

Impact Assessment, The Home Office

Title: Private Member's Bill making unauthorised entry to football matches a criminal offence IA No: HO IA 0485 No: Other departments or agencies:	Date: 12 January 2024
	Stage: FINAL
	Intervention: Domestic
	Measure: Primary legislation
	Enquiries: FDPTeam@homeoffice.gov.uk

Other departments or agencies:

RPC Opinion: RPC Opinion Status	Business Impact Target: Not a regulatory provision
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	Cost of Preferred (or more likely) Option (in 2024 prices)
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Net Present Social Value NPSV (£m)	-£0.15m	Business Net Present Value BNPV (£m)	0	Net cost to business per year EANDCB (£m)	0
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What is the problem under consideration? Why is government intervention necessary?

In 2021, the Football Association (FA) commissioned Baroness Casey to undertake an Independent Review into the dangerous mass unauthorised entry by force and other disorder that occurred during the Euro 2020 Final at Wembley Stadium. The report recommended strengthening the legal framework to deter football-related disorder, including ‘tailgating’ (the act of a ticketless person following, or attempting to follow, a legitimate entrant into a stadium) at football stadia. The report recommended that the practice should be made a criminal offence. At present there are no football-specific legal consequences for gaining unauthorised entrance to regulated football matches. Tailgating and other types of unauthorised entry pose public order and security problems to matchday operations at stadia and tends to take place at the highest interest sold-out matches, including Premier League matches and the final stage matches of major tournaments.

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<p>What is the strategic objective? What are the main policy objectives and intended effects?</p> <p>The strategic objective is to deter the practice of seeking to gain entry without authorisation to football matches. Creating the new unauthorised entry offence within the Football (Offences) Act 1991 and adding the offence to Schedule 1 to the Football Spectators Act 1989 should provide a deterrent effect as there will be legal repercussion to would-be offenders. Including the new offence within Schedule 1 means that a court can impose a preventative Football Banning Order (FBO) following conviction if the offence takes place at a designated football match, or the court makes a declaration of relevance that the offence is football related.</p>
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What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 1: ‘Do Nothing’ - do not make any changes to the Football (Offences) Act 1991 or Schedule 1 of the Football Spectators Act 1989.

Option 2: Add unauthorised entry as an offence within the Football (Offences) Act 1991 and add the offence to Schedule 1 of the Football Spectators Act 1989. **Option 2 is the government’s preferred option as it meets the strategic and policy objectives.**

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Main assumptions/sensitivities and economic/analytical risks	Discount rate (%)	3.5
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Costs to the criminal justice system of the newly created offence have been estimated using the costs of the offence of "ticket touting" (unauthorised selling of tickets for a football match), as a proxy. Whilst in practice this may have different costs, sensitivity analysis is used to mitigate this where possible.

Will the policy be reviewed? The policy will be kept under review. **If applicable, set review date:** N/A

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister: Chris Philp MP  Date: 08/03/2024

Summary: Analysis & Evidence

Policy Option 2

Description: Add unauthorised entry as an offence within the Football (Offences) Act 1991 and extending Schedule 1 of the Football Spectators Act 1989.

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2024/25	PV Base	2024/25	Appraisal	10	Transition	
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-£0.25	High:	-£0.06	Best:	-£0.15	Best BNPV	-	

COSTS, £m	Transition Constant	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	-	£0.127	£0.127	£0.015	0
High	-	£0.253	£0.255	£0.029	0
Best Estimate	-	£0.190	£0.190	£0.022	0

Description and scale of key monetised costs by 'main affected groups'

Increased arrests under the new legislation could lead to increased HM Courts & Tribunals Service costs and legal aid costs, including due to an increase in appeals and breaches of FBOs which arise from the conviction of individuals under the new legislation. The creation of a new offence will require guidance for police officers to read. Transition costs have been quantified but are negligible.

Other key non-monetised costs by 'main affected groups'

1. There will be an opportunity cost incurred where police at football matches spend time detaining individuals who attempt to gain unauthorised entry or are successful in doing so. There is no estimate for a cost per arrest, but the opportunity cost represents what the police could otherwise have done with their time.

