



malcolm.clarke@fsf

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To: Ross Young/LONDON, vivienne.avery@culture,  
john.dequidt@FLAWEB, david.deaton@cabinet-office,  
frank.skelling@culture

cc:

bcc:

Subject: FLA injury statistics

Dear colleagues

I would like to comment on Mr. De Quidt's letter to Ross Young dated 28 May 2009.

I will first deal briefly with the comments about the FSF, which he describes as a "small vocal pressure group". In fact we are the nationally recognised representative organisation for football supporters. I sit on the FA Council to represent supporters, and we meet regularly with Ministers and the football authorities. We are therefore a key stakeholder of both the FLA and DCMS. I question the appropriateness of a public servant attempting to discredit us in that way, particularly when we are conducting a quite legitimate correspondence with another public agency (UKSA). The apparent implication that UKSA should not be responding to us or treating our correspondence seriously is quite inappropriate.

On a purely personal note, my professional training was as a social statistician and my doctorate is in statistical sociology. I would not lend my name, or that of our organisation, to a statistical report which did not stand up to scrutiny. Mr. De Quidt's letter, whilst focussing on attacking us as an organisation is noticeably short on response to the statistical criticisms made in the report, and in our previous national report on safe standing (paras 3.20 - 3.25 and 6.2 - 6.4).

I also repeat what I drew attention to in my letter to Sir Michael, namely that we sent the report to the FLA a month before we sent it to the UKSA, which was the professional and courteous thing to do. Unfortunately, the FLA did not feel it appropriate to respond to us. If the FLA believe it to be flawed, it is most surprising that they did not do so, and we can hardly be blamed in those circumstances for referring the report as it stood to the UKSA.

The comment about drawing the author's attention to a mathematical error can only refer to an exchange about the use of data copied down by the FLA from records supplied by clubs, the source copies of which were subsequently lost by the FLA, contrary to their own data retention policy, which therefore could not be verified. The FLA have not pointed out any mathematical flaws in the key analyses in the report.

I do not accept Mr. De Quidt's analysis of our policy objectives, but will not respond in detail to that because it's not relevant to this issue - which is whether or not the FLA's statistics are accurate and their use them valid. There is a major public interest in this because those statistics are used to support, and possibly formulate, Government policy. This is illustrated, for example, in a letter to me from the Minister of Sport dated 13 November 2007, which the FLA have posted on their website, in which the

Minister draws extensively upon the injury statistics provided by the FLA and draws conclusions from them. Elsewhere on their site, the FLA quote injury statistics and, in our view, draw conclusions from them which the data do not support.

There are two separate but related issues raised by the report. Firstly, the accuracy of the FLA data. Secondly, and more importantly, the conclusions drawn from those data, in particular the mistake of drawing invalid causal conclusions from statistical correlations by failing to break the data down appropriately; failing to acknowledge, let alone analyse, the possible effect of intervening variables and failing to identify levels of statistical significance.

(Dr) Malcolm Clarke, FRSA. MIBC

Chair, Football Supporters Federation

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