

**ARREST, EJECTIONS, ACCEPTABLE BEHAVIOUR
AGREEMENTS AND BANNING STRATEGY
2024/25**



<i>Document Details</i>	
Document owned by	Jon Bullas
Version number	v 0.6
Reviewed	19/11/2024
Review date	Regularly

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Introduction

This document describes BFC's approach to dealing with any incidents and/or crimes that are either reported directly to the club or witnessed by the Ground Safety Team, club employees or from the Stewarding Operation.

There are several methods available that allow incidents to be reported to the club, and this can include, but not exhaustive, of the below:

- The report line – 62277
- Email and club telephone line
- The Police or other Emergency Services
- Club employees
- Stewards
- Written correspondence
- Social Media

Every incident/crime reported to the club is reviewed by the Head of Safety and Security – the process that follows the report of such matters is detailed further within this document.

The approach described is a framework for dealing with any person who is identified as committing a crime, causing anti-social behaviour, using discriminatory language/behaviour or breaching ground regulations. The sanctions for such behaviour can include:

- Ejection
- Arrest
- Criminal Conviction
- Stadium bans
- Acceptable Behaviour Contracts
- Warning letter
- Verbal warning

Our aim is to provide a fair and transparent process for dealing with reports submitted to the club regarding people's behaviour so that we can ensure that all spectators and visitors to Turf Moor continue to have a pleasurable experience in a safe environment.

Investigations and ban meeting

All incidents/crimes reported to the club are reviewed on receipt.

Should action be required immediately due to the nature of the incident then an internal review will be conducted by the Head of Safety and Security – this will include initial discussion with the appropriate parties before action is taken (see below sections that provide details around the options to be considered.)

Each incident/crime that is reported to the club is reviewed at the monthly investigations and ban meeting – this is attended by:

- Head of Safety and Security
- Director of Operations
- Operations Executive Support
- Police

This meeting is documented, and actions agreed – all agreed actions which result in the club issuing any kind of sanction are then recorded on the 'Investigations and Ban' spreadsheet.

This Spreadsheet is a live document that is kept up to date by the Operations Support Executive – this spreadsheet is also reviewed at the monthly meeting to ensure that all new investigations are added, bans coming to an end are discussed, decisions taken around granting access back into the stadium made, whether people should be subject to an Acceptable Behaviour Contract etc etc.

It is imperative that this document is kept up to date with clear cognisance of Human Rights as well as GDPR.

Ground Safety Team

The Ground Safety team will play a key role in ensuring that all incidents and crimes are recorded promptly, efficiently and accurately.

The key message within the match day briefing to all stewarding supervisors, which in turn is disseminated to the stewarding teams, is very simple but clear:

See it, Hear it Report itDeal with it

This is referred to further in this document below.

The club views the Ground Safety Team safety team as a wider partnership outside of just club staff – the below are keys roles within this team:

Ground Safety Officer

- Responsible for the overall safety of the staff, spectators and any other person who attends the 'footprint of the ground' on a match day
- Co-ordinates the safety team, directs the stewarding operation, dynamically risk assesses all incidents and the link with the emergency services in particular, the Police
- Co-ordinates the investigations and banning process and chairs the monthly meeting

Director of Operations and Deputy Safety Officer on match days

- Overall responsibility for the infrastructure of the stadium.
- Supports the SO in the control room throughout the match.
- The link between the GSO and the match day staff in all other club departments including commercial, media, marketing, fan experience, catering, ticketing etc.
- The link to the club ownership and executive

Deputy Safety Officer – Match-days

- Assist the SO and support the overall safety plan/strategy for the event
- Has an 'on the ground role' with direct liaison with all the stewarding providers
- Undertakes a QA process on each match day which will include checking stewarding numbers, observing briefings, questioning stewards on their roles and responsibilities etc.
- Operationally deployable on match days to monitor crowd dynamics, assist with crowd control, deploy spontaneously to and manage incidents, liaise with the

control room to agree tactics to resolve incidents/issues and undertake/implement security measures that may be required

Facilities Manager

- Responsible for the Health and Safety, maintenance, and cleaning operations of the stadium
- Supports the SO throughout the match
- The link between the SO and the match day staff of the maintenance and cleaning departments

Deployment Manager – G4S

- Responsible for the staff of G4S, their attendance, welfare, and deployments
- Will deal with all stewarding issues and incidents and direct stewards to incidents
- Reports to the GSO/DSO on all issues

Deployment Manager – Compact

- Responsible for the staff of Compact, their attendance, welfare, and deployments
- Will deal with all stewarding issues and incidents and direct stewards to incidents
- Reports to the SO/DSO on all issues

