

STANDING IN SEATED AREAS AT FOOTBALL GROUNDS

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**A joint statement by the Sports Grounds Safety Authority, FA Premier League,
Football League, Football Association, Core Cities Group, Football Safety
Officers' Association, and Association of Chief Police Officers**

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Introduction

1. The government's policy in respect of all seated grounds is enforced by way of conditions set out in the licence issued to clubs by the Sports Grounds Safety Authority (SGSA). Where grounds are required to be all seated the SGSA is instructed by the Secretary of State for Culture, Media and Sport to include conditions restricting the admission of spectators to seated accommodation. The 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.

2. In 2002 we published a paper examining the nature and causes of spectators standing in seated areas at Premier and Football League grounds. It concluded that there were a number of safety, crowd management, and customer care issues presented by persistent standing, and that it should be eradicated as far as reasonably practicable. While many of the key findings and possible measures which could be taken identified in the original paper remain valid they have been reviewed and updated and are summarised at Annex A.

General Principles

3. The report also identified a number of general principles relating to the management of persistent standing, which have been reviewed and are updated below:
 - a) It is preferable for standing in seated areas to be addressed primarily through the education, persuasion and positive management of spectators. However, such measures alone have not always achieved the desired results. To the extent that they continue to prove insufficient, they may need to be backed up by more robust action.

 - b) This issue goes beyond safety, although safety is a major concern. It also encompasses customer care, crowd management and behaviour, and the

relationship between clubs and their supporters. As such it cannot be resolved by a single agency but must instead be addressed in the round by the various responsible bodies acting together. The SGSA, the football authorities, the individual clubs and local authorities, and in some cases the police, all have a role to play.

- c) It is important that supporters are engaged in the process where possible and that they understand why the proposed action is both necessary and ultimately for their benefit. A heavy-handed approach that is perceived to penalise the innocent could be counterproductive and might exacerbate the situation. The measures taken should recognise that not all those who stand for prolonged periods do so out of choice. This may be their only means of seeing the game when other spectators around them are standing. Openness and transparency in how such issues are being managed is encouraged.
- d) The measures taken will vary according to the configuration of the ground, the number and type of spectators standing, their location and whether this is a one-off problem or one that lasts all season. The measures should flow from a detailed event specific risk assessment, and should be reasonable and proportionate. While recognising the need for a tailored approach dependent on circumstances, the degree of consistency at a national or strategic level will have an impact on the success of tackling this issue.

Context

- 4. Since the publication of the 2002 report persistent standing continues to be of concern. In 2010 research was commissioned by the Premier League to look at issues arising from standing in seated areas. A summary of the research and the factors the Premier League have recommended clubs should consider is at Annex B.

Responsibility for action

Ground Management

5. The ground management (in most places the club) is responsible for the safety of spectators, for customer care, for providing suitable accommodation for spectators with disabilities and for enforcing the ground regulations. For every match clubs should produce an event specific risk assessment. Where that risk assessment identifies that spectators may stand persistently it is down to management to produce a plan for addressing the issue. These are likely to include measures to educate and persuade supporters, to control the crowd actively and to take firm action against those spectators who do not comply. If the management plan fails to resolve the issue it must be reviewed to identify whether further measures need to be put in place. Although ground management are responsible for the safety of spectators if the local authority consider reasonable spectator safety is being compromised they have the statutory responsibility take appropriate action under the provisions of the Safety of Sports Grounds Act 1975. (see below)

6. In conducting the risk assessment, the ground management should take account of the advice in paragraph 3. 3. e. of the Green Guide, sections 3.2 – 3.4 of Sports Ground and Stadia Guide No. 4 “Safety Management” along with the general guidance on risk assessments issued by the Health and Safety Executive. An example of the format of risk assessment for standing in seated areas is at Annex C.

7. The ground management should also have regard to all the relevant safety, crowd management and other customer care considerations at the particular ground concerned. Annex D to this paper comprises a check list of the main issues to be borne in mind when identifying the hazards and assessing the risks of persistent standing in seated areas. This list does not purport to be exhaustive. It should not constrain the ground management from including any other matters specific to its ground.

