

Guide to Safety Certification

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1 INTRODUCTION

1.1 Purpose of the guidance

This guidance updates and supersedes previous guidance on the safety certification of sports grounds issued by the Football Licensing Authority (“FLA”) and the Sports Grounds Safety Authority (SGSA). Although most examples used in this guide relate to football stadia where designated football matches are played, the guide will also be of value to all local authorities that issue safety certificates to sports grounds under the Safety of Sports Grounds Act 1975 (“the 1975 Act”) or the Fire Safety and Safety of Places of Sport Act 1987 (“the 1987 Act”).

It is intended that it will assist a local authority to identify, apply and enforce the terms and conditions that are prescribed in the safety certificate.

This guidance offers two possible styles of safety certification. It sets out a less directive approach under which the ground management uses risk assessments to identify the mitigating actions which it considers necessary to secure reasonable safety at the ground and records them in an operations manual for scrutiny, acceptance and incorporation in a schedule to the safety certificate by the local authority. This is the preferred option, consistent with a modern approach to public safety. It is recommended that all new sports grounds and those undergoing major redevelopment or refurbishment adopt this style of safety certificate. Local authorities should consider encouraging grounds who have prescriptive certificates to adopt the risk based approach at the earliest opportunity.

While risk based safety certification is strongly recommended it is not mandatory for a local authority to move to this approach. Where local authorities choose to continue with prescriptive certification, this guidance explains how this may need to be modified to comply with current requirements. There may be tensions within the safety certificate between the prescriptive sections and those, such as fire safety, where other requirements, in this case, the Regulatory Reform (Fire Safety) Order, legislate for a risk based approach.

This guidance should be read with the relevant Circulars issued by the Home Office and the Department for Digital, Culture, Media and Sport (“DCMS”) and its predecessors; the latest edition of the Guide to Safety at Sports Grounds (“the Green Guide”) and Sports Grounds and Stadia Guide (SGSG) no 4 – “*Safety Management*”. It also brings together various interpretations of the legislation and its attendant circulars given by DCMS or the SGSA. Much of this material can be accessed through the [SGSA website](#).

This document covers the interface between safety certification and measures that may be taken by local authorities under the Regulatory Reform (Fire Safety) Order 2005 (“the Fire Safety RRO”), the Licensing Act, 2003, the Health and Safety at Work etc. Act 1974 (“the HSWA”) and its related Regulations, Building Regulations and any other requirements that may affect the safety of those at a sports ground. It does not, however, provide guidance on these, except insofar as they have a direct impact upon the process of safety certification or the contents of the certificate.

1.2 Background to the guidance

Following the disaster at the Ibrox Stadium in Glasgow in January 1971 and the subsequent public inquiry, the 1975 Act introduced a system of safety certification of sports grounds by local authorities. The local authority is required to issue a safety certificate to a designated sports ground which will include the safe capacity of the ground and such terms and



conditions as the local authority considers necessary or expedient to secure the reasonable safety at the ground.

1.3 Applying the guidance

This guidance provides local authorities with information to enable them to take reasonable decisions in individual cases after having considered the particular facts on their merits. It is given in good faith but does not purport to cover every eventuality. Further specific advice is available from the SGSA, through the regional inspectors.

1.4 Designated sports grounds

The 1975 Act applies to designated sports grounds which are those sports grounds that, in the opinion of the Secretary of State for the Department for Digital, Culture, Media and Sport (DCMS), have accommodation for more than 10,000 spectators or 5,000 in the case of the home grounds of Premier League or English Football League grounds in England and Wales. The designation process is described in detail in section 3.1.

The 1975 Act defines a sports ground as 'a place where sports or other competitive activities take place in the open air, and where accommodation has been provided for spectators, consisting of artificial structures, or of natural structures artificially modified for the purpose'.

The Act did not foresee that a sports ground might be fitted with a roof that could be closed for certain events. However, provided that some sport is played with the roof open, such a venue should still be regarded as a sports ground under the 1975 legislation.

The legislation does not apply to indoor arenas. These are generally subject to a Premises Licence issued under the Licensing Act 2003.

1.5 Sports Grounds with Regulated Stands

The 1987 Act includes provisions detailing the responsibility of local authorities in relation to the certification of regulated stands at non-designated sports grounds. Regulated stands are stands that provide covered accommodation for 500 or more standing or seated spectators, as determined by the local authority under section 26 of the 1987 Act (see also 3.2).

1.6 Safety Certificates

Section 1(3) of the 1975 Act provides that a safety certificate shall be issued in respect of the use of all designated sports grounds, for an activity or number of activities specified in the certificate, irrespective of the nature and level of the sport played there:

- either for an indefinite period commencing with a date so specified (general safety certificate);
- or on an occasion or series of occasions so specified (special safety certificate).

Section 26(10) of the 1987 Act contains similar provisions in respect of safety certificates for regulated stands.

There is no provision in the Act for a general safety certificate to be issued for a finite period. It must be assumed, therefore, that such a certificate should run indefinitely, unless or until it is revoked, replaced or surrendered.



2 GENERAL PRINCIPLES OF SAFETY CERTIFICATION

2.1 Responsibility for Safety

As stated in paragraph 1.4 of the Green Guide, responsibility for safety at a sports ground lies at all times with the ground management. The management will normally be the owner or lessee of the ground, who may not necessarily be the promoter of the event or the club playing matches at the ground. This responsibility should not be assumed by either the local authority or any other authority or agency. Nor should the local authority become involved in the management of events or take any action that could be interpreted as involvement.

The Fire Safety RRO imposes a requirement on management to risk assess, plan, organise, control, monitor and review the necessary preventive and protective measures against the risk of fire and to record these arrangements in writing. Similar approaches are adopted in Regulations under the HSWA and in the Licensing Act 2003. These requirements will all apply to some degree to sports grounds.

In line with this general approach, it is strongly recommended that the ground management should be required to commission or undertake risk assessments on all matters relating to the safe management of the ground when in use for a specified activity. These should include arrangements for facilities maintenance, crowd management, crowd disorder and anti-social behaviour stewarding, medical and first aid arrangements, counter terrorism and fire safety. Management should not rely on the local authority or the SGSA, where it has a regulatory role, to undertake this work on its behalf.

On the basis of the risk assessments, management should produce a comprehensive operations manual (see SGSG – [Green Guide](#)) setting out how it will achieve reasonable safety at the ground. This should also include the calculated capacity for the whole of the sports ground and for each area of the sports ground, along with its suggested (P) and (S) factors (see 2.3). Where the ground is subject to a safety certificate, the ground management should submit this material to the local authority for scrutiny and acceptance.

Whether the safety certificate issued for the ground is prescriptive or risk based, this process will demonstrate the ground's commitment to providing a safe and welcoming environment for everyone who attends events there.

2.2 Responsibilities of the local authority

Under the 1975 Act, the county council, unitary authority, metropolitan or London borough ("the local authority") is responsible for issuing and enforcing a safety certificate in respect of sports grounds designated by the Secretary of State (see 1.5). The 1987 Act lays a similar responsibility upon the local authority in relation to regulated stands at non-designated sports grounds. A local authority also has responsibilities at other sports grounds, that are not designated grounds or have regulated stands, by virtue of section 10 of the 1975 Act, as amended by the 1987 Act. For further details see section 7.3 below.

2.3 Safe capacities

The most important condition in the safety certificate sets the maximum number of people that may be accommodated for the ground as a whole and for each separate area. Where there are regulated stands, it should set the capacity for each such stand.



Chapter 2 of the Green Guide provides detailed and comprehensive guidance on how to determine the safe capacity of sports grounds. It emphasises that this capacity depends not merely on the available viewing accommodation and the capacities of the entrances and exits, including the emergency exit capacity, but also on the physical condition (the (P) factor) and the quality of the safety management (the (S) factor) of the sports ground. These latter two elements are defined in paragraph 2.4 of the Green Guide. Therefore, the safe capacity of a seated stand may be lower than the number of seats within it.

