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Criminal Responsibility of Football Match Organising Committees for Riots: The Kanjuruhan Tragedy

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Abstract

A football match organising committee is expected to guarantee the safety of players and spectators, yet the Kanjuruhan tragedy of 1 October 2022 shows how hard it is to attribute criminal responsibility when a riot, a crowd crush and police use of tear gas occur together. This study asks on what provisions, under what elements and within what limits an organising committee can be held criminally responsible for a riot, and how that responsibility differs from that of the league operator, the football association and the police. It is normative legal research using statutory, case and conceptual approaches. The materials are the Criminal Code, Law No 11 of 2022 on Sport, the PSSI Statutes and Safety and Security Regulations, FIFA rules, police regulations, the report of the government fact-finding team and press accounts of the trials. The study finds that responsibility of the committee rests on negligence under Articles 359 and 360 of the Criminal Code and, separately, on Article 103 of Law No 11 of 2022; that the committee's omissions on ticketing, evacuation and preparation were concurrent causes beside the firing of tear gas; and that the proposed characterisation of the events as a crime against humanity is not supported. Regulation of stadium safety, clear command responsibility and licensing of organisers are needed.

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Keywords

Negligence; Causation; Football; Kanjuruhan; Organiser

Introduction

Football is among the most popular sports in the world and in Indonesia, where the history of the game, from the revival of the football association in the 1950s[1] to match fixing,[2] has also been marked by problems that reach the criminal law. Clashes between supporters of different clubs, and of the same club, are common, and have long been recorded as a persistent feature of Indonesian football.[3] As violations of the law they fall under the Criminal Code, and riots by supporters are no longer matters for the PSSI Disciplinary Commission alone but also for the police, who act under Law No 2 of 2002.[4] Victims of such events, and their claim to be recognised in the criminal process, are a recognised concern of victimology.[5]

The leading example is the Kanjuruhan tragedy of 1 October 2022, when, after Arema FC lost to Persebaya at Kanjuruhan Stadium, Malang, police fired tear gas at the field and into the stands and the crowd crowded the exits. Early reports counted 131 dead. The fact-finding team set up by the government (TGIPF) reported on 14 October 2022 that 712 people were victims: 132 had died, 96 were seriously injured and 484 slightly or moderately injured;[6] reports of the later trials and appeal give 135 dead.[7] The differences reflect the date and the source of each count, and this article uses the TGIPF figures for the facts it relies on and notes the later figure where it matters. The TGIPF found, among other things, that the league operator, PT LIB, had not checked the track record and competence of the organising committee and had trained security officers in a two-hour online session.[8] The case has since been prosecuted. The Surabaya District Court convicted the committee chair, Abdul Haris, of negligence causing death and injury on 9 March 2023 and sentenced him to one year and six months, against a demand of six years and eight months;[9] it sentenced the security officer, Suko Sutrisno, to one year,[10] and, on 16 March 2023, a police commander to one year and six months while acquitting two

[1] Alif Cahyo Mitra Pratama & Agus Tri Laksana, "Lahirnya Kembali PSSI (Persatuan Sepak Bola Seluruh Indonesia) Tahun 1950–1954" (2020) 10:1 *AVATARA, e-Journal Pendidikan Sejarah*.

[2] Luthfy Avian Ananda, "Match Fixing dalam Sepakbola Indonesia Ditinjau dari Perspektif Hukum Pidana", *Kompasiana.com* (2016).

[3] Verelladevanka Adryamarthanino, "Sejarah Kerusuhan Sepak Bola di Indonesia", *Kompas.com* (2022).

[4] Law No 2 of 2002 on the Indonesian National Police (Indonesia).

[5] Arif Gosita, *Masalah Korban Kejahatan* (Jakarta: CV Akademika Pressindo, 2018).

[6] Tim Gabungan Independen Pencari Fakta, *Laporan Tim Gabungan Independen Pencari Fakta Tragedi Stadion Kanjuruhan Malang* (Jakarta: 14 October 2022), online: <https://id.wikisource.org/wiki/Laporan_Tim_Gabungan_Independen_Pencari_Fakta_Tragedi_Stadion_Kanjuruhan_Malang> at ch V.

[7] "Disappointment in Indonesia after football disaster appeal ruling", *Al Jazeera* (25 August 2023), online: <https://www.aljazeera.com/news/2023/8/25/disappointment-in-indonesia-after-football-disaster-appeal-ruling>.

[8] TGIPF Report, *supra* note 6 at ch V.

[9] "Panpel Arema FC Abdul Haris Divonis 1 Tahun 6 Bulan Penjara", *detikJatim* (9 March 2023), online: <https://www.detik.com/jatim/hukum-dan-kriminal/d-6609093/panpel-arema-fc-abdul-haris-divonis-1-tahun-6-bulan-penjara>.

[10] "Families dismayed as Indonesia court acquits two police over stadium crush that left 135 dead", *The Guardian* (March 2023), online: <https://www.pressreader.com/usa/the-guardian-usa/20230318/281715503852699>.

other officers.[11] The Supreme Court later set aside those two acquittals on cassation and convicted the officers of negligence causing death, serious injury and temporary incapacity.[12] The statement that the case "has not yet been resolved" is therefore out of date; what remains unresolved is the legal question of how responsibility is divided.

The literature on crowd safety shows why that division is difficult. The inquiry into the Hillsborough disaster in England treated the failure of crowd control, and not the conduct of supporters, as the decisive cause of the deaths and made stadium safety an obligation of the owners and organisers of grounds;[13] studies of crowd dynamics explain how a panicked crowd at narrow exits produces dangerous pressure that neither supporters nor stewards can control once it starts.[14] Indonesian scholarship on Kanjuruhan has begun to analyse the judgments, for instance whether the element of fault was proved in Decision No 13/Pid.B/2023/PN Sby and whether the judges' assessment of negligence reflected the interests of the victims.[15] What has not been done is to set out, in one analysis, who the organising committee is in law, how the elements of Articles 359 and 360 apply to its omissions, how causation is to be assessed when police tear gas is the proximate cause, and why the label of crime against humanity does not follow. That is the contribution of this article.

The research questions are: (1) on what provisions, under what elements and within what limits can a football match organising committee be held criminally responsible when a riot occurs; and (2) how does that responsibility differ from that of the league operator, the football association and the police? The purpose is to answer them using the Kanjuruhan tragedy and to propose rules that allocate responsibility more clearly.

Research Method

This is normative legal research, with no fieldwork, interviews or other collection of data from people. It uses a statutory approach, a case approach and a conceptual approach. The primary legal materials are the Criminal Code and the Criminal Code

[11] "Sidang Tragedi Kanjuruhan Vonis Bebas dan Ringan Terdakwa, Pakar Hukum Ungkap 3 Kejanggalan", *NU Online*, online: <https://www.nu.or.id/nasional/sidang-tragedi-kanjuruhan-vonis-bebas-dan-ringan-terdakwa-pakar-hukum-ungkap-3-kejanggalan-cgMzt>.

[12] "Disappointment in Indonesia", *supra* note 7.

[13] Lord Justice Taylor, *The Hillsborough Stadium Disaster, 15 April 1989: Final Report* (London: HMSO, 1990).

[14] Dirk Helbing, Illés Farkas & Tamás Vicsek, "Simulating Dynamical Features of Escape Panic" (2000) 407 *Nature* 487, DOI: <10.1038/35035023>.

[15] Moch Ilyas Akbar Rizki & Maria Novita Apriyani, "Pertanggungjawaban Pidana atas Kelalaian yang Mengakibatkan Luka-Luka dan Kematian: Analisis Putusan Nomor 13/Pid.B/2023/PN Sby" (2026) 14:1 *Jurnal Ilmiah Advokasi*, DOI: <10.36987/jiad.v14i1.8068>.

of 2023, Law No 11 of 2022 on Sport (which repealed Law No 3 of 2005 on the National Sports System), Law No 2 of 2002 on the Police, Law No 26 of 2000 on Human Rights Courts, Police Chief Regulation No 1 of 2009 on use of force, the PSSI Statutes and Safety and Security Regulations of 2021, and the FIFA Stadium Safety and Security Regulations. The facts of Kanjuruhan are taken from the report of the government's fact-finding team (TGIPF), which is published online, and from press reports of the indictments, judgments and the cassation ruling. The authors did not have the full texts of the judgments, so the account of what the courts decided is limited to what the press and one published analysis of Decision No 13/Pid.B/2023/PN Sby report, and the findings of the National Human Rights Commission are not analysed. Secondary materials are journal articles, books and official inquiry reports on criminal responsibility and crowd safety. The materials were collected by library research and analysed qualitatively: the provisions were interpreted, the elements of negligence and causation were tested against the facts the TGIPF found, and the result was compared with the judgments as reported.