BENEFITS, £m	Transition Constant	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	-	£0.018	£0.018	£0.002	0
High	-	£0.072	£0.072	£0.008	0
Best Estimate	-	£0.041	£0.041	£0.005	0

Description and scale of key monetised benefits by 'main affected groups'

1. When convicted under this legislation of committing an offence by attempting to, or successfully, gain unauthorised entry into a football match, a fine will be given. The receipts of these are modelled using a number of arrests, derived from a reasonable proxy offence (unauthorised selling of tickets to a football match).

Other key non-monetised benefits by 'main affected groups'

1. Making unauthorised entry a criminal offence will likely result in a deterrent effect.
2. Removing offenders, who can be given a FBO, may prevent further related offending.
3. The removal of individuals without a valid ticket may help to prevent overcrowding and maintain the safety of those who are legitimately attending matches.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	0		Benefit, £m	0		Net, £m	0			
Score for Business Impact Target (qualifying provisions only) £m:							0			
Is this measure likely to impact on trade and investment?							N			
Are any of these organisations in scope?			Micro	N	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)					Traded:		0	Non-Traded:		0

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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Evidence base

A. Strategic objective and overview

A.1 Strategic objective

1. In 2021, the Football Association (FA) commissioned Baroness Casey to undertake an Independent Review into the dangerous mass unauthorised entry by force and other disorder that occurred during the Euro 2020 Final. The report recommended strengthening the legal framework to deter football-related disorder, including 'tailgating' (the act of a ticketless person following, or attempting to follow, a legitimate entrant into a stadium) at football stadia. The report recommended that the practice should be made a criminal offence. At present there are no football-specific legal consequences for gaining unauthorised entrance to regulated football matches. Tailgating and other types of unauthorised entry pose public order and security problems to matchday operations at stadia and tends to take place at highly significant sold-out matches – this has historically included Euro 2020 matches at Wembley Stadium and Premier League matches.
2. The government believes the problem of unauthorised entry to football matches is wider than tailgating alone. The more specific problem at the Euro 2020 Final was mass forced entry in excess of tailgating; police estimate 3,000-5,000 persons gained entry without tickets in this way. Other forms of unauthorised entry also exist – for instance, fans, protestors, and lone wolf actors sometimes use various deceptions to attempt entry to spectator areas or areas of the stadium to which general entrance is restricted. Such deceptions include the use of forged tickets, passes or accreditation documents, or posing as a member of stadium or playing staff.
3. The policy intention is to deter persons from seeking to gain entrance to regulated football matches by tailgating, or other forms of unauthorised attendance, through the creation of a clear, easily understood bespoke football-specific offence.
4. The policy intention is also to make it possible for courts to impose a Football Banning Order (FBO)¹ against persons convicted of unauthorised entrance, to prevent their further involvement in disorderly and unsafe practices and to deter others from attempting this practice.

A.2 Background

5. The FA and Premier League report that tailgating and other forms of unauthorised entry are an increasing problem that regularly takes place - both successfully and unsuccessfully - at major high-profile football matches including internationals, cup finals and Premier League matches. The practice takes safety and security stewarding and policing resources away from where they would otherwise be deployed and can contribute to entry delays for legitimate ticket holders. Additional persons gaining entry to sold-out football stadia creates health and safety risks linked to overcrowding (for example, gangways and entrances become blocked), and an increased risk of conflict and disorder between fans with tickets and those without.
6. Mass forced entry is a specific form of unauthorised entry which is a particular issue in football, and creates the same risks mentioned above. The Sports Grounds Safety Authority advised Home Office officials that whilst mass forced entry (like that seen at the Euro 2020 final) does not happen frequently, attempts to force open doors and other access points are not uncommon.
7. Other forms of unauthorised entry also exist, and whilst they do not pose the same level of mass public order risk given they often do not occur on a large scale (for example, instances may involve a single individual seeking to enter the stadia by posing as a player or staff member, or using a forged ticket or pass), they are a threat to safety and security. These actions also draw upon stadia

¹ Football banning orders – Sentencing ([sentencingcouncil.org.uk](https://www.sentencingcouncil.org.uk)): <https://www.sentencingcouncil.org.uk/explanatory-material/magistrates-court/item/ancillary-orders/14-football-banning-orders/>

safety and security resources and can potentially result in persons with dangerous or disruptive intent gaining access to the stadium, pitch and players.

