and streamlined access arrangements to improve the matchday experience;
- Presence of SLOs and stewards trained in supporter engagement and communication, not just crowd control;
- Youth and community programs developed with clubs and local authorities to promote a positive fan culture; and
- Investments in infrastructure like e ticketing, turnstiles, and CCTV to enhance service delivery.

Türkiye is committed to expanding these efforts through additional stakeholder training, improved facilities, and broader interagency collaboration to ensure safe, inclusive environments for all fans.

Türkiye prioritises harmonising the standards related to venue design, infrastructure, licensing, certification, and inspection to maintain consistency and safety nationwide. All sports venues particularly those hosting professional football are governed by a comprehensive inspection regime coordinated by the Ministry of Interior, General Directorate of Security, Ministry of Youth and Sports, TFF, and local authorities.

This regime includes:

- Licensing based on structural safety, access control, and emergency systems;
- Periodic inspections involving police, fire, health, and technical experts; and
- Certification of systems like CCTV, turnstiles, PA systems, and fire protection infrastructure aligned with UEFA/FIFA guidelines.

Work is ongoing to unify and codify these standards within a single national framework through stakeholder consultation and international cooperation.

For each professional football match particularly in the Super Lig and 1. Lig a detailed Match Safety and Security Plan is prepared and submitted to the relevant Provincial Sports Security Board for review and approval. These plans define roles, responsibilities, and command structures, including:

- Deployment zones and emergency procedures;
- Steward and police competencies aligned with UEFA/FIFA; and
- Communication protocols between command units and control centres.

Plans are tailored based on the assessed risk level and Türkiye is working to further align these protocols with T-S4 Recommendation Rec(2021)1 – Annex A (Safety).

Türkiye also ensures all safety officers and management personnel are qualified under the Occupational Health and Safety Law (Law No. 6331). Each stadium must appoint certified safety experts and physicians. Competence reviews, ongoing training, and regulatory oversight guarantee matchday personnel are fully capable and qualified.

These measures also influence maximum safe capacity decisions and ensure safety management meets both national legislation and international standards.

Türkiye recognises the importance of establishing clear and consistent standards for the level of service and training expected from personnel provided by private security companies, as well as formalising these expectations through contractual agreements.

The provision of private security services at sports venues is governed primarily by two key pieces of legislation:

- **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, which outlines the security requirements and roles at sports events to ensure safety and order; and

- **Law No. 5188 on Private Security Services**, which regulates the licensing, training, and supervision of private security personnel across all sectors, including sports.

According to Law No. 5188, all private security personnel must complete mandatory training programs certified by the Ministry of Interior. These programs cover essential topics such as crowd management, emergency response, and legal responsibilities.

Under the coordination of the Special Security Inspection Department of the Directorate General of Security, special security branches provide sports security training to special security personnel who will be assigned to sports competitions in all provinces. The relevant training is provided to DG Security personnel as part of their training plans. A Sports Security certification system has been developed for special security officers. While sports security training is provided at regular intervals for personnel assigned to sports events, personnel serving as sports police are transferred to the relevant branch after completing this training to ensure they perform their duties professionally. The recruitment processes, accreditation, and training of private security managers and personnel assigned to competitions are carefully carried out by the Special Security Inspection Department of the DG Security. The sports safety training provided includes necessary education on how police officers should proactively interact with fans and behave.

Event organisers work closely with private security companies to develop **service level agreements (SLAs)** that specify the number, qualifications, and expected conduct of security personnel deployed at matches. These contracts ensure consistent service delivery and compliance with national standards.

Additionally, the Police Force has a specialised division the **Private Security Department** within the **General Directorate of Security**. This department oversees provincial directorates in all 81 provinces and monitors private security personnel through official applications and social security registrations.

Moreover, the **Social Security Institution** conducts electronic and onsite inspections to verify that all private security employees are properly registered and covered under social security.

This dual oversight mechanism guarantees that private security personnel at sports events comply with both legal employment standards and security service requirements, contributing to a professional and regulated security environment throughout Türkiye.

Training and service standards are applied uniformly nationwide to ensure a consistent and professional approach to private security at all sports venues.

Türkiye remains committed to continuously improving these frameworks in alignment with international best practices, thereby ensuring the safety and satisfaction of all event attendees.

Türkiye acknowledges the critical importance of setting the **maximum safe capacity** of stadiums not only based on their physical design and condition but also considering the **quality of safety management** and operational factors such as spectator behaviour, including the risks associated with persistent standing in seated areas.