Results and Discussion

The Parties Who Organise Football in Indonesia

Under the PSSI Statutes, football in Indonesia is carried out by PSSI, the committee appointed to organise a match or league, the match officials, the security teams or stewards, the medical teams and each registered club.[16] PSSI has its own disciplinary, appeals and ethics bodies, but their existence does not decide who is criminally responsible for a death at a match.

The relevant question is how the disciplinary regime of the federation relates to state criminal law. Article 70 of the Statutes forbids PSSI, its members, players, officials and agents from taking disputes to state courts except as the Statutes and FIFA rules allow.[17] That rule concerns disputes inside football. It cannot exclude the jurisdiction of the criminal courts over an offence that causes death: criminal law is public law, the state prosecutes, and neither a federation nor its members can waive or arbitrate it. A riot that kills is therefore no longer a matter that the Disciplinary Commission alone can deal with, because its power is to sanction breaches of PSSI rules, such as fines or match bans on clubs, while the police and prosecutors act on the Criminal Code. The two regimes run in parallel, and a disciplinary sanction does not bar prosecution. The same applies to allocations of risk between PSSI and the

[16] PSSI Statutes (Statuta PSSI), arts 42(1)(c), 80(1).
[17] *Ibid*, art 70.

committee. Article 3 of the PSSI Safety and Security Regulations makes the organiser bear full responsibility for accidents and indemnify PSSI against claims,[18] but a contractual indemnity allocates civil loss; it does not transfer or extinguish criminal liability. The TGIPF in fact found that these 2021 regulations appeared designed to free PSSI from responsibility for incidents.[19]

The Kanjuruhan Tragedy

On 1 October 2022, after the Liga 1 match between Arema FC and Persebaya at Kanjuruhan Stadium, Malang, tear gas fired at the field and at the stands, including near gates 3, 12 and 13, caused supporters to flee and crowd the exits. The TGIPF, which reported to the President on 14 October 2022,[20] recorded 132 dead (90 men and 42 women, 70 of them aged 10 to 19), 96 seriously injured and 484 slightly or moderately injured.[21] Its findings fall into three groups. On preparation, the league kept the 20.00 kick-off although police had recommended 15.30, the committee sold tickets without regard to the capacity of the stadium and without a digital system, there was no evacuation plan, and the entrance also served as exit and emergency door. The committee's request that no tear gas be used was not followed, and the match was run by a committee without legal standing.[22] On the response, tear gas was fired at the field, the stands and outside the field, the stands showing little disorder, and the officers did not follow the stages of force in Police Chief Regulation No 1 of 2009;[23][24] some canisters were expired. On the institutions, the TGIPF found that the league operator did not vet the committee or the security officers, and that PSSI had adopted only about 30 per cent of the FIFA safety rules.[25] The unprofessionalism of the league organisers, the lack of understanding of roles among the parties and the inadequate stadium arrangements that the authors identify are thus confirmed by the official findings.

Article 19(b) of the FIFA Rules and the Decision to Fire Gas

The most useful legal point in the case is the conflict between FIFA and police rules. Article 19(b) of the FIFA Stadium Safety and Security Regulations provides that no firearms or crowd-control gas shall be carried or used.[26] Police Chief Regulation No

[18] PSSI, Safety and Security Regulations (2021), art 3.
[19] TGIPF Report, *supra* note 6 at ch V.
[20] "TGIPF Serahkan Laporan Investigasi Tragedi Kanjuruhan Kepada Presiden", *Sekretariat Kabinet Republik Indonesia* (14 October 2022), online: <https://setkab.go.id/tgipf-serahkan-laporan-investigasi-tragedi-kanjuruhan-kepada-presiden/>.
[21] TGIPF Report, *supra* note 6 at ch IV–V.
[22] *Ibid* at ch IV–V.
[23] Police Chief Regulation No 1 of 2009 on the Use of Force in Police Action (Indonesia).
[24] TGIPF Report, *supra* note 6 at ch IV–V.
[25] *Ibid* at ch IV–V.
[26] FIFA, Stadium Safety and Security Regulations, art 19(b).

1 of 2009, in its stages of use of force, contemplates the use of tear gas by officers,[27] and the TGIPF noted that the two sets of rules were not synchronised and that officers had never been trained on the FIFA ban.[28] Read systematically, Article 19(b) sits in the part of the regulations on stewards, which suggests that security inside the stadium is to be done by trained stewards under the organiser, with police in a supervisory role; the practice in Indonesia, where police and military personnel handle crowd control inside stadiums, differs.