Football Authorities

8. The football authorities 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 authorities can impose certain penalties, it might be difficult to relate these to the specific problem of standing spectators.
9. The football authorities 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.
10. It is important that in developing strategies to address persistent standing by visiting supporters that clubs and local authorities are able to access up to date information on the behaviour of those supporters away from home. The Premier and Football League are building databases which identify the extent of persistent standing by both home and away supporters at every game in the Premier League and the Championship, record accident and injury statistics and provide details of management plans adopted by clubs.

Local Authorities

11. The local authorities are responsible for certifying the ground capacities and imposing terms and conditions on safety matters. Where standing in seated areas presents a safety hazard, the local authority should ensure that the club has undertaken the event specific risk assessment, should scrutinize its management plan and identify whether, and if so what, further action should be taken by the club. It may therefore be sensible for the local authority to sit down with the club at the start of the season to identify those visiting clubs whose supporters are likely to stand.
12. The local authority should also monitor the effectiveness of the plan put in place by the club. If the measures taken by the club do not provide for the reasonable

safety of spectators and the club is unable to identify any further action it is able to take, the local authority should review the (S) factor with a view to reducing the capacity to an appropriate level at future matches where such circumstances are anticipated.

The Sports Grounds Safety Authority

13. The Sports Grounds Safety Authority keeps under review the safety certification by the local authorities. It can provide advice and guidance on what practical measures are available and can ensure that the local authorities are adopting a consistent approach. In an extreme case the SGSA has the power to impose conditions in the safety certificate.
14. The SGSA, through its inspectors, will monitor the procedures adopted by the local authority to ensure that it has required and received the club's event specific risk assessment, has properly considered the club's management plan, has implemented any measures it (the local authority) considers to be necessary and reasonable, has kept under review the effectiveness of the club's plans and where there are concerns about the reasonable safety of spectators has taken appropriate action to address this.
15. The SGSA has the power to refuse to licence any seats with a seriously restricted view of the pitch. However, it would have to demonstrate that spectators were regularly and persistently standing because of the restricted view and not for any other reason. The case would need to be made in respect of each row. Hitherto, the SGSA has operated under a voluntary agreement with the clubs. Seats with severely restricted views are not sold; those with lesser restrictions are identified accordingly on the ticket.
16. Refusing to licence particular seats would be a cumbersome and inflexible weapon against spectators standing in seated areas. The licence was not designed for this purpose. Its terms and conditions cannot be amended without formal consultation over a period of several weeks which would preclude the SGSA reacting quickly to changes of circumstance.

Measures

17. The 2002 report identified a number of measures which could be taken by the parties above to prevent or limit standing in seated areas. They are included in Annex A, In addition, there are some practical examples or case studies of how various measures have been implemented and the results at Annex E.

Conclusion

18. Tackling standing in seated areas requires a concerted and consistent approach by all the relevant bodies acting together over time. Wherever possible, the ground management and the football authorities should be given the opportunity to address the issue through education, persuasion and positive crowd management before the local authorities or SGSA take more robust action such as reducing capacities. Where the evidence indicates that such action is necessary to safeguard spectators the local authorities should receive the full and public support of the clubs and of the football authorities. Supporters should be able to expect a clear approach appropriate to the circumstances of the ground and the fixture, within a consistent overall framework. Achieving this will require the collaboration and commitment of ground management and local authorities and the support of the football authorities.

19. All parties involved, including the football authorities, local authorities, the SGSA, clubs and supporters, should continue to work together to support the regulations in place and to ensure all spectators have an enjoyable and safe experience when attending a match.