In Türkiye, the **Provincial Sports Safety Boards** hold the primary responsibility for assessing and determining the safe capacity for each venue. This process involves a multiagency risk assessment considering:

- The **stadium's structural design, infrastructure, and maintenance status**;
- The **effectiveness of safety and security management plans**;
- The **capacity and deployment of stewarding and security personnel**;
- The **expected supporter behaviour and specific risk factors**, including standing in seated areas; and
- Compliance with **national legislation**, particularly Law No. 6222 on the Prevention of Violence and Disorder in Sports.

The Provincial Sports Safety Boards make the necessary plans for any potential incidents that may occur during the competition and determine the maximum safe capacity. All police officers acting under the authority of the Competition Security Officer have the authority to intervene in any incident that occurs within the framework of the law. The Competition Security Officer is authorised and responsible for coordinating with all individuals and organisations involved in the security of the match regarding the management and supervision of security measures to be taken during sports matches. These duties, authorities, and responsibilities are defined by regulation.

Moreover, Türkiye's stadium licensing and inspection procedures are aligned with internationally recognised standards, including the principles outlined in the **UK Guide to Safety at Sports Grounds (Green Guide)** and **European Standards EN 13200 series**, which provide detailed criteria for safe spectator capacities and entry/exit route design.

Where applicable, Turkish authorities consult these standards alongside UEFA and FIFA technical guidelines to ensure best practices in spectator safety are implemented.

This comprehensive and integrated approach ensures that stadium capacities are set at levels that are both physically and operationally safe, prioritising the wellbeing of all attendees.

Türkiye remains committed to continuously reviewing and updating these practices in line with evolving international standards and risk assessments.

Türkiye recognises the importance of ensuring that licensing staff are adequately trained in determining the **safe capacity of stadiums and their individual sectors**, taking into account evacuation capacities and the overall quality of safety management.

Currently, the licensing and inspection personnel involved in stadium safety in Türkiye receive specialised training coordinated by the **Ministry of Youth and Sports**, the **Turkish Football Federation (TFF)**, and relevant security agencies.

Key elements of this training include:

- Understanding stadium infrastructure and design in relation to crowd movement and evacuation procedures;
- Application of **risk assessment methodologies** that incorporate both physical capacities and operational safety management quality;

- Familiarity with national legislation, particularly **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, as well as international guidelines such as the **INTERPOL Guide to Stadium Safety and Security Licensing and Certification**; and
- Practical exercises and workshops to simulate evacuation scenarios and assess safety management effectiveness.

Moreover, these training programs are regularly updated to reflect evolving best practices and technological advancements in stadium safety.

Through this comprehensive approach, licensing staff in Türkiye are well equipped to accurately determine safe capacities and contribute to the overall safety and security of sports venues.

Türkiye is committed to further enhancing these training programs and aligning them fully with international standards to ensure the highest levels of spectator safety.

Türkiye recognises the vital importance of having a clearly defined and documented **command and control structure** for the management of safety and security during sports events.

In Türkiye, for each professional football match especially in the Süper Lig and major tournaments a comprehensive **command and control plan** is developed and approved by the **Provincial Sports Security Board**.

This plan includes:

- Detailed assignment of roles and responsibilities for all parties operating within the various **control rooms**, such as the **match command centre**, **stadium security operations room**, **police incident control room**, and other relevant units;
- Clear protocols for **communication, coordination, and escalation** among police, Safety & Security Officers, stewards, private security personnel, emergency services, and other stakeholders;
- Defined chains of command and decision making authority to ensure rapid and effective response to any incidents; and
- Use of modern technology, including CCTV systems, radio communications, and integrated information platforms to support real-time situational awareness.

These structures are regularly reviewed and exercised through multiagency tabletop and full-scale operational exercises to ensure preparedness.

Türkiye continuously seeks to align these command and control arrangements with international best practices, such as those outlined in the **T-S4 Recommendation Rec (2021)1, Annex A – Safety**, to maintain the highest standards of event safety and security.

In Türkiye, stadium safety is regulated under **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, which requires that each stadium must appoint a **designated Stadium Safety Officer** who is responsible for the in-stadium safety, security, and service-related matters.

The appointment of a Stadium Safety Officer is **mandatory** for the issuance of a valid matchday safety certificate, which is reviewed and approved by the **Provincial Sports Safety Board** prior to each professional football match.