Three consequences follow for responsibility. First, the FIFA rule binds PSSI and its members through the statutes of the federations, not the Indonesian police, who are bound by Indonesian law; it cannot by itself found criminal liability of an officer, though it is evidence of the standard of care expected at a football match. Second, responsibility for applying the rule lies with the party that sets the security regime of the match: PSSI and the league operator, which adopt and approve the regulations and the security plan, and the committee, which must apply them in the stadium. Third, the decision to fire gas is an act of the officers who fired and of the commanders who ordered or allowed it, not of the committee, which asked that gas not be used and had no authority over police operations. This distinction matters for causation, and it supports the argument that the police were the main cause without removing the committee's own responsibility.

Criminal Responsibility of the Organising Committee

The rules on which responsibility can be based are as follows. Under the repealed Law No 3 of 2005, PSSI as regulator had to ensure that matches were controlled and safe;[29] that law was replaced by Law No 11 of 2022 on 16 March 2022, before the tragedy, and must not be treated as in force.[30] Articles 42(1)(c) and 80(1) of the PSSI Statutes make the Chairman supervise the General Secretariat and PSSI regulate and coordinate official competitions.[31] Article 3 of the Safety and Security Regulations places on the committee the duty to comply with the law and to bear the losses of accidents.[32] In the Criminal Code, Article 359 punishes causing death by negligence with up to five years' imprisonment or one year's confinement, and Article 360 punishes causing serious injury by negligence in the same terms and injury that hinders work by up to nine months' imprisonment, six months'

[27] Police Chief Regulation No 1 of 2009, *supra* note 23, art 5.
[28] TGIPF Report, *supra* note 6 at ch V.
[29] Law No 3 of 2005 on the National Sports System (Indonesia) (repealed).
[30] Law No 11 of 2022 on Sport (Indonesia).
[31] PSSI Statutes, *supra* note 16, arts 42(1)(c), 80(1).
[32] PSSI Safety and Security Regulations, *supra* note 18, art 3.

confinement or a fine.[33] Law No 11 of 2022 requires an organiser of a sports event to meet technical, health, safety, local, security, public-order and public-interest requirements (Article 52), and an organiser who brings in a mass of spectators to have the recommendation of the sport's governing body (Article 54(1)), to appoint a person in charge of the event (Article 54(2)) and to respect the spectators' right to safety and security (Article 54(4) and (5)).[34] Article 103 punishes an organiser who fails to meet the requirements of Article 52, or who brings in spectators without the recommendation under Article 54(1), with up to two years' imprisonment and/or a fine of up to IDR 1 billion; the figure of five years and IDR 20 billion that the manuscript linked to this offence belongs to Article 103(3), which concerns the removal or change of use of public sports infrastructure under Article 73(8) and is not relevant here.[35] Police Chief Regulation No 1 of 2009 sets the stages of use of force for the police.[36]

Who Is the Organising Committee in Law?

The committee is a body appointed for one match. It has no legal personality; the TGIPF found that the match was run by a committee without legal standing.[37] Under the old Criminal Code only natural persons could be offenders, so the prosecutors charged the chairman and the security officer, in the alternative under Articles 359 and 360 and Article 103(1) read with Article 52 of Law No 11 of 2022.[38] Law No 11 of 2022 points the same way, since Article 54(2) requires a person in charge, and in practice that person is the chair. The club that hosted the match, Arema FC, and the league operator are legal entities, but neither was charged. The Criminal Code of 2023, in force since 2 January 2026, now recognises corporations as subjects of crime and allows liability of their management, so that a club or operator which causes death by negligence through its officers could be prosecuted for acts after that date.[39] Under the law applied in Kanjuruhan the committee's responsibility is that of its chair and officers, each for his own negligence.

Negligence, Duty of Care and the Committee's Acts

Articles 359 and 360 require that the defendant, through negligence (*kealpaan*), caused the death or injury of another. Negligence means failure to take the care that the circumstances required, and in a position of control over a public event the duty

[33] Kitab Undang-Undang Hukum Pidana [Criminal Code], as enacted by Law No 1 of 1946 (Indonesia), arts 359, 360.
[34] Law No 11 of 2022, *supra* note 30, arts 52, 54.
[35] *Ibid*, art 103.
[36] Police Chief Regulation No 1 of 2009, *supra* note 23, art 5.
[37] TGIPF Report, *supra* note 6 at ch IV.
[38] "Daftar Lima Dakwaan Tragedi Kanjuruhan", *Tirto.id*, online: <https://tirto.id/daftar-lima-dakwaan-tragedi-kanjuruhan-gBcg>.
[39] Law No 1 of 2023 on the Criminal Code (Indonesia).

of care is set by the rules the defendant is bound to apply: the law on sport, which requires safety and the protection of spectators, and the PSSI and FIFA regulations on stewards, ticketing and evacuation. Measured against the facts found by the TGIPF, the committee's failures are specific: ticket sales above the capacity of the stadium, no plan for evacuation, an entrance used as an exit, and security staff who were poorly trained and certified without assessment.[40] These are omissions in a role that carried a duty to act, and they were foreseeable risks at a high-risk match. The first-instance court accepted that the chairman was negligent, but the press accounts do not set out the court's reasoning,[41] and a published analysis of Decision No 13/Pid.B/2023/PN Sby argues that the assessment of fault rested mainly on trial facts and the testimony of the defendants and did not adequately reflect the interests of the victims.[42] Table 1 sets out the parties, the duties and failures found, and the route to responsibility.

Table 1. Parties, failures found and routes to criminal responsibility

Party	Failure identified by the TGIPF or the courts	Route to responsibility
Committee chair	Ticket sales not tied to capacity; no evacuation plan; entrance also used as exit; committee without legal standing	Arts 359 and 360 Criminal Code; Art 103(1) with Art 52 of Law No 11 of 2022
Security officer	Stewards poorly trained and certified without assessment	Same provisions; convicted at first instance
League operator (PT LIB)	Kick-off kept at 20.00 against police advice; committee not vetted; absent from the match	Not charged; the Criminal Code of 2023 allows corporate liability for later acts
PSSI	Adopted about 30% of the FIFA rules; regulations written to release it from responsibility	Not charged; institutional and moral responsibility
Police commanders and officers	Tear gas fired at the field, stands and outside; stages of force not followed; no training on the FIFA ban	Arts 359 and 360; two officers convicted on cassation, one at first instance

Source: compiled from the TGIPF report and press reports of the indictments and judgments cited in this article.

Causation and the Role of the Police

The central difficulty is causation. The tear gas fired by police was the proximate cause of the panic and the crush, while the committee's failures (a late kick-off set by the league, over-sold tickets, narrow and obstructed exits, lack of preparation) were conditions that made the harm worse and the flight more dangerous. Under a condition theory every necessary condition is a cause, and the committee's omissions qualify; under the adequacy theory used in much Indonesian doctrine, the question is whether the act made the result foreseeably probable, and a crowd at overcrowded and obstructed exits is a foreseeable setting for a crush once any

[40] TGIPF Report, *supra* note 6 at ch IV–V.
[41] "Panpel Arema FC Abdul Haris Divonis", *supra* note 9.
[42] Rizki & Apriyani, *supra* note 15.

trigger occurs. That a third party's act intervened does not by itself break the chain when it is the very risk the duty was meant to guard against; the dispute is one of degree, which goes to the sentence and to the allocation of blame, not to whether the committee's negligence was a cause at all.[43]

The courts' outcomes show the same difficulty from the other side. The Surabaya District Court acquitted two police officers on the ground that their acts were not shown to have caused the deaths, while convicting the chairman and a security officer;[44] a legal scholar criticised the trial because the evidence was not directed at causation, none of the officers who fired gas was charged, and the judges relied on police case files without comparing them with the TGIPF findings.[45] On cassation the Supreme Court convicted the two officers, of whom one received two and a half years and the other two years.[46] Table 2 summarises the outcomes reported for the five defendants.

Table 2. Reported outcomes for the five defendants

Defendant and role	Surabaya District Court	Later stage
Abdul Haris, committee chair	1 year 6 months (9 March 2023); prosecution demanded 6 years 8 months	Not examined in this article
Suko Sutrisno, security officer	1 year (March 2023)	Not examined in this article
Hasdarmawan, Brimob company commander	1 year 6 months (16 March 2023)	Not examined in this article
Wahyu Setyo Pranoto, operations head, Malang Police	Acquitted (16 March 2023)	Supreme Court: 2 years 6 months (reported August 2023)
Bambang Sidik Achmadi, head of preventive patrol unit, Malang Police	Acquitted (16 March 2023)	Supreme Court: 2 years (reported August 2023)

Source: compiled from the press reports cited in this article; the full judgments were not available to the authors.