It is recommended that, whatever the style of safety certificate, the management of the sports ground should take responsibility for assessing the (P) and (S) factors and calculating the safe capacity and not leave this to the local authority. These should take account of all the recommendations in the Green Guide, not merely those with which the sports ground already complies. The (S) factor and to a lesser extent the (P) factor will reflect the operations manual and its underlying risk assessments (see section 2.4 below) or, in a prescriptive style certificate, the conditions included by the local authority. Detailed guidance on the indicative questions to be answered in determining the appropriate (P) and (S) factor is given in SGS – [*“Guide to Safety at Sports Grounds Annex A and B”*](#).

Whoever is calculating the safe capacity should set a single (P) factor and a single (S) factor for each separate area of the sports ground. It should then use whichever is lower to determine the safe capacity of that area. It should neither multiply the (P) and (S) factors by each other nor adopt the average. Both these approaches would distort the final figure.

If the local authority is satisfied that the proposed (P) and (S) factors are reasonable and that the ground management’s methodology and calculations are correct, it may accept the recommended safe capacity and promulgate it in the safety certificate. If it is not satisfied or if the ground management has not calculated the capacity itself, the local authority may set what it considers to be the safe capacity.

2.4 Terms and conditions in the safety certificate – risk based style

It is recommended that a risk based safety certificate should be a comparatively short document which, by condition, requires the holder to:

- undertake appropriate risk assessments;
- produce an operations manual; and
- comply with the policies, plans and procedures set out in the operations manual.

The latter condition is particularly important in order to ensure a local authority is able to take appropriate enforcement action if the holder deviates from the approach described in the operations manual.

The operations manual and any proposed amendments should be submitted to the local authority for consideration to enable it to determine whether to accept the holder’s proposed capacity. (For further details see section 5.2 below.) The safety certificate should set out what the holder must do in order to operate the sports ground at its permitted capacity. In this context it is worth remembering that absolute safety, however desirable, is, in reality, unattainable.

Provided that the local authority is satisfied that the operations manual is compatible with the advice in the Green Guide and that it is based on a series of relevant risk assessments undertaken by competent persons, it should be able to accept it.



If, however, the operations manual does not follow the guidance in the Green Guide, the local authority should ask the ground management to demonstrate that the proposed deviation from the Green Guide provides an equivalent or higher standard of safety (See section 1.8 of the Green Guide). Where this has not previously been demonstrated, agreed and recorded, the local authority will normally need to scrutinise the particular risk assessments. If it is then satisfied, it should record the nature of the deviation and the reasons why it regards the alternative approach as acceptable. An example of the format in which proposed deviations to the Green Guide could be submitted by ground management is set out at Annex C.

If the local authority is not persuaded that the procedures set out in the operations manual will provide reasonable safety for those at the ground, it should reduce whichever of the (P) or (S) factors applies, and hence the permitted capacity. It should at the same time discuss with the ground management how they might improve their procedures. The local authority should avoid taking responsibility for drafting the manual – which it will subsequently be responsible for accepting.

The permitted capacity of a sports ground should always reflect its current circumstances, not those which are intended or expected to apply at some future date. Accordingly, the safety certificate should not require the holder to submit an operations manual in the future but should require it to comply with that which it has already submitted. The move from an existing prescriptive style certificate to one based on risk assessments and an operations manual should ideally be by agreement between the local authority and ground management, however the final decision rests with the local authority. The necessary documentation should be completed before the risk based certificate is introduced.

If a sports ground is not always used with a capacity attendance, or is used to host a variety of sports or activities which attract different numbers of attendees, the operations manual should identify event day operation scenarios for these different levels of attendance. These could be in the form of an alternate section of the operations manual or an alternative version of the operations manual. A similar approach may be adopted in relation to a prescriptive certificate.

2.5 Coverage of the operations manual and the safety certificate

The safety certificate should specify all the activities, including ancillary activities, to which it applies. These ancillary activities will include not merely event-day catering and dining but pre, during and post-event displays. Accordingly, any operations manual should cover all areas to which people have access in relation to a specified activity, including restaurants, licensed bars, and concourses. The operations manual should also cover any other areas and all matters, over which the ground management has either direct or indirect control (through a contract with a commercial provider), which may affect the safety at the sports ground. This could encompass offices or players' facilities within a stand, media facilities, club or leisure facilities, satellite buildings and access and egress to and from car parks. For detailed guidance on the contents of the operations manual see SGSG ["Guide to Safety at Sports Grounds"](#).

Staff working under a franchise or agency agreement should be required as a condition of their contract or agreement to comply with the terms of the operations manual. The certificate holder could be liable for any breach of the operations manual and hence of the safety certificate by franchisees or agency staff.



2.6 External factors

A certificate holder cannot be held responsible for circumstances outside their control, for example hazards presented by local industrial premises or restricted access for emergency vehicles because of congestion on the public highway, even if these could adversely affect the safety at the sports ground. The 1975 and 1987 Acts and the safety certificate do not cover safety beyond the boundary described within the certificate. However, the ground's operations manual should include any measures that its management can take to ensure reasonable safety at the ground when affected by such external factors. Moreover, the local authority should take account both of any such factors and of the proposed mitigating measures in any operations manual when agreeing the permitted capacity.

Where conditions are imposed they must be achievable and relate to safety at the ground and must not be unfair, illegal or physically impossible. For instance, a ground cannot be subject to a condition to install measures on land that it does not own or control. However, such external factors can impact upon the determination of the safe capacity if no mitigating measures are put in place.

The permitted capacity of a regulated stand could be reduced because of circumstances in other areas of the sports ground that are not themselves covered by the safety certificate. As indicated in section 2.5 above, any operations manual should cover such areas whether or not they fall within the ambit of the safety certificate.

2.7 Terms and conditions in the safety certificate – prescriptive style

The same general principles apply as for risk based safety certificate. The certificate should set out what the holder must do in order to operate the sports ground at its safe capacity. If the holder is unable to comply with one or more of these terms or conditions, the local authority, using the (P) or (S) Factor, should reduce the capacity to whatever figure it considers necessary to ensure reasonable safety at the sports ground. This capacity should always reflect the current circumstances at the sports ground, not those it is planned or hoped to achieve in the future. The local authority should ensure that it determines the permitted capacity reasonably, proportionately and in accordance with due process (see section 3.9 below).

The terms and conditions may “involve alterations or additions to the sports ground”, in the sense that the certificate holder may need to undertake certain modifications in order to achieve compliance and thereby avoid a reduction in capacity. The conditions should not, however, consist of a list of specific improvements or alterations to be implemented at some future date. If these are required in order to secure an increased capacity, the local authority should notify the certificate holder separately.

Where a particular sports ground is rarely filled to capacity or where it regularly hosts a variety of sports or activities that attract different numbers of spectators, the local authority may base its requirements on the actual levels of attendance provided that, as in the case of risk based certificates (see section 2.4 above), the overall permitted capacity and those of each separate area are calculated accordingly.

2.8 Consultation and co-ordination

The safety certificate should be seen as part of a total, integrated system for managing health, safety and security at the sports ground. While the local authority alone is responsible for issuing the safety certificate, safety cannot be achieved by one agency acting in isolation. The local authority is under a statutory duty to consult with the chief officer of police and, where it is not itself that authority, with the fire authority and the building



authority. It is good practice to consult the ambulance authority and to have regard to the views not merely of the certificate holder but to those of any other regular users of the sports ground and, where relevant, representative supporters of the sports club(s) concerned. Where relevant it may also need to consult the authorities responsible for emergency planning and health and safety at work. The practical issues are discussed more fully in section 4.4.

Under the Fire Safety RRO, the responsible person – in practice someone nominated by the ground management – must undertake a risk assessment. Thereafter it is the duty of the responsible person to implement the preventive and protective measures which have been identified as necessary by the risk assessment. This forms part of the general duty to ensure that general fire precautions are in place for the safety of all employees or of any other relevant persons such as spectators. Common sense dictates that the performance of this duty should form part of any operations manual.

The local authority needs to ensure that there is no conflict between the safety certificate, or any operations manual produced as a requirement of the safety certificate, and any requirements imposed under the Management of Health and Safety at Work Regulations 1999 or other Regulations under the HSWA. As a general principle, where the two overlap, the specific provisions of the safety certificate take priority over the general requirements under the HSWA where an incident occurs during a specified activity requiring regulatory action.

Local authorities should ensure that protocols are in place between different departments in the authority dealing with the different legislation to clarify their responsibilities in relation to the sports ground.

In areas where there are two-tiers of local authority, the certifying authority under safety at sports grounds legislation will be a County Council and the enforcing authority under HSWA will be a District Council. In these areas County Councils may find themselves in the position of identifying a risk to the safety of non-spectators but a reduction in the (S) factor will not mitigate the risk, and amending the conditions will not resolve the issue in a timely manner. They will therefore be reliant on colleagues in the District Council to take enforcement action under HSWA legislation.

Where there are concerns about the safety of non-spectators which the County Council believes can only be effectively resolved under HSWA legislation they should make the appropriate representations to the relevant District Council. It will be essential for those with responsibility for sports grounds safety in County Councils to build a strong relationship and develop protocols with health and safety colleagues in the relevant District Council. This could take the form of a Memorandum of Understanding if appropriate. In addition, the relevant health and safety officers from the District Council should be invited to join the Safety Advisory Group.

2.9 Policing

The local authority has no responsibility for operational policing either inside or outside the sports ground. Both the 1975 and 1987 Acts state explicitly that, where a condition within a safety certificate requires a request being made for the attendance of police at an event, the number of police deployed is entirely a matter for the chief officer of police. All operational issues concerning the deployment of police officers within a sports ground are for the police themselves.



The operations manual, or conditions in a prescriptive certificate, should include details of when and how the sports ground management will inform police about an event and the consultations that may take place to decide on police attendance.

Sports grounds are responsible for keeping people at their events safe from physical harm or injury arising from being present at the event. This is a broad responsibility and includes protecting people from such risks through crowd disorder and anti-social behaviour.

Following a risk assessment, sports grounds will most likely demonstrate the need for a crowd disorder and anti-social behaviour plan. This will outline the various responsibilities for the ground management and police to protect people against this threat.

Ground management and police should produce a written statement of intent to clarify their various responsibilities. The local authority may require the certificate holder to use his best endeavours to agree such a statement with the police. This should be included as a schedule to the operations manual or kept with the safety certificate.

A condition in a safety certificate may reasonably require the certificate holder to notify the police of particular events and, if appropriate, request their attendance. However, the certificate cannot require the ground management to secure the attendance of the police. Nor may it direct the police to attend.

If the chief officer of police believes that police officers need to attend a particular event, but the management of the sports ground disagrees, the local authority must consider whether the absence of police would adversely affect safety at the ground. It should consider any mitigating measures offered by the ground management. It is for the certificate holder to satisfy the local authority that the event can proceed safely without the police being present. If the local authority is not satisfied, it could close part or all of the sports ground or reduce its permitted capacity to a level that it considers reasonably safe for the event concerned. The options available to the local authority are described in section 7 below.

2.10 Football Spectators Act 1989

The home grounds of clubs playing in the Premier League, English Football League and Wembley and the Principality Stadiums must obtain a licence to admit spectators from the SGSA under the Football Spectators Act 1989 as amended. The powers under the licence are particularly wide and, in addition to enforcing the Government's all-seated policy, can extend to other issues relating to the admission of spectators and the arrangements to which they are admitted, including facilities for disabled people. However, the licence does not restrict the local authority from including whatever conditions in the safety certificate it considers necessary or expedient to secure the reasonable safety at the ground. The local authority could close or limit the capacity of a sports ground for safety reasons, notwithstanding that the area in question had been licensed by the SGSA. The SGSA has the legal power to require a local authority to include a condition within the safety certificate.



3 THE CERTIFICATION PROCESS

3.1 Designated sports grounds

Where a new sports ground is under construction that would fall within the remit of the 1975 Act as a designated sports ground (see 1.5), it is likely that the Secretary of State will be aware of the development however, the Secretary of State may not always have been informed of developments that might increase the capacity of an existing sports ground to a capacity above the threshold for designation. It is therefore incumbent upon the local authority to notify the Secretary of State of any sports ground likely to require designation. It should give at least 10 weeks' notice, so that the Secretary of State has sufficient time to be satisfied that the sports ground meets the criteria. As part of this process, the Secretary of State will formally consult the local authority, the sports ground owner, the emergency services and, where it will have a regulatory role, the SGSA.

The notification to the Secretary of State should include the proposed capacity of the sports ground, together with its full postal address as soon as this is known. While this may appear pedantic, and can be difficult to supply for new sports grounds where the precise address has not been fixed, it is the only certain means of identification. While the name of the sports ground may change, the postal address rarely does.

The designation order remains in force unless or until formally revoked by the Secretary of State. If a designated sports ground is demolished or is permanently modified, so as to reduce the capacity below the threshold, the local authority should formally notify the Secretary of State and request that it be de-designated. Should the local authority not do so, the certificate holder may apply directly to the Secretary of State.

3.2 Regulated stands

Under the 1987 Act, a local authority has a responsibility to determine whether any stand at a sports ground is a regulated stand (see 1.6).

In making that determination the local authority should not seek to apply the detailed guidance on calculating the safe capacity set out in the Green Guide but **must** instead follow the statutory guidance on how to determine whether or not a stand provides accommodation for 500 or more spectators given in Home Office Circular 97/88. For the precise details local authorities should refer to the Circular. In brief the local authority is required to count:

- the number of individual seats and / or marked places on bench seats; and
- the number of places available on bench seating allowing 530mm per person and disregarding any shorter lengths left over; and
- the number of spectators who can be accommodated on a terraced or sloped viewing area at a rate of 2.7 per square metre after disregarding gangways, stairways and landings; and
- the number of spectators who can be accommodated in the front two metres of a flat standing area at a rate of 2.7 per square metre.

It is stressed that this methodology should be used only for determining whether the stand in question should be a regulated stand. Its safe capacity does not depend only on the amount of accommodation available. When calculating the permitted capacity for inclusion in the safety certificate, the local authority should follow the methodology set out in the Green Guide. This may well result in a substantially lower capacity, which may even fall below 500.



The local authority may at any time revoke any determination that a stand is a regulated stand if it no longer provides accommodation for 500 or more spectators, as determined in accordance with the criteria in the Home Office Circular.

3.3 Applying for a safety certificate

Once a sports ground has been designated, it is an offence under section 12 of the 1975 Act to admit spectators until an application has been submitted to the local authority for a safety certificate. The requirements governing the submission and handling of applications are set out in section 3 of the 1975 Act. They are shown in the flow chart in Annex A.

An application for a safety certificate for a designated sports ground must be in the form prescribed in the schedule to the Safety of Sports Grounds Regulations 1987 (“the 1987 Regulations”) or a form to like effect. Local authorities should make provision for applications for a safety certificate to be made online.

The application should be accompanied by detailed information as to the structure, proposed capacity and safety management systems. The local authority may, by notice in writing, require the applicant to submit within a reasonable period such information and plans as it considers necessary to enable it to determine what terms and conditions to include. Where a risk based safety certificate is to be issued, this information should be set out in full in an operations manual. Since the safety certificate should relate to the actual condition of the sports ground, local authorities should not be deterred from seeking further information when they consider this necessary in the interests of safety at the ground.

The local authority must supply the chief officer of police and, where it is not itself that authority, the fire authority and the building authority, with a copy of the completed application form. It should also formally consult them about the terms and conditions of the certificate. The normal forum for this consultation will be the Safety Advisory Group (“the SAG”). This is described in section 4.3.

Similar provisions apply to the issue of a safety certificate for a regulated stand and are shown in the flow chart in Annex A. Under section 26 of the 1987 Act, it is an offence to admit spectators until an application has been submitted to the local authority for a safety certificate. The local authority may, and in practice should, issue a single certificate in respect of two or more such stands at the same sports ground. Different conditions may apply to the various stands.

The form of the application is laid down in the Safety of Places of Sport Regulations 1988 (“the 1988 Regulations”). The local authority may require the same information as for a designated sports ground. It is under the same duty to consult the police and other agencies. As with a safety certificate for a designated ground (see above) the local authority should make provision for online applications.

3.4 Demountable structures

If a demountable stand of any size is erected at a designated sports ground, the ground management will need to undertake the necessary risk assessments as to its use and management and incorporate the outcome into any operations manual. For its part, the local authority will need to promulgate its safe capacity.

The position is less clear cut where a demountable covered stand with accommodation for 500 or more spectators is erected at a non-designated sports ground and is proposed as a temporary construction. Section 26 (11) of the 1987 Act defines a stand at such a sports ground as “an artificial structure (not merely temporary) which provides accommodation for



spectators and is wholly or partly covered by a roof". Home Office Circular 96/1988 explains that, by use of the phrase "not merely temporary", the definition excludes temporary stands from certification.

The term "temporary" has not been further defined. It does not automatically cover all demountable structures. Some may remain in place for many years. A stand erected for one or more specific events should clearly be regarded as temporary. However, it would be difficult to argue this in relation to a stand that is to be used for a whole season of the sport in question. The local authority will need to assess every case having regard to its individual circumstances. In this context, it may be relevant to consider the Building Regulations definition of a temporary building. Where a demountable stand is not deemed to be a regulated stand the local authority may still issue a prohibition notice under section 10 of the 1975 Act. This procedure is described in section 7.3.

Chapter 14 of the Green Guide offers guidance on the safety, design and management of demountable structures. Further detailed advice may be found in the fourth Edition of 'Temporary Demountable Structures: Guidance on Procurement, Design and Use', published by the Institution of Structural Engineers ("ISE") in 2017.

Temporary demountable structures not used as spectator accommodation, such as television gantries, lighting towers, information boards or advertising hoardings may nevertheless affect the safety of people at the event. They should be covered in the operations manual (or, where there is no such manual, in the terms and conditions of the safety certificate), with particular attention being paid to their stability and fire safety.

3.5 Qualified person

Before it may issue a safety certificate for a designated sports ground, the local authority must determine whether the applicant is a "qualified" person. This is defined in the 1975 Act as a person who is likely to be in a position to prevent any contravention of the terms and conditions of a safety certificate. The certificate holder should hold a position of authority within the management of the sports ground. This could include the chair, chief executive, club secretary, sports ground manager, operations manager or a director, depending upon the sports ground management structure. The holder should be empowered to approve the allocation of funding for safety.

The applicant may also be the body corporate of the sports ground management, in which case the Board of Directors, or other similar entity, takes responsibility for compliance with the terms and conditions of the safety certificate.

If the local authority determines that the applicant is a qualified person, section 3(2) of the 1975 Act requires it to issue the safety certificate. If it determines to the contrary, it must notify the applicant in writing. The applicant may appeal against this determination to the magistrates' court within 28 days (seven days in the case of a special safety certificate).

The same principles apply if the local authority receives an application to transfer the safety certificate to another holder. If it determines that the applicant is not a qualified person, and therefore that it will not transfer the certificate, it must formally notify both the existing certificate holder and the applicant in writing and give reasons for the refusal.

Under the 1987 Act, the definition of a person qualified to hold the safety certificate for a regulated stand is more tightly drawn. In the case of a general safety certificate, it is the person responsible for the management of the sports ground; for a special safety certificate, it is the person responsible for organising the activity being watched by the spectators. This



apart, the procedure mirrors that for the issue of the safety certificate for a designated sports ground.

3.6 Notices by the local authority

The safety certificate is a public document, to which any person who is either responsible for applying it or likely to be affected by it should have access. Both the 1987 and 1988 Regulations require the local authority to notify every interested party, as defined in the Regulations, in writing of its decision to issue, amend or replace, or refuse to amend or replace, a safety certificate. In the case of a refusal, the local authority must give its reasons. This notice must specify that a copy of the safety certificate and any application is available for inspection at a specified time and place. The local authority must also publish a similar notice in a local newspaper. Recent legal advice has confirmed that this requirement is still in force even though digital communications are available.

3.7 Safety certificate, issue amendment and replacement

Section 4 of the 1975 Act and section 29 of the 1987 Act provide that the local authority may either amend or replace the safety certificate in any case in which this appears appropriate. It may do this either on its own initiative or in response to an application from the certificate holder. Replacing safety certificates can normally only be justified where the change of circumstances or the number and scale of the amendments makes this the most practical option. This would most commonly occur when a club moves to a new ground. In such cases, it would be sensible for the club and the local authority to move to a risk based certificate if they have not already done so.

3.8 Review of the general safety certificate and operations manual

The local authority should formally review the general safety certificate as soon as reasonably practicable after any incident in which safety at the ground may have been put at risk or where doubts have been cast on the condition or management of the sports ground. Such a review should encompass both the wording of the safety certificate and the permitted ground capacity.

A risk based certificate should include a condition requiring the Holder to examine the operations manual following any incidents. It is also good practice for such a commitment to be included within the operations manual. A “near miss” should always be treated as an incident for these purposes.

This review should not be limited to the circumstances of the incident. It should identify and analyse any underlying safety weaknesses that need to be addressed. These weaknesses and the local authority’s response should be recorded in writing.

In addition to a review after an incident the safety certificate and where required the operations manual should be reviewed annually. Where the sports ground is used on a seasonal basis, this review should take place in sufficient time for any necessary remedial work to be completed during the close season. At those sports grounds where events are held throughout the year, the local authority and certificate holder should liaise about the most sensible time for the annual review.



3.9 Amendments to the general safety certificate and the operations manual

The local authority may need to amend a prescriptive style safety certificate to reflect changes at the sports ground. Planned changes may include those to the physical structure; safety management or changes in the personnel identified in the safety certificate. While these may eventually lead to changes in capacity, an interim capacity calculation may be required while any construction work is carried out or new systems are tested. Hence, section 8 of the 1975 Act and section 32 of the 1987 Act require the certificate holder to notify the local authority of any proposed alterations or extensions that are likely to affect safety at the ground.

In the same vein, the ground management should be required to notify the local authority of any proposed changes in the operations manual. These may occur at any time because the manual is a dynamic document. As notification of changes to the operations manual is not, of itself, a legislative requirement, the local authority will need to ensure that it appears as a condition in the safety certificate.

In some cases, the local authority may consider it necessary to recalculate the permitted capacity of part or all of the sports ground, either following an incident or because of deterioration in its structure, maintenance or management. This is most easily achieved by decreasing either the (P) or (S) factor as appropriate. Such decisions should be taken in accordance with laid down procedures and be formally recorded. This is explained further in sections 4.5 – 4.7.

3.10 Special safety certificates

A general safety certificate covers any event that is held regularly at the sports ground and is included as a specified activity. Where it is intended to hold an event of a type not specified in the general safety certificate, an application should be submitted to the local authority for a special safety certificate. Such applications should normally be made at least three months in advance of the proposed event. However, the local authority may vary this period at its discretion.

The procedure for granting a special safety certificate is slightly different from that for a general safety certificate. Unless the applicant is already the holder of a general safety certificate, the local authority must first determine whether he or she is a qualified person. However, whereas it is obliged to grant a general safety certificate provided that the applicant is a qualified person, it has the discretion to refuse to issue a special safety certificate. In reaching its decision, the local authority must act reasonably. The applicant has the right to appeal within seven days against any refusal.

The local authority should be aware that it may need to set a different capacity in a special safety certificate for certain events compared with that promulgated in the general safety certificate. A pop concert, for example, may have spectator accommodation on the pitch, while a fireworks display may require certain sections of the sports ground to be kept clear of people. Some events may give rise to dynamic forces on stands due to rhythmic crowd movements that were not specifically taken into account in the design of the structure. In these cases, it may be necessary to restrict the use of the areas concerned.

The applicant may be required to supply whatever information the local authority needs in order to discharge its functions. This should include details of any proposed changes to the normal accommodation or arrangements, in particular to the safety systems, crowd management and stewarding, toilet and medical provision and fire precautions. Where there



is a risk based safety certificate, these should be set out in a revised operations manual supported by the relevant specific risk assessments.

3.11 Rights of appeal

The 1975 and 1987 Acts provide a right of appeal to the magistrates' court for:

- any person against a determination by the local authority that he or she is not qualified to hold a safety certificate;
- any interested party against the inclusion of anything in or omission of anything from a safety certificate or the refusal of the local authority to amend or replace it (NB: an 'interested party' is defined in s.5.5 of the 1975 Act);
- the applicant against the refusal of the local authority to issue a special safety certificate;
- any person, upon whom the local authority has served a notice that it has determined that a particular stand is a designated stand, against that determination; and
- any aggrieved person against a prohibition notice or an amendment to a prohibition notice, as described in section 7.5 (NB: an "aggrieved person" is defined in s.10A(7) of the 1975 Act).

Appeals must be lodged within 28 days if they relate to a general safety certificate and within seven days if they relate to a special safety certificate. If the appeal is against an amendment to the safety certificate, the original terms and conditions remain in force until the appeal has been determined. By contrast, any restrictions imposed under a prohibition notice remain in force unless or until amended or annulled by the court.

There is no statutory right of appeal against a condition that the SGSA has required a local authority to include in a safety certificate under section 13(2) of the 1989 Act.

3.12 Fees

The 1987 and 1988 Regulations empower the local authority to determine the fee to be paid in respect of an application for the issue, amendment, replacement or transfer of a safety certificate, or the cancellation of a certificate for a regulated stand. This fee shall not exceed an amount commensurate with the work actually and reasonably done by or on behalf of a local authority in respect of the application. It will be for the local authority to determine whether and, if so, how much of the work that it undertakes to determine whether to accept an operations manual (or any amendments) is chargeable. It should be noted that the local authority may only charge for amending the safety certificate in response to an application from the proposed or existing certificate holder.



4 THE ADMINISTRATIVE PROCESS

4.1 Delegated powers

In accordance with its standing orders, the local authority may delegate its power to take and implement decisions on safety certification to a committee, sub-committee or to one or more particular officers, most commonly the officer who chairs the authority's Safety Advisory Group (SAG) (see para 4.3). However, the SAG cannot take decisions on behalf of the local authority nor may any outside body or other authority exercise the responsibilities of the local authority.

4.2 Lead department

The local authority should determine which of its departments or services should take the lead on sports ground safety certification having regard to its particular administrative structure. It is usually advisable that this department should be responsible for some similar or related subject. If the staff concerned do not themselves possess the necessary qualifications, competence and professional experience to determine the safe capacity of the ground, scrutinise the ground's operations manual and perform the wider safety certification function effectively, it is essential that they have ready access to such resources.

The latter might be found either in-house or from an external source on a consultancy basis. In such cases, the local authority may properly obtain such assistance as it may require from another local authority or public body under a service level agreement. It may also wish to co-operate in regional or professional groups, both to share good practice and to facilitate training for its staff. Formal training courses are available. Nevertheless, the local authority remains solely responsible for any decisions on safety certification.

Many local authorities will find it helpful to draw up written policy statements identifying the specific responsibilities of particular individuals or groups of staff involved in sports ground safety certification. The production of these policies demonstrates that management has devoted thought and effort to the safety of sports grounds role. Putting policy in writing helps focus the mind and shows whether it has been fully thought out in practical terms.

Guidance on developing procedure can be found on [the SGSA website](#).

4.3 Safety Advisory Groups

In the Final Report of the Inquiry into the Hillsborough Stadium Disaster, Lord Taylor recommended that each local authority set up an advisory group (now generally known as the Safety Advisory Group). The SAG exists primarily to provide specialist advice to the local authority so that it may effectively discharge its functions under the 1975 and / or 1987 Acts. In practice, it also provides the vital forum within which the local authority and other agencies may develop a corporate approach to safety at the sports grounds concerned, while each exercising its own responsibilities.

Although the SAG is not constituted to advise the ground management on sports ground safety, the management may nevertheless frequently benefit from the expertise within the SAG. However, it cannot thereby transfer its responsibility for safety to the SAG or any of its members. Moreover, it is the local authority, not the SAG, that issues the safety certificate, and which is responsible for advising and assisting the certificate holder where necessary.



All communication with the certificate holder or management of the sports ground on safety and all requirements relating to the safety certificate should therefore be initiated by or routed through the responsible committee or officers of the local authority. Other individuals or agencies should avoid dealing unilaterally with the certificate holder on such matters, lest this cause confusion or conflict over requirements and thereby undermine the work of the local authority.

4.4 Membership of the Safety Advisory Group

It is for the local authority to determine which member or officer shall chair the SAG. This individual should have the status and authority to act quickly where necessary as well as sufficient time to commit to the task. The other local authority staff attending the SAG should likewise be suitably senior, as should the representatives of the participating agencies and bodies. These should be able to speak with knowledge and authority and be empowered to take operational decisions on behalf of their organisations, save where these raise new policy issues.

The local authority should plan ahead to ensure that, when a member of the SAG retires or moves to a new post, a successor has already been identified and is ready to take the work forward without any delay. This applies particularly to the SAG Chair or lead officer on whom the local authority may depend heavily.

It is recommended that, in addition to appropriate members of local authority staff, the SAG should include representatives of the police, fire service, ambulance service and building authority. In many cases, it may be sensible to invite someone from the relevant first aid agency. SAG chairs may also wish to arrange formal regular liaison with the local authority staff responsible for emergency planning and traffic management and with those enforcing the HSWA, Licensing and the Fire Safety RRO.

As a matter of principle, the safety certificate holder should be invited to all meetings of the SAG unless there is a positive reason for excluding them on a particular occasion. It would be inappropriate to discuss any operations manual or to reach any decision regarding the safety certificate in their absence, without giving them the opportunity to brief the SAG members, secure an informed debate and put their case. This should also ensure that they are aware of the issues underlying the local authority's requirements.

Local authorities are encouraged to consult representatives of a recognised supporters' group where possible. Indeed, there are no objections in principle to such a representative attending SAG meetings, if this is considered beneficial.

4.5 Management of the Safety Advisory Group

The SAG fulfils an important safety role. This could well come under scrutiny in the event of a serious safety failure at a sports ground. Accordingly, the SAG should be properly constituted, have written terms of reference and effective procedures. These terms of reference should encompass all matters falling within the purview of the local authority on stadium safety.

The local authority would also be well advised to identify the responsibilities and potential liability of the SAG and its members. It may wish to lay down written procedures for them to follow if they observe or are alerted to a safety weakness either during an inspection of a sports ground or when they are present in the course of their normal duties. The role of the SAG and its members in inspecting sports grounds and attending events is described in greater detail in section 6.



The local authority should provide the necessary level of secretarial and administrative support to the SAG and should lay down procedures for ensuring that it runs smoothly. The meeting should have a formal agenda with all members being invited to submit agenda items, accompanied, where applicable, by written reports. The secretariat should circulate the agenda, relevant papers and minutes of the previous meeting sufficiently in advance. It should minute the proceedings of the SAG and produce regular written reports for the members' committee to which it is accountable. These reports should normally include the results of any monitoring visits by members of the SAG and details of any exercises by the certificate holder to test the sports ground's contingency plans.

Where confidential matters are to be discussed, particularly in relation to counter terrorism activities, arrangements should be made for the issues to be discussed in a separate meeting, or part of the meeting, of the SAG where only those needing to be engaged are present. Separate confidential minutes might also be required for that part of the meeting to prevent issues arising in relation to the unwitting release of sensitive material. The precise membership of this smaller SAG meeting will be dictated by local requirements and protocols in relation to information sharing agreements. It is important that the privacy of counter terrorism documents is preserved and that the attendance at discussions is restricted to those who need to be present. The handling and sharing of all documents relating to police counter terrorism advice and the ground counter terrorism plans should be in accordance with a suitable and agreed security marking scheme, for instance the Government Security Classification Scheme.

The process for dealing with counter terrorism matters confidentially could also be used to deal with other sensitive matters. It is for the local authority to determine membership of other such meetings.

4.6 Minutes of the Safety Advisory Group

The production of accurate minutes of the SAG meetings provides a vital audit trail and ensures that key discussions are recorded and actions are reviewed. It is not recommended that the chair of the SAG also takes the minutes.

Accurate minute taking is particularly important when new sports grounds are under construction or existing ones are undergoing a major redevelopment. In such cases, the situation may change on an almost daily basis. The local authority, advised by the SAG, may need to reach decisions at very short notice, often during a visit to the site. Unless all these decisions are recorded at the time and the minutes are agreed as soon as possible thereafter, they risk giving rise to debate and possible recriminations at a later date.

It is also essential to record why the ground management has proposed, the SAG has supported, and / or the local authority has accepted any deviations from the recommendations of the Green Guide when setting the capacity of the sports ground. The onus will be on the local authority to demonstrate that it has acted reasonably.

Similarly, the minutes should record the reasons for any amendments to the terms and conditions in the safety certificate. In the absence of such information, the local authority could be vulnerable to an appeal by the certificate holder. Such minutes do not themselves constitute the amendment to the safety certificate. The local authority must formally issue a written amendment.

4.7 Audit trail

Such minutes constitute an important part of the audit trail that the local authority should establish for the SAG. This should cover the procedures for ensuring that:



- the annual inspection of the sports ground and the annual review of the safety certificate have been completed;
- any identified safety weaknesses in the ground and / or the contents or implementation of any operations manual have been analysed and addressed;
- any incidents involving an actual or potential threat to the safety of people at the ground have been debriefed and the lessons learned have been implemented;
- any recommendations of the SAG have been properly reported to the local authority;
- the decisions of the local authority have been properly communicated to all interested parties;
- these recommendations and decisions have been followed up and fully implemented; and
- this action has been reported back to the SAG and thence to the local authority.

4.8 Frequency of meetings

The local authority should always convene a meeting of the SAG as soon as possible after any significant incident or “near miss” at a sports ground in order to ascertain whether there were any breaches of the safety certificate and whether the operations manual and / or safety certificate should be amended.

Such cases apart, the number of SAG meetings in any year will largely depend upon the particular circumstances of the sports ground concerned. Good practice shows that a local authority is likely to require a minimum of two meetings of the SAG per year to perform effectively, even if the sports ground has an up to date operations manual and safety certificate and is well managed with no significant problems. By contrast, experience has shown that, during the planning and building stages of a major sports ground redevelopment, the SAG will need to meet much more frequently, perhaps monthly, to deal with the many issues raised by the contractors, architects and nominated certificate holder.

The local authority should balance the need to retain a sufficient overview against its desire to avoid overburdening a certificate holder who is acting responsibly. In the majority of cases, three or four meetings per year would seem reasonable. It is helpful for all agencies involved to schedule the meetings well in advance, perhaps doing so at the start of the season or calendar year.

4.9 Separate Safety Advisory Groups

In some circumstances, the local authority may wish to maintain a separate SAG for each sports ground with a safety certificate in its area. Where the membership of these SAGs would substantially overlap, the local authority might sensibly decide that one SAG may cover several sports grounds. Those attending at any stage of the meeting could vary according to the sports ground under discussion. Representatives could arrange to attend as required. Conversely, cases exist of sports grounds that cut across local authority boundaries. The authorities concerned have set up a single SAG. The local authority should formally record these arrangements in the terms of reference.

4.10 Role of the Sports Grounds Safety Authority (SGSA)

Inspectors from the SGSA can attend meetings of the SAG in respect of those football grounds which fall within its regulatory oversight. These are currently the home grounds of clubs playing in the Premier League and English Football League and Wembley and the



Principality Stadium. The Inspectors are not members of the SAG. They are independent advisers who are present at the invitation of the local authority.

Under the provisions of the Football Spectators Act 1989 as amended (1989 Act) the SGSA has the task of keeping under review the discharge by local authorities of their safety certification functions under the 1975 Act. Under section 13 (2) of the 1989 Act it may require a local authority to include in any safety certificate such terms and conditions as it may specify in its written notice. Before exercising this power, the SGSA must consult the local authority, the chief officer of police and, where these are not the local authority, the fire authority or the building authority.

As part of its oversight, the SGSA may also require the local authority to furnish it with such information relating to the discharge of its safety certification functions as it may require. Its inspectors may undertake such inspections of any ground as they consider necessary and may examine and take copies of the safety certificate and its schedules (including the relevant sections of the operations manual) and any records kept under the 1975 Act.

The SGSA role goes much wider than ensuring that local authorities set and enforce such terms and conditions as are necessary for reasonable safety at sports grounds. It promotes the adoption and maintenance of a safety culture and is a source of advice and good practice. The SAG meeting is often the forum in which the SGSA can best engage with and assist the local authority in a proactive and constructive manner.

The Sports Grounds Safety Authority Act 2011 extended the SGSA's role to include providing advice in respect of safety at sports grounds to any local authority or sports ground management. Although this guidance document is intended to provide comprehensive advice on the safety certification process SGSA Inspectors are available to provide advice to those local authorities and sports grounds outside their regulatory remit, although they would not expect to regularly attend SAG meetings in respect of grounds outside those for which they have regulatory oversight.



5 CONTENTS OF THE SAFETY CERTIFICATE

5.1 Introduction

The local authority is responsible for agreeing the safe capacity of the sports ground and for determining what terms and conditions should be included in the safety certificate. These should reflect the particular circumstances of the ground concerned and any operations manual and pay due regard to the detailed advice in the Green Guide. Where a prescriptive certificate is in place, the terms and conditions should be included in detail in the certificate. Where a risk based safety certificate is in place, the certificate will include a general condition requiring an operations manual which contains details of the mitigating actions for the risks identified. A risk based certificate may also contain terms and conditions dealing with specific arrangement required to ensure safety at the ground.

5.2 Format of the certificate

It is strongly recommended that local authorities issue all safety certificates in a modular form with a series of schedules, appendices and annexes, as follows:

- a short core section, containing a general statement of the duties laid upon the certificate holder. In a risk based certificate this would primarily consist of a requirement to undertake appropriate risk assessments, to set out in an operations manual how reasonable safety is to be maintained and a requirement to adhere to the operations manual. In a prescriptive certificate this would generally consist of a requirement to ensure that all terms and conditions within the certificate are complied with;
- schedules, either comprising the condition to comply with the operations manual or the detailed conditions inserted by the local authority setting out what the certificate holder must do to ensure reasonable safety at the ground;
- annexes, setting out the specified activities to which the certificate applies and the capacities of the sports ground as a whole and of each element of spectator accommodation for each activity; and
- appendices, including plans of the ground and other documents and sources of information referred to elsewhere in the certificate.

It is essential that a safety certificate is both easy to follow and complete within itself. The terms and conditions with which the certificate holder must comply should be clear and specific. General provisions to the effect that tasks must be undertaken to the satisfaction of the local authority, the chief officer of police, the chief fire officer or any other person, should be avoided. In similar vein, a safety certificate should not require the holder to comply with a general recommendation in the Green Guide.

The safety certificate should also include the geographical extent of the safety certificate conditions (often referred to as the red-line boundary), and the timescales of when the certificate conditions are in force (often 2 hours before an event until one hour after the event). These timings will depend on local circumstances and agreements.

All terms and conditions should be specific to the sports ground concerned and should be achievable and must not be unfair, illegal or physically impossible.

A risk based certificate should not be issued until the ground management has undertaken its risk assessments and has drawn up and submitted its operations manual and this has



been scrutinised by the local authority. Failure to follow this procedure could lead to the local authority prescribing a capacity for the ground on the basis of work that is to be undertaken in the future and not on the actual circumstances at the ground. As indicated in section 2.4, the move from an existing prescriptive style certificate to one based on risk assessments and an operations manual should be by agreement between the local authority and ground management.

5.3 Core section – risk based certificate

The core section should begin by identifying:

- the Act under which the certificate is issued;
- the responsible local authority;
- the holder of the certificate;
- the sports ground or regulated stand(s) to which it applies; and
- the specified activities to which the certificate applies (although these may be more conveniently listed in an annex).

The certificate should also provide that the local authority is entitled to inspect, investigate and take copies of documents at any reasonable time in order to fulfil its enforcement obligations.

Moreover, the holder should be required to supply the local authority with details of all forthcoming events. The local authority should consider how much advance notice it requires. As indicated in section 2.9, the safety certificate may reasonably require the certificate holder to notify the police of particular events. Where appropriate, the holder may also be required to notify the other emergency services.

In a risk based certificate the core section should also require the holder to undertake suitable and sufficient risk assessments, which should be made available to the local authority if requested, and in the light of those assessments draw up an operations manual. The contents of an operations manual are set out in the Green Guide.

The stadium management should be required to clearly set out details of the safe capacity of the ground for each specified activity as a whole and by area, including an assessment of the (P) and (S) factors.

The core section should also require the holder to comply with the policies, plans and procedures set out in the operations manual.

Detailed guidance on the preparation of safety policies and contingency plans and on what should be included in an operations manual may be found in SGSG [“Guide to Safety at Sports Grounds”](#) (see section 1.1 above).

5.4 Core section – prescriptive certificate

Where a prescriptive style certificate is in place, the core section should lay upon the certificate holder the general requirements to:

- ensure that the capacity of the sports ground or stand as a whole and of its separate areas is not exceeded (the capacities should be laid out in the safety certificate);



- provide the necessary equipment, supervisory staff and stewards, for monitoring, directing, controlling and assisting spectators;
- ensure the provision of first aid and medical staff, equipment, facilities and accommodation;
- ensure that all permanent and temporary buildings, structures and installations, including means of ingress and egress, are maintained in such condition that they safely fulfil their required function;
- take all reasonable precautions to prevent the outbreak and spread of fire, maintain suitable equipment and train staff to deal with an outbreak of fire; and
- maintain and make available for inspection as required, full records of inspections and tests of the buildings, structures, installations and safety management systems;

subject in each case to the detailed requirements of the related schedule.

5.5 Core section – general requirements

Whatever form of certification is adopted, the core section should also require the holder to:

- produce a written statement of the ground's event safety policy and appoint a person responsible for its implementation;
- draw up a plan of action to cover all reasonably foreseeable contingencies; and
- appoint "a safety officer", and deputy safety officer, of sufficient competence, status and authority to take day to day responsibility for event day safety. The safety officer should have a written job description.

The core section should require the certificate holder to notify the local authority in advance of any changes the Holder proposes to make to any operations manual and any other change of circumstances that may affect the terms or conditions of the safety certificate. Moreover, where a risk based certificate is in place, the certificate holder should be required to commission or undertake a formal review of its risk assessments every year, even if nothing untoward has occurred, and should formally confirm or amend its recommended capacities and (P) and (S) factors.

The local authority needs to be satisfied that the appointed safety officer is competent and that the event safety policy and contingency plans are sufficiently clear and comprehensive. However, it is not up to the local authority to 'approve' the employment of the individual concerned. Similarly, the local authority is not required to 'approve' the safety policy and contingency plans or risk assessments underlying any operations manual. These must remain, and be seen to remain, the responsibility of the certificate holder. If not satisfied on any of these matters, it should reduce the (S) factor and hence the capacity of the ground.

The ground's responsibility for safety of people at the sports ground on event days is not restricted to the safety of spectators but extends to others who are present and the operations manual should reflect this.

5.6 Schedules and appendices

In the case of a risk based safety certificate, a copy of the operations manual should form the schedule (this may be in the form of a digital link to the manual held by the ground).



Where a prescriptive style certificate is in place, the detailed requirements should be set out in a series of schedules. Even where the certificate holder has not produced a detailed operations manual, there is no reason why it should not draft some or all of the detailed conditions, for promulgation by the local authority. Indeed, this approach is to be encouraged since it gives the certificate holder a greater sense of ownership of the safety management of the sports ground.

The local authority should structure the schedules and appendices for a prescriptive certificate according to local need. In most cases, the best approach is to include definitions and written requirements as schedules and to attach any plans, tables and lists as appendices.

Thus, the schedules might cover all requirements relating to:

- safety management, stewarding and crowd control;
- counter terrorism measures;
- prevention of crowd disorder and anti-social behaviour;
- buildings, structures and installations;
- fire and fire-fighting;
- first aid and medical facilities; and
- records and certificates relating to training, briefing, tests and inspections.

The appendices could include plans of the sports ground along with details of its permitted capacity. If they are not included in the operations manual, the following should be attached as appendices:

- the event safety policy;
- the ground contingency plans;
- the statement of intent between the ground management and the police.
- any detailed lists of equipment or installations to be maintained by the certificate holder, such as first aid equipment and supplies; fire-fighting equipment; and control room equipment; and
- an index of the key locations and details of all exit gates and doors.



6 MONITORING BY THE LOCAL AUTHORITY

6.1 The need for monitoring

The achievement of reasonable safety at a sports ground is a continuous process that does not end with the production of an operations manual and / or the issue of the safety certificate. The local authority must monitor the holder's compliance with the certificate's terms and conditions.

For a prescriptive certificate, the monitoring should examine compliance with the terms and conditions laid out in the certificate.

As a risk based certificate will include a condition or conditions requiring the holder to comply with the policies, plans and procedures set out in the operations manual, the monitoring by the local authority must include examining the extent of such compliance. Nonetheless, while the safety certificate should require the holder to comply with the operations manual, it would be neither reasonable nor practicable for the local authority to monitor every smallest detail of this plan at all times. The ground management must be allowed to perform its functions and exercise its responsibilities without unnecessary restrictions being imposed. It will be necessary to identify and strike a reasonable balance between close oversight of the key issues that have a significant impact on safety at the ground and a more hands-off approach to those which can reasonably be left for the most part to the ground management.

In this context, local authorities should be mindful of the Recommendation in the March 2005 Hampton Report on Reducing Administrative Burdens that regulators should make on-site visits and tailored advice available to businesses. In other words, they should provide ground management with advice and assistance to improve its compliance.

Any failure by the holder to follow the procedures set out in the operations manual should be dealt with by the local authority in the same way as it would have dealt with a holder not complying with the terms and conditions of a prescriptive style certificate. Advice on enforcement action is set out in sections 7.1 – 7.6 below.

Under section 10B of the 1975 Act, it is the duty of the local authority to enforce the provisions of the Act and of the Regulations made under it and, for that purpose, to arrange for the periodical inspection of the designated sports grounds within its area. Section 34 of the 1987 Act imposes a broadly similar duty with regard to sports grounds containing regulated stands. Further statutory guidance is given in Home Office Circulars 72/87 ("the 1987 Circular") and 97/88 ("the 1988 Circular").

The duty in section 34 of the 1987 Act applies to the whole sports ground. It is left to each local authority to determine, in light of its local knowledge, the extent of the inspection. This local knowledge would include not only the general condition of the sports ground but also whether any events were scheduled which might attract unusually large numbers of spectators. This has proved particularly relevant when football clubs from divisions below the Football League have been drawn at home in the latter stages of the various Football Association cup competitions.

6.2 Scope of the inspection

The Home Office Circulars prescribe in considerable detail what is to be examined by or on behalf of the local authority. In summary this should encompass:



- the certificates covering structural, dynamic performance and electrical tests;
- the records maintained by the management of the sports ground, in particular of attendances, accidents, maintenance, equipment tests, steward training and contingency plans;
- the condition of the sports ground and its fixtures and fittings; and
- the lighting, public address, fire warning and entry control equipment.

6.3 Responsibility for physical inspections

The physical inspection of the sports ground by the local authority in compliance with the Home Office Circulars is not intended to duplicate work that should be undertaken by or on behalf of the certificate holder. Instead it is designed to check that the certificate holder is complying with the provisions of the operations manual or the safety certificate conditions for properly maintaining the sports ground and its fittings and, ideally, for noting and agreeing remedial action on problems already identified by the certificate holder.

The certificate holder should be responsible for appointing suitably qualified persons to undertake the structural appraisals and the other inspections or tests prescribed in the operations manual. The local authority should check that the required inspections have indeed taken place and that the persons concerned were duly qualified. Unless the authority has doubts about the independence, competence or approach of these persons, the submission of a certificate that the structure or fitting meets the appropriate requirements should normally suffice. Nevertheless, the local authority remains free to carry out sample testing if it considers this to be necessary.

6.4 Inspections during events

The physical inspection of the sports ground constitutes but one element of the monitoring by the local authority. It is equally important to have regard to the safety management – the (S) factor – when determining its safe capacity. The local authority should therefore also monitor both the certificate holder's general compliance with the operations manual or safety certificate conditions and such matters as:

- the safety culture of the ground management;
- the training, assessment, qualification and competence of the safety officer;
- the training, assessment, qualification and competence of the stewards and other safety personnel; and
- whether there are effective systems for identifying and tackling problems.

The scrutiny of records may indicate whether tasks have been performed; it may also give an impression of good or poor management. However, it cannot adequately convey whether the sports ground is being operated safely. Experience has shown that the local authority can only monitor this effectively if it periodically observes the performance of the management immediately before, during, and after the event. Such inspections can also help inform the local authority's assessment of how much oversight of the ground's performance is required.

6.5 Frequency of inspections

For designated sports grounds, the 1975 Act defines periodical as "at least once every twelve months". For regulated stands with accommodation for over 2,000 spectators, the 1988 Circular lays down a minimum of one inspection in the calendar year following the



issue of the last safety certificate and once in every calendar year thereafter. In all other cases the minimum is once in every two calendar years.

There is nothing to preclude the local authority from inspecting the sports ground more frequently. The number of inspections reasonably required will vary from venue to venue. This will be for the local authority to determine, having regard to its duty to monitor the suitability of the terms and conditions of the certificate and ground management's compliance with the operations manual or safety certificate conditions and to ensure that these are being observed.

At most designated sports grounds, it will normally be sufficient for the local authority to inspect the structures and fittings once a year while the sports ground is empty. It might be sensible to conduct this inspection at different times each year, so as to observe the sports ground under a variety of conditions. Further inspections are likely to be necessary only in the event of significant structural modifications.

However, the sports ground management's performance during events will undoubtedly need to be checked more frequently. Without regular checks there is a risk of potentially hazardous situations developing unchallenged. The same considerations apply to the local authority's checks of the records of attendances, accidents, maintenance, steward training and contingency plans, though some of these could be carried out on non-event days.

It is for the local authority to determine, in light of its local knowledge, the extent of the inspection. This local knowledge could include not only the general condition of the sports ground and its management but also whether any events are scheduled which might attract unusually large numbers of spectators.

The most sensible way for the local authority to identify how many inspections it might reasonably undertake during the course of the year, would be for it to require each venue to undertake an annual self assessment as part of its review of its risk assessments and recommended capacities – see sections 3.8 and 5.3 above. The local authority should take this into account, along with any other relevant factors, in particular the management's compliance with the operations manual or safety certificate conditions. Improvements in safety management should normally lead to a reduction in the number of inspections.

In only the most exceptional cases would it be necessary for the local authority to be present at every event staged at the sports ground. Nevertheless, the local authority needs to be alerted quickly to anything that may affect stadium safety so that it may take any necessary action as soon as practicable. It should also invite feedback from other sources, in particular, from the other agencies represented on the SAG who may attend events in the course of their normal duties. This should be seen as an adjunct to, not a substitute for, inspection by the local authority.

When inspecting the sports ground during an event, the local authority should be sensitive to the operational responsibilities of its management. Any requests for access, in particular to the sports ground control room, must be reasonable and should not distract safety personnel from the performance of their duties.

6.6 Inspection personnel

It is for the local authority to determine how best to undertake inspections. It must be satisfied that the inspecting officers are competent for that purpose. There is no legal requirement for inspections to be undertaken by staff from a particular professional discipline. The local authority should consider the potential advantages of a team approach,



in particular to the statutory annual inspection. This might involve the officers who represent the police, fire and building authorities on the SAG.

The inspecting personnel may need to respond immediately if they become aware of a serious safety hazard. The local authority should therefore identify and formally record what enforcement powers it has delegated and to whom. Moreover, under section 11 of the 1975 Act or section 35 of the 1987 Act, any personnel who may need to exercise a right of entry to a sports ground must be formally authorised by the local authority. This too should be properly recorded in the minutes of the relevant committee.

6.7 Records of inspections

The local authority should maintain detailed records of all inspections as part of its audit trail. It may wish to consider sending a copy to the certificate holder, if only to ensure that there is no confusion about any need for immediate remedial action.

Staff inspecting all kinds of sports grounds have found written checklists invaluable. The detailed example at Annex B of this document is intended to assist not constrain local authorities. Individual authorities are free to modify it to meet their particular needs. They could, for instance, include references to other matters, such as environmental health, for which they may be responsible under other legislation. Moreover, it may not be practicable for a local authority to inspect every element of a very large ground on a single event day. Staff using it should be encouraged to comment as fully as necessary on each item and not merely to tick entries on a form. This is particularly important where there are any deviations or problems since these will need to be noted in writing and investigated.

Where breaches of the terms and conditions of the safety certificate, or non-compliance with the operations manual are noted, these should be brought to the immediate attention of the safety officer.

Further helpful guidance on “during performance” inspections of specified activities at sports grounds is available from the London District Surveyors’ Association.



7 ENFORCEMENT

7.1 Initial response

The local authority may need to respond quickly to any incident that puts people at risk or any safety weakness identified by or to its inspecting personnel. This is particularly important if the terms and conditions of the safety certificate appear to have been contravened and / or if the ground management is failing to comply with its own operations manual. The local authority should ensure that it has the necessary powers and procedures in place to enable it to take any necessary action in sufficient time. In this context it should be noted that the risk based safety certification provides local authorities with the same enforcement powers as a prescriptive certificate.

The response of the local authority must be proportionate to both the urgency and the seriousness of the case. It may choose between the following options:

- a reduction in the permitted capacity of all or part of the sports ground;
- the issue of a prohibition notice; or
- in the event of a breach of the safety certificate conditions, a warning, formal caution or prosecution.

7.2 Reduction in the capacity of a sports ground

If an incident suggests that the management of a sports ground is performing poorly, the local authority should review the (S) factor and hence the capacity of the sports ground or a particular section of the sports ground. The same applies if there has been no incident but the sports ground management's overall performance during an event appears deficient and / or it does not appear to be fully in control. Similarly, if the local authority's inspecting personnel identify any deficiencies in the fabric, equipment, records or management systems, which the authority has not already taken into account when accepting or calculating the permitted capacity, it should review either the (P) or (S) factor as appropriate.

Any new capacity should be properly calculated having regard to the change in circumstances. The local authority should follow the same procedures as during the routine annual review of the safety certificate. It should invite the ground management to submit its proposed revised (P) or (S) factor, while reserving the right to overrule this if appropriate. Wherever possible, the two parties should also agree a programme of remedial measures or improvements. Once these have been implemented, the local authority should consider restoring the original capacity. There is a clear onus on the local authority to act reasonably and in accordance with due process, not least because the certificate holder has a right of appeal against any reduction in capacity.

7.3 Prohibition notices

Unlike the other provisions of the 1975 and 1987 Acts, the power to issue a prohibition notice applies to all sports grounds, as defined in section 17 of the 1975 Act, including those that are neither designated nor contain a regulated stand.

A review of the (P) and (S) factors and a possible alteration to the permitted capacity is likely to be the appropriate response in the majority of cases. However, section 10 of the 1975 Act empowers the local authority to issue a prohibition notice in respect of all or part of any sports ground if it considers that the admission of spectators involves a risk to them so



serious that, until steps have been taken to reduce it to a reasonable level admission of spectators ought to be prohibited or restricted. The prohibition may be general or may apply to a particular event.

A prohibition notice is a measure of last resort. It may be general or apply to a particular event. In practice, it is likely to be required only if the problem is urgent or the certificate holder or management of the sports ground appears unable or unwilling to rectify the situation before the next event.

If the local authority considers and states in the notice that the risk to spectators is or may be imminent, the notice takes effect as soon as it is served. In all other cases, it comes into force at the end of the period specified in the notice. The local authority may amend or withdraw the notice at any time.

Under the Environment and Safety Information Act 1988 the local authority is required to keep a register of any prohibition notices that it has issued.

Local authorities need to ensure that any requirement in a prohibition notice is clear and specific. A general statement that the certificate holder shall comply with the operations manual to the satisfaction of the local authority would be inappropriate because it would leave the requirements unclear and at the whim of the local authority. By contrast, it would be acceptable to require the certificate holder to comply with the operations manual or to specify ways in which this should be achieved.

For further detailed guidance on prohