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Dear Sir Michael,

Report by the Football Supporters Federation and the Stand Up Sit Down campaign into the annual injury statistics produced by the Football Licensing Authority

Each year, the Football Licensing Authority (FLA) collect data and publish a report detailing the injury levels within football stadia in England and Wales. This report is the culmination of a data collection exercise that includes both the raw figures together with a certain amount of interpretation placed upon them.

These reports are of particular interest to football supporters as the evidence contained within them are used by the FLA to support government policy that clubs within the top two divisions must operate all-seater stadia, a policy which we oppose. To assist you to understand the debate about this issue, I enclose a copy of a comprehensive report on safe standing which we produced. The issue of safety and injury statistics is dealt with in sections 3 (particularly paras. 3.20 – 3.25) and 6 (particularly paras. 6.2 – 6.4)

Over the past two years, we have conducted a further detailed audit on the FLA figures, the results of which we have published within the enclosed report. It is our opinion that the quality of the FLA's data is of such poor quality that it should not be used, and we seek your assistance in ensuring that the FLA ceases to use its data in the way in which it previously has.

We did, as a courtesy, forward a copy of our report to the FLA on 11th February 2009, explaining our intention to send this to you but have not received a response. We look forward to hearing your views on it.

Yours sincerely,

Malcolm Clarke
Chair.





FOOTBALL SUPPORTERS FEDERATION AND STAND UP SIT DOWN

JOINT INVESTIGATION INTO THE EVIDENCE PUT FORWARD BY THE FOOTBALL LICENSING AUTHORITY ON THE RELATIVE SAFETY OF ALL-SEATER STADIA AND FOOTBALL GROUNDS WITH STANDING AREAS

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1. Background - Safety as an argument for all-seater stadia

1.1 In the aftermath of the Hillsborough Stadium Disaster in 1989, Lord Justice Taylor recommended that football clubs move towards the development of all-seated stadia. This was based on a belief that all-seated grounds were safer than grounds containing standing accommodation.

1.2 The Football Spectators Act that followed, gave the Secretary of State the power to insist that grounds were all-seated. Currently, this provision applies to stadia in the Premiership and Championship.

1.3 Since 1989, our understanding of stadium safety, include the design and management of standing areas, has improved immeasurably. A number of grounds in Football League's One and Two retain standing accommodation.

1.4 In recent years, the Football Supporters Federation (FSF) and Stand Up Sit Down (SUSD) organisation have campaigned removal of the all-seater requirement at top level football grounds. This is not about bringing back terracing, but enabling supporters of top clubs the same choices afforded to, amongst others, spectators at many lower level football grounds, top flight rugby league and union venues. In June 2007, as part of this campaign, the FSF produced a report outlining '*The Case for Safe Standing at major football stadia in England and Wales*'.

1.5 The Department for Culture, Media and Sport (DCMS) and Football Licensing Authority (FLA) have resisted these calls. A key reason is a belief that all-seater stadia are safer:

'While we have made standing much safer, it is still not as safe as sitting.' (FLA website)

1.6 The evidence used to support this claim comes from injury figures collated annually by the FLA. These statistics show a higher rate of injuries in 'grounds with standing areas' compared with 'all-seated stadia'. For example, according to the FLA report for season 2006-07:

Grounds with standing areas: 1 injury per 22,001 spectators

All-seated grounds: 1 injury per 39,450 spectators

1.7 The FLA accept, however, that there are a number of factors affecting the levels of injuries inside a ground, and that not all spectators seek treatment. As such, they agree that the injury statistics should be treated with *'a degree of caution'*.

1.8 We examined this argument by exploring the database on which the claims are founded.

2. The FLA's data sources

2.1 The FLA collate figures on ninety-four stadiums in total, being the ninety-two Football League grounds in a given season, along with Wembley and the Millennium Stadium. Figures on matches outside the football league are excluded from consideration.

2.2 The FLA report statistics of the type '1 injury per 20,000 spectators'

2.3 In order to make these claims, they collate figures on the total number of injuries, along with the total number of spectators attending matches across a season. The attendance figures are taken from newspapers. The injury numbers are taken from club returns, returned annually by each Football League Club (+ Wembley/Millennium Stadium).

2.4 We examined copies of club returns, along with attendance list breakdowns of individual games, provided by the FLA.

2.5 Examination of the data collection methods in both of these areas found deep routed flaws which would distort the final results. There are also question marks regarding the scope of their data used and it is to this that we shall turn first.

3. Scope

3.1 When asked, the FLA said that 'all games' were included in their data collection processes. On investigation, they appear to have included competitive league and cup games; but excluded fixtures such as pre-season friendlies.

3.2 Where figures are broken down by division, games at Wembley and the Millennium Stadium are included within the Premier League figures.

3.3 The FLA's data lists figures include many matches played abroad. Examples include the Germany v England game in Munich in 2001, as well as away fixtures for English clubs in European competitions. This is a basic failing as the statistics are only supposed to cover matches in England & Wales.

3.4 If attendances of (predominantly Premier League clubs) games played abroad are included, the effect of this is likely to inflate the attendances in the Premier League, where grounds are all-seated. This will skew the comparison against grounds with standing areas.

4. Attendances

4.1 In order to say, for example, that during season 2005/06 there was 1 injury per 23,914 spectators in League 2, the FLA need to know the aggregate attendance for that season. The aggregate attendance is quoted within the annual report.

4.2 The FLA report on season 2005/06 states that the aggregate League 2 attendance was 3,443,679. Yet the club list, also provided by the FLA, totals only 3,263,679 spectators.

4.3 To compound the problem, the individual club totals are often wildly misstated. For example, Darlington played twenty-three home matches during season 2005-06. The official website gives attendances for these games totalling 96,571 – the FLA claim this figure is 198,179, more than twice the actual figure.

4.4 In addition, the club totals do not tally with those for the individual games that make them up. For example, In 2005-06, Barnet played twenty-seven home matches, including four in the cup. The aggregate attendance per the FLA was 93,564, yet adding together their individual games, again provided by the FLA, gives only 77,636.

4.5 Further consideration needs to be made as to whether the individual match attendances are accurate. There are a number of risks here, first that the source data used by the FLA is inaccurate, second that it is not copied correctly. Numbers need to be double checked to ensure accuracy.

4.6 The FLA merely state that they get statistics from 'newspapers'. It is not clear which papers are used, or indeed whether these numbers are cross checked to ensure accuracy.

4.7 However, quite a number of typing errors were discovered. Isolated errors might be expected, given the volume of data collected.

4.8 However, many errors were found that could not simply be written off as misprints. Following on from the example above, Barnet played twenty-seven matches during season 2005-06. By comparing FLA figures for these games with those on the club's official website, we found errors on six of them. For example, on 22nd November 2005, Barnet played MK Dons. The attendance per the FLA was 2,563, the actual attendance 991, less than half the FLA's number.

5. Club Returns

5.1 Each year, every club sends a return to the FLA detailing the number of injuries sustained during the season.² The FLA's policy is to retain such data for six years. As such we requested copies of club returns for seasons 2001/02 through to 2006/07. 5.3 We were provided with information only up to season 2004/05. Contrary to their own policies, the returns for seasons 05-06 & 06-07 seasons had been destroyed by the FLA. These documents are crucial in building up a picture of injury rates across the country, yet their destruction reduces the auditability of the FLA.

5.4 In spite of this, the FLA stated that they will continue to use the 06-07 data in the 07-08 season report (as a comparative), arguing that they had copied down the numbers before destroying the returns. Of course, nobody can check if they have done this correctly. 5.5 Evidence from prior seasons (up to 2005) suggests that they are not likely to have done so .

5.6 Some club returns (perhaps one in four) split out treatments of spectator injuries sustained inside the ground with those outside. It is not clear which numbers are supposed to be in the used for the purposes of the annual report. Suffice to say, that the injury numbers on club returns do not agree to totals as disclosed by the FLA.

For example, for the Premier League Season 01-02, the total injuries recorded on the list sent to FSF was 850. However, spectator injuries recorded on club returns including those sustained outside the ground was 835 (excluding those outside the ground it was 794).

5.7 The fact that the FLA cannot transcribe numbers from returns accurately, strongly harms their case for the continued usage of (06/07 season) data without the source documents backing it up.

6. Conclusion

6.1. We began by considering the claim made by the FLA, that *'Standing is not as safe as sitting.'* (paragraph 1.5). The DCMS have said the same.

6.2 The basis of this argument is that there is a higher reported injury rate in grounds with standing areas. This has always been a suspect argument for a number of reasons.

6.3 No grounds are all-standing, yet the FLA do not split injuries in grounds with standing areas are between those occurring in standing areas and those in seated areas. This would be quite simple to do, indeed one club (Wrexham) voluntarily included such a split in their return.

6.4 The FLA further accept that there are a range of factors affecting injury levels in a ground, such as the age of a stadium. Since grounds with standing areas tend to be older, a higher injury rate may be expected for reasons unrelated to standing per se..

6.5 This is particularly important when considering the type of injuries incurred, something first split out in the 2006/07 report. The highest category, with 30% of injuries, is 'trips'. Clearly these are

more likely to occur when the surface is uneven, a factor which is more common at older grounds. The existence or otherwise of seats in a section seems incidental to this. The same may be said of other categories, such as 'hit by ball' (6%) and 'stings' (2%). Only in the 'seat and turnstile' (4%) category, is the type of accommodation relevant.

6.6 It is interesting to note that the total number of injuries in grounds with standing areas in Leagues 1 and 2 (122) is exceeded by the number of injuries by scalds (161), suggesting that the removal of hot drinks and not the removal of remaining standing areas is the way to improve ground safety.

6.7 Consideration should also be given to the fact that nearly all grounds have 'standing areas', whether designated areas or sections of all-seater stadiums where people stand in front of their seats. These can be very large areas indeed. Examples of thousands standing in all-seated stadia include the Stretford Upper Tier (Manchester United), the Bobby Moore Lower Tier (West Ham United) and the Kop Upper (Leeds United). Away from home, numbers are even higher; with virtually the entire away support from these three clubs, among others, standing throughout every game.

6.8 Despite failing to carry out any proper research, the FLA still claim that the lower injury rate in all-seater stadia is 'suggestive' that these are safer. This argument remains a central reason for the continued prohibition on designated standing areas in the top two divisions.

6.9 Yet as we have seen, the numbers relied upon to make this claim are unreliable. Factors such as the inclusion of games played abroad, the endemic errors in the attendances and the failure to copy down figures from club returns properly are all basic failings in the data collection process.

6.10 Without proper data, the arguments based on the data are like a house built on sand. Until they can produce some proper evidence, the FLA and DCMS should stop using the injury statistic numbers to support their claim that all-seated stadia are safer than grounds with standing areas.

7. The Way Forward

7.1 Nobody wishes to see a return to the chaotic, unmanaged terraces of yesteryear. These were rightly condemned by Lord Taylor, and where standing areas still exist they are unrecognisable from those seen in the 70's and 80's.

7.2 On the continent, a new form of standing accommodation is emerging. Seated areas with hi-rails along each row protect spectators and eliminate the risks of crowd surges and crushes.



8. Appendix – The FLA and their figures

8.1 After the preparation of this report, the FLA released their analysis of injury statistics for the 2007-08 season. This shows a large 61% increase in the number of injuries relative to the previous year, along with a tripling in the number of hospitalisations. This is notable as the trend in prior years was for a small decrease year on year, something for which the FLA heaped praise on themselves.

8.2 For reasons of time, we have not studied the figures in this report in detail. However, two main themes emerge from it. Firstly, the FLA lack confidence in their own data and second they lack objectivity in respect to standing.

8.3 The FLA believe that the number of injuries are overstated as a couple of clubs had included pre-existing illnesses in their figures. There are further incredible admissions. A quadrupling of limb injuries, for example, is passed off as '*a change in reporting practice at one ground*'.

8.4 In previous years, injury rates were compared between all-seater stadiums and grounds with standing areas (the subject of this report). Curiously, this analysis was omitted in season 07-08. There remains, however, much anti-standing rhetoric.

8.5 An '*increase in persistent standing at particular grounds*' is suggested as one of possible reason for the sharp rise in injury rates from the previous year. However, the FLA admit that '*they do not have enough firm evidence to be confident about this*' or any of the other causes they propose.

8.6 The role of governmental organisations is to collect meaningful and reliable data and then conduct proper analysis on it. What the FLA actually do is provide us with a largely worthless jumble of figures and then proceed to make vague, unsubstantiated claims on the back of them.