Deployment Manager – Stadium TM

- Responsible for the staff of Stadium, their attendance, welfare, and deployments
- Will deal with all stewarding issues and incidents and direct stewards to incidents
- Reports to the SO/DSO on all issues
- Responsible in particular the car parks, turnstiles and HVM barrier operation

G4S Chief Steward/Compact Chief Steward/Stadium Chief Steward

- Responsible for the 'on ground' supervision of their respective companies
- Will manage safety and security issues on the direction of the SO, Deputy or Deployment Manager

The Ground Safety Team meet early in the day of the match, are briefed by the SO and discuss intelligence, risks, threats, operational plans and contingencies – early intervention is stressed with a focus on the above approach **'see it, hear it, report it Deal with it'**

Complaints and/or reports

A complaint or report can be made to the club in several ways – including:

1. Verbally to a club staff member or agency staff
2. The report line
3. In writing via letter, email, or social media
4. In text or phone call to the club
5. Through a third party like the Police, Kick it Out, the F.A. or the EFL etc.
6. Via My Compliance by a steward supervisor

On receipt of a complaint to the club by any of the above methods, the person receiving the complaint on behalf of the club will create an email based around the facts of the email and send it to the relevant person or person to deal with the complaint.

If sent by email to info@burnleyfc.com, an automatic reply will be sent to the sender stating – ‘*Thank you for contacting Burnley Football Club. We will endeavour to reply to your query as quickly as possible.*’

The info@ emails are received by several members of staff, including Veronica Simpson - Veronica will allocate the email to the most appropriate person to deal with it. In addition, Veronica Simpson and Jack Ormesher keep a register of the complaints.

The Executive Operations Support officer monitors the report line, My Compliance and third-party portals. Any reports are recorded onto a spreadsheet which is currently cross referenced to the Investigations and bans spreadsheet – this will become one document during 2024/25.

The Executive Operations Support officer will liaise with the Head of Safety and Security to decide on the next steps to any report received and agree the actions to be undertaken.

All other correspondence etc. that has been received into the club will be forwarded to the Head of Safety and Security for review.

The Head of Safety and Security is in regular contact with the Lancashire Constabulary Dedicated Football officer – all appropriate incidents are discussed, reviewed and next steps agreed.

Incidents in general

Incidents, breaches of ground regulations and crimes are dealt with primarily by the Head of Safety and Security.

Incidents reported on a match day are recorded in the match day log and will be dynamically assessed by the Safety Officer or Deputy Safety Officer to decide on the most appropriate course of action to be taken at that time.

To assist in this decision making, it is recommended that the SO and Deputy SO utilise the ‘National Decision Model’ and that the below is recorded, either in the match day log or individual command log:

- Incident type – crime, ASB, breach of ground regulations etc
- Information/intelligence gathered around the circumstances
- Risk and threat associated to the incident
- What options are available to be considered – ie. is the risk of such a level that a dynamic intervention is required or does the matter require further investigation post-match
- What powers are available and/or what policies have been breached
- Which partners/stakeholders are available to be consulted with to agree a joint response
- The action to be taken and the outcome of such action

The incidents will subsequently be recorded within the post-match report – this will detail the action and who is responsible for it.

These actions are followed up in between matches by the Head of Safety and Security and if not completed, is mentioned at the pre-match meeting of the next match.

Crime reporting

If a crime is witnessed, as a breach of ground regulations or otherwise, on a Match day and the police are on-site, the Police Bronze Commander will be informed.

The Safety Officer will discuss the next steps with the Police Bronze Commander and agree the next steps.

In all matters where the Police are present, they will take primacy for the investigation and will be assisted by the Ground Safety Team. A decision will be taken by the Police as to whether an arrest will be made on the day and how they will facilitate it.

The Ground Safety team will assist in this matter – this will include safely removing the offender (if appropriate) from the crowd, monitoring the offender/s on CCTV, providing witness statements together with any other evidence required.

If the police are not on site (including a 'OFO' fixture), the SO will gather all evidence available, consider the action to be taken utilising the NDM and decide upon the most appropriate next steps.

This will include, but not is not exclusive, the below:

1. The crime is ongoing or of such **a severe nature** that it requires **immediate police intervention**:
 - the SO will arrange for the police to be called via 999 and ask for their immediate attendance
 - the Ground Safety Team will make all efforts to ensure that the best available evidence is secured
 - Full details of the incident will be recorded on the match log including the incident number and crime number when supplied
2. If the crime is not ongoing and is of a level that **immediate police intervention is not required**:
 - the Ground Safety Team should secure the best evidence available
 - the SO will arrange for the police to be called via 101 or report the matter directly to the Police DFO
 - full details of the incident will be recorded on the match log, including the incident number and crime number if applicable
3. If the crime reported is **personal to an individual** – i.e. not one that involves the Club or a general safety issue and/or not an ongoing incident:
 - the victim will be asked if they want the club to inform the police, or if they want to report the matter direct themselves
 - if the victim needs assistance with this, they will be offered a 'phone' to contact the police
 - the Ground Safety Team will make all efforts to ensure that the best available evidence is secured
 - full details of the incident will be recorded on the match log
 - the SO will inform the Police DFO at a later time and ensure that an incident number and crime number, if applicable, are recorded on the match day log
4. If the incident is of a **minor nature** and the risk/threat presented means the matter can be dealt with post-match:
 - the SO will arrange for full details to be obtained in order that a report can be made to the police on the next working day
 - the Ground Safety Team will make all efforts to ensure that the best available evidence is secured
 - full details of the incident will be recorded on the match log

- the SO will inform the Police DFO at a later time and ensure that an incident number and crime number, if applicable, are recorded on the match day log

The above is not exhaustive and each situation must be assessed at the time based upon the **risk/threat presented** at the time either to the safety of the individual concerned and/or the overall risk/threat to safety to all attendees within the stadium.

In all cases, the best evidence available must be secured to assist in any future potential criminal prosecutions as well as the club banning process.

Prosecutions

If a person is dealt with by the police and CPS for a 'football related offence,' there is a likelihood that a Court Banning Order will be applied for at court – this will be where an offence under Schedule 1 has been committed.

If the offender is a season ticket holder they will be issued with an interim ban and a letter sent confirming this – this interim ban will be in place until such time as the prosecution has been finalised, at which point the ban will be reviewed based upon the prevailing circumstances.

If the person is prosecuted and a Banning Order secured, the police will notify the Head of Safety and Security who will record the dates of the banning order.

There is always the likelihood that a person will appeal against their Banning Order either on issue or before it expires – the Police will consult with the Club in these cases.

If the appeal is upheld:

- the person will be contacted by the SO and invited to attend Turf Moor to see the SO, with the condition that they will not be able to attend a match until the interview has taken place
- Following the interview the SO will review the evidence of the offence and point out the clause in the Customer Charter relating to the Arrest and Acceptable Behaviour Policy which states – ***"Any person who has been convicted of a football related offence either home or away, may receive an 'Indefinite ban' from Turf Moor and will be unable to purchase tickets for away fixtures as a Burnley supporter. The ban may be reviewed, on request, after a period of 5 years."***
- A decision will then be made based upon the circumstances presented as to whether the person is issued with a club ban – if so the time period will be determined at that time
- If it is decided to issue a club ban the person will be contacted by phone and informed of the decision – a letter will then be sent confirming the decision
- Should the decision be to not issue a ban, before the person will be allowed to attend Turf Moor to watch a match, an Acceptable Behaviour Contract will be insisted upon. The Customer Charter states – ***"A person who breaches a Ground Regulation may be requested to sign an Acceptable Behaviour Agreement before being allowed to attend Turf Moor or may be issued with a stadium ban for a number of matches."***
- **Of note**, once a Football Banning Order has expired, a full review will be undertaken by the club with Police to determine as to whether the person concerned should be allowed back into Turf Moor

- Should the decision taken that the person be allowed access back into Turf Moor, they will be informed that a Acceptable Behaviour Contract be entered into – if they do not agree to this then they will not be readmitted
- If it is decided that they are not to be readmitted to Turf Moor upon the expiration of the Football Banning Order, then the person must be informed of this decision in writing

Non prosecutions

There may be circumstances where a person has either:

1. Been dealt with by police but not prosecuted or the prosecution failed
2. Not dealt with by police but has breached ground regulations to the extent that a sanction is required

Those offences relating to a breach of ground regulations will be assessed and discussed by members of the Ground Safety Team and a decision made on the severity of the breach and whether a sanction or ban should be considered.

The incident will be then reviewed by the Head of Safety and Security and taken to the next Investigations and Bans meeting.

At the meeting a decision will be taken as to whether a sanction is required, and if so what the sanction will be – as detailed above the decision taken could include a Stadium Ban, Acceptable Behaviour Agreement, a written warning or a verbal warning.

If the nature of the offence/breach is such that immediate action is required and the next Investigations and Bans meeting is not due to take place before the next home game, the Head of Safety and Security will make a decision around an interim sanction – this will then be taken to the next meeting for discussion, ratification or changed for an more appropriate sanction.

