



Erasmus+ project addressing the problem of spectator violence in European football through improved cooperation between club supporter liaison officers and the football and public authorities

Liaison-based Integrated Approach to Improving Supporter Engagement (LIAISE)

Action Plan: Republic of Bulgaria

The purpose of this Action Plan is to support the football and public authorities in the Republic of Bulgaria through the provision of suggested actions, customised to meet national needs and circumstances, designed to enhance the role of Supporter Liaison Officers (SLOs) in developing effective communication and dialogue with supporters as part of a wider and comprehensive multi-agency approach to the planning and organisation of safety and security in connection with international and domestic professional football matches held in Bulgaria.

Project Aim: *"Tackle cross-border threats to the integrity of football and other sports (where appropriate) posed by spectator violence, other criminality and prohibited behaviour, and all kinds of intolerance and discrimination by:*

- *encouraging and supporting the football authorities and partner agencies to recognise the value of enhanced dialogue and communication between club supporter liaison officers (SLOs) and the football and public authorities through better understanding, awareness and implementation of established SLO good practices."*

Action Plan: The content within is based on discussions and observations undertaken during Liaise project activities, in particular a programme of research exchange visits undertaken in 2019. It is recognised that there may be some misinterpretation in translation or explanation. It is also recognised that consideration of the recommended actions is the preserve of public and private entities in the Bulgaria and that the suggestions are intended solely to aid discussion within and between the relevant agencies.

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For ease of reference, the seventeen recommendations are presented under four inter-related thematic headings:

- (i) developing the SLO concept in Bulgaria;
- (ii) supporting the SLO role and network (as set out in the European Union Council Resolution Handbook on Police Liaison with Supporters¹ and the national SLO Handbook);
- (iii) building trust and cooperation between SLOs and the police, and other key stakeholders, notably club management, BFU, private security companies, club security officer;
- (iv) facilitating the work of SLOs in the community; and
- (v) creating a managed, safe and secure environment in which SLOs can function effectively.

Each Recommendation, or grouping of related recommendations, is accompanied by a summary explanation of its intended purpose.

¹ Adopted at the 3490th meeting of the Council of the European Union (JUSTICE AND HOME AFFAIRS - HOME AFFAIRS ISSUES) held in Luxembourg on 13 October 2016. A copy can be obtained from the Council Register of publicly available documents (available in all the official languages of the EU) on <https://www.consilium.europa.eu/en/documents-publications/public-register/> by inserting the following document reference number 12792/16.

Theme 1. Developing the SLO Concept in Bulgaria

Recommendation One: the BFU and Ministry of Youth and Sports to use their offices to jointly promote and publicise the important role which SLOs can play in generating a positive and welcoming football experience for all supporters, helping to reduce football related criminality and misbehaviour, facilitating more effective dialogue between the clubs, police and supporters, and promoting wider community interest in participating in the football experience.

Explanation: The SLO network remains at an embryonic stage in Bulgaria, notwithstanding efforts of Bulgarian Football Union SLO Network Coordinator, the enshrinement of the SLO concept in BFU regulations, and the appointment of SLOs in almost all clubs competing in the top two professional leagues. Those SLOs appointed are usually existing club employees designated to undertake the additional SLO role.

However, the circumstances in Bulgaria is far removed from the model set out in the SLO Handbook and in European guidance. In effect, the clubs with SLOs have tended to customise the concept and role to fit their specific circumstances and imperatives. This is understandable, and by no means unique to Bulgaria.

The main barriers to developing the SLO concept in Bulgaria, highlighted during Liaise project visits, included a range of inter-related issues, notably:

- poor physical infrastructure of most stadia hosting professional football matches;
- inadequate stadium safety management and stewarding;
- low attendances;
- limited financial capacity within many professional clubs;
- lack of awareness among clubs and supporters regarding the potential benefits of the SLOs role; and the
- status and empowerment of supporter group leaders;

In the circumstances, it is almost certain that it will take a major top down initiative to expand upon and empower the current embryonic community of SLOs. At present, key partner agencies, notably the police, have direct access to supporter leaders or representatives and have yet to be fully convinced on the added value which of SLOs. Moreover, a combination of poor stadium infrastructure and inadequate safety management, coupled with negative perceptions of the football experience, has a major impact on the appeal of attending matches among potential supporters in the wider community. These and related factors appear to have generated a cycle of negativity regarding football in Bulgaria.

The above obstacles will not be easily overcome, but this should not deter public and private authorities from jointly attempting to raise awareness among public and private entities, football supporters, and the wider community, both at national and local level, regarding the important role which SLOs can play in respect of generate a more positive football experience

for all supporters and helping to prevent and counter significant levels of criminality and prohibited behaviour by some supporters, and Key issues which could be highlighted include the potential role of SLOs in:

- making football matches safer, more secure, welcoming and, importantly, more attractive to potential supporters in the community;
- facilitating the development of a partnership approach towards tackling any existing or emerging frictions or misunderstandings between the respective parties;
- encouraging supporters to help identify solutions to current problems; and
- generating a sense of community pride in, and encouraging more active support for, local football clubs.

