

Festival and Event Solutions Limited

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Mr McLoughlin
Senior Coroner
HM Coroner's Service
71 Northgate
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By email: [REDACTED]

19 April 2021

By email only

Dear Mr McLoughlin

**OUR CLIENTS : FESTIVAL REPUBLIC LIMITED, LIVE NATION ENTERTAINMENT PLC AND [REDACTED]
MATTER: REGULATION 28 REPORT DATED 19 JANUARY 2021 : ANYA LILY BUCKLEY (DECEASED)**

I remain instructed by our Clients as set out above, in this matter, but please note my change of contact details.

Background

The framework for the organisation of the Leeds Festival is that it is authorised by a Premises Licence issued by Leeds City Council in its capacity as the Licensing Authority. The process under the Premises Licence is that Festival Republic must present an Event Management Plan for each Festival to demonstrate that it is promoting the four Licensing Objectives:

- Prevention of Crime and Disorder
- Public Safety
- Prevention of Public Nuisance
- Protection of Children from Harm

Each year, the Event Management Plan is presented to a Multi Agency Group (including the Police, Safeguarding and Child Protection Agencies) for scrutiny which takes place over a period of several months before a Festival. In addition, sub-groups are formed to consider specific issues which then inform the main Multi Agency Group.

A Multi Agency Debrief takes place each year and the experience and learnings from each Festival are fed into the planning process for the next Festival.

Reading Festival is a sister Festival to the Leeds Festival. It takes place over the same weekend and has the same audience demographic and the same artists. The learnings from both festivals are carried into their respective Event Management Plans.

This planning process of submitting a draft Event Management Plan, which is scrutinised and developed over several months before it is finally approved, is one which has been successfully adopted for all Festival Republic Events under the previous Public Entertainment Licensing regime (pre 2006) and under the existing regime introduced in 2006. It is a tried and tested process which has been adopted nationwide by all major promoters and is one which is recognised in the relevant industry guidance.

In our experience, the Leeds Licensing Authority has been a robust Regulatory Authority whilst being supportive of our Clients' efforts to improve the Festival each year.

Police Evidence

Thank you for allowing us to delay this response until the Police had finished their investigation.

This week our Client received a summary of the evidence gathered by the Police regarding the death of the Deceased and the circumstances of the supply of illegal drugs, which was presented to the Crown Court at a hearing on 12 April 2021. The summary is shocking. Evidence gathered by the Police indicate that the Deceased was a party to the conspiracy to take illegal drugs into and supply illegal drugs at the Leeds Festival in 2019.

The evidence shows that an organised drugs gang consisting of persons between the ages of 17-25 organised and carried out a plan prior to Leeds Festival 2019 to purchase a quantity of illegal Class A and Class B drugs to sell at the Festival.

The Regulation 28 Report

In the Regulation 28 Report, it is suggested that the entry to Leeds Festival for persons aged 16 and 17 should be restricted.

It is clear from the Police investigation that a restriction requiring people aged 16-17 to only be admitted to the Festival with adult supervision would have been futile in preventing the death. The gang members comprised of some persons over the age of 18 who could easily have fulfilled this entry restriction if it had been in place.

Further, our Clients consider that a ban on all persons under 18 attending Leeds Festival would be a disproportionate reaction to the death. The evidence does not support such a conclusion and from our Clients' discussions they do not believe that such a proposition is supported by the Licensing Authority, the Police or other Responsible Authorities.

Leeds Festival is a properly authorised and regulated event with a raft of measures to protect persons of every age who attend the Festival, these include:

- A planning process for each event and the approval by the Licensing and Responsible Authorities of the Event Management Plan as described above.
- Risk assessments and a Drugs Policy approved by the Police and other agencies which includes covert operations to detect and disrupt any drug dealing.
- An agreed Searching Policy on entry to the Festival including the use of drugs detection dogs.
- A drugs advisory service where drugs are tested by the Police.
- Amnesty bins on site for the surrender of illegal substances.
- Approved onsite medical facilities.
- Welfare facilities including safe hubs offering peer to peer support.
- A Challenge 21 Policy for all bars.
- Security and Stewarding Plans including numbers and deployments agreed with the Police.
- All security, stewarding and welfare staff are trained to be aware of persons showing apparent distress. There are specific welfare protocols for assisting persons under 18.

