

CONSULTATION DRAFT
**All-Seater Policy – SGSA
Enforcement Approach**

2023/24 Football Season

May 2023



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Further information:

Sports Grounds Safety Authority
10 South Colonnade, London, E14 4PU

020 7930 6693

info@sgsa.org.uk
www.sgsa.org.uk



Summary

The Sports Grounds Safety Authority (SGSA) is the UK Government's expert body in respect of sports ground safety. The SGSA supports sports grounds, clubs, local authorities and others to create a safe and enjoyable experience for spectators.

This document outlines the SGSA's approach in the 2023/24 football season to enforcement of the all-seater licence conditions under statutory powers in the [Football Spectators Act 1989](#). It has been updated to reflect the change in Government policy announced on 4 July 2022, which permits licensed standing at football grounds subject to the all-seater policy, provided they can demonstrate compliance with the SGSA's published criteria. It outlines a transparent and proportionate approach as to how the safety risks associated with persistent standing in seated areas will be managed in the context of the SGSA's licensing system.

This version of the document is for consultation. We would welcome your views on the contents and changes. Please do so via this link:

<https://www.surveymonkey.co.uk/r/3TBRCRN> by 5pm, Monday 12 June 2023.

Overview of changes

The majority of the document is the same as previous versions. However, the following changes have been made:

- **Terminology:** The terminology has been amended through the document, replacing 'reasonable steps' to 'initial steps'. This is to signal that the 'initial steps' are the start of the journey towards compliance with the SGSA licence conditions, and not the end point.
- **Paragraph 22** indicates the 'initial steps' should be kept under regular review as part of driving continuous improvement.
- For the avoidance of doubt, the initial steps outlined in the document continue to apply in relation to licensed standing grounds which provide both seated and licensed standing accommodation for spectators. This is particularly relevant in circumstances where the capacity of the licensed standing area(s) proves to be insufficient to meet demand for such areas and spectators in other parts of the ground are choosing to stand in seated areas.
- **Paragraph 23** focuses on further actions for grounds where the persistent standing safety risks remains, despite the initial steps being implemented. It outlines what management should do during the 2023/24 season to bring a ground back into compliance with the SGSA all-seater conditions.
- **Paragraph 25** outlines three specific further actions to be taken, where safety risks associated with persistent standing continue to be identified at a ground, once the initial steps have been implemented. In brief these are:
 - Relocating supporters to areas where the safety risks are lower, for example lower tiers.
 - Reducing the capacity in the area where spectators choose to stand
 - Installing seats incorporating barriers or independent barriers in areas where spectators still choose to stand.



- **Paragraph 26** outlines the current position with grounds installing standing infrastructure, along with case studies from three grounds.
- **Paragraph 27** outlines that ground management should consult home supporters about the nature and scale of any planned installation of seats incorporating barriers or seats with independent barriers, but that the final decision about whether to install such new apparatus should continue to rest with ground management.
- **Paragraphs 28-29** outlines the SGSA's expectation that when installing seats incorporating barriers/seats with independent barriers, ground management should provide these for both home and away supporters, other than in exceptional circumstances where it can be shown there is not demand for such new apparatus by home or away supporters.
- **Paragraph 28** also proposes that ground management should apply to SGSA to operate licensed standing areas within two years of the installation of seats incorporating barriers and/or seats incorporating barriers for home and away supporters.
- **Paragraph 31 and Table 1** proposes that if there is limited or no evidence of further action as outlined at paragraphs 23 and 25 being taken by ground management in response to identified safety risks associated with persistent standing, SGSA will move to formal, proportionate enforcement action (outlined at paragraph 42 onwards) during the 2023/24 season, targeting where the risks are greatest.

How to use the document

This document builds on the consistent and proportionate approach adopted by SGSA in previous seasons. That approach has helped to facilitate ongoing constructive engagement with grounds about the spectator safety risks associated with persistent standing, and the agreement of voluntary mitigation measures at those grounds identified as higher risk.

The SGSA will work with ground management to address issues, liaising with relevant local authorities which have safety certification responsibilities where these are engaged. Any SGSA enforcement options under the 1989 Act will be tailored to the risk and compliance levels for each ground.

The SGSA will, subject to the nature of risk and compliance issues encountered, adopt a graduated scale of actions, as outlined in this document, to give ground management every opportunity to take all initial steps and appropriate further action to comply with the all-seater licence conditions and/or licensed standing conditions.

It is highly recommended that ground management review this document and use it as a blueprint to address the safety risks associated with persistent standing in seated areas.



Introduction

1. The Government's current policy in respect of all-seated grounds dates from the start of the 1994/95 season and is enforced by way of conditions set out in the licence issued by the Sports Grounds Safety Authority (SGSA) in respect of premises where designated football matches are played in England and Wales¹ (henceforth "ground(s)"). Where grounds are required to be all-seated, the SGSA is instructed by the Secretary of State for Culture, Media and Sport to include licence conditions restricting the admission of spectators to seated accommodation.
2. This document outlines the SGSA's proposed approach to enforcement of those licence conditions in the 2023/24 season, including in relation to incidents of persistent standing² in seated areas of those grounds subject to the Government's current all-seater policy.
3. Additionally, the document outlines SGSA's proposed approach to the enforcement of licensed standing conditions at grounds that have been permitted to operate licensed standing areas.
4. The document builds on the consistent and proportionate approach adopted by SGSA in 2022/23. That approach helped to facilitate ongoing, constructive engagement between SGSA and individual grounds about the spectator safety risks associated with persistent standing, and the agreement of voluntary mitigation measures at those grounds identified as higher risk.
5. The document also details how the SGSA will discharge its statutory oversight of local authorities' safety certification responsibilities. It supplements the SGSA's [Oversight and Licensing Policy](#)³, and should be read in conjunction with that Policy.
6. The SGSA recognises that there are several interested parties in relation to the enforcement of the Government's all-seater policy, including individual grounds subject to the policy, relevant local authorities, relevant police bodies, football governing bodies and supporters. The SGSA's enforcement approach is mindful of the respective roles and responsibilities of those interested parties, and of better regulation principles including the need for enforcement action to be transparent, proportionate, consistent, and targeted where the risks are greatest.
7. As in previous seasons, this document will continue to be kept under review to ensure it remains appropriate and fit for purpose.

¹ A designated match is defined under the [Football Spectators \(Designation of Football Matches in England and Wales\) Order 2000](#) as "any association football match which is played at Wembley Stadium, at the [Principality] Stadium in Cardiff or at a sports ground in England and Wales which is registered with the Football League or the Football Association Premier League as the home ground of a club which is a member of the Football League or the Football Association Premier League at the time the match is played".

² In this document persistent standing is defined as when individuals in seated areas stand for prolonged periods of time other than for short durations during moments of excitement.

³ For further details see SGSA website: [Oversight and Licensing Policy](#).



SGSA statutory role under the Football Spectators Act 1989

8. The SGSA has powers under the [Football Spectators Act 1989](#) (the 1989 Act) to issue licences to admit spectators to grounds which are used for designated football matches in England and Wales. The 1989 Act states the purpose of such licences are “to provide for the safety of spectators...”. It makes it an offence for a club/stadium operator to admit spectators for such matches without a SGSA licence or to contravene any term of a licence. The 1989 Act has a broad reach, which can be summarised as: “the proper control of the admission of spectators, including the arrangements to which they are admitted, in the interest of those present during the event, and the proper running of the event”.
9. The SGSA’s role when issuing licences includes ensuring that:
 - spectator safety is secured;
 - the ground and any equipment and procedures at the ground are such that only authorised spectators are admitted to designated football matches; and
 - the arrangements, equipment and procedures at the ground are such as reasonably required to prevent offences at designated football matches.

The SGSA has power to impose additional licence terms or conditions where it considers that such action would be appropriate.

10. Offences for breach of a licensing condition, or for admitting spectators without a licence, are subject to a defence⁴ that the offence took place without the responsible person’s⁵ consent and that the responsible person took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.
11. The SGSA also has powers under the 1989 Act to oversee local authorities in their regulation (under the [Safety of Sports Grounds Act 1975](#)) of safety at all football grounds that are used for designated football matches in England and Wales (see also paragraph 41).
12. The Government’s all-seater policy does not allow standing accommodation at Wembley Stadium, the Principality Stadium, and the grounds used by clubs who have been in the Premier League or Championship for more than three years since the start of the 1994/95 season, with the exception of licensed standing grounds – see paragraph 13 below. The policy is administered and enforced through two conditions in the licences issued by the SGSA. These are:
 - a. Only seated accommodation is to be provided for spectators at a designated football match; and
 - b. Spectators shall only be admitted to watch a designated football match from seated accommodation.

⁴ Sections 10(14) or 9(2) of the [Football Spectators Act 1989](#)

⁵ ‘Responsible person’ in this context will normally mean the ground management (which in most cases means the club).



13. Following the Government announcement of 4 July 2022⁶, those grounds currently subject to the all-seater licence conditions outlined above, and who can demonstrate compliance with licensed standing criteria (see [Annex A](#)), are permitted by the Secretary of State for Culture, Media and Sport to operate licensed standing areas. The licensed standing criteria have been informed by independent evaluation by CFE Research on five 'early adopter' grounds in the 2021/22 season, which confirmed the positive impact on safety of licensed standing areas⁷. The first three conditions are consistent with other all-seater grounds (with the first condition a feature of all SGSA licences), while the fourth and fifth conditions are specific conditions governing the operation of licensed standing areas:
- a. The licence holder shall permit any person authorised by the Secretary of State or the Sports Grounds Safety Authority to:
 - (i) enter at any reasonable time the premises to which this licence applies; and
 - (ii) make such inspection of the premises and such enquiries relating to them as he considers necessary for the purposes of Part 1 of the Football Spectators Act 1989.
 - b. Only seated accommodation is to be provided for spectators at a designated football match; and
 - c. Spectators shall only be admitted to watch a designated football match from seated accommodation.
 - d. The licence holder need not comply with conditions b. and c. above in respect of seats incorporating barriers or seats with independent barriers, where SGSA has confirmed in writing for the purpose of this paragraph that:
 - (i) such accommodation meets the standards for the time being set by the SGSA; and
 - (ii) the management of spectators within such accommodation meets the standard required by SGSA to ensure their safety.
 - e. SGSA may at any time, by notice in writing to the licence holder, vary or withdraw any confirmation it has given in respect of accommodation for the purposes of condition d. above.

Key roles and responsibilities of other interested parties

14. **Ground management**, in most cases the club, is primarily responsible for the safety of spectators, for making 'reasonable adjustments'⁸ to provide suitable accommodation for disabled spectators, and for enforcing the ground regulations and the SGSA licence conditions. A match specific risk assessment for the ground should form the basis of how ground management discharges these responsibilities.

⁶ Statutory instrument [SI 2022/78](#) was laid on 4 July 2022, which revoked all existing all-seater orders, and replaced them with a single direction from the Secretary of State to SGSA imposing new requirements as respects to the seating of spectators at designated football matches.