Theme 2 Supporting the SLO Role and Network

Recommendation Two: senior management in professional football clubs to consider how best to empower their SLOs in terms of enabling the SLOs to represent the club in liaison with supporters, police, other agencies and the wider community.

Recommendation Three: all professional football clubs in the top two leagues to provide their SLO with a comprehensive job description setting out their core functions based on those set out in European guidance. This should be supplemented with an annual work plan for each SLO setting out annual objectives and an appraisal of what was achieved in the previous year and the reasons why any objectives were not fulfilled

Recommendation Four: all professional football clubs in the top two leagues, to provide their SLO with additional support personnel, on match days, either in a paid or voluntary capacity.

Recommendation Five: professional football clubs in the top two leagues to provide their SLO with a direct channel of communication with senior club management.

Recommendation Six: BFU to take full advantage of the SLO Education Programme available through the UEFA Academy by hosting an event in Bulgaria.

Recommendation Seven: BFU to review whether the SLO network coordinator is adequately resourced (notably in terms of support) to undertake all his SLO coordination functions effectively.

Recommendation Eight: BFU to appoint and resource a national team SLO to undertake core SLO duties at international matches played at home and abroad

Explanation: Notwithstanding the limited resources on most professional football clubs in Bulgaria, with modest investment clubs can help develop a relatively sophisticated SLO network through providing SLOs with the status, support and resources necessary to

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undertake effectively their extensive range of challenging preventative SLO functions as set out in European guidance, namely:

- acting as an interface and communicating between fans, security officers, stewards and the police, BFU, and club and stadium management, before, during and after matches;
- providing detailed information for fans attending matches to facilitate match day travel and logistics and removing the potential for misunderstanding;
- providing input at security meetings before home games and high-risk away games;
- explaining the actions of fans to police and stewards and vice-versa to break down barriers and misconceptions;
- in addition to attending formal pre-match conferences in accordance with BFU regulations, SLOs should participate in any dynamic safety and security meetings inside the stadium with club security officers, stewards to evaluate the situation;
- working to prevent disorder by exerting a calming and de-escalating influence on fans and other stakeholders, mediating in conflict situations, and encouraging a positive supporter culture;
- attending debriefing meetings after matches;
- contributing to police training;
- participating in local sport and security committees, etc.
- building an effective communication structure with fans, clubs, security staff, police, local and national government, other SLOs, transport companies, etc.

This represents an extremely demanding menu of strategic and operational activities, especially if an SLO is working in isolation, or is employed on a voluntary or part-time basis, or in a dual or multi-capacity by the club. Indeed, the task becomes almost impossible if an SLO is not provided with sufficient time, along with human and other resources, to deliver their core functions effectively. It is important, therefore, for clubs to provide their SLO with a job description and access to a team of trained assistants (paid or voluntary) adjudged to have the appropriate competences and communication skills necessary to assist the SLO in undertaking his or her strategic and operational activities with supporters generally, organised groups, local communities and, importantly, the police. In addition, given the impact which a wide range of club policies and procedures can have on supporters, all SLOs should be provided with opportunity to make this impact clear to senior decision makers within the club.

Theme 3. Building Trust and Cooperation between SLOs and the Police.

Recommendation Nine: Ministry of Interior and the BFU to jointly initiate a meeting at a national level to bring together experienced SLOs and policing football decision makers to discuss how best to encourage and facilitate effective communication between the police and SLOs in each locality hosting professional football matches and to raise awareness of the mutual benefits for both sides.

Explanation: the aim of the recommendation is to prompt a national debate between key agencies on how to enhance trust and communication at a local level in order to:

- facilitate the development of a partnership approach towards tackling any existing or emerging frictions or misunderstandings between the respective parties;
- empower SLOs; and
- highlight the positive role that SLOs can play in the community in terms of generating a sense of community pride in, and encouraging more active support for, local football clubs.

Recommendation Ten: Ministry of Interior to encourage the police in all localities hosting professional football matches to proactively seek to engage with SLOs as a means for developing effective and trusted channels of communication.

Recommendation Eleven: the BFU to encourage all professional football clubs to facilitate, support, and encourage SLOs to seek to identify key contacts within the police who operate in the locality in which the club is based in order to develop a discrete but meaningful dialogue in order to build trust and mutual understanding of their respective roles.

Recommendation Twelve: Ministry of Interior and professional football clubs to encourage the police to engage with club SLOs in respect of operational planning and risk assessment processes.