The statistics for Leeds Festival do not demonstrate a failure by Festival Republic to fulfil its duty to take reasonable care of all persons attending the Festival. The operations for searching for illegal substances on entry demonstrate considerable success by security in apprehending those who supply drugs and the Medical and Welfare Provisions are all considered to be of a very high standard. In 2019, drugs worth over £120,000 were seized and 117 individuals were appropriately dealt with for drug related matters by onsite security.

Our Clients fully understand the popularity of the Festival with young persons and addresses the challenge of younger persons attending their events within the provisions they put in place, for example, by significantly enhancing the Welfare Provision. The data recorded relating to incidents, welfare and medical interventions in previous festivals (both Leeds and Reading) does not show any increasing trends involving 16 and 17 year olds.

Actions Taken and to be Taken

Our Clients are not complacent and following receipt of the Regulation 28 Report our Clients fed the concerns which are expressed in it into their internal planning for Festivals.

In addition, our Clients have liaised with Leeds City Council and fully participated in discussions with the Council, the Police and other Relevant Agencies which began on 9 February 2020. A Working Group was formed by Leeds City Council and meetings of the Working Group and the Licensing Committee of the Council have taken place with further discussions and correspondence also taking place at officer level.

Our Clients understand that a further meeting is to be held by the Licensing Committee on 19 April 2021 and we will engage with the Council further following feedback arising from that meeting.

However, we feel it appropriate at this time to bring you up to date with the following further actions which will be taken in connection with all future Leeds Festivals :

- Our Clients will commit to an ongoing specific review of their Safeguarding Plans within the Event Management Planning Meetings which are already part of the planning process.
- Our Clients will host and participate in a Festival S-Map Group which is to hold its first meeting on 28 April 2021. This will be a working group hosted by Festival Republic, including

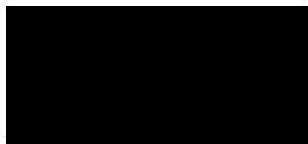
representatives from Festival Republic, Leeds City Council, Reading Borough Council, the Police, Forward Leeds and a leading Child Clinician. The purpose of the Group is to discuss harm reduction campaigns and how best to communicate with and educate Festival audiences regarding drugs and overall safety, both pre event and during events. It will focus on campaigns and safety messaging which can be used in conjunction with and at Leeds and Reading Festivals. Research and findings from engagement with young people will be fed into the Group and there will be resource and input from the existing Responsible Drinking Programme. An agency will be appointed to advise upon and create messaging / animations/ communications across social media platforms and apps appropriate to all age groups.

- Stand alone drugs advisory points and welfare points will be introduced into the arena, rather than being part of combined service points, to make them more accessible and user friendly. These will be clearly signed and they will have some younger staff to enhance peer to peer communication.
- The safe hubs on the campsites will have improved signage and again, these will be made more user friendly for younger members of the audience.
- Medical provision will be reviewed and increased in the campsites as necessary.
- Specialist medical advice will be obtained to establish whether or not further facilities are required for treatment of drug related admissions.
- A review of the drinking water facilities will take place and enhanced as necessary.
- A system of wrist bands for under 18 year olds will be implemented so they can be identified more easily and quickly.

All of the above actions will be progressed by our Clients immediately with a view to the measures being introduced for the Leeds and Reading Festivals 2021.

We will update you further following feedback received from Leeds Licensing Committee after its meeting on 19 April 2021.

Yours sincerely



Solicitor
Festival and Event Solutions Limited