⁷ For further details see SGSA website: [Licensed standing conditions and research](#).

⁸ Under the terms of the [Equality Act 2010](#).



15. Responsibility for the safety certification of grounds at which designated football matches are played rests with **local authorities** discharging their powers under the [Safety of Sports Grounds Act 1975](#) (the 1975 Act). Under the 1975 Act a local authority⁹ is responsible for issuing a general safety certificate for a ground. The local authority needs to be satisfied that the ground management can prevent contravention of the terms and conditions of the certificate (for example through appropriate policies and procedures) to ensure the 'reasonable safety'¹⁰ of all people who attend 'specified activities' at the ground, including designated football matches. The local authority is also the enforcing authority in relation to the [Health and Safety at Work etc. Act 1974](#).
16. Additional background on the roles and responsibilities of all interested parties, including spectators, is at [Annex B](#).

SGSA's all-seater licensing responsibilities

17. The primary purpose of the Government's all-seater policy is to help ensure spectators are kept safe when they watch designated football matches played at home grounds used by clubs in the Premier League or the Championship for at least three years since the 1994/95 season, plus Wembley Stadium and the Principality Stadium.
18. In carrying out the SGSA's statutory functions in relation to the licensing of designated football grounds subject to the all-seater policy, SGSA Inspectors will primarily be concerned with seeking evidence that spectator safety is being managed in accordance with the all-seater licence conditions, and with securing spectator safety, including the safety risks associated with persistent standing in seated areas.
19. SGSA Inspectors will consider evidence supplied by the ground management, whether directly or via the relevant local authority, including:
 - health and safety risk assessment(s) for the ground and associated operations manual;
 - match specific risk assessment(s); and
 - the persistent standing management plan.

SGSA Inspectors will consider the evidence on its merits and make judgments about whether ground management is effectively managing both the nature and scale of persistent standing and the associated risks to spectator safety, in the context of the specific ground's infrastructure.

Urgent and immediate enforcement action

20. Where SGSA Inspectors identify evidence, or have evidence brought to their attention, that represents an immediate and significant risk to spectator safety, they will take urgent action, consulting the relevant local authority as necessary (see also the flow diagram at [Annex C, Figure 1](#)). The type of urgent action by SGSA Inspectors will vary

⁹ The unitary authority is responsible for issuing safety certificates and for enforcing the [Health and Safety at Work etc Act 1974](#); In two tier authorities, the County Council is responsible for issuing safety certificates, with the District/Borough Council responsible for enforcing the Health and Safety at Work etc Act 1974.

¹⁰ Sections 2(1) and 3(1) of the [Safety of Sports Grounds Act 1975](#).



depending on the precise nature of the immediate and significant safety risk and it should be noted that the below are **not** mutually exclusive:

- a. Informing the relevant local authority, who may then judge that urgent action is needed using their safety certification powers under the 1975 Act (see also paragraphs 39-40 and [Annex D](#)), where the immediate and significant safety risk arises from non-compliance with one or more of the terms and conditions for the general safety certificate of the ground; and/or
- b. Using SGSA's powers under the 1989 Act to direct the relevant local authority to include particular terms and conditions in the general safety certificate (see also paragraph 41) in appropriate circumstances. This may include, for example, cases where there is evidence that the basis on which the safety certificate was granted has altered requiring additional measures to secure reasonable safety, or where the SGSA considers that the local authority is not discharging its safety certification responsibilities appropriately; and/or
- c. Formal enforcement action by the SGSA through the licensing regime under the 1989 Act (see also paragraphs 42-55) where there is an immediate and significant safety risk arising from non-compliance with one or both all-seater conditions. This may include, for example, cases where a ground is openly selling tickets to standing areas despite this being prohibited, or selling tickets to inappropriate seated accommodation, such as where seating is locked up and therefore not available to spectators to watch the match from a seated position.

‘Initial steps’ and ‘further action’ to demonstrate compliance with the all-seater licence conditions

21. Whilst acknowledging the need to tailor regulatory action to the circumstances of a specific ground, a broadly consistent overall approach will be taken by the SGSA when assessing evidence of whether a ground is compliant with the all-seater licence conditions. The SGSA will look for evidence that the ground management is visible and active in taking all reasonable precautions and in exercising all due diligence (‘initial steps’) to discourage persistent standing in seated areas and thereby manage spectator safety risks. This evidence may include, but not be limited to, SGSA's matchday inspections observations, and any ground management team matchday observations requested by SGSA (see also paragraph 45). The causes and potential impact of persistent standing in seated areas, including the safety, crowd management, and customer care issues arising from such spectator behaviour, are detailed at [Annex E](#).
22. **Initial steps** to discourage persistent standing and thereby comply with the all-seater licence conditions could include one or more of the below. In taking such initial steps, the SGSA recognises that no single step alone is likely to address the safety risks comprehensively, and that such initial steps need to be kept under regular review as part of driving continuous improvement (see paragraph 22i below). The SGSA further recognises that such initial steps may also manage wider spectator safety risks beyond those associated with persistent standing:
 - a. Ground management work with both home and away supporters in the context of their customer charter to identify why they are standing and how best to address



this. Ground management and club use the information received from this spectator engagement to inform their approach to managing persistent standing.

- b. Ground management produce and keep under review a programme for educating and persuading their home supporters about why they must sit. This covers safety, crowd management and other customer care issues (see [Annex E](#)) and explains the likely consequences should spectators continue to stand persistently.
- c. Ground management ensure that season ticket holders and home supporters are clearly advised that it is a condition of entry that they sit and that a deliberate failure to do so is likely to result in the withdrawal of the ticket without compensation and refusal of entry. Season ticket holders and those receiving their tickets in advance by post, or electronically, should be given this warning in writing.
- d. Ground management may wish to warn away supporters that if they stand in seated areas they risk losing entitlement to tickets. Ground management will need to co-operate with other grounds/clubs, to ensure they treat all spectators equally both in terms of raising awareness of the all-seater condition in the ground regulations, and in the way in which that condition is enforced.
- e. Ground management takes positive action to ensure that all gangways and vomitories are kept clear at all times, along with such measures as may be necessary to prevent uncontrolled migration by spectators standing in seated areas, for example:
 - closely controlling access to certain areas;
 - ticket checks;
 - taking certain rows of seats, or seats near gangways, out of use; and,
 - raising the height of front barriers on raised seating decks (upper tiers) and vomitories.
- f. Ground management uses accessibility audits to understand how best to meet their obligations under the [Equality Act 2010](#) and thereby ensure that disabled spectators are not prevented from seeing the pitch by others standing, even for short periods, in seated areas. Where views are obstructed in this way, the ground management should take the row or rows of seats causing the obstruction out of use.
- g. Ground management, informed by knowledge of the nature and scale of persistent standing at the ground, ensures the Persistent Standing Management Plan for the ground recognises the particular triggers (excitation and thrust) which can lead to a progressive crowd collapse, and details the mitigation to manage such triggers (see also c. below), for example, stopping crowd surfing and/or elaborate goal celebrations by spectators.
- h. Ground management, informed by knowledge of the nature and scale of persistent standing at the ground, ensures that the Crowd Disorder and Anti-Social Behaviour Plan for the ground mitigates the risks of anti-social behaviour, including in persistent standing areas of the ground, for example through ticket checks to ensure appropriate segregation of supporters, and bag/personal searches to stop inappropriate items entering the ground.
- i. Ground management regularly measures the nature and scale of persistent standing at the ground to assess the efficacy of the initial steps already undertaken and to inform further action as part of driving continuous improvement (see paragraph 23 below).



23. If a particular ground management can demonstrate robustly that all initial steps have been taken to discourage standing in seated areas and thereby comply with the all-seater licence conditions along the lines detailed in the previous paragraph, the SGSA anticipates the focus of its regulatory activity in 2023/24 will be on working with ground management to take **further action** using voluntary measures to ensure they manage the safety risks for those spectators who are continuing to choose to stand. In such circumstances, the SGSA will liaise closely with the relevant local authority given the clear relevance of safety certification under the 1975 Act. Appropriate further action by the ground management could include one or more of the options at sub paragraphs 23a-d below. Note, these options are **not** mutually exclusive. Rather, they should be used individually or in combination to address the identified safety risks and bring the ground back into compliance with the all-seater conditions:
- a. Ground management, informed by feedback from home and away supporters, and known heightened safety risks associated with persistent standing, such as standing in upper tiers, and on seating decks with gradients in excess of 25 degrees, using ticket sales and marketing prior to match day, to help limit persistent standing to certain discrete areas of the ground where the spectator safety risks are lower. For example, lower tiers and gradients less than 25 degrees. In doing so, ground management recognises that safety risks still exist, and takes all initial steps to ensure the safety of spectators in such areas.
 - b. Ground management, in consultation with the relevant local authority and SGSA Inspector, take steps voluntarily to reduce capacity/density in areas of the ground where persistent standing continues to take place.
 - c. If all other mitigation measures have been tried, ground management, in consultation with the relevant local authority and SGSA Inspector and informed by relevant guidance including the sixth edition of the Guide to Safety at Sports Grounds (Green Guide)¹¹ and Supplementary Guide 01 (SG01): Safe Standing in Seated Areas, installs seats incorporating barriers, or seats with independent barriers, in those remaining areas. This is in order to reduce the risk of progressive crowd collapse. In doing so, the ground management will be mindful of relevant guidance in the Green Guide¹².
 - d. For those grounds that are subject to the all-seater policy on a voluntary basis¹³, ground management in consultation with the relevant local authority and SGSA Inspector and informed by relevant guidance including the Green Guide¹⁴, replaces seated areas with other forms of spectator accommodation such as terracing to prescribed standards¹⁵ or dual-purpose seating.
24. The SGSA will keep under regular review the way in which ground management is implementing voluntary measures to manage the safety risks for those spectators who

¹¹ The Guide to Safety at Sports, colloquially known as the 'Green Guide', is the SGSA's guidance on spectator safety at sports grounds.

¹² See Sections 12.19-12.25 of the Green Guide.

¹³ Defined as grounds that are used by clubs who have **not** been in the Premier League or the Championship for more than three seasons since the start of the 1994/95 season, but whose ground management has nonetheless chosen to provide seated accommodation only (see also paragraph 12 for which grounds are automatically subject to the Government's all-seater policy).

¹⁴ See Sections 13.1-13.24 of the Green Guide.

¹⁵ For further details see SGSA website: [Terracing](#).



are continuing to choose to stand. The SGSA will do so through matchday inspection activity, as well as regular dialogue with ground management and the relevant local authority. The SGSA will use risk categorisation (see section 25 below) to assess whether the current action being taken by ground management using voluntary measures is sufficient to manage the safety risks associated with persistent standing, or whether further action is required to manage any identified residual risk as far as is reasonably practical.