These officers are **formally trained and accredited** through Ministry approved training programs. They are expected to demonstrate knowledge and competence in risk management, crowd dynamics, emergency planning, and coordination with police and private security forces. Only those who meet the competency standards are certified to perform this critical role.

This approach ensures that safety certification is **directly tied to the competence and appointment** of qualified safety professionals, aligning with international best practices.

Turkish authorities have already set **minimum competence criteria** for **safety officers, supervisors, and stewards** in accordance with **Law No. 6222** and **Law No. 5188**. These standards are reflected in **certified training curricula** approved by the **Ministry of Interior** and regularly updated based on evolving risk environments and operational demands.

Each **Safety Officer** is provided with a **detailed job description**, which clearly outlines their **duties and responsibilities**, including:

- Ensuring crowd safety and control;
- Overseeing private security and stewarding operations;
- Coordinating with local law enforcement and emergency services;
- Managing emergency evacuation procedures; and
- Supervising access and egress points.

These responsibilities are also integrated into checklists developed and used during matchday safety planning, consistent with the **T-S4 Recommendation Rec (2021)1, Annex A (Safety) and Annex D (Checklist)**.

Through a clear framework of expectations and documented duties, Türkiye ensures all appointed officials are not only competent but also **accountable for the execution** of their roles.

Türkiye has implemented a **structured training and certification system** for safety officers, supervisors, and stewards, as stipulated under **Law No. 6222** and **Law No. 5188**. Training is provided both at the **theoretical and practical levels**, encompassing modules such as:

- Stadium crowd management;
- Crisis response and evacuation;
- Communication skills;
- Interagency coordination; and
- Legal and ethical responsibilities.

Personnel are formally **assessed for competence**, and only those who meet the standards are certified for deployment in professional sports venues.

Furthermore, in cooperation with the **Sports Police units**, continuous **on-the-job training** is conducted to strengthen real-time operational skills.

Türkiye also supports **information sharing and capacity-building efforts** through international forums and has previously engaged with networks such as **ESSMA (European Stadium & Safety Management Association)** and UEFA/FIFA safety conferences. The Turkish Football Federation regularly sends representatives to these international events and actively reviews and implements good practices from shared experiences.

Efforts are ongoing to **develop a national platform for Safety Officers** to enhance peer learning, exchange expertise, and align with international safety management trends.

In Türkiye, the training and competency assessment of **safety officers, supervisors, and stewards** are carried out in accordance with the national legal frameworks, specifically:

- **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, which defines the roles, responsibilities, and qualifications required for safety personnel involved in sports events; and
- **Law No. 5188 on Private Security Services**, which regulates the training, certification, and supervision of private security personnel, including those deployed in stadiums.

These laws mandate a **comprehensive training structure** at both the **theoretical and practical levels**, including modules on:

- Crowd management and control;
- Emergency response and evacuation procedures;
- Communication and conflict resolution;
- Legal obligations and rights; and
- Safety and security coordination with police forces and emergency services.

All training programs must be delivered by certified training institutions approved by the **Ministry of Interior**. Upon completion, personnel are subject to **formal assessment and certification**, ensuring they are competent to carry out their assigned duties.

In addition, **on-the-job training and real-time operational guidance** are provided by **specialised units of the sports police**, particularly during matchday operations. This helps reinforce theoretical knowledge with practical application in live-event scenarios.

Authorities also maintain **procedures to monitor and document the performance and certification status** of trained personnel, ensuring that only qualified individuals are assigned to safety-critical tasks at sports venues.

This structured, regulated, and continuously monitored approach ensures that all safety and security staff in Turkish stadiums are properly trained and **demonstrably competent**, in line with international standards such as those outlined in **T-S4 Recommendation Rec (2021)1, Annex A – Safety, Appendix 33**.

As previously noted, the recruitment, accreditation, training, and assessment of safety managers and stewards in Türkiye are conducted in line with the provisions of **Law No. 6222 on the Prevention of Violence and Disorder in Sports** and **Law No. 5188 on Private Security Services**.

These laws mandate that all stewards and private security personnel undergo certified training programs, which cover a wide range of essential competencies, including crowd management, emergency response, conflict de-escalation, and legal responsibilities. The training is delivered by institutions authorised by the **Ministry of Interior**, and only personnel who successfully complete these programs are licensed to operate in sports venues.

In addition to the certified training, **sports police units** provide **on-the-job training within stadiums**, offering stewards real time experience and practical knowledge tailored to the specific dynamics of live sports events. This includes working side by side with law enforcement to enhance coordination, communication, and situational awareness.

Furthermore, regular **joint exercises** and simulation-based trainings are organised, involving police, stewards, and safety managers, with the aim of strengthening interagency cooperation and ensuring a unified response framework during high-risk matches and emergency scenarios.

Under Law No. 6222 on the Prevention of Violence and Disorder in Sports, sports police, clubs, and federations work together to hold regular training and coordination meetings with fan groups. Police officers with a certain level of English proficiency are assigned to international competitions. In high-risk competitions, security coordinators from relevant countries are invited to ensure international cooperation and establish coordination regarding measures to be taken for competition security.

Türkiye remains committed to continually improving the quality and consistency of training for safety personnel, aligning practices with **international standards**, such as those outlined in **T-S4 Recommendation Rec (2021)1** and **Rec (2022)2**. This integrated approach ensures that stewards and safety managers are professionally equipped to maintain a safe, secure, and welcoming environment for all participants and spectators.

In Türkiye, a **comprehensive stewarding and safety plan** is developed for each professional football match, in accordance with the procedures set by **Law No. 6222 on the Prevention of Violence and Disorder in Sports**.

Prior to every match, a meeting of the **Provincial Sports Security Board** is convened. This board brings together all relevant stakeholders, including local law enforcement, stadium management, club representatives, private security companies, and other public agencies. During this meeting, a match specific safety and security plan is prepared and approved.

As part of this planning process:

- The **number of police officers and stewards/private security personnel** required is determined based on the **risk level of the match**, the **expected number of spectators**, and other relevant operational factors;

- Specific **zones of responsibility within the stadium** are designated for both public and private security personnel, and coordination protocols are established; and
- Roles and responsibilities of each security actor including the **police, stewards, and private security companies** are clearly defined, taking into account the **competency and qualifications required** for each position.

This structured and collaborative approach ensures the deployment of appropriately trained personnel in the right areas, supporting a safe and well-managed environment for spectators, teams, and officials.

Extensive meetings are held prior to each season with the participation of personnel appointed as Competition Security Officers. In accordance with Law No. 6222 on the Prevention of Violence and Disorder in Sports, all incidents are dealt with under the authority of the Competition Security Officer. The intervention of health and firefighting teams is stipulated by law. Taking into account the attitudes and behaviours exhibited by fans in previous matches and the situations that occurred during matches and affected the fans, a separate risk analysis is prepared for each match. Banners to be brought into the stands can be brought into the stadium with the approval of the Competition Security Officer. If a banner is displayed in the stands in any way, legal proceedings are initiated against the relevant individual or individuals under Law No. 6222 on the Prevention of Violence and Disorder in Sports. There is no record of crimes related to hate speech, racist, or other discriminatory behaviour in sports in our country.

Furthermore, these event-specific plans are fully aligned with the principles outlined in **T-S4 Recommendation Rec (2021)1, Annex A – Safety, Appendix 41**, ensuring consistency with international standards and best practices.

As previously noted, the provision and performance standards of private security personnel at sports venues in Türkiye are governed by two main legal frameworks:

- **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, which outlines the security structure and responsibilities for sporting events, including private security; and
- **Law No. 5188 on Private Security Services**, which regulates the licensing, training, employment, and supervision of private security personnel across all sectors, including sports.

In line with these laws, all private security personnel must undergo certified training programs approved by the **Ministry of Interior**. These programs include critical topics such as **crowd control, emergency response, communication skills, and legal responsibilities**.

In addition to formal certification, **on the job training** is provided by **sports police units** in the stadiums. This practical training ensures that private security staff are familiar with matchday operations, real-time coordination with police, and the expectations of their specific roles within the event's security plan.

Moreover, event organisers are required to establish **Service Level Agreements (SLAs)** with private security companies. These contracts clearly define:

- The **required number** of personnel to be deployed;

- The **minimum qualifications and competencies** expected; and
- The **code of conduct and operational standards** to be maintained throughout the event.

These agreements are carefully reviewed and aligned with match risk levels, anticipated spectator numbers, and the stadium's specific security needs.

This multilayered approach ensures that all security personnel are properly qualified and operate under standardised procedures, contributing to a **safe, professional, and consistent security environment** across all sporting events in Türkiye.

As previously stated, all stadium stewards in Türkiye are trained in accordance with the provisions of **Law No. 6222 on the Prevention of Violence and Disorder in Sports** and **Law No. 5188 on Private Security Services**. These legal frameworks mandate both theoretical and practical training, which must be delivered by certified instructors and institutions approved by the Ministry of Interior.

In addition to these formal programs, **specialised sports police units** provide **on the job training** within stadiums. This practical training focuses on the unique challenges of managing crowds during live sports events, such as matchday dynamics, supporter behaviour, de-escalation techniques, and emergency procedures.

The combination of certified legal training and hands-on experience ensures that stewards are not only licensed but also well prepared to carry out their diverse responsibilities professionally and effectively.

Türkiye remains committed to maintaining high standards in steward training through a structured, regulated, and continuously evaluated approach. The involvement of competent trainers and the oversight of law enforcement further strengthen the integrity and effectiveness of the stewarding system in Turkish football venues.

The Turkish Football Federation (TFF) actively engages with relevant national and international organisations on stadium safety and security matters, including UEFA. TFF collaborates closely with international experts as well as Turkish specialists working abroad to conduct safety inspections of stadiums hosting professional football matches.

Furthermore, TFF participates regularly in UEFA's annual Safety and Security Conferences, sending designated personnel to stay updated on the latest standards, best practices, and emerging challenges in stadium safety management. The insights and reports obtained from these events are thoroughly evaluated and used to inform the continuous development and enhancement of Turkey's technical, operational, and safety management standards for football venues.

Through these ongoing partnerships and expert collaborations, TFF is committed to aligning its stadium safety framework with international benchmarks, ensuring a safe and secure environment for players, officials, and spectators alike.

Türkiye fully recognises the essential need for a detailed and clearly documented **command and control structure** within the safety management operations of sports events.

In accordance with national legislation, particularly **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, and in alignment with international best practices such as the **T-S4 Recommendation Rec (2021)1, Annex A – Safety**, a formalised hierarchical structure is established to ensure clarity of command and streamlined decision-making during events.

For each professional football match, especially in the Süper Lig and 1. Lig, a comprehensive **Safety and Security Plan** is prepared and submitted to the **Provincial Sports Security Board** for approval. This plan explicitly defines the roles and responsibilities of all parties involved in the safety management operation, including the police, safety officers, stewards, volunteers, private security companies, and emergency services.

Furthermore, operational protocols require that all **key decisionmakers be physically located together within a centralised command and control room** during events, facilitating rapid communication and coordinated responses to any incidents.

The **Ministry of Interior**, Turkish Football Federation (TFF), and law enforcement agencies collaborate closely to ensure these command structures are enforced and regularly reviewed through multiagency training exercises.

By integrating legislative mandates with international standards and operational best practices, Türkiye ensures that safety management at sports venues operates with maximum efficiency, clarity, and effectiveness, providing a secure environment for all participants and spectators.

Türkiye fully acknowledges the critical importance of multiagency collaboration and preparedness in the management of safety and security at sports venues, in line with the provisions of **Law No. 6222 on the Prevention of Violence and Disorder in Sports** and other relevant legislation.

Safety management teams work closely with police forces, emergency services, municipal authorities, and other competent local bodies to develop comprehensive, multiagency contingency and emergency plans tailored for each stadium and relevant premises. These plans are prepared with a clear understanding of local risks, infrastructure, and available resources, ensuring coordinated responses to any incident or emergency.

Once contingency plans are developed, Türkiye mandates regular multiagency **tabletop and full scale exercises** to test their effectiveness. These exercises engage all key stakeholders involved in event delivery including security personnel, emergency responders, club officials, and stadium management and simulate a variety of realistic scenarios that may occur before, during, or after a match. This approach allows identification of potential gaps or weaknesses, enabling continuous improvement and enhanced readiness.

Recognising the increasing reliance on technology, Türkiye requires that electronic systems such as ticketing, accreditation, and access control have robust **redundant backup systems** to ensure business continuity in the event of technical failures or cyberattacks. Stadium management is responsible for implementing resilient and secure electronic entry systems complemented by fail safe manual procedures. These measures align with national cyber security policies and international best practices to safeguard operational integrity and spectator safety.

In summary, Türkiye's approach is to embed a culture of proactive, coordinated preparedness and technological resilience in line with legal requirements and international standards, thereby ensuring a safe and secure environment for all sports events.