8. Currently there is little deterrent against tailgating and other forms of unauthorised entry – the Baroness Casey Review into Euro 2020 found that “unauthorised entry to football grounds does not attract specific enforcement measures and is unlikely to have long-term consequences sufficient to deter repetition or emulation”. Currently, detected persons in-stadia are likely to be ejected with no legal repercussion, whilst persons detected attempting entry are usually moved on and will often make multiple attempts to gain entry, particularly those attempting to tailgate.
9. England and Wales will co-host (as part of the UK and Ireland) the Euro 2028 Championship. This major finals tournament will generate huge public interest with a potential for mass assemblage near stadia and consequently a substantial risk of a repeat of the dangerous mass forced entry and resulting disorder seen during the Euros 2020 Final. The FA have repeatedly expressed to Ministers the need for legislation in this space, and government can see the benefits of doing so.
10. A specific offence to ensure that unauthorised entrance to football stadia is comprehensively criminalised would create a strong deterrent. Such an offence should be classified as “football-related”, as defined by the Football Spectators Act 1989, which would mean that a court could also impose a preventative football banning order (FBO) against the individual which would prevent their attendance at regulated football matches for between three and five years. Additional conditions to address offending behaviour could be added to the FBO such as setting exclusion zones around one or more football stadia on matchdays.

A.3 Groups affected

11. The amendments to add unauthorised entry as an offence within the Football (Offences) Act 1991 and add the new offence to schedule 1 of the Football Spectators Act 1989 will not directly negatively impact any person or any groups with a protected characteristic.
12. Persons aged 18 to 34 may be more likely to be impacted by this measure than other age groups as they are overrepresented amongst those who currently have a FBO recorded against them (an indicator of the demographic of persons that are convicted of football-related offences). Over 70 per cent of all FBOs currently in force and where an age was recorded are against individuals in this age group. By virtue of the overrepresentation of younger individuals in the cohort of offenders for similar offences, we acknowledge that this measure may be more likely to affect this age group.
13. Additionally, men may be more likely to be impacted by this measure as they are overrepresented amongst those who currently have a FBO recorded against them (a proxy for this new offence). Over 99.5 per cent of FBOs currently in force and where a gender was recorded are against men. Furthermore, Ministry of Justice statistics (December 2022) indicate that all who were convicted of ticket touting, a proxy ticketing offence, were male. By virtue of the overrepresentation of men in the cohort of offenders for similar offences, we acknowledge that this measure may be more likely to affect this group.
14. We do not, however, consider that this overrepresentation will be likely to result in any particular disadvantage. Our assessment is that this measure is a proportionate means of achieving the legitimate policy aim of preventing and deterring unauthorised entrance at football matches.

A.4 Consultation

15. No formal consultation has taken place. Legislating in this space was a specific recommendation of the independent Baroness Casey review into events at the Euro 2020 Final. Relevant football authorities have made representations to government stressing the importance of legislating in this space to create an effective deterrent to unauthorised entry practices. Policing are also supportive of legislating to create this football-specific public order measure. Ultimately this will help ensure the safety of fans and others legitimately inside football stadia and protect the customer experience.

B. Rationale for intervention

12. The FA and Premier League report that tailgating and other forms of unauthorised entrance are an increasing problem that regularly takes place - both successfully and unsuccessfully - at major high-profile football matches including internationals, cup finals and the Premier League. The practice takes safety and security stewarding and policing resources away from where they would otherwise be deployed and can contribute to entry delays for legitimate ticket holders. Additional persons gaining entry to sold-out football stadia creates health and safety risks linked to overcrowding (for example, gangways and entrances become blocked), and an increased risk of conflict and disorder between fans with tickets and those without.
13. In 2021, the Football Association (FA) commissioned Baroness Casey to undertake an Independent Review into the mass forced unauthorised entry and other disorder that occurred during the Euro 2020 Final. The report recommended strengthening the legal framework to deter unauthorised entry, including 'tailgating' (the act of a ticketless person following, or attempting to follow, a legitimate entrant into a stadium) at football stadia. The report recommended that the practice should be made a criminal offence. Tailgating poses public order and security problems to matchday operations at stadia and tends to take place at the highest interest sold-out matches – this was seen during Euro 2020 matches at Wembley Stadium. However, evidence from the tournament showed that other forms of unauthorised entrance were also a considerable problem. The FA has provided evidence of various behaviours used to gain unauthorised entrance to matches.

C. Policy objective

14. The policy intention is to deter persons from seeking to gain entrance to regulated football matches by all forms of unauthorised attendance, including tailgating, through the creation of a clear, easily understood bespoke football-specific offence.
15. The policy intention is also to make it possible for courts to impose a football banning order against persons convicted of unauthorised entrance, to prevent their further involvement in disorderly and unsafe practices and deter others.
16. The proposed new provision should create an offence of unauthorised entry at designated football matches in England and Wales.

D. Options considered and implementation

17. To meet the policy objectives, there were two options considered:
 - **Option 1:** 'Do Nothing' - do not make any changes to the Football (Offences) Act 1991 or Schedule 1 of the Football Spectators Act 1989.
 - **Option 2:** Add unauthorised entry as an offence within the Football (Offences) Act 1991 and adding the offence to Schedule 1 of the Football Spectators Act 1989. **Option 2 is the government's preferred option as it meets the strategic and policy objectives.**

Preferred option and implementation date

18. Option 2 is the government's preferred option as it meets the strategic and policy objectives. The implementation date would ideally be before the start of the 2024/25 football season - that is, on or before 2 August 2024. If this is not possible, then the earliest date that is.

E. Appraisal

General assumptions and data

19. All costs and benefits are measured relative to Option 1 'Do nothing'.
20. The length of the new guidance issued is assumed to be around 500 words, based on it being one side of A4 in 12-point font.
21. The Readingsoft² calculator is used in calculating familiarisation costs. Following engagement with police forces, it is assumed that only a proportion of police officers, whose role is relevant to football policing, will be required to read the new guidance in each force³. Furthermore, it is assumed that the guidance is sent to police forces to read digitally and estimates use volumes of current police workforce based on March 2022 statistics⁴.
22. HMCTS, legal aid and appeals costs are provided by Ministry of Justice.
23. All costs and benefits are expressed in 2024/25 prices.
24. The introduction of a new offence may generate new demands on the CJS. In the absence of data on the costs of this new offence, the costs of the offence of "ticket touting" (unauthorised selling of tickets for a football match), has been used as a reasonable proxy. This includes where the number of arrests and appeals has been estimated.
25. It is unknown what the typical fine given to those sentenced will be, however this will be subject to the Level 3 maximum of £1,000. In modelling the fine receipts as a benefit, the typical fine has been estimated using MoJ data on "ticket touting" (unauthorised selling of tickets for a football match). The mean fine given under this offence is around £200. Because that offence carries a higher maximum cap than the proposed unauthorised entry offence, £200 is used only as the high estimate, with lower figures for the best and low estimates.

COSTS

Monetised costs

Set-up costs

Familiarisation costs

Police familiarisation costs

26. Police workforce statistics⁵ show that as at March 2023, 457 police officers in England and Wales primarily work on civil contingencies and events (which includes football matches). Police who perform more than one function are recorded under their primary function and so this figure is likely an underestimate. To account for this, a high estimate of 737 includes the total number of police officers as well as police staff, whose primary function is civil contingencies and events. A central estimate of 597 officers is created by taking a midpoint of the high and low estimates. Due to a lack of certainty in the data, it is expected that this figure is an underestimate. It should also be expected that higher-profile matches, particularly non-frequent fixtures such as a major international tournament (such as Euro 2020 and 2028) more police will be required than at regular matches.
27. The familiarisation cost assumes that all of these officers will need to read some guidance. It is estimated that guidance may take the form of up to 600 words in prose, with a central estimate of 500 words and a low estimate of 400 words. Using the Readingsoft calculator, it is estimated that this will take between 1.4 and 4.8 minutes to read, with a central estimate of 2.3 minutes. Using the

² The speed at which officers are assumed to read the guidance is taken from: <http://www.readingsoft.com/>

³ Based on a working assumption from a single police force, scaled up to cover all 43 police forces.

⁴ According to March 2022 data published in July 2022: <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2022>

⁵ Police workforce, England and Wales: 31 March 2023 - GOV.UK (www.gov.uk):

<https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2023>

Annual Survey of Hours and Earnings (ASHE)⁶ hourly wage for Police officers (sergeant and below), upscaled by an ONS labour costs multiplier⁷, it is estimated that this familiarisation will cost between £0.57 and £1.93 per officer, with a best estimate of £0.92. The total for all officers, (the total familiarisation cost) is therefore estimated to be between £260 and £1,420, with a central estimate of £550.