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 positively prefer to stand; or
- e) they are demonstrating their opposition to the all seated policy

Seated areas do not contain any of the design and safety features found on terraces designed to accommodate a standing audience. Standing in seated areas may raise issues in respect 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 of such falls and the likelihood of a cascading effect increase along with the gradient of the seating deck. Over 200 stands, or parts of stands, in all seated grounds have gradients above the 25⁰ that the Guide to Safety at Sports Grounds (the “Green Guide”) considers safe for any standing accommodation, even where this is equipped with crush barriers to the highest standard. Indeed many seating decks, particularly on upper tiers,

have gradients close to the recommended safety maximum for seating of 34° . Standing in a seated area with a gradient above 25° must by definition be treated as unsafe.

- 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. 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 eg 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 10m^2 . Seated areas with smaller dimensions, of which there are many, can hold a higher number. 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 10m^2 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 very 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) A seated crowd is easier to monitor in the interests of both safety and public order. It is easier for the ground management and police to identify potential problems in advance and respond before they become serious. Known troublemakers can be kept under observation. This becomes harder if spectators are standing.
- b) 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 offending and individual offenders.
- c) Even where this does not lead to misbehaviour, standing spectators may not be in the mood to comply with requests (in particular to keep the gangways and exits clear – see above) that may be for their own safety.

Customer care issues these are primarily matters of concern for football clubs 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 ten 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.
- d) Spectators in wheelchairs cannot satisfactorily be accommodated among, or in many cases behind, standing spectators. If spectators stand in seated areas, they may prevent clubs from providing accommodation for those with such disabilities in all parts of the ground.

Measures

It is important that each of the relevant authorities or bodies involved should identify the precise action that it should take at either local or national level or both, having regard to the circumstances. While recognising the need to tailor measures to local circumstances, supporters may legitimately expect a broadly consistent overarching approach to be adopted at whichever ground they visit.

The measures may include:

- a) Ground management (the clubs) working with both home and travelling supporters in the context of their customer charter to identify why they are standing and how best to address this.
- b) The clubs and the football authorities producing and keeping under review a programme for educating and persuading their supporters at both the national and local level about why they should sit. This should cover safety, crowd management and other customer care issues and explain the likely consequences should spectators continue to stand persistently.
- c) Clubs ensuring 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 should be given this warning in writing.
- d) As with home supporters, clubs may wish to warn their travelling supporters that if they stand in seated areas while attending away matches, they risk losing entitlement to tickets for such matches. Home and visiting clubs should co-operate in this matter to ensure that all supporters are treated reasonably and fairly on this issue.
- e) Clubs using the disability audits required under the Equalities Act to ensure that their supporters with disabilities are not prevented from seeing the pitch by other supporters standing even for short periods in seated areas. Where views are obstructed in this way, the club should take the row or rows concerned out of use. Clubs should ensure that all supporters in the vicinity are aware of these considerations.
- f) Clubs taking 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.

- g) Where management measures have failed in the past and there is good evidence that visiting supporters are likely to stand persistently and compromise reasonable safety, clubs may seek to consider alternative locations for them. On occasions it may be necessary to limit their number or in extreme cases to exclude them altogether. It is recognised that such action would need the approval of the appropriate football authorities, who would expect the clubs plans to have the support of the local authority. In such cases, the club may seek permission from the football authority concerned to offer the empty places to home supporters, subject to the agreement of the local authority and the police and provided that all safety and public order concerns are met. Any requests would be considered by the football authorities on a case by case basis.

It is unlikely that any of the measures identified above will have a consistent long term success in tackling persistent standing if they are adopted in isolation. Educational campaigns which repeat the same message in the same format are likely to have a limited long term impact but where campaigns have been coupled with a proactive approach by the club and local authority greater success has been achieved.

Where local authorities are not satisfied that any management plans provide for the reasonable safety of spectators they should 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^o, 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 area where spectators are standing to be taken out of use on safety grounds.
- 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 club 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. Clubs and their supporters should be aware that this alone would result in one in every six supporters in the area concerned losing their tickets.
- d) In addition, if the club is failing to manage the crowd, the local authority may reduce the S Factor 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). 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 if they did not sit down.
- f) If a club 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.
- g) If the rake is so shallow that it positively encourages spectators to stand, the local authority may reduce the P Factor accordingly. In extreme 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.

Premier League summary of research

The following statement sets out details of research commissioned by the Premier League into the safety issues raised by fans standing in seated areas at football grounds (including in circulation, at moments of excitement and persistently during periods of play).

Background to the commissioning process

The Crowd Dynamics computer simulations of safety threats to spectators when standing in seated areas were undertaken as part of the Premier League's response to the Football Licensing Authority's continuing concern over the apparent failure of attempts to reduce incidents of significant minorities of fans standing during matches. Analysis of the safety threats potentially posed by persistent standing has been unresolved in part because of a lack of data. The absence of serious safety incidents (such as falls leading to breaks, concussions etc.) has meant that real world studies are of limited use – except to say that over a long period of time and thousands of matches, persistent standing in seated areas has not generated any serious incidents. The safety issue is of course separate from the other reasons for seeking to reduce persistent standing, principally customer care concerns such as comfort, the ability to see the game properly and the discriminatory impact on women, children and people with disabilities and crowd management issues such as identifying trouble-makers.

Given the lack of data and to test the circumstances of extreme risks to crowd safety (ie those types of incidents which are rare in occurrence and therefore for which there are few empirical data but which could raise the possibility of significant harm to substantial numbers of people) the Premier League commissioned Crowd Dynamics (CD) , a consultancy specialising in crowd behaviour, to conduct computer simulations of crowd movements in seated areas which could lead to threats to spectator safety of fans, including a particular focus on risks associated with persistent standing. Specifically, CD were asked to examine what the factors were that could lead to a major progressive crowd collapse in a seated area of a football ground in which fans were standing persistently and to examine how likely it was that these factors could cause such a crowd collapse. The intention was to apply the

lessons learnt from computer modelling to the real world circumstances of Premier League stadia. CD were also asked to provide some insight into how Clubs could encourage fans to sit. Persuading fans to sit remains a constant struggle for stewards and Clubs were particularly keen to draw on CD's expertise in crowd psychology, but CD did not complete this part of the commission and the work remains to be undertaken.

Information derived from the computer simulations

The lack of real world data meant that CD used computer modelling techniques and simulation in order to test a series of assumptions and scenarios, inevitably simplified versions of what happens in an actual stadium on matchday. The model was able to generate a progressive collapse under certain circumstances, principally where a significant force could be applied to the backs of people standing who then toppled forward, unrestrained by barriers or seatbacks into those standing in the seats in front of them.

The model also looked at how the collapse could be contained or exacerbated by changes in the variables used in the simulations. These included rake of stand, the presence of barriers and circulation space, the height, width and depth of seats, the use of empty rows and columns of seats but did not include tests of stewarding methods or other variables not directly related to the built environment itself. The computer model also used simplified assumptions about individual behaviour – so spectators were assumed to fall forward and not sideways, backwards or down, and were assumed not to reach for support. While initially prompted by concerns over persistent standing the computer simulations also included the safety risks of crowd collapses at times of crowd circulation (pre-match, half-time, end of match) and standing at moments of excitement, such as craning to view at corners and free-kicks, fouls and cautions, goal-mouth incidents and when goals are scored. The precise nature of risk varied to a limited extent according to the different types of standing in seated area.

Applying the lessons learnt from the simulations

Those circumstances which were tested and which suggested an increase in risk then formed the basis of a series of factors for consideration sent to safety officers to ascertain whether any or all of those circumstances existed in any of our grounds and if so whether they were mitigated by stewarding or other crowd management techniques. These factors were circulated to Club Safety Officers in a Guidance Note (and summarised below for convenience). In the event the Safety Officers were able to reassure us that the combination of circumstances as modelled in the extreme cases did not occur in their stadia and that current standards and stewarding methods already identified and dealt with the threats suggested by the modelling.

Clubs continue to work to and to apply the current standards and to manage the issue as CD suggested, for example maintaining empty seats adjacent to radial gangways, communicating a consistent message to fans and monitoring areas where persistent standing is anticipated.

Factors for Consideration

DESIGN

- Consideration of avoiding areas where **steep** rake applies
- Assessment of front barrier heights
- Application of 'S' factors to maintain 'fire breaks' (empty rows of seats particularly to the front of upper tiers)
- Application of 'S' factors to maintain empty seats adjacent to radial gangways (standing spectators require more space than seated)
- Introduction of strategically placed barriers to seated areas
- Revision of seat and spacing dimensions

INFORMATION

- Use of positive communication to encourage sitting (sit down and enjoy the show)

- Development of NLP (Neuro Linguistic Programming) options in support of a communication strategy
- Consistency of message
- Good rapport between safety officials and spectators
- Accurate, timely and relevant intelligence

MANAGEMENT

- Crowd Safety Risk Assessment
- Management policies on persistent standing:
- Clear ownership of persistent standing 'risk'
- Monitoring of areas where persistent standing is anticipated
- Focus on vulnerable areas/spectators in particular (although tolerating standing in other areas can lead to the impression that it is acceptable to stand)
- Early interventions/attention to front rows (if standing, those behind will also tend to stand in order to see plus such interventions will be seen by those behind)
- Education of safety personnel regarding risks from progressive crowd collapse
- Education of spectators

Standing in seated areas risk assessment

Stand	<i>Insert stand name</i>	Date of Event	<i>Insert date of event</i>	Match / Event S factor	<i>Insert event details</i>	Stand angle of rake Level / section of stand	<i>In degrees Lower or upper etc</i>
Stand / section capacity	<i>Calculated safe capacity</i>	P factor				Anticipated attendance	<i>For the event in the stand</i>
Date of assessment		Review date		Assessed by	<i>Assessor's name</i>		

Section 1

A	B	C	D	E	F
Hazard	Who will be harmed?	Risk / Likelihood	Severity of impact	Existing controls	Additional controls
<i>Identify here the hazards associated with the practice of persistently standing in the seated accommodation. Hazard #1</i>	<i>Identify who may be harmed by the hazard in column A</i>	<i>Identify the likelihood of the identified hazard in column A occurring</i>	<i>Identify the impact severity of the hazard in column A occurring</i>	<i>Record here those existing controls you have in place to limit the likelihood and / or impact of the hazard in column A</i>	<i>Record here any additional measures you feel are required in addition to those identified in column E to limit the likelihood and /or impact of the hazard in column A</i>
<i>Another hazard #2</i>	<i>As above</i>	<i>As above</i>	<i>As above</i>	<i>Another set of controls for the second hazard.</i>	<i>Another set of additional measures for the second hazard</i>
<i>Another hazard #3</i>					

References and research material considered in the risk assessment.

Eg

- *Previous post match reports and other historical data*
- *Previous risk assessments*

Section 2

Post event assessment review:

The following questions may be considered by the reviewer

1. Were all the existing control measures effective? **Yes / No**
2. What existing control measures were not effective? (identify here those control measures in column E that were not effective. Where the existing controls did not work or have any impact they should be withdrawn and new controls implemented and recorded in column E.)
3. Were all the additional control measures effective? **Yes / No**
4. What additional control measures were effective (Identify here the control measures in column F that were effective and move them to column E to become an existing control measure)
5. What additional control measures were not effective? (identify here those control measures in column F that were not effective, withdraw them from the additional control measures and where relevant identify new additional controls to be implemented for the next fixture / event where persistent standing in seated areas is to be expected)

Hazard Identification and Risk Assessment Considerations

Have you identified the underlying reasons why spectators stand persistently?

- Inadequate sightlines?
- An obstructed view?
- Uncomfortable seating?
- Other standing spectators obstructing their view?
- That is their preference?
- To demonstrate their opposition to any club policy?
- As part of an organised campaign for the return of standing terraces?

Have you considered the following hazards (including who might be harmed and how)?

- The gradient of the seating deck?
- In an upper or elevated tier, the height of the front barrier or parapet in front of seated rows and gangways?
- Spectators failing to occupy the seats allocated to them and / or migrating into seated areas not allocated to them, either from choice or to avoid uncovered or partially covered seating?
- The spectator density exceeding the number of seats in any area?
- Spectators obstructing gangways, vomitories and other circulation routes?
- Standing spectators acting in an uncontrolled manner, in particular in gangways?
- Standing spectators behaving aggressively or unpleasantly, thereby causing offence to others around them?

Have you evaluated the following risks?

- Spectators falling onto or between seats?
- Spectators falling down gangways?
- Spectators falling from elevated seating decks?
- Spectators having other spectators fall against or on top of them?
- The loss of enjoyment for spectators who have to stand involuntarily?

- The fear of threat or intimidation faced by spectators who don't wish to stand?
- The inability of children and people of small stature to see the game?
- The inability of persons with disabilities to see the game?
- The difficulty in monitoring the safety of standing spectators?
- The difficulty in identifying troublemakers in the event of any crowd trouble?
- Crowd hostility towards the stewards and / or the police over the enforcement of ground regulations?
- The greater difficulty of enforcing the football offences legislation, particularly against racist or obscene behaviour and the throwing of missiles?

Have you considered the following in your assessment of the risks (including whether existing precautions are adequate or whether more could be done)?

- Injuries from slips / or falls due to uncontrolled movement on seating decks?
- Injuries from falls down gangways?
- Spectators suffering harm because first aiders or stewards cannot get to them or because they are unable to leave when they wish?
- Spectators staying away because of poor customer care or bad behaviour?
- A prosecution by the local authority's trading standards department or a civil action by spectators under consumer protection legislation?
- Legal action under the Disability Discrimination Act 1995?
- Antisocial behaviour by standing spectators?
- Disorder by standing spectators?

Have you included the following measurement indicators in recording your risk assessment?

- General crowd behavioural patterns?
- Records of crowd-related incidents?
- Records of spectator injuries?
- Records of spectator complaints?

When did you last review, and if necessary revise your risk assessment?

Case Study 1 Education and Enforcement – a dual approach

What was the situation?

During a successful promotion chasing season a Championship club observed increased levels of persistent standing in one of their stands.

During the close season the club received a letter from the local authority expressing concern at the extent of persistent standing. The letter reminded the club that the gradient of the stand exceeded 25° and that the Green Guide advised that even within purpose built standing terraces with appropriate barriers standing should be considered as unsafe at gradients above 25°. The local authority required the club to review their policy and control methods in respect of persistent standing and to submit an action plan to reduce persistent standing. The local authority advised the club that if by the start of the 3rd home game of the season the level of standing was not reduced to one at which individuals persistently standing could be dealt with independently they would expect progressive removal of rows of seating at the front of the stand starting with the first persistently standing row.

What did the club do?

The club's initial response to the problem had been to launch a campaign which aimed to increase awareness amongst their supporters of the persistent standing issues. That campaign included:

- Programme coverage
- Poster campaign
- Publicity campaign in local newspapers and radio
- PA announcements at games and communication via match day stewards
- Briefing and debating the issue at the Fans Parliament meetings
- Publication of the minutes of Fans Parliament meetings where the issue has been discussed and the publication of those minutes on unofficial fan message boards

Despite the clubs hope that the extensive “educational” campaign would ultimately lead to supporters understanding the need to voluntarily remain seated this did not happen. Towards the end of the season there were games where all 5,000 plus supporters in the stand were standing and the clubs were receiving complaints from fans, most notably the elderly or those with children, who wished to remain seated but would see little or nothing of the match if they did so.

In response to the local authorities request for action the club wrote to every season ticket holder in the stand in question, enclosing a copy of the letter the club had received from the local authority, explaining the consequences for the club if they continued to stand. The club purchased an additional CCTV camera which was to be used to continually scan the supporters in the stand where persistent standing was a problem with a view to identifying individuals who stood persistently in order that action could be taken to ban them from the ground. In the letter to the season ticket holders the club made it clear that it would be using the CCTV in this way. In the same way as the club wrote to their season ticket holders anyone purchasing a match day ticket for the stand are sent a flyer with their ticket which contains the same message.

An early lesson the club learned was the necessity of only using equipment which could produce high quality images of individuals. A secondary lesson was that the introduction of an access control system greatly facilitated the withdrawal of tickets from supporters identified as persistently standing.

Although stewards continue to offer general warning to spectators about the consequences of standing the club no written warnings are given in advance of withdrawing their access. The club feel the publicity they have given, and continue to give in a range of media including facebook and twitter, to their intended approach to those who persistently stand is sufficient to allow it to withdraw access to anyone it identifies as persistently standing without any written warning.

What was the impact?

This approach has not totally eliminated persistent standing but has reduced it by more than 80% and to a level where the local authority has not considered it necessary to impose any reductions in capacity.

With such high levels of persistent standing there is a significant risk of spectators blocking gangways. The traditional way of reducing that risk is to remove the last two seats in each row from sale. As the stand in question had an 85% occupancy by season ticket holders relocating season ticket holders to different seats would have created significant problems. The club therefore adopted an alternative approach of employing an additional two stewards for each gangway whose sole job was to patrol the gangways to keep them clear of spectators. This approach has proved successful.

Case Study 2 Putting customers first and encouraging compliance

What was the situation?

A club saw the opportunity of a move to a new 22,500 capacity stadium as a chance to make a change. At its old ground it experienced problems of persistent standing by both home and away supporters

The club wanted to produce a ground and safety management operation that aimed to make each spectator day an event not just a match and one which sought to put customer service and quality at the forefront of all plans. It decided that seating, for both home and away supporters, would not be to the minimum standard permitted by the Green Guide but would be quality padded seats with ample leg room and excellent sightlines which would encourage spectators to sit. The club's staff would not assume that supporters would misbehave but would treat supporters in the way they would themselves wish to be treated. Staff would be friendly and helpful and treat supporters in respect. Spectators were not only made aware of what the club was offering them but also the level of behaviour the club expected in return.

The quality of what the club was offering not only attracted increased support but also one that was more diverse. As a consequence the home areas of the ground were sold in their entirety to season ticket holders. While not seeking to condone standing in any areas of the new ground the club took a decision that while there should be zero tolerance of standing in some parts of the ground, for example in the stand that housed the family section, there would be others where there would be greater tolerance but where the club would work through the stewards to eradicate it.

What did ground management do?

Before any spectator could buy a season ticket for any part of the ground they were required to attend a presentation which included the behaviour that the club would expect of supporters in particular areas. It was made clear to anyone purchasing a ticket for those areas where there was to be zero tolerance of persistent standing that if they stood they could expect their ticket to be withdrawn. Such an approach was made easier by the fact the stadium was access controlled and all home areas

were sold to season ticket holders. Where the club has denied access as a result of persistent standing there has been little sympathy for the barred individual from other supporters. The general view being that we were all told the levels of behaviour the club expected.

To improve the safety in the upper tier of the ground the 800mm barrier in front of the front row of seats has effectively been increased to 1100 mm by the addition of a toughened glass barrier on top of the wall. The glass barrier does not impede sightlines nor has it encouraged spectators to stand.

The quality of the spectator accommodation offered to the visiting supporters is of the same high quality as that offered to the home supporters. To make the visiting supporters “feel at home” lighting is used to dress the away section in the visiting team’s colours, the beer and refreshments available reflect what is popular at the visiting teams ground the screens show action from the visiting teams matches.

What was the impact?

Although the approach adopted by the club has not totally eliminated persistent standing it has contained it to one small manageable area of the ground and to a small group of around 250 spectators.

In terms of the visiting areas, the club feel that their approach of making visiting spectators feel like valued customers has led to a general improvement in behaviour from that experienced in the old ground. In so far as persistent standing is concerned those clubs whose supporters stand wherever they go have continued to stand at the new ground but on the whole those spectators that stand at some grounds but not others have generally tended to sit.

Case Study 3 A multi-agency approach

What was the situation?

For several seasons the Premiership club had been unable to sell the entire capacity of the grounds away section to the supporters of certain teams, as due to their persistent standing the local authority had imposed on the club a varying number of seat kills to address the problem that if a row of spectators stood then the additional space required by a standing person forces them to spill out into the radial gangways and block free passage along those gangways.

The number of kills varied between the two end seats of every row adjacent to a radial gangway and above every vomitory, or to one seat at the end of every row adjacent to a radial gangway. The revenue lost due to these seats being removed from sale varied according to the category of match, the number of seat kills imposed and the level of occupancy of the away allocation, but in some cases exceeded £40,000 a match.

Additionally the two front rows in the upper section had for several seasons been removed from sale and covered to address the issue of persistent standing and the possibility of supporters falling from the upper tier.

What did ground management do?

In order to reduce the loss of revenue the club sought to address the concerns of the local authority by introducing control measures to prevent encroachment onto gangways and reduce persistent standing. The club sought to adopt a dual approach of an education / communication strategy coupled with enforcement action if necessary.

The education / communication strategy was intended to ensure that visiting supporters would be aware of how they would be welcomed and that their patronage would be welcomed while making it clear that their behaviour would have to be modified if they wished to ensure that the maximum number of seats would be available to their club in future seasons. It included:

- Letters to home supporters who persistently stood in their own areas of the stadium asking them to sit down and thereby assist the club in dealing with the away supporters.
- Letters to the visiting clubs informing them of the intention to value and welcome the visiting fans and to allow them the maximum number of seats possible. The letter will also stated that in return the expectation would be that their supporters would sit down and pointed out the consequence of losing more seats if this did not happen.
- Leaflet with every away ticket which set out the proposed approach.
- Letters of consultation to supporters groups, which included the offer of meetings to explain and set out the proposals, to ensure that the visitors knew what was not acceptable and the reasons behind the club's initiative.
- Providing kiosk staff with caps and shirts supplied by the away club in the colours of the visiting team.
- The use of stewards from the visiting club.
- Signage to welcome the visitors.
- Concourse TV showing highlights from previous matches involving the visitors and to reinforce the 'remain seated' initiative.
- Increased refreshment provision by the use of hawkers.
- Information on home and the visiting clubs websites
- Extra training in customer support for stewards
- Focused briefing for stewards and front of house staff in visitors areas.
- Support from the Premiership

The enforcement strategy included:

- Extra stewards and police in the visiting section with the remit of striking the balance between extending a welcome and enforcement.
- Use of barriers outside the visiting turnstiles for a more controlled and less intrusive access.(specifically to deter the practice of two supporters pushing through at the same time)
- The enforcement of ground regulations by inspecting tickets and ensuring each supporter sat in the seat allocated to the ticket.

- Robust management of seating .
- Positioning in the first two rows of the upper section a number of stewards to deter spectators standing in such an exposed area.
- A zero tolerance of spectators standing in gangways.

What was the impact?

A review of the initiative after the first three matches for which it had been deployed considered it to be a success. At all three matches all, or most, of the gangways were kept clear. The compliance of supporters varied between the three games with a total of 17 supporters ejected for non-compliance with steward directions, 15 on the first match and none on the final match. It was also noted in the final match that visitors that had stood to a man on previous visits now had areas of supporters who remained seated. Since the initial three match trial of the strategy it has been adopted at two further games, where again gangways remained clear throughout the match and there was a significant increase in the number of away supporters who remained seated.

The club were surprised and pleased at how successful the initiative was. Although the initiative was expensive, in that extra police may have to be employed, and labour intensive for all concerned as well as particularly demanding of stewards, the club consider it financially justifiable as the local authority has agreed to increase the capacity for any match where the initiative is to be repeated. However, the initiative could not succeed without the cooperation of the away club who in addition to providing caps and shirts for kiosk staff, issuing leaflets to all those purchasing tickets also controlled the sale of front upper seats to selected persons.