The Turkish authorities acknowledge the importance of developing a comprehensive, multidimensional strategy focused on the service pillar in sports events. Recognising that effective safety and security go hand in hand with quality service, Türkiye is committed to involving all key stakeholders both public and private in this long-term project.

Efforts are underway to enhance collaboration among governmental bodies, sports federations, clubs, law enforcement, private security providers, and supporter groups to create a unified framework. This approach aims to improve fan engagement, communication, and overall experience, while maintaining high safety standards.

The strategy will incorporate legislative support, continuous training programs for security personnel, and proactive engagement with supporters to ensure that the service element is embedded at every level of event organisation.

Türkiye is dedicated to implementing this strategy to foster a safer, more welcoming, and fan-centred sporting environment aligned with international best practices.

The Turkish Football Federation (TFF) remains committed to advancing the implementation of the Supporter Liaison Officer (SLO) concept across Turkish football clubs.

TFF continues to invest in the development and delivery of comprehensive training programs to ensure that SLOs are well equipped to effectively engage with supporters, promote positive fan behaviour, and enhance matchday experiences.

These efforts are aligned with international best practices and aim to foster a safe, inclusive, and respectful environment within all levels of Turkish football.

TFF will maintain its focus on expanding and strengthening the SLO framework, recognising its vital role in supporting both clubs and supporters.

The Turkish Football Federation (TFF) has taken significant steps toward developing an integrated **Supporter Liaison Officer (SLO)** national system, particularly for the top two professional football leagues, the Süper Lig and 1. Lig.

Within this framework, a coordinator has been appointed at the TFF to manage the **training, certification, and standardisation** processes of SLOs at the national level.

Moreover, these efforts are carried out in compliance with **Law No. 6222 on the Prevention of Violence and Disorder in Sports**, supporting the participation of supporters in matches within a safe, respectful, and inclusive environment.

The TFF continues to work collaboratively with relevant stakeholders to strengthen the legal framework, expand the SLO system, and fully align with international standards.

While Turkish football clubs maintain connections with their fan clubs abroad, the impact of these efforts is often limited due to differing regulations and practices in various countries.

A significant challenge arises from the inability to share data on supporters involved in incidents, primarily due to strict **data protection laws** in those countries. This limitation hampers effective communication and preventive actions.

Furthermore, notifications and warnings issued by clubs through their official social media and communication channels, although valuable, are sometimes insufficient to fully mitigate the risks associated with diaspora supporters.

Türkiye and its clubs continue to explore ways to enhance cooperation with local authorities and diaspora fan groups, taking into account these legal and practical constraints.

As the Project Study Department, we prepare national and international new stadium projects primarily in accordance with current fire regulations and earthquake regulations, and they are evaluated in terms of accessibility standards. Additionally, the projects are planned in accordance with the TFF Stadium and Security Committee Directive, UEFA and FIFA criteria, and the Green Guide. All areas, including the protocol stands and lobbies, press stands and lobbies, disabled spectator viewing areas, guest spectator stands, first aid rooms, spectator restrooms, cafeteria areas, mosques, athlete dressing rooms, referee rooms, infirmaries, doping rooms, etc., are designed in accordance with these guidelines. During the project preparation phase, consultations are also held with TFF officials, and necessary revisions are made in accordance with the report prepared by the TFF regarding the project. After the projects are completed, an application is made to the relevant municipality for a building permit. The projects are then submitted to the tender unit for construction tendering.

For existing structures, seismic performance analyses are conducted to assess the structural integrity of the building, and reinforcement projects are prepared if necessary. Additionally, fire department reports are prepared by the provincial directorates for existing structures, and the necessary renovations are made to bring the building into compliance with the regulations in accordance with these reports.

In this context, it is recommended that projects are updated in line with changing regulations by following current legislation and that technical staff are informed about the regulations.

As the Project Study Directorate, we prepare national and international new stadium projects, and their capacity is determined by the investment program or at the request of the provincial directorates. Projects are prepared according to the determined capacity. In this context, the stadium is divided into stands according to its capacity, and the stands are divided into sectors. For each sector, spectator entrance gates and evacuation gates are planned in accordance with the criteria specified in the TFF Stadium and Security Committee Guidelines, UEFA, FIFA criteria, and the Green Guide.

In this regard, it is recommended that projects are updated in line with changing regulations and that technical staff are informed about the regulations.