Ongoing and total costs

Court costs and legal aid

28. Using the ticket touting proxy offence, the Home Office estimates that between 30 and 60 arrests will be made for the offence of unauthorised entry at football matches per year, with a central estimate of 45. Assuming that 70 per cent of those arrested have proceedings brought against them (as is the case with the proxy offence), the Home Office estimates that between 21 and 42 people will be tried in a Magistrates' Court, with a central estimate of 32, resulting in court costs of between £7,700 and £15,500 per year. This includes costs where verdicts or sentences are appealed in a Crown Court. It also includes costs where further sentencing is required should an FBO, issued for an offence of unauthorised entry at football matches, be breached. Under all scenarios there is estimated to be less than one additional case proceeded against for breach of a FBO per year, and less than one appeal per year.
29. Though not modelled due to an absence of data, arrests for unauthorised entry to football matches may help to prevent more serious or repeat disorder. This could reduce these costs in the long run.
30. The total additional cost, including HMCTS and legal aid costs, is estimated to be between £14,700 and £29,400 per year, with a central estimate of £22,100 (2024/25 prices).

Table 1: Ongoing costs (legal aid and court costs, including breaches and appeals), £

Estimates (2024/25 prices)	Low	Central	High
Total court costs per year	7,700	11,600	15,500
Total legal aid costs per year	7,000	10,400	13,900
Total additional cost per year	14,700	22,100	29,400
Total PV additional court costs (10-year appraisal period)	66,700	100,000	133,400
Total PV additional legal aid costs (10-year appraisal period)	59,900	89,800	119,800
Total PV additional legal aid and court costs (10-year appraisal period)	126,600	189,900	253,100

Source: Home Office estimates, 2023

Non-monetised costs

Police and matchday staff time

31. There is an opportunity cost to police officers dealing with the new offence, which is time they could otherwise spend on other activities. The estimated volume of arrests per year under the proposed legislation is expected to be between 30 and 60 with a central estimate of 45.⁸

⁶ ONS (2023p) Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14, Table 14.5a, Datasets. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashtable14>

⁷ ONS (2020) Index of Labour Costs per Hour: level (£) by sector, seasonally adjusted. Available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/indexoflabourcostsperhourilchseasonallyadjusted>

Methodology: Wholesaling, Retailing, Hotels & Restaurants Other Costs per hour (2020Q1 as the last Quarter unaffected by COVID-19 measures) divided by Wage Costs per hour. $1.8/13.2 = 0.1364$ (4 d.p.). Multiplier is therefore 1.1364.

⁸ This estimate was calculated using a rounded 10-year mean of arrests for the proxy offence, unauthorised selling of tickets at a football match, with 30 per cent tolerance either side of central estimate for the low and high estimates. This reflects the uncertainty in the use of the proxy offence.

32. Under section 25 of the Police Act 1996⁹, provision of special services, the police can charge football clubs for any costs incurred as a result of policing football matches. This is charged on an hourly basis. Given that policing the new offence will take place during the normal hours spent policing football matches, and expected arrests are low in volume, there is not expected to be additional police time required as a result of the new offence. This means that there is not expected to be an increase in the costs charged to football clubs as a result of this proposal.
33. It is possible that match day stewards and other officials at football clubs will need to read any issued guidance, but it has not been possible to monetise this as there is no data on the number of such staff.

BENEFITS

Monetised benefits

Revenue through fines

34. It is estimated that the typical fine issued will be within a range of £100 to £200 with a central estimate of £150. This is based on the proxy offence of ticket touting which carried a mean fine of £200 for the years 2010 to 2019¹⁰. The maximum fine for ticket touting is greater than the proposed maximum fine for unauthorised entry and so the average estimate is taken as the high estimate, with the central and low estimates assumed to be 75 per cent and 50 per cent of the high estimate respectively.
35. This means that receipts are estimated to amount to between £2,100 and £8,400 with a central estimate of £4,800 per year (2024/25 prices).
36. Over a 10-year appraisal period, this gives a total present value monetised benefit of between £18,000 and £72,000, with a central estimate of £41,000.

Non-monetised benefits

Deterrance

37. The Baroness Casey Review into events which took place during the Euro 2020 tournament found that the current procedure of ejecting offenders who gain unauthorised entry to football matches “is unlikely to have long-term consequences sufficient to deter repetition or emulation”¹¹.
38. The review recommends creating a criminal offence for unauthorised entry at football matches to act as a deterrent to the practice of unauthorised entry. Creating a criminal offence should act as a deterrent to those attempting to, for example, tailgate as there is a legal repercussion for those who choose to attempt to gain unauthorised entry to football matches. At present, it is common practice to simply move attemptees on, and eject persons that have successfully gained entrance without authorisation with no further legal repercussion. Due to an absence of data and the new nature of this offence, it is not possible to estimate the deterrent effect that will result from this new offence, but it is clear from the Casey Review that this act being made a criminal offence is needed. As a result, this benefit is non-monetised.

Prevention of other crimes

39. Those who attempt to gain unauthorised entry into a football game may do so with the intention of causing further disruption. This can lead to other crimes being committed, both on entry to stadia and within stadia. By preventing entry, any further potential crimes are prevented, which means that stadium staff and police may come across fewer more serious crimes. An example of this is, as the

⁹ Police Act 1996, section 25, available at: [https://www.legislation.gov.uk/ukpga/1996/16/section/25#:~:text=\(1\)The%20chief%20officer%20of,be%20determined%20by%20%5BF2that](https://www.legislation.gov.uk/ukpga/1996/16/section/25#:~:text=(1)The%20chief%20officer%20of,be%20determined%20by%20%5BF2that)

¹⁰ Criminal Justice System statistics quarterly: December 2022 - GOV.UK: <https://www.gov.uk/government/statistics/criminal-justice-system-statistics-quarterly-december-2022>

¹¹ Can be accessed here: <https://www.thefa.com/news/2021/dec/03/baroness-casey-review-uefa-euro-2020-final-20210312>

Casey review found, that those who entered without tickets at the Euro 2020 final went on to damage property within the stadium.

40. Those who would have been ejected from football games for unauthorised entrance previously, will now be arrested under the new offence, preventing further attempts of unauthorised entry in the near future. If convicted and given a FBO, this is also true in the longer term.

Improved quality of football matches

41. Providing a legal route to deter persons from repeated attempts of unauthorised entry should improve the quality of the matchday experience for fans who have bought legitimate tickets. Preventing unauthorised entry helps to prevent overcrowding at sold-out events, and helps ensure that only genuine fans are present in the right areas. This is important in ensuring the safety of all fans present.

Value for money (VfM)

42. Table 2 presents the monetised costs and benefits identified in this assessment. The costs and benefits presented in this analysis indicate a net cost from this measure.
43. For Table 2, the monetised benefit is estimated to be between £0.018 and £0.072 million, with a central estimate of £0.041 million (2024/25). The monetised cost is estimated to be between £0.127 to £0.255 million, with a central estimate of £0.193 million (2024/25).
44. As there is no impact to business, both the **Business Net Present Value (BNPV)** and the **net cost to business (EANDCB)**¹² is zero. The **Net Present Social Value (NPSV)** is between **-£0.25 to -£0.06 million with a central estimate of -£0.15 million (2024/25, Table 2).**
45. The NPSV does not include many of the benefits identified which are non-monetised. Principally, these are a deterrent effect both short and long-term, an improvement to fan safety, and an improvement to the matchday experience for staff and fans. These should be considered when assessing the value for money of the legislation.

Table 2: Estimate of Net Present Social Value (NPSV) 2024/25, England and Wales, £ million

	Low	Central	High
TOTAL BENEFITS (PV)	0.018	0.041	0.072
TOTAL COSTS (PV)	0.127	0.190	0.255
TOTAL NPSV	-0.25	-0.15	-0.06
BNPV	0	0	0
EANDCB	0	0	0

Source: Home Office own estimates, 2023, Numbers may not add up due to rounding

Place-based analysis

46. This legislation will be applicable in England and Wales and is not defined at a more local level.

Impact on small and micro-businesses

47. The new measures outlined within this legislation will not have any impact on small and micro businesses.

¹² This is defined as the Equivalent Annual Net Direct Cost to Business and is the metric used by the Regulatory Policy Committee (RPC). It is referred to as the '*net cost to business per year*' in this impact assessment.

F. Proportionality

48. A large proportion of the analysis within this IA looks to monetise the impacts on the criminal justice system costs as a result of introducing the new offence.
49. A proportional approach was taken to monetise as many impacts as possible, prioritising the most substantial costs and benefits. Where impacts have not been monetised, either due to proportionality or the absence of evidence, a qualitative summary has been provided.

G. Risks

Data

Proxy offence

50. Because this legislation proposes the creation of a new offence, it is not possible to measure many of the associate metrics such as expected arrests. Instead, a reasonable proxy is used, which is unauthorised selling of tickets for a football match. This offence, whilst being related to ticketing, is not a perfect comparator, and as such the estimates within this impact assessment should be treated with caution. This offence was chosen as a proxy following engagement with Home Office policy officials. It can reasonably be expected that more occurrences of the new offence being committed will happen during major tournaments, such as Euro 2028 which is being hosted by England, Northern Ireland, the Republic of Ireland, Scotland and Wales.

Familiarisation costs

51. The number of police officers and staff who need to be familiarised with the new offence of unauthorised entry at a football match is estimated using police workforce data. However, it is currently not possible to estimate the exact number of officers who will be required to read the guidance.
52. The length of the guidance issued is currently estimated to be between half a side and a side of 11-point A4 prose, following other similar issued guidance, however a precise estimate is not possible at this stage.

Large significant events

53. While volumes of arrests are expected to be low, there is the potential for games of national significance to have an unusually high number of unauthorised entry offences occurring. An example is the Euro 2020 final at Wembley, cited in the Baroness Casey review. Attending such games is highly desirable, and ticket prices are often higher than lower-level or standard league/cup games, and such matches sell-out. The extent to which large volumes of unauthorised entry incidents could occur will depend on the circumstances of the game in question and the deterrent effect of this new offence. In the event that a particular game leads to an unusually large number of offences, there is potential for costs to be much higher with respect to this offence than is modelled in this impact assessment.
54. Exceptional scenario analysis is provided below for context, simulating the additional costs and benefits should there be 100, 500 or 1,000 arrests, but this is not the expected number of arrests in a usual year. This scenario analysis has been conducted to demonstrate how a large increase in arrests would impact on the figures and does not form an assessment of how likely a large volume of arrests is expected to occur.

Table 3: Scenario analysis for exceptionally high number of arrests at an event, £, undiscounted

Scenario	Low	Central	High
Number of Arrests	100	500	1,000
Total Benefits (£)	7,000	52,500	140,000
Total Costs (£)	42,000	193,600	352,100

Source: Home Office estimates, 2023

H. Direct costs and benefits to business calculations

55. The new measures within this legislation will not have any direct costs and benefits to businesses. Under section 25 of the Police Act 1996, provision of special services, the police can charge football clubs on an hourly basis for any costs incurred as a result of policing football matches. This is charged on a by time basis. Given that policing the new offence will take place during the normal hours spent policing football matches there is not expected to be additional police time required as a result of the new offence. This means that there is not expected to be an increase in the costs charged to football clubs as a result of this proposal.

I. Wider impacts

56. An Equalities Impact Assessment (EIA) has been carried out in addition to this IA.

J. Trade Impact

57. The new measures outlines within this impact assessment will not have an impact on international trade.

K. Monitoring and evaluation plan

58. Following implementation, the department will monitor the impact and effectiveness through analysis of football related arrests and banning order data (official statistics published annually by the Home Office), along with criminal justice system outcome data. Further to this the Home Office will engage with policing and other relevant stakeholders such as the FA to evaluate its effectiveness.

L. Annexes

Impact Assessment Checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
Statutory Equalities Duties	Yes

Consideration has been given to the impacts of the proposed changes and whether it will or will not be likely to lead to discrimination or disadvantage, based on the protected characteristics as specified in the Equality Act 2010. From the EIA, the department has established their proposed changes are not likely to lead to discrimination or disadvantage, based on the protected characteristics as specified in the Equality Act 2010,	
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Social Impact Tests

New Criminal Offence Proposals Proposed new criminal offences will need to be agreed with the Ministry of Justice (MOJ) at an early stage. The Justice Impact Test (see below) should be completed for all such proposals and agreement reached with MOJ before writing to Home Affairs Committee (HAC) for clearance. Please allow 3-4 weeks for your proposals to be considered.	Yes
Justice Impact Test The justice impact test is a mandatory specific impact test, as part of the impact assessment process that considers the impact of government policy and legislative proposals on the justice system. [Justice Impact Test Guidance]	Yes