Any offences relating to a breach of Ground Regulations will be assessed and discussed as above – there is no defined list of behaviours that will lead to a club ban, but they will include:

- Any criminal offence
- Hate crime
- Any form of discriminatory words or behaviour
- Anti-Social Behaviour
- Ejections (as below)
- Ticket breaches
- Refused entry – whether alcohol related or general behaviour

The sanctions or bans are not determined in this policy as there are many factors which will be taken into consideration when making the decision. The following is a list of factors that will be considered, but not exhaustive:

- Previous behaviour
- Previous convictions/club sanctions
- Victim's behaviour during the offence
- Victim's views
- Injury to anyone or damage to anything
- Viciousness of actions
- Alcohol or drug consumption
- Cost of repair
- Inconvenience caused

- Match day experience affected
- Likelihood of a repeat of the offence
- Impact on the victim
- Impact or potential impact on the Club
- Remorse shown for behaviour

Ejection and Arrest

Ejections

If a person contravenes a ground regulation in the stadium, the matter should be reported to the control room and a decision will be taken by the Ground Safety Team as to the most appropriate course of action.

This decision will be based upon the risk/threat presented at the time – the timeliness of taking the action will also be key and must consider the overall impact on crowd dynamics and safety, not only of the offender, the spectators around them but also the stewarding team.

Any decisions taken to arrest or eject will be recorded on the match day log.

Depending on the nature of the incident, the SO will deploy the most appropriate resource – this will more than likely be a Response Team made up of SIA Stewards, and, if present, Police support.

All ejections will be undertaken by the stewarding response team unless the threat/risk is such that the Police are required to deal with the situation. This will be dynamically assessed by the SO and Police Commander if present.

The following options will be considered:

- Eject without taking details
- Eject, but take details of their ticket/season card
- Eject as at (a) or (b) above but hand to the Police outside the ground
- Escort to the concourse, obtain details and allow back into the stand
- Escort to the concourse, hand to the Police to deal
- Verbally warn in the stand
- Monitor the person on CCTV and allow them to move to the concourse before intervening – either with Stewards or the Police
- Monitor the individual on CCTV, note their seat number and investigate post-match
- Note the person on CCTV including seat number and the loggist will record details with no further action being taken

Ejection Policy for Under-18s at Turf Moor

Under-18s may be subject to ejection in circumstances where their behaviour(s) present(s) a risk to themselves, others, or disrupts the enjoyment of the game for other supporters and fans.

As with adult ejections, ejections of those under the age of 18 years old will be conducted based on a dynamic risk assessment being carried out – this will consider:

- the individual and environmental factors such as the nature of the behaviour
- the individual's age
- who they have attended with
- their proximity to their home address

- their understanding of the ground's rules

Whenever an Under-18 is ejected from the ground, a member of the Safeguarding Team MUST be requested to attend for oversight and to be involved in the management and decision-making process.

Every effort will be made to resolve issues without ejection, but where necessary, the safeguarding officers, in consultation with the SO, will enforce our ejection policy on those under the age of 18 years old.

If an under-18 home fan is ejected from the ground:

- Full details will be taken of the individual
- Checks made on the season ticket and whether there are any other tickets associated to it
- An assessment made around the vulnerability of the individual
- Arrangements made for the Under-18 to be handed to or collected by an appropriate adult
- Follow up action should be taken directly through our own Club policies in relation to whether sanctions or bans are to be imposed or whether welfare support, if appropriate, is offered or signposted

Where the ejection is an away fan, it is absolutely vital that, in addition to the above:

- It is fully understood how the Under-18 is due to leave Turf Moor and return home
- Who the appropriate adult is for the Under-18
- Ensure that arrangements are made for the individual to be met by and supervised for the duration of the game by the appropriate adult
- Where no such appropriate adult is available, the Police must be informed to assist in assessing the vulnerability of the individual and agreeing the next steps
- Contact will be made with the Head of Safeguarding and/or Safety Officer, at the away Club to make them aware of the incident

Arrests

All arrests will be made by the police.

The stewards may be involved in the safe removal of an individual from the stands where offences have been committed and then hand them to the Police.

Where the risk/threat presented by the situation is too high for Stewards intervention, the incident will be monitored by CCTV and the Police will be asked to deal.

If there is not Police presence in the stadium, an immediate call will be made requesting emergency Police assistance.

If appropriate, based upon the demeanour of the person arrested, full details of the individual should be obtained prior to arrest.

If not possible, these details will be obtained later from the Police.