Two conclusions follow. The police were the principal cause of the deaths, and their responsibility is distinct and rests on their own acts and on the rules on the use of force. The committee's responsibility is narrower and rests on the specific omissions listed above; it is not displaced by the police's conduct, but a sentence has to reflect that the committee's negligence was a concurrent cause. The league operator and PSSI bear institutional responsibility for scheduling, vetting and the safety regime, which the criminal law under the old Code could not reach, and which the TGIPF treated as a moral and administrative responsibility.[47]

The Proposed Characterisation as a Crime against Humanity

[43] Helbing, Farkas & Vicsek, *supra* note 14.
[44] "Sidang Tragedi Kanjuruhan Vonis Bebas", *supra* note 11.
[45] *Ibid*.
[46] "Disappointment in Indonesia", *supra* note 7.
[47] "TGIPF Serahkan Laporan", *supra* note 20.

The manuscript concluded that Kanjuruhan can be categorised as a crime against humanity under Law No 26 of 2000. That conclusion cannot stand. The Law defines the crime as certain acts, including killing, committed as part of a widespread or systematic attack directly aimed at a civilian population, with knowledge of the attack.[48] The facts found by the TGIPF describe unpreparedness, poor training and indiscriminate, disproportionate use of force, which show negligence and a breach of the rules on force; they do not show a policy or plan to attack the spectators, and the prosecutors and courts treated the events throughout as negligence under Articles 359 and 360. The label also does not appear in the title or the analysis of this article. It is therefore withdrawn. The more cautious and better supported conclusion is that the organisers and, separately, the police are responsible for negligence.

Comparison with Earlier Research

The findings agree with the Hillsborough inquiry on the main point that crowd disasters are caused by failures of control and preparation, not by the supporters alone,[49] and with the analysis of crowd dynamics that makes narrow exits and uncontrolled pressure the mechanism of the deaths.[50] They differ from earlier Indonesian work in two respects. The analysis of Decision No 13/Pid.B/2023/PN Sby concentrates on whether fault was proved and on the interests of the victims;[51] this article adds the question of who the committee is in law, an analysis of the relation between the committee's omissions and the police's tear gas, and the Article 19(b) problem, and it rejects the human rights characterisation. It also corrects the statement in the manuscript that Law No 3 of 2005 is in force and that the case is unresolved.

Conclusion

A football match organising committee is criminally responsible for negligence causing death and injury under Articles 359 and 360 of the Criminal Code, applied to the natural persons who run it, and an organiser who does not meet the requirements of Article 52 of Law No 11 of 2022 is separately punishable under Article 103(1) with up to two years' imprisonment and/or a fine of up to IDR 1 billion. The elements are negligence, measured by the duty of care the sports law and the football regulations set, and causation; at Kanjuruhan the committee's

[48] Law No 26 of 2000 on Human Rights Courts (Indonesia), arts 7, 9.
[49] Taylor, *supra* note 13.
[50] Helbing, Farkas & Vicsek, *supra* note 14.
[51] Rizki & Apriyani, *supra* note 15.

omissions on ticketing, evacuation and preparation were concurrent causes of the deaths, beside the police firing of tear gas, which was the proximate cause and for which the police are responsible. The league operator and PSSI bear responsibility for scheduling, vetting and the safety regime, which the criminal law applied in the case reached only in part. The characterisation of the events as a crime against humanity is not supported.

Three recommendations follow. A regulation on stadium safety should bind all parties, including police, and reconcile the FIFA ban on crowd-control gas with the police rules on use of force. Command responsibility for crowd control should be assigned clearly between the organiser and the police for each match. Organisers should be licensed against defined standards of capacity, evacuation and steward training, and corporate liability under the Criminal Code of 2023 should be used for clubs and operators for later events. The study is limited by its reliance on regulations, the TGIPF report and press reports, and by the absence of the full judgments and of analysis of the later stages of the proceedings against the chairman and the security officer; those should be examined in further research.

Ethics and Data Availability

This normative legal research is based on legislation, official reports, court outcomes and published sources. It did not involve human participants or personal data, so ethical approval was not required. The sources are public documents and are listed in the References.

Use of Generative AI

Generative AI was used only to improve the language of this article (grammar, clarity and style). The authors reviewed the output and are responsible for the content of the article.

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