25. In circumstances where safety risks associated with persistent standing continue to be identified at a ground, SGSA expects to see further action taken by ground management during the 2023/24 season of the kind outlined at paragraph 23 above. The precise nature of the further action will depend on the specific nature of the residual risks identified and the individual characteristics of the ground in question. However, SGSA anticipates that such further action will need to include one or more of the following, with past experience suggesting ticketing/marketing interventions alone are unlikely to address the safety risks sufficiently to bring the ground back into compliance with the all-seater conditions:
 - a. use ticket sales and marketing prior to matchday to relocate supporters who wish to stand to areas of the ground where the spectator safety risks are lower, for example lower tiers; and/or
 - b. reduce the capacity/density of those seated areas of the ground where spectators still choose to stand; and/or.
 - c. Install seats incorporating barriers, or seats with independent barriers, in those seated areas where spectators still choose to stand.
26. The specific further action highlighted in the preceding paragraph has already taken place at a number of SGSA licensed grounds in the recent past. For example, by the end of the 2022/23 season nine grounds had applied successfully to operate licensed standing areas, and a further 10 grounds had installed areas of seats incorporating barriers and/or seats with independent barriers. SGSA currently anticipates up to a further 20 grounds will install new apparatus and/or apply for licensed standing over the next two years. Three case study examples of effective installation of new apparatus are detailed at [Annex E](#), highlighting what can be done to address persistent standing risk in different contexts.
27. In undertaking the further action outlined at paragraphs 23 and 25 above, the SGSA expects to see evidence of ground management undertaking meaningful engagement with their club's home supporters to help inform the nature and scale of any proposed new apparatus. The SGSA recognises, however, that ultimately the decision about whether to install new apparatus will be for ground management, driven by a need to address the identified risk to spectator safety and comply with the all-seater licence conditions.
28. Where ground management decides to take further action in the form of the installation of areas of seats incorporating barriers and/or seats with independent barriers, the SGSA anticipates that such apparatus will be available for both home and away supporters to ensure equality of choice for both sets of supporters. The SGSA accepts, however, that the capacity of home and away areas may differ. Furthermore, whilst such installation of seats incorporating barriers and/or seats incorporating barriers may not result in an immediate application from ground management to operate licensed standing areas, the SGSA does expect such an application within two years of the new apparatus first coming into use by spectators so that they can realise fully the benefits of such apparatus in terms of improved spectator safety.



29. In exceptional circumstances where ground management can demonstrate that the demand for standing accommodation is limited to home or away supporters only, SGSA will consider waiving the need to provide seats incorporating barriers and/or seats with independent barriers for both sets of supporters. The SGSA will consider each case on its individual merits.
30. Where residual safety risks associated with persistent standing continue to be identified at a SGSA licensed ground during the 2023/24 season, the SGSA expects to see further action taken by ground management of the kind outlined at paragraphs 23 and 25 above during that season.
31. SGSA licensed grounds have had since the 2018/19 season to engage with their local Inspector and local authority and then address persistent standing risk. Moreover, the Government's announcement of 4 July 2022 means there is now a well-established option available to those grounds subject to the all-seater policy to apply to operate licensed standing areas. Consequently, if there is limited or no evidence of further action being taken along the lines outlined at paragraphs 23 and 25 in response to residual safety risks arising from persistent standing, SGSA will move to formal, proportionate enforcement action as outlined at paragraph 42 onwards below, targeted where the risks are greatest.

SGSA all-seater risk categorisation

32. SGSA Inspectors will assess the risk to spectator safety arising from persistent standing, using evidence from SGSA matchday inspections together with evidence supplied by ground management and/or the relevant local authority. They will do so by identifying:
 - the nature and scale of the risk;
 - the likelihood of the risk becoming a reality;
 - the impact/consequence if the risk does materialise; and
 - the nature of any relevant mitigation already in place to manage the risk.
33. Without prejudice to circumstances in which urgent action is merited (see paragraph 20), the SGSA will categorise spectator safety risk and the extent of compliance with the all-seater policy, as a necessary pre-cursor to taking consistent and proportionate enforcement action under the 1989 Act, targeted where the risks are greatest.
34. This all-seater spectator safety risk categorisation approach is summarised in [Table 1](#) overleaf, including the likely SGSA enforcement approach in each of the four main scenarios shown. Throughout the process there will be an ongoing dialogue between the SGSA, ground management and, as appropriate, the relevant local authority.

Table 1 shows the SGSA's approach will be proportionate to the nature and scale of any unmanaged or ineffectively managed spectator safety risks that are identified from the evidence supplied, and will range from no action, through advice and voluntary measures, to formal enforcement action under the 1989 Act. The table is indicative rather than comprehensive, with SGSA reserving the right to take action appropriate to specific spectator safety risks identified.

35. The flow diagrams at [Annex C \(Figures 1-2\)](#) illustrate how the SGSA's risk-based approach is anticipated to work in practice, with any formal SGSA enforcement action under the 1989 Act targeted where the risks are greatest.



Table 1: All-seater Licence Conditions Compliance – spectator safety risk categorisation approach 2023/24

HIGHER Spectator Safety Risk	Scenario 1 – Higher Risk / No Compliance <i>Persistent standing is widespread/commonplace. Typically characterised as taking place: at the majority/all of the matches hosted by the ground each season; in more than one stand or more than one distinct area of one stand; and/or involving more than 1000 spectators.</i> <i>Ground management does not enforce the all-seater licence conditions effectively.</i> <i>Limited or no effective management of the associated spectator safety risks.</i> SGSA anticipated approach: - Initiate investigation to determine appropriate enforcement action under the 1989 Act, liaising with the relevant local authority as necessary. - Ground management given the opportunity to comply prior to progressing enforcement action (unless the risk is deemed too severe and/or the low compliance is wilful in which case immediate enforcement action may be appropriate). - The SGSA will take enforcement action where ground management fails to co-operate or fails to act promptly and appropriately to enforce the all-seater licence conditions.	Scenario 2 – Higher Risk / Insufficient Compliance <i>Persistent standing is widespread/commonplace. Typically characterised as taking place: at the majority/all of the matches hosted by the ground each season; in more than one stand or more than one distinct area of one stand; and/or involving more than 1000 spectators.</i> <i>Ground management taking initial steps and/or some further action to discourage standing and enforce the all-seater licence conditions but more remains to be done.</i> <i>Evidence of management of associated spectator safety risk arising from those spectators who still choose to stand, but residual risk remains.</i> SGSA anticipated approach: - Work with ground management, liaising with the relevant local authority as necessary, to ensure all initial steps, and appropriate further action, are being taken to enforce the all-seater licence conditions, and to manage residual safety risk arising from those spectators who still choose to stand. - SGSA only likely to take formal enforcement action under the 1989 Act where ground management fails to co-operate or fails to take further action identified to enforce the all-seater licence conditions during the 2023/24 season. - SGSA likely to use voluntary measures to encourage ground management to take any further action to ensure effective management of safety risks arising from those spectators who still choose to stand in seated areas.
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LOWER Spectator Safety Risk	Scenario 3 – Lower Risk / Insufficient Compliance <i>Persistent standing is small scale/infrequent. Typically characterised as taking place: at a minority of the matches hosted by the ground each season; in only one stand or only one distinct area of one stand; and/or involving 10s rather than 100s/1000s of spectators.</i> <i>Effective management is not in place for any residual risk.</i> <i>Ground management does not enforce the all-seater conditions effectively.</i> SGSA anticipated approach: - Work with the ground management, liaising with the relevant local authority as necessary, to ensure the former is proactive in taking all 'initial steps' and appropriate further action to enforce the licence conditions. - SGSA only likely to take formal enforcement action under the 1989 Act where ground management fails to co-operate or take appropriate and timely action to enforce the all-seater licence conditions during the 2023/24 season.	Scenario 4 – Lower Risk / Sufficient Compliance <i>Persistent standing is small scale/infrequent. Typically characterised as taking place: at a minority of the matches hosted by the ground each season; in only one stand or only one distinct area of one stand; and/or involving 10s rather than 100s/1000s of spectators</i> <i>Effective management is in place for any residual risk.</i> <i>Ground management enforces the all-seater licence conditions effectively.</i> SGSA anticipated approach: - Unlikely to need to take any additional action in 2023/24.
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Licensed standing criteria compliance assessment

36. For those grounds subject to the all-seater policy and operating licensed standing areas, SGSA Inspectors will periodically assess compliance with the safety management aspects of the licensed standing criteria, using evidence supplied by ground management and/or the relevant local authority, as well as evidence from SGSA matchday inspection activity. They will do so by identifying:
- i. the nature and scale of any non-compliance with the safety management aspects of the licensed standing criteria and associated risk to spectator safety;
 - ii. the likelihood of any identified risk to spectator safety from step i. above actually occurring;
 - iii. the potential impact/consequence if the risk to spectator safety were to materialise; and
 - iv. the nature of any relevant mitigation already in place to manage the risk.
37. The licensed standing criteria compliance assessment outlined above will inform the nature and timing of any remedial action identified by the Inspector to enable the ground to come back into compliance with all the criteria, which the Inspector will then communicate to the ground in writing, copied to the relevant local authority.
38. The licensed standing criteria compliance assessment process outlined above complements the SGSA all-seater risk categorisation process (see paragraphs 32-35), with licensed standing grounds subject to both processes. For example, in circumstances where a licensed standing ground is found to be non-compliant with the licensed standing criteria, but is compliant with the all-seater conditions, then any remedial action identified by SGSA will focus on bringing the ground back into compliance with all the licensed standing criteria. By contrast, in circumstances where a ground is compliant with the criteria in terms of operating licensed standing areas, but spectators continue to choose to stand in seated areas of the ground, the SGSA's all-seater risk categorisation process will inform the SGSA's enforcement approach.

Local authority enforcement of safety certificates under the 1975 Act

39. The SGSA categorisation of spectator safety risk and analysis of the extent of compliance with the all-seater licence conditions at a ground may identify issues associated with non-compliance with the terms and conditions of the general safety certificate for the ground. In such circumstances, the SGSA will share safety certificate issues with the relevant local authority. The SGSA anticipates the relevant local authority will judge what action is appropriate, including potential enforcement action under the 1975 Act. Examples of potential local authority enforcement action under the 1975 Act are at [Annex D](#).
40. Subject to what enforcement action is taken by the relevant local authority under the 1975 Act to ensure the 'reasonable safety' of all people who attend 'specified activities' at the ground, including designated football matches, the SGSA may judge that enforcement action under the 1989 Act is not necessary. For example, if a local authority directs a ground management, through enforcement of the terms and conditions of the safety certificate, to keep all gangways and vomitories clear, compliance with this will also help deliver compliance with the all-seater licence conditions by encouraging spectators to sit on the seat provided rather than stand in the



gangway/vomitory. SGSA reserves the right, however, in appropriate circumstances to take enforcement action under the 1989 Act in parallel with local authority enforcement action under the 1975 Act.

SGSA oversight of local authority safety certification responsibilities

41. If the SGSA judges that the relevant local authority is failing to take all appropriate enforcement action under the 1975 Act¹⁶ to require the ground management to ensure the 'reasonable safety' of all people who attend 'specified activities' at the ground, including designated football matches, the SGSA has the power under the 1989 Act¹⁷ in an appropriate case to require the relevant local authority to insert conditions in the safety certificate for the ground. In such circumstances, the SGSA's potential enforcement action will be consistent with the examples of potential local authority enforcement action at [Annex D](#). The SGSA also has the power under the 1989 Act¹⁸ to impose additional terms and conditions in the ground's licence to prevent or minimise the effects of non-compliance with the licence. The SGSA's powers to require the relevant local authority to insert conditions in the safety certificate are subject to the SGSA undertaking a statutory consultation process¹⁹. The SGSA's powers to impose additional terms and conditions in the licence are subject to affording ground management the opportunity to make representations²⁰.

SGSA enforcement options

All-seater grounds

42. SGSA enforcement action under the 1989 Act will be proportionate and based on the risk categorisation process outlined above (see paragraphs 32-35, and [Annex C, Figures 1-2](#)), in accordance with the Regulators' Code²¹. Paragraphs 56-63 below outline the SGSA's enforcement options specifically in relation to the operation of licensed standing areas.
43. Except where immediate and significant safety risks necessitate urgent action (see paragraph 20), SGSA's enforcement approach under the 1989 Act will use an **escalating scale of action** (see also [Annex C, Figure 3](#)) designed to:
- give ground management the opportunity to take all initial steps and further action (as defined at paragraphs 22-23) to comply with the all-seater licence conditions before formal enforcement action is taken;

¹⁶ Section 2(1) of the [Safety of Sports Grounds Act 1975](#).

¹⁷ Section 13(2) of the [Football Spectators Act 1989](#).

¹⁸ Section 10(10) of the [Football Spectators Act 1989](#).

¹⁹ Section 13(3) of the [Football Spectators Act 1989](#).

²⁰ Section 10(11) of the [Football Spectators Act 1989](#).

²¹ The Regulators' Code came into statutory effect on 6 April 2014 under the [Legislative and Regulatory Reform Act 2006](#) and provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate.



- b. help ground management to identify appropriate and proportionate further action to manage residual safety risks associated with those spectators who still choose to stand despite ground management taking initial steps and further action (as defined at paragraphs 22-23) to ensure compliance with the all-seater licence conditions (for grounds with licensed standing areas, this includes managing the safety risks associated with spectators continuing to stand in seated areas of ground); and
 - c. keep the relevant local authority informed of developments at every stage given the local authority's related safety certification responsibilities for the ground.
44. The following **enforcement options** are anticipated to be used, tailored to the particular spectator safety risk/all-seater licence condition compliance profile for each ground (see paragraph 33 and [Table 1](#)). Those grounds identified as having higher spectator safety risk in terms of standing in seated areas and insufficient compliance in terms of the all-seater licence conditions are more likely to be considered by the SGSA for enforcement action under the 1989 Act.
45. In the first instance the SGSA will provide ground management, and the relevant local authority, with **advice and guidance** about any additional initial steps and associated timescales for ground management to comply with the all-seater licence conditions. This will cover anything deemed necessary or expedient to ensure spectator safety at the ground in the context of compliance with the all-seater licence conditions, including but not limited to one or more of the initial steps detailed at paragraph 22. It may also include a requirement for the ground management team to supply SGSA with regular written reports of that team's own matchday observations of the nature and scale of persistent standing at designated football matches hosted by the ground, to supplement SGSA's matchday inspection observations at the ground.
46. Depending on the particular risk/compliance profile for the ground, the SGSA's advice and guidance may also include any further action and associated timescales to manage residual risk associated with spectators who still choose to stand, including but not limited to one or more of the further actions detailed at paragraph 23.
47. Subject to the response of ground management to the advice and guidance, the SGSA will then seek to agree **voluntary measures** to encourage ground management to implement the actions detailed in the SGSA's advice and guidance.
48. If the ground management fails to co-operate and/or take timely action to minimise the incidence of persistent standing in seated areas including but not limited to one or more of the actions at paragraph 23, the SGSA will **advise** the relevant local authority. The SGSA anticipates that the relevant local authority will then determine what action is appropriate, including potential enforcement action under the 1975 Act. However, if the SGSA considers that the local authority is failing to take appropriate action under the 1975 Act, SGSA may **direct** the local authority to insert conditions in the general safety certificate (see paragraph 41).

Enforcement of SGSA licence conditions

49. Irrespective of the steps outlined at paragraph 48, if the SGSA determines that enforcement action is merited, for example, if the SGSA determines spectator safety will not be wholly managed under paragraph 48, the SGSA may use its direct licensing powers under the 1989 Act and as outlined below, in which case the SGSA will inform



the local authority that it is minded to take enforcement action against the ground management.

50. If the ground management fails to co-operate and/or take timely action to minimise the incidence of persistent standing, the SGSA will issue a **written warning** to ground management indicating that if they fail to take the necessary action, the SGSA will commence enforcement action under the 1989 Act for non-compliance with the all-seater licence conditions. This written warning will be copied to the Secretary of State for Culture, Media and Sport and the relevant football governing body. The SGSA will also keep the relevant local authority informed of developments. The written warning will explain clearly the necessary actions and associated timescales for taking reasonable steps to comply with the all-seater licence conditions, and the potential consequences of non-compliance. Potential consequences may include the SGSA using its enforcement powers under the 1989 Act to vary the terms and conditions (including the all-seater conditions) of the licence to admit spectators, or suspend, revoke or not renew all or part of the licence for the ground. The SGSA's decision as to whether or not enforcement action should be targeted at all or part of the licence will be informed by whether non-compliance with the all-seater licence conditions is associated with part or all of the ground and the nature of the residual risk.
51. If the ground management still fails to take the necessary action in a timely way, the SGSA will take enforcement action under the 1989 Act either directly or through the variation of the terms and conditions of the licence, including new terms and conditions where appropriate. Such action will be:
 - a. **Suspension of part or all of the licence** – the SGSA is more likely to use this approach if it is confident that ground management will take all initial steps and appropriate further action to comply with the all-seater conditions before the end of the 2023/24 season; or
 - b. **Revocation** – the SGSA is more likely to use this approach if it cannot foresee that ground management will take all initial steps and appropriate further action to comply with the all-seater conditions by the start of the 2024/25 season at the earliest; or
 - c. **Non-renewal of all or part of the licence** – the SGSA is more likely to use this approach on receipt of an application to renew a licence if it does not consider that ground management has taken all initial steps and appropriate further action to comply with the all-seater conditions prior to the start of the 2024/25 season at the earliest.
52. Unless there is an urgent issue which poses a serious and immediate risk justifying immediate suspension²² of the licence (see paragraph 20), all of the above actions will be commenced by a written notice to ground management detailing the proposed action and giving them the opportunity to make representations. In respect of suspension, revocation or the imposition of varied/new terms and conditions this will require a response within 21 days from date of service²³; in respect of non-renewal this will require a response within 28 days from the date of service²⁴. The SGSA will take these representations into account in making its decision which it will communicate to ground management after the relevant period has elapsed.

²² Section 12(5) of the [Football Spectators Act 1989](#)

²³ Section 12(4) and section 10(11) of the [Football Spectators Act 1989](#)

²⁴ Section 10(3) of the [Football Spectators Act 1989](#)



53. The SGSA recognises the outcome of any enforcement action as described above for non-compliance with the all-seater licence conditions is likely to be that ground management, when hosting designated football matches at their ground, will not be allowed to permit spectators to part or all of the ground. This will be an unwelcome outcome for all concerned, including spectators. With that in mind, the SGSA will seek to proceed by means of advice, persuasion and agreement, with use of statutory powers a last resort, except in circumstances where the SGSA considers urgent action (paragraph 20) and/or enforcement (paragraph 54) is merited.
54. Nevertheless, the SGSA will take formal enforcement action if all other approaches have been exhausted and it considers based on the available evidence that the risk of spectator injury is unacceptably high and/or the ground management is failing to co-operate or act promptly to comply with the terms and conditions (including the all-seater licence conditions) of the licence to admit spectators.
55. If the SGSA considers that the risk gap created by non-compliance with licence conditions is extreme (i.e. there is a high residual risk, the risk is likely to materialise, and the consequences are likely to be severe), or where there is a wilful breach of the law (such as admitting spectators to unlicensed grounds) and all reasonable steps were not taken by ground management, it will consider taking immediate enforcement action²⁵.

Licensed standing areas

56. The SGSA's approach to enforcement action in relation to licensed standing grounds will continue to follow the same approach as outlined above in respect of compliance with the all-seater licence conditions for the seated areas of those grounds.
57. In relation to compliance with the licensed standing conditions for operating licensed standing areas, SGSA enforcement action under the 1989 Act will be proportionate and based on the licensed standing criteria compliance assessment outlined at paragraphs 36-38.
58. In circumstances where there is evidence at a licensed standing ground of non-compliance with one or more of the SGSA's published licensed standing criteria, the SGSA will inform ground management of the steps SGSA considers are required to bring the licensed standing area back into compliance with all the licensed standing criteria. However, if ground management fails to co-operate and/or take timely action to bring the licensed standing area back into compliance with all the criteria, the SGSA will adopt a **sliding scale of action** (see [Annex C, figure 4](#)). Initially, the SGSA will **advise the relevant local authority** that it is minded to move towards enforcement action under the 1989 Act for non-compliance with the licensed standing conditions.
59. If ground management fails to co-operate and/or take timely action to bring the licensed standing area into compliance with all the licensed standing criteria, the SGSA will issue a **written warning** to ground management indicating that if they fail to take the necessary action, the SGSA will commence enforcement action under the 1989 Act for non-compliance with the ground's licence. This written warning will be copied to the Secretary of State for Culture, Media and Sport and the relevant football governing

²⁵ Relevant offences for admission of spectators without a licence and for breach of licence conditions are created by s9(1) and s10(13) respectively of the [Football Spectators Act 1989](#)



body. The SGSA will also keep the relevant local authority informed of developments. The written warning will include:

- The measure(s) that the SGSA considers are required to bring the licensed standing area back into compliance with the licensed standing criteria;
- the timescales within which ground management must put in place the required measures; and
- notice that the licensed standing conditions may be withdrawn if the required measures are not put in place within the relevant timescales.

60. If, following the receipt of the written warning described above, ground management at a licensed standing ground fails to take the required action set out in the warning, the SGSA will consider taking **enforcement action** under the 1989 Act. Depending on the individual circumstances, the SGSA may remove the licensed standing conditions (thereby prohibiting the continued operation a licensed standing area) and/or make other variations to the terms and conditions of the licence, for example, taking a specific part of the ground out of use.
61. Unless there is an urgent issue which poses a serious and immediate risk justifying immediate suspension²⁶ of the licence (see paragraph 20), the enforcement action outlined in the preceding paragraph will be commenced by a written notice to ground management detailing the proposed action and giving them the opportunity to make representations. Given the action will involve the imposition of varied/new terms and conditions this will require a response within 21 days from service²⁷. The SGSA will take these representations into account in making its final decision, which it will communicate to ground management after the relevant period has elapsed.
62. As with the all-seater enforcement approach, the SGSA recognises that enforcement action as outlined in the preceding paragraph will be disruptive and unwelcome by ground management and spectators. It will therefore only be taken as a last resort if the SGSA determines that other approaches have been exhausted and/or that ground management is failing to co-operate or act promptly to comply with the licensed standing conditions.
63. If the SGSA considers there is a wilful breach of any of the licensed standing criteria, it reserves the option to take such immediate enforcement action under the 1989 Act as it sees fit, which may include criminal enforcement for breach of the ground's licence conditions²⁸.

Different types of spectator accommodation

64. The SGSA further appreciates that, without prejudice to the risk categorisation and associated enforcement approach above, a ground management whose ground is subject to the Government's all-seater policy may choose to take advantage of different types of seated spectator accommodation, such as seats incorporating barriers, or seats with independent barriers, to invest in new spectator accommodation even if the existing ground infrastructure and crowd management arrangements are able to support the effective management of the identified spectator safety risks. If a ground management

²⁶ Section 12(5) of the [Football Spectators Act 1989](#).

²⁷ Section 12(4) and section 10(11) of the [Football Spectators Act 1989](#).

²⁸ Section 10(13) respectively of the [Football Spectators Act 1989](#).



chooses to adopt such an approach, the SGSA will consider such proposals on their individual merits and in accordance with existing established guidance, most notably the Green Guide, and SGSA guidance on spectator accommodation changes²⁹. Additionally, in such circumstances the SGSA will remind the ground management about the Government's all-seater policy, where specified grounds hosting designated football matches are expected to comply with the existing all-seater licence conditions (see paragraph 12).

65. The SGSA also recognises that ground management at licensed standing grounds may determine once they start operating licensed standing areas that the size and location of such areas needs to change to reflect the high demand from spectators for such areas. In those circumstances, the SGSA will consider each proposal from ground management on its individual merits and in accordance with existing established guidance, most notably the Green Guide and SG01: Safe standing in seated areas). In doing so, the SGSA will remind ground management about the ongoing requirement to comply with the licensed standing criteria (see [Annex A](#)).

Review

66. The SGSA's enforcement approach will be kept under review and adapted as necessary for the 2024/25 season onwards as new technologies are developed in terms of the provision of spectator accommodation, and as new evidence is gathered about the characteristics and effective management of safety risks associated with persistent standing in seated areas.
67. The approach will also be kept under review to ensure it remains appropriate and fit for purpose, for example to reflect: the emergence of any new safety risks arising from changes in crowd behaviour, especially at moments of excitement, for example, new ways of celebrating when goals are scored.

Impact assessment

68. This document outlines the SGSA's approach in the 2023/24 football season to enforcement of the existing all-seater licence conditions under statutory powers in the Football Spectators Act 1989. Consequently, the SGSA considers the document to be a Non-Qualifying Regulatory Provision for the purposes of Business Impact Target Reporting³⁰ under the Enterprise Act 2016. Business impact is centred principally on relevant ground management and relevant local authorities familiarising themselves with the new document, which is based substantively on the corresponding document published in summer 2019 ahead of the 2019/20 football season.

²⁹ For further details see SGSA website: [Spectator Accommodation Changes](#).

³⁰ For further details see Gov.uk website: [Business Impact Target Reporting](#).



Annex A: Licensed standing in seated areas criteria

Grounds can apply to the Sports Grounds Safety Authority (SGSA) to offer licensed standing where the necessary infrastructure and crowd management arrangements, outlined below, are in place.

To become licensed standing ground, management teams must:

- Demonstrate how they have addressed the criteria set out below.
- Obtain approval from the Sports Grounds Safety Authority (SGSA) to operate licensed standing in seated areas and receive a licence with the necessary conditions.

Application criteria

Grounds applying to become a licensed standing ground must demonstrate how they meet the following criteria, which cover four categories:

- A. Compliance with guidance (point 1)
- B. Infrastructure (points 2-8)
- C. Safety management procedures (points 9-13)
- D. Safety Advisory Group (SAG) engagement (points 14-16)

A. Compliance with guidance

1. Any infrastructure must comply with the appropriate SGSA guidance.

Compliance with the relevant sections of the current (sixth) edition of the *Guide to Safety at Sports Grounds (Green Guide)*, with particular reference to Chapter 12 – *Seated Accommodation*, and Chapter 2 of the current (second) edition of *Supplementary Guidance 01: Safe Standing in Seated areas (SG01)*, in terms of:

- a. the design and installation of the proposed area(s) including testing/sign off of new seats with barriers/independent barriers by a competent person³¹; and
- b. the safety management procedures put in place in advance of spectators being admitted to the area(s) in question, including the provision of suitably qualified/trained stewards.

B. Infrastructure

2. Licensed standing areas must be made available to both home *and* visiting supporters.

In achieving this, visiting supporters should *also* be offered seated accommodation within the provision.

³¹ To validate the design and quality of installation, the ground is required to carry out proof of load testing to a minimum of 5% of the installation to ensure that required loadings can be achieved.

Additional testing will be required in cases where more than one type of fixing has been used and where fixings are into different types of substrate.

The minimum figure of 5% is without prejudice to any additional testing requirements of the local authority in relation to the General Safety Certificate.



The ground management must be able to demonstrate active engagement with supporters, which has helped inform decision making on the size and location of those licensed standing areas. The final decision will be based on a range of factors, most notably the nature and scale of spectator safety risk associated with persistent standing in conventional seated accommodation and the associated SGSA Persistent Standing Enforcement Approach.

Note that it is recognised that the capacity of licensed standing areas, whether for home or visiting supporters, may vary according to the event and the likely demand, and that allocations will require continual review.

3. **Each seat/space must be allocated to *only one* spectator.**
4. **It should not be possible for any of the seats in the proposed areas to be locked in either the 'up' or the 'down' position.**
5. **Each seat and seat row must be clearly identifiable.**

For the legibility of both spectators and stewards, each individual seat and seat row must be clearly, neatly and accurately identified. Where tip-up seats are in place, the seat numbers must be clearly visible both when the seat is in the 'up' position and the 'down' position and fixed so as to make removal difficult.

6. **A CCTV system must be in place and offer full coverage of the licensed standing areas.**

The installation must be in accordance with the requirements outlined in the sixth edition of the *Green Guide* (see Section 16.20 – CCTV provision).

7. **There must be no negative impact on viewing standards for other spectators.**

The ground management must be able to show that the provision of licensed standing will have no negative impact upon the viewing standards, comfort or amenity levels of seated spectators in adjoining areas.

8. **There must be no negative impact for disabled spectators.**

The ground management must be able to show that the provision of licensed standing will have no negative impact upon the viewing standards, comfort or amenity levels of disabled spectators, either in the area in question or adjoining areas, and that the ground is continuing to meet its responsibilities under the Equality Act 2010.

C. Safety management procedures

9. **Ticket buyers must be informed in advance.**

Purchasers of tickets for licensed standing areas must be informed at the point of sale, and on the ticket itself, that spectators in the area in question will be standing during the activity (see Section SG01 2.4.c.ii of SG01).

All clubs should develop a ticket sales strategy that accommodates home and visiting spectators who do not wish to or cannot, stand, including ambulant disabled people and families with small children. Close co-operation with the visiting club will be required when selling the visiting clubs ticket allocation.

10. **A Code of Conduct must be introduced.**

A *Code of Conduct*, enforced by ground management, to maintain high standards of spectator behaviour in the proposed areas must be provided to all ticket holders. This



must reflect the entry conditions outlined in the *Supplementary Guidance* (see Section 2.4.c of SG01). An example of such a *Code of Conduct*, which can be tailored for local circumstances, is at Appendix A.

11. Briefing and training must be in place for staff and stewards.

Procedures must be in place, including the training and briefing of staff and stewards, to ensure that only relevant ticket holders are admitted to the areas in question.

12. Safety management procedures must be in place to monitor and manage the behaviour of spectators in licensed standing areas.

13. Management must demonstrate compliance with the SGSA's Persistent Standing Enforcement Approach in the ground's conventional seated areas.

D. Safety Advisory Group (SAG) engagement

14. There must be meaningful consultation with the SAG.

Ground management must be able to demonstrate that there has been meaningful consultation with the core members of the relevant SAG as defined in its terms of reference, about the plans for licensed standing areas, together with evidence of support for those plans by the relevant certifying authority.

Additionally, ground management must show they have reviewed any information sharing agreement with the local police informed by their plans for licensed standing areas.

15. SAG consultation must be recorded and inform the proposed approach.

Ground management must demonstrate that SAG consultation has informed the proposed approach both in terms of the physical infrastructure and crowd management arrangements for those areas, including evidence that any existing and effective management of the segregation line between home and visiting supporters will not be compromised.

Note that in circumstances where such SAG consultation results in objections to the proposals for licensed standing areas from one or more of the core SAG members, the ground management must show evidence that the certifying authority has recorded formally:

- a. details about each of the objections, including the evidence base and who tabled each of them; and,
- b. the certifying authority's accompanying rationale for rejecting each of those objections when giving its support to the proposed safe standing areas.

16. There must be continued engagement with the SAG.

Ground management must demonstrate that there are arrangements in place for regular dialogue with the core members of the relevant SAG about the operation of licensed standing areas to provide a suitable forum where partners, including the local police, can take an evidence-based approach to the ongoing effective management of the proposed areas.



Appendix A

Code of Conduct for licensed standing areas

Background

It has long been established that, simply by entering a sports ground, all spectators commit themselves to adhere to a number of ground regulations. Equally it is acknowledged that few spectators are familiar with those regulations, other than in the broadest terms. For this reason, it is recommended that all spectators who purchase or are allocated tickets for licensed standing areas are provided in advance with a copy of a *Fan Code of Conduct*. This should include both home and away supporters.

Management considerations

When preparing a *Fan Code of Conduct* for licensed standing areas, ground management should take the following into consideration:

- a. The Code should be tailored to the specific characteristics of the ground, the nature of the match being staged and to the provisions of any national and/or local guidance in force at the time (for example, in relation to COVID-19).
- b. The Code should be written in concise, plain language.
- c. If being communicated in digital form – as is strongly recommended – a check box should ideally be included for ticket buyers to confirm that they have read the Code, before leaving the page.
- d. Printed copies of the Code should be posted in prominent locations within the spectator accommodation.
- e. Where appropriate, the wording of the Code should be shared in advance with representatives of supporters' groups.
- f. More prominent and specific spectator messages should be displayed in prominent positions where applicable eg 'no climbing on seats or barriers'.

An example *Fan Code of Conduct* for licensed safe standing areas is available overleaf.



Example Fan Code of Conduct in licensed safe standing areas

This safe standing area has been introduced to help keep you safe while watching the match.

This *Code of Conduct* does not replace any other ground rules. Failure to comply with these may lead to you being removed from the ground and banned from future matches, and/or the ground losing the right to maintain safe standing areas.

1. Be respectful towards staff, stewards, and other fans at all times.
2. Have your ticket available at all times for any necessary secondary ticket checks.
3. Behave appropriately in the stand – anti-social behaviour will not be tolerated. That includes no climbing on the seats or rails.
4. Don't stand on the rails or seat. This safe standing area is here to keep you and other fans safe.
5. Unless needing to use facilities, don't move around in the safe standing area – your ticket is for your space only.
6. Don't stand in the gangways or on the steps to watch the match – these are for accessing and leaving your seat only.

Thank you for your support and co-operation.



Annex B: Additional background – roles and responsibilities of all interested parties

1. **Premier League and English Football League ground regulations** adopted by all Premier and Football League clubs include as a condition of entry to the ground that spectators may not stand in seated areas while play is in progress:
 - *“12. All persons entering the Ground may only occupy the seat allocated to them by their ticket and must not move from any one part of the Ground to another without the express permission or instruction of any steward, officer of the Club and/or any police officer.”*
 - *“13. Nobody may stand in any seating area whilst play is in progress. Persistent standing in seated areas whilst play is in progress is strictly forbidden and may result in ejection from the Ground.”*
2. **Ground management (in most places the club)** is primarily responsible for:
 - the safety of spectators
 - customer care
 - making ‘reasonable adjustments’³² to club policies, procedures, and the physical environment, to provide suitable accommodation for disabled spectators
 - enforcing the ground regulations, including the conditions relating to seated areas detailed above
 - the safety of employees/workers (under the Health and Safety at Work etc Act 1974)

For every match clubs should produce a specific risk assessment. Where that risk assessment identifies that spectators may stand persistently it is for management to produce a plan for addressing the issue that reflects the nature and scale of persistent standing at the ground and the specific ground’s infrastructure characteristics. The plan should first identify and initiate all reasonable steps to get spectators to sit down in accordance with the all-seater licence conditions (including publicising the all-seater requirements from the ground regulations on ticketing) and then seek to manage safety risks arising from those spectators who still choose to stand.

3. While responsibility for the safety of all people present in a ground lies at all times with ground management, at certain sports grounds and for certain events the presence of the **Police** may be required, or requested, to maintain public order and prevent the commission of offences. If there is to be a police presence in or at the sports ground, management should consult with police in advance and draw up a Statement of Intent. This sets out the division of responsibilities and functions and makes clear who will assume responsibility in particular circumstances. Ground management should not, however, rely on the presence of police officers to overcome inadequacies in the safety management operation at a ground.
4. Primary responsibility for certifying ground capacities and imposing terms and conditions on safety matters rests with **local authorities** in the context of their safety certification role at sports grounds. Ground management are responsible for the safety of spectators as well as their employees. If the **local authority** considers ‘reasonable safety at the ground’ is being compromised they have the statutory responsibility to take appropriate enforcement action under the provisions of the Safety of Sports Grounds Act 1975.
5. The **Sports Grounds Safety Authority (SGSA)** is the UK Government’s expert body of sports ground safety. The SGSA’s core statutory functions are set out in the Football

³² Under the terms of the [Equality Act 2010](#).



Spectators Act 1989 and the Sports Grounds Safety Authority Act 2011. These include an important statutory responsibility to regulate local authorities in their oversight of safety at the 92 football clubs in the Premier League and the English Football League, and at Wembley and the Principality Stadium. The SGSA also issues licences to those 94 stadia through which the Government's all-seater policy is implemented and enforced.

6. The causes and potential impact of persistent standing in seated areas, including the safety, crowd management, and customer care issues arising from such spectator behaviour, are detailed at [Annex E](#).
7. **The football governing bodies (Football Association, Premier League and English Football League)** are responsible for drawing up and enforcing the rules and regulations of football, including those relating to ticketing and the number of places to be provided for visiting supporters. This offers opportunities for encouraging good behaviour and discouraging supporters who misbehave, for instance by allowing clubs to reassign accommodation. However, the scope for such action is limited. While the football governing bodies can impose certain penalties, it might be difficult to relate these to the specific problem of standing spectators. The football governing bodies are also in a position to co-ordinate initiatives by and on behalf of the clubs. These can include communicating with supporters directly and through publicity programmes and encouraging clubs to take a consistent approach to supporters who persist in standing.
8. **Spectators, whether home or away supporters**, are expected under Section 8 of the Health and Safety at Work etc. Act 1974 not to "intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare in pursuance of the relevant statutory provisions." In the context of a football ground at which designated football matches are played, this means spectators are expected not to misuse or otherwise interfere with the infrastructure provided for their safety. They are also expected, as a condition of their admittance, to comply with the ground regulations, and are at risk of being ejected if they fail to do so.



Annex C: SGSA enforcement approach flow diagrams

Figure 1: All-seater policy: SGSA enforcement approach for the 2023/24 season – overview

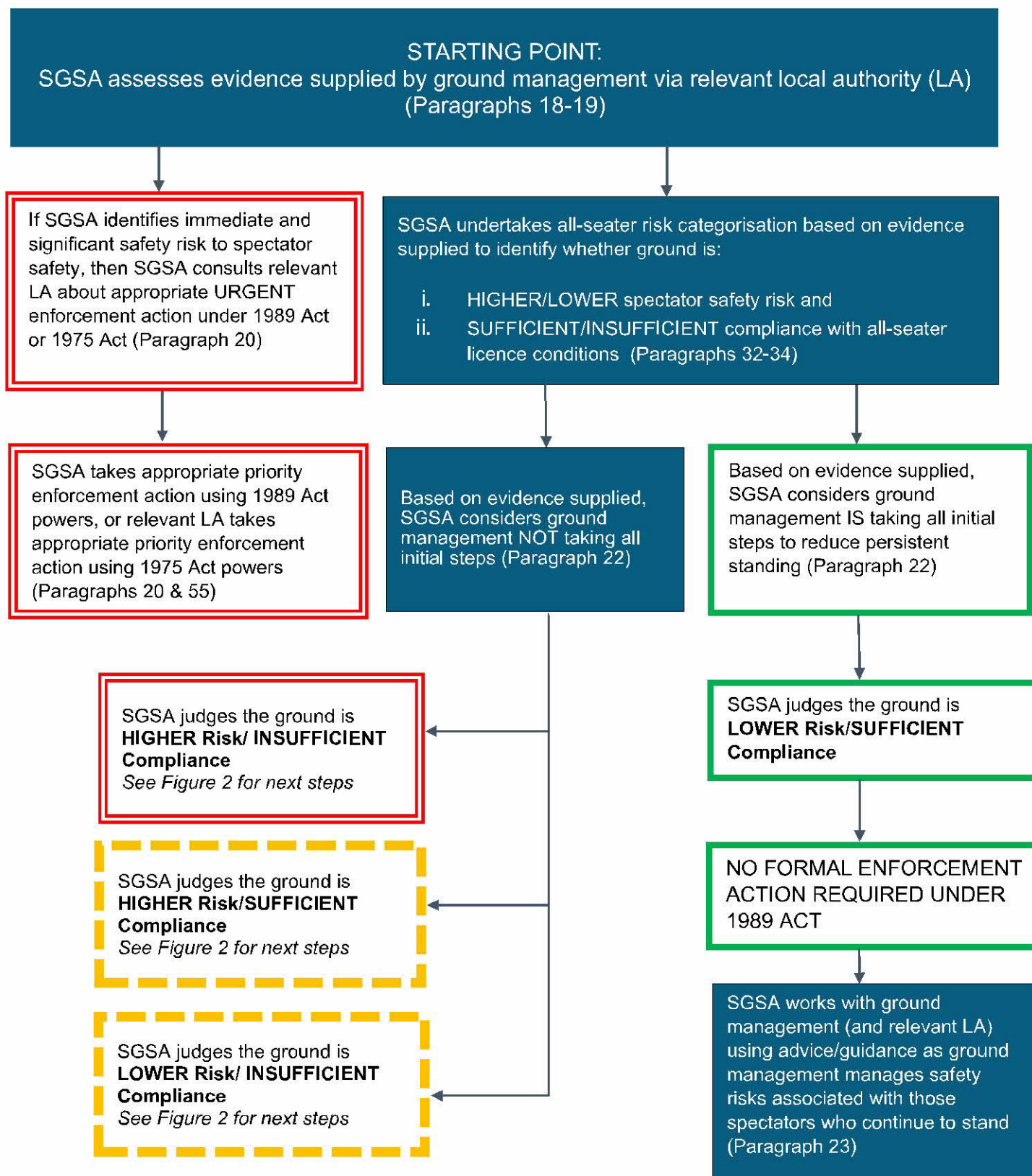




Figure 2: All-seater policy: SGSA enforcement approach for the 2023/24 season – detail

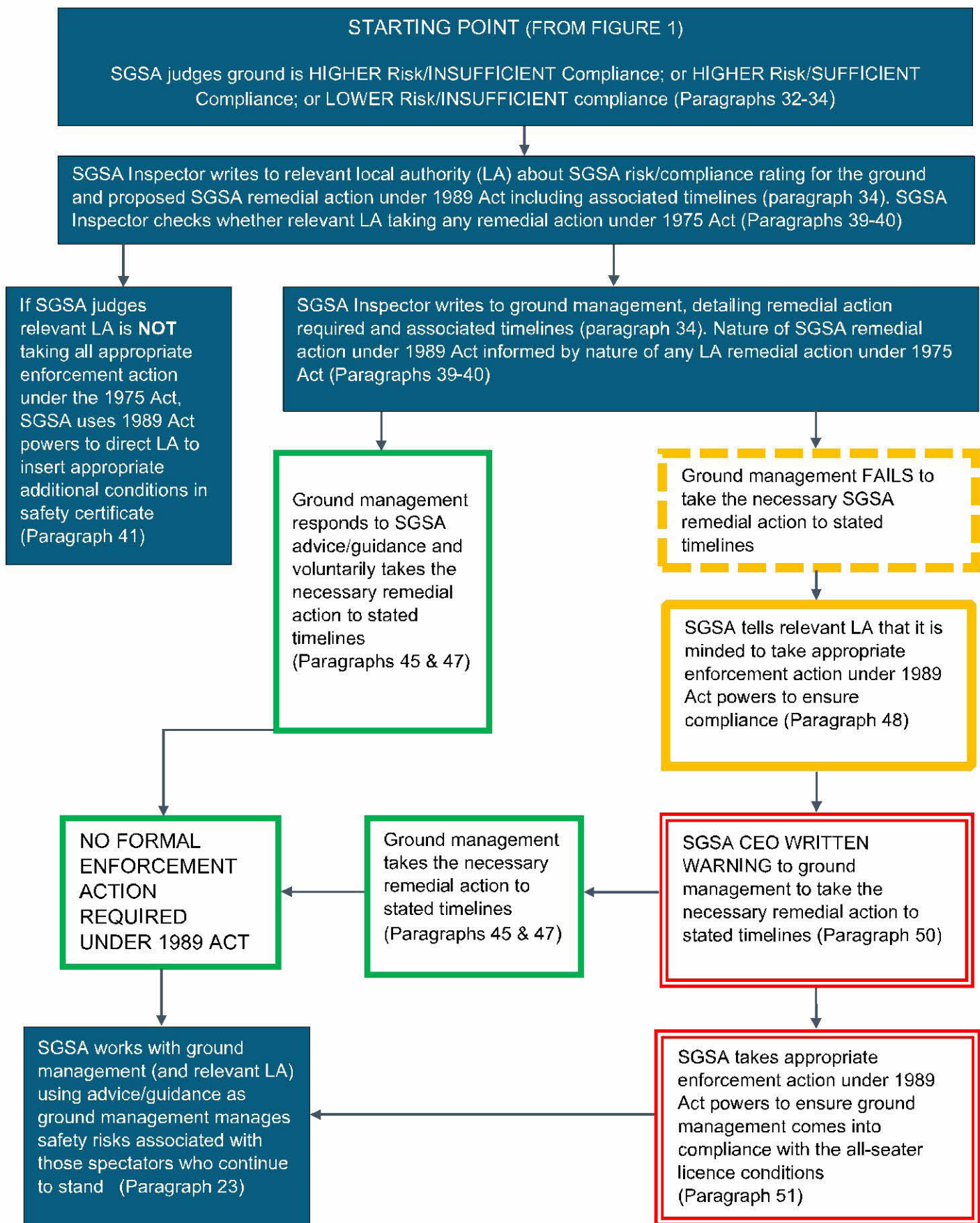




Figure 3: All-seater policy: SGSA enforcement approach for the 2023/24 season – sliding scale of enforcement options where evidence suggests ongoing non-compliance with all-seater conditions (under 1989 Act powers unless otherwise stated)

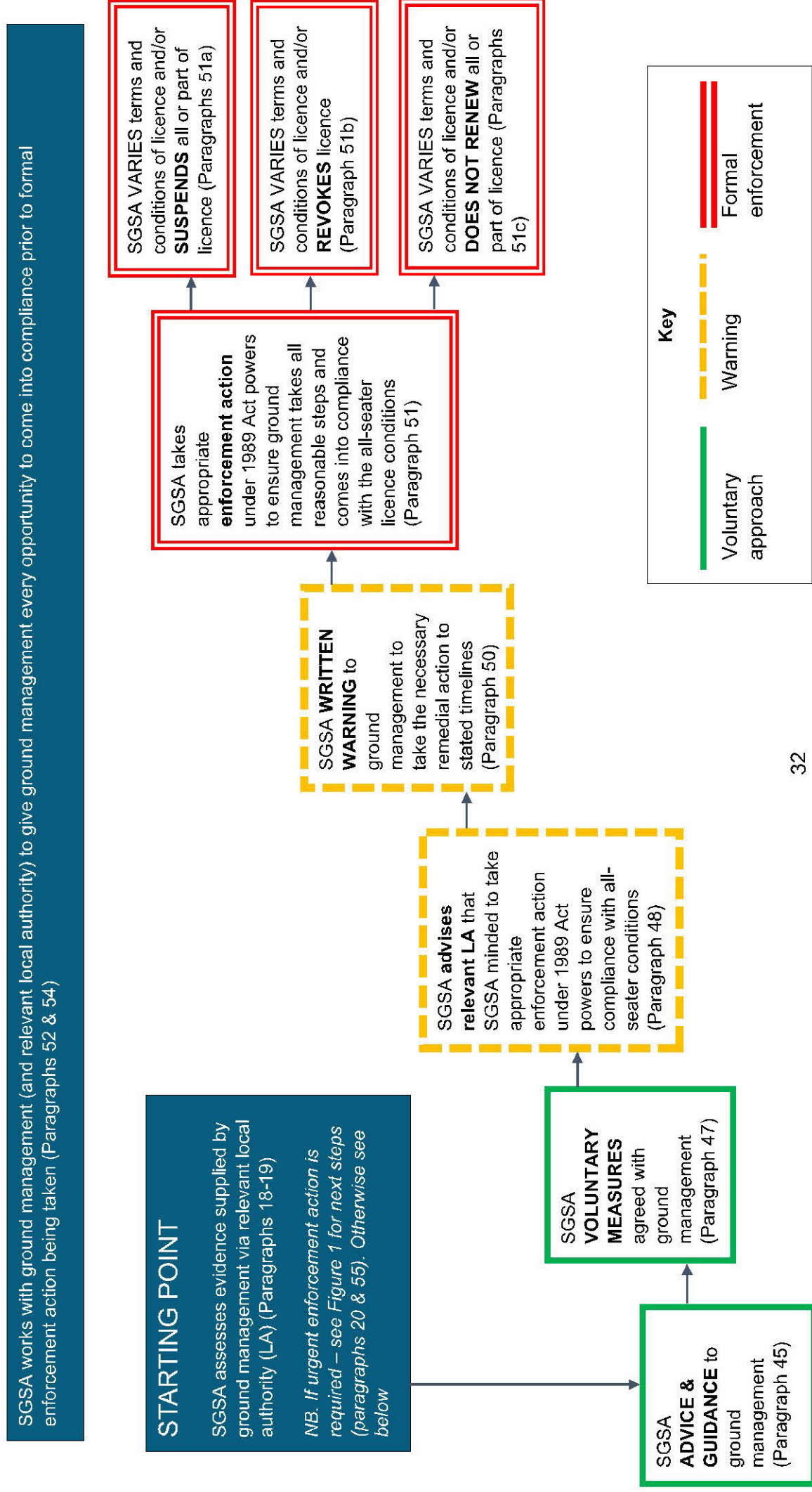
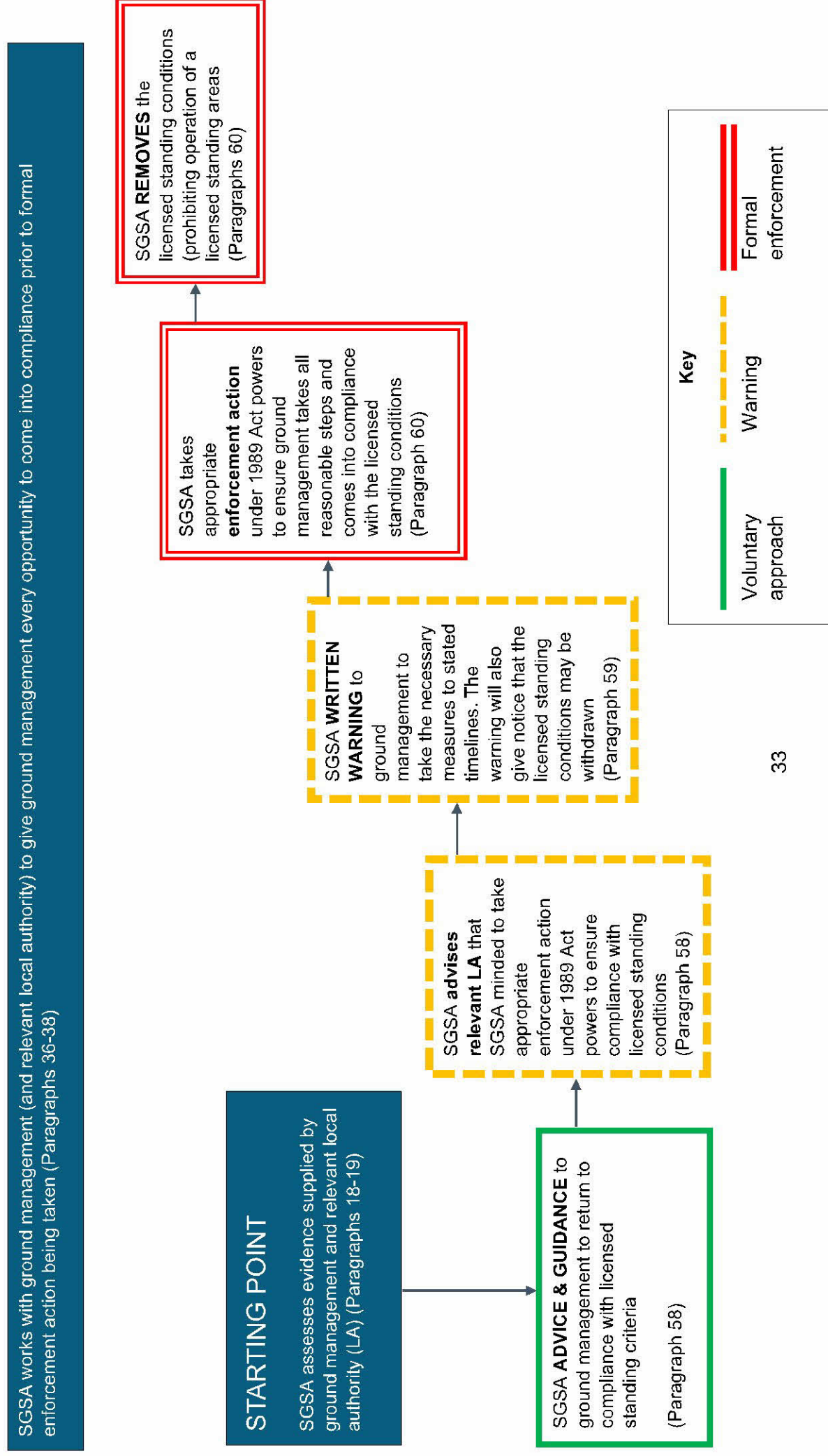




Figure 4: Licensed standing areas: SGSA enforcement approach for the 2023/24 season – sliding scale of enforcement options where evidence suggests ongoing non-compliance with all-seater conditions (under 1989 Act powers unless otherwise stated)





Annex D: Potential enforcement action by local authorities under the Safety of Sports Grounds Act 1975

Where local authorities are not satisfied that any management plans provide for the reasonable safety of spectators, they can consider limiting capacity to an appropriate level. Instances where action may be required by local authorities include:

- a. If the gradient of the seating deck is above 25 degrees, persistent standing could be regarded as unsafe by definition (on the basis that the Green Guide does not allow standing in areas with rakes exceeding that). The local authority may require any such seating deck area where spectators are standing to be taken out of use on safety grounds. Additionally, persistent standing on seating decks with gradients below 25 degrees may also be unsafe. The local authority will consider each case on its individual merits and take action appropriately.
- b. If the front barrier of an elevated seating deck is not to crush barrier height and strength, persistent standing presents increased safety risks. The local authority may require the ground management to take at least the front row, and preferably the front two rows, out of use on safety grounds.
- c. Where significant numbers of spectators are standing, the local authority may reduce the holding capacity of the area concerned by allocating each spectator a width of 550mm, rather than the 460mm of the typical seating configuration, to prevent them spilling out into gangways. Ground management and supporters should be aware that this alone would result in one in every six seats in the area concerned being taken out of use.
- d. In addition, if the ground management is failing to manage the crowd, the local authority may reduce the (S) factor³³ for the area concerned to whatever level is necessary to ensure the reasonable safety of spectators. Where the area concerned is occupied by visiting supporters, the reduction could apply to all matches or to those that have been identified as likely to present a particular risk.
- e. As an alternative to the previous option, the local authority could also require the closure of particular rows (radial or lateral) or could limit the use of certain areas to particular groups of spectators (for instance, home supporters or disabled spectators)³⁴. The progressive closure of rows from the front would effectively deal with the main transgressors and warn those behind that they may also lose their places for subsequent matches if they do not sit down.
- f. If the ground management fails to take measures to educate and persuade supporters that they must sit down, with a consequent impact on safety, the local authority may reduce the (S) factor and therefore the ground capacity.

³³ In order to calculate the holding capacity of a sports ground, each part of the ground's viewing accommodation should be assessed according to the quality of the safety management in that area. This assessment is known as the (S) factor. Further information on the (S) factor can be found in Section 2.4 of the sixth edition of the Green Guide.

³⁴ Closure of particular rows may contain seats for disabled spectators, such as identified easy access and amenity seats. In such circumstances, the seats for disabled spectators should remain operational, subject to being adequately stewarded.



- g. If the rake is so shallow that it positively encourages spectators to stand, the local authority may reduce the (P) factor³⁵ accordingly. In appropriate cases, the SGSA could consider whether to impose a licence condition limiting the use of such areas.

It is extremely important that local authorities act reasonably and follow due process if seeking to adopt any of the measures above. It is particularly important to be able to demonstrate a proportionate and transparent approach if taking action which could result in reduced capacities.

³⁵ In order to calculate the holding capacity of a sports ground, each part of the ground's viewing accommodation should be assessed according to its physical condition. This assessment is known as the (P) factor. Further information on the (P) factor can be found in Section 2.4 of the sixth edition of the Green Guide.



Annex E: Causes and potential impact of standing in seated areas

It is recognised that spectators may stand persistently for different reasons, some involuntary, some deliberate, for example:

- a. they stand because inadequate sightlines obstruct their view or the seats are uncomfortable;
- b. they cannot see because other spectators are standing;
- c. they see supporters of the other team standing;
- d. they prefer to stand; or
- e. they are demonstrating their visible/vocal support for their team

Seated areas do not contain any of the design and safety features found on terraces designed to accommodate standing spectators. Standing in seated areas may raise issues in respect of one or more of the following: safety, crowd management and customer care.

Safety

Spectators standing in seated areas may create a number of hazards both for themselves and for those around them, for example:

- a. Spectators standing in these circumstances are not protected by any crush barriers. Instead they have a seat back in front of their legs. In the event of an incident, there would be nothing to prevent them from falling forwards onto the heads and upper bodies of the spectators in front. The falling spectators could themselves incur lower limb injuries from the seats. The risk is exacerbated if spectators stand on the seats themselves.
- b. The risk associated with such falls, and the likelihood of a cascading effect, increase along with the gradient of viewing accommodation. The Green Guide considers areas of conventional terracing with gradients in excess of 25 degrees to be potentially hazardous and as such should be avoided. This fact is supported by recent research carried out by CFE Research. However Green Guide compliant seating accommodation, including seats incorporating barriers or seats with independent barriers, is permitted to a maximum gradient of 35 degrees.
- c. A further significant safety hazard arises if spectators stand on an upper or elevated tier. The front barrier or parapet in front of the seated spectators will normally be at a height of 800mm, rising to 1100mm at the foot of each gangway. These barrier heights assume seated spectators. The Green Guide recommends that 800mm is sufficiently high to protect spectators entering and leaving but may not prevent a standing spectator from toppling over the barrier and into the crowd below. Raising the barrier would in many cases create a restricted view and might even encourage spectators to stand. An alternative, which has been adopted at some grounds, is to increase the height incorporating the use of transparent materials e.g. toughened glass. Another ground has sought to reduce the risk by installing a horizontal barrier extending outwards from the parapet wall.
- d. A seated area built to the minimum dimensions recommended by the Green Guide can accommodate 31 seated spectators per 10m² although it is accepted that this number may be slightly higher in older stadia conforming to previous guidance. If spectators have migrated and are not occupying their allocated positions, the density is likely to be higher still. It could even come close to the maximum of 47 persons per 10m² permitted in a standing area that is fully equipped with crush barriers.



- e. Moreover, spectators standing side by side will, if they can, tend to occupy a greater lateral space (typically 550mm per person) than those who remain seated (typically 460mm). If the stand is full, standing spectators are likely to spill out into the gangways and vomitories, which become blocked. This not only impedes the safe circulation and exit of spectators; it also makes it difficult for stewards and first aid staff to undertake their safety duties. Keeping gangways clear is a fundamental safety requirement.
- f. Spectators standing in radial gangways are, moreover, the most prone to falling, both during moments of excitement and when others are pushing their way through. The SGSA is aware of incidents where spectators were injured by other spectators falling down the gangways in which they were standing. It should be remembered that gangways are unlikely to have handrails and may have a significant number of risers permitted in one consecutive flight.
- g. Spectators purchase a seat in the reasonable expectation that they will be able to see the match. If those in front are standing, smaller spectators, in particular children, may be unable to see unless they stand on the seat. This constitutes a significant safety hazard.

Crowd management

Standing in seated areas can have a number of potentially serious consequences, for example:

- a. It is important for ground management and stewards to be able to secure the co-operation of spectators on a match day. While there is no automatic correlation between standing in seated areas and misbehaviour, there is evidence that some groups of standing spectators regularly adopt a hostile attitude to stewards and to the authorities generally. This can make it harder to identify individual offenders.
- b. Even where this does not lead to misbehaviour, standing spectators may not comply with requests (in particular, to keep the gangways and exits clear – see above) that may be for their own safety.
- c. Standing spectators are less static, less identifiable as individuals, and less likely to make eye contact with stewards than seated spectators. Consequently, standing spectators present additional challenges when stewards seek to give instructions to them.

Customer care issues

These are primarily matters of concern for football ground management and the football authorities, who recognise that standing in seated areas can have an impact on the customer experience and customer care, for example:

- a. Once the spectators at the front of a seating deck stand, those behind them have no alternative but to do likewise, whether they wish to or not. Those who are unable to stand for prolonged periods, or who prefer not to are likely to suffer a significant loss of enjoyment. They cannot remedy this themselves.
- b. Spectators who do not wish to stand may feel threatened and intimidated by those who do. The SGSA is aware of spectators being assaulted when they asked those standing to sit down.
- c. Over the past 20 years, there have been significant increases in the number of women, children and older people attending matches. If they are prevented from seeing or



enjoying matches in popular areas, they may choose to stop coming rather than move to other areas, and hence may be lost to the game, and reduce the diversity of spectators to the game which has grown in recent years.

- d. Disabled spectators, including but not only wheelchair users, cannot satisfactorily be accommodated among, or in many cases behind, standing spectators. If spectators stand in seated areas, they may prevent ground management from making 'reasonable adjustments' to club policies, procedures and the physical environment to provide suitable accommodation in all parts of the ground for disabled spectators in accordance with the Equality Act 2010.



Annex F: Case studies of three grounds that have installed seats incorporating barriers or independent barriers.

Chelsea FC

To get internal approval for the installation of barriers, Chelsea FC's Match Day Safety Department went through the process of engaging with the club's Operations Team, Finance Team, and the Board.

The main challenges the ground had to face during the planning stage were encountered when dealing with the Architects, Local Authority and during the SGSA consultation period. In addition, the cost of installing the barriers was another hurdle to overcome in the process.

Chelsea FC opted to remove all the seats from the area they were installing barriers. However, this led to some issues during the installation process. The ground was running behind schedule due to the appointed installers not delivering to the agreed time frame. Due to this issue, Chelsea FC played two fixtures with reduced capacity in one of the stands affected by the delay in the delivery and installation of barriers.

On reflection, if the ground were to go through the process again, they would have planned not to remove all the seats in one go, in order to not be so reliant on the installers to deliver the barriers in the agreed time frame. Chelsea FC would advise other grounds to remove the seats and install in blocks.

Wolverhampton Wanderers FC

To get internal approval for the installation of barriers, Wolverhampton Wanderers FC produced a report which was presented to leadership outlining the management challenges of persistent standing, the options available to mitigate the risks, the potential exposure to enforcement action, along with possible consequences such as reduced capacity.

During the approval stage, various barrier options were installed in an unused section of the stadium, including 12 seats incorporating barriers of differing designs, and 8 with independent barriers. Representatives of supporter groups and the local authority visited the stadium to test the options and feedback on the most appropriate version for larger installation.

The planning stage saw the Safety Team appoint Architects to lead on the initial feasibility study. The team found this study useful as it led to identifying that one additional seat per row could be added to one area of the ground. To ensure an increased capacity could be accommodated, the Architect assessed the sightlines, entry/exit capacities, exit network and facilities.

During the installation process the ground encountered issues with the time frame for completion, initially indicated for the start of 2019/20 season. Due to barriers being a new concept and product, the team took the potential risks and delays in manufacturing into



account by choosing to remove one block of seats at a time upon confirmation that all materials were available. As such, the project came to completion in September 2019.

When planning for the installation of barriers, Wolverhampton Wanderers advise other grounds to consult supporters on the type of seat/barrier, to appoint an experienced Architect to analyse the area intended for installation, and to work with a competent contractor to create a realistic programme that factors in potential delays due to the provision of material and labour.

Queens Park Rangers FC

Queens Park Rangers FC has supported the introduction of safe standing for several years and started discussions around installation a decade ago.

To achieve internal approval the club owners were involved in various discussions with supporter groups about the installation of barriers. This became a formal process in 2020, when Queens Park Rangers FC launched their first supporter consultation about the introduction of safe standing. In October 2021 the ground had over 3000 respondents with over 88% agreeing that rail seating was preferred, and 74% of fans voted for one particular area of the stadium to receive rail seating.

The supporter consultations carried out by the club, led to a smooth planning process, particularly the decision to plan where the barriers would be installed. However, to ensure that all supporters in those areas were happy with the plans, the club invited season ticket holders in the affected area to join a Zoom call with the CEO/Head of Operations.

The main challenge was experienced during the planning stage for the physical installation of the barriers. This was due to new seats incorporating barriers being installed, rather than using the existing seats and installing independent barriers.

Despite undertaking pull out testing and load testing, the logistics and delivery of the seats incorporating barriers was the biggest challenge during the installation process. This was due to the seats being manufactured in Turkey and having several delays. Although the club had initial concerns, the seats were installed with no issues.

For other grounds planning to source seats incorporating barriers/ independent barriers from outside of the UK, Queens Park Rangers FC recommend ensuring there is plenty of time left between original delivery date and the installation of barriers. In addition, consultation with supporter groups is key. Queens Park Rangers FC experienced an overwhelming positive response to the installation of barriers due to their efforts in consulting with supporters.