Explanation: irrespective of the liaison which currently exists between police spotters and supporter group leaders, and the established arrangements involving the BFU SLO Coordinator and the NFIP, steps should be taken to develop more effective and ongoing liaison between the police and SLOs at a local level. The reality is that to effectively deliver their core functions, all SLOs need to identify and develop communication channels with a police contact capable of influencing policing football risk assessments, strategies and tactics. It is only through developing such contacts that trust can be developed and maintained.

In parallel, the Ministry of Interior should encourage the police in localities hosting professional football matches to designate a police contact with whom SLOs can liaise on a regular basis. Whilst some risk assessment and operational planning information will remain sensitive, and not for wider dissemination, police engagement with SLOs should help in assessing the mood, wishes and concerns of supporters and assist decision makers in

developing and adopting operational strategies and tactics which are likely to be perceived by supporters as appropriate and proportionate.

Theme 4. Facilitating the Work of SLOs in the Community.

Recommendation Thirteen: the BFU and Ministry of Youth and Sports, along with other governmental and public bodies and NGOs, to explore the potential for providing funding to enable SLOs to work with local public and community agencies/groups in developing or expanding a range of social and fan projects designed to enhance community life and influence the behaviour of young supporters.

Recommendation Fourteen: SLOs, professional football clubs and public and voluntary community groups to jointly consider the scope for supporting the empowerment of disabled supporters through facilitating their active participation in the football experience.

Explanation: the two inter-related but distinctive recommendations above are based on Liaise project discussions and observations which, amongst other things, highlighted some impressive local social/fan projects, involving football clubs and SLOs (notably but not exclusively in Poland) which appeared to be delivering successful results in demonstrating awareness of the importance of clubs, SLOs and supporters participating in social responsibility initiatives in order to:

- provide reassurance to local communities;
- build closer links between clubs, fans and local residents and businesses;
- counter any negative publicity regarding football and football fans in Bulgaria;
- help dispel the potential allure among young supporters for participating in negative activity of risk groups;
- promote the role of SLOs in communities hosting professional football matches; and, importantly
- encourage passive and potential supporters to attend matches.

Theme 5. Creating a Safe and Secure Environment in which SLOs can Function Effectively

Recommendation Fifteen: Ministry for Interior, Ministry of Youth and Sports and BFU to work together in reviewing the current arrangements for ensuring that all spectator areas in all stadia hosting professional football matches are managed effectively.

Explanation: in order to provide an operating climate in which SLOs can focus effectively on all of their wide ranging functions, the key governmental and football agencies should review the current safety management arrangements in stadia hosting professional football matches to ensure that all spectator areas, including those areas where home and visiting risk groups gather, are managed effectively and consistently in all professional football stadia.

Observation of match operations revealed that spectator areas where risk groups gather were not managed effectively by private security or the police, presumably on the expectation that such deployment would be provocative. However, European experience evidences that lack of effective crowd management can exacerbate the potential for misunderstanding, conflict and unacceptable behaviour and, in some cases, conflict between supporters and clubs (and ultimately, in extremis, the police). The reality is that whilst some supporter groups may perceive their designated area as belonging to them, legal responsibility and liability for the safety of spectators in all spectator areas of a stadium rests firmly with the event organiser (unless responsibility is formally handed over to the police or other emergency service in the event of a major safety or security scenario). To expect any SLO to undertake their intermediary role or to negotiate with supporter groups in an unmanaged area is not only extremely challenging but can also put their health and safety at risk.

Recommendation Sixteen: the Ministry of Interior and police to review whether the current exclusion options and legislation are being uniformly implemented and effectively enforced.

An inter-related issue appears to centre on the desirability of reviewing implementation of the current exclusion options and enforcement arrangements to consider if they are effective in dealing with individuals who organise or contribute to criminal or other prohibited misbehaviour both inside and outside of football stadia.

The public authorities in the Bulgaria recognise that effective exclusion from the football experience (not just stadia), targeted at offenders, can: deter criminal and prohibited activity; prevent re-offending; and transform behaviour; and be perceived by football supporters and the wider community as an appropriate and proportionate response to football related criminality, especially if the exclusion arrangements are open and transparent and involve a judicial or administrative process.

Moreover, targeted exclusion is widely perceived by supporters as being preferable to collective (indiscriminate) punishments which impact on supporters irrespective of whether or not they have engaged in any criminal or prohibited behaviour, particularly if accompanied by good communication with supporters and incentives designed to promote and facilitate positive behaviour.

In essence, the key public and private authorities should consider whether a combination of effectively managed football stadia and an ethos of evidence-based targeted exclusion, will enhance the football experience generally, enable SLOs to undertake their varied tasks within a more positive and safe supporter environment, attract an increased number of spectators, and, in time, help to build an effective bridge between supporters, the police, and football clubs and/or the football authorities.

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**ANNEX**

| <b>ACTION PLAN RECOMMENDATIONS: Republic of Bulgaria</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                  |                            |
|----------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------|
|                                                          | <b>Recommendation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                |                                  |                            |
| <b>No</b>                                                | <b>Recommendation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                | <b>Accepted</b><br><br>Yes or No | <b>Action and Progress</b> |
| <b>Developing the SLO concept in Bulgaria</b>            |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                  |                            |
| 1                                                        | BFU and Ministry of Youth and Sports to use their offices to jointly promote and publicise the important role which SLOs can play in generating a positive and welcoming football experience for all supporters, helping to reduce football related criminality and misbehaviour, facilitating more effective dialogue between the clubs, police and supporters, and promoting wider community interest in participating in the football experience. |                                  |                            |
| <b>Supporting the Delivery of SLO Functions</b>          |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                  |                            |
| 2                                                        | Senior management in professional football clubs to consider how best to empower their SLOs in terms of enabling SLOs to represent the club in liaison with supporters, police, other agencies and the wider community.                                                                                                                                                                                                                              |                                  |                            |
| 3                                                        | All professional football clubs in the top two leagues to provide their SLO with a comprehensive job description setting out their core functions based on those set out in European guidance. This should be supplemented with an annual work plan for each SLO setting out annual objectives and an appraisal of what was achieved in the previous year and the reasons why any objectives were not fulfilled.                                     |                                  |                            |
| 4                                                        | All professional football clubs in the top two leagues, to provide their SLO with additional support personnel, on match days, either in a paid or voluntary capacity.                                                                                                                                                                                                                                                                               |                                  |                            |

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|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 5                                                                 | Professional football clubs in the top two leagues to provide their SLO with a direct channel of communication with senior club management.                                                                                                                                                                                                                                      |  |  |
| 6                                                                 | BFU to take full advantage of the SLO Education Programme available through the UEFA Academy by hosting an event in Bulgaria.                                                                                                                                                                                                                                                    |  |  |
| 7                                                                 | BFU to review whether the SLO network coordinator is adequately resourced (notably in terms of support) to undertake all his SLO coordination functions effectively.                                                                                                                                                                                                             |  |  |
| 8                                                                 | BFU to appoint and resource a national team SLO to undertake core SLO duties at international matches played at home and abroad.                                                                                                                                                                                                                                                 |  |  |
| <b>Building Trust and Cooperation between SLOs and the Police</b> |                                                                                                                                                                                                                                                                                                                                                                                  |  |  |
| 9                                                                 | Ministry of Interior and BFU to jointly initiate a meeting at a national level to bring together experienced SLOs and policing football decision makers to discuss how best to encourage and facilitate effective communication between the police and SLOs in each locality hosting professional football matches and to raise awareness of the mutual benefits for both sides. |  |  |
| 10                                                                | Ministry of Interior to encourage the police in all localities hosting professional football matches to proactively seek to engage with SLOs as a means for developing effective and trusted channels of communication                                                                                                                                                           |  |  |
| 11                                                                | BFU to encourage all professional football clubs to facilitate, support, and encourage SLOs to seek to identify key contacts <b>within the police who operate in the locality in which the club is based in order to develop</b> a discrete but meaningful dialogue in order to build trust and mutual understanding of their respective roles.                                  |  |  |
| 12                                                                | Ministry of Interior and professional football clubs to encourage the police to engage with club SLOs in respect of operational planning and risk assessment processes.                                                                                                                                                                                                          |  |  |

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| <b>Facilitating the Work of SLOs in the Community</b>                                |                                                                                                                                                                                                                                                                                                                                                                             |  |  |
|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| 13                                                                                   | The BFU and Ministry of Youth and Sports, along with other governmental and public bodies and NGOs, to explore the potential for providing funding to enable SLOs to work with local public and community agencies/groups in developing or expanding a range of social and fan projects designed to enhance community life and influence the behaviour of young supporters. |  |  |
| 14                                                                                   | SLOs, professional football clubs and public and voluntary community groups to jointly consider the scope for supporting the empowerment of disabled supporters through facilitating their active participation in the football experience                                                                                                                                  |  |  |
| <b>Creating a Safe and Secure Environment in which SLOs can Function Effectively</b> |                                                                                                                                                                                                                                                                                                                                                                             |  |  |
| 15                                                                                   | Ministry of Interior, Ministry of Youth and Sports and BFU to work together in reviewing the current arrangements for ensuring that all spectator areas in all stadia hosting professional football matches are managed effectively.                                                                                                                                        |  |  |
| 16                                                                                   | Ministry of Interior and police to review whether the current exclusion options and legislation are being uniformly implemented and effectively enforced.                                                                                                                                                                                                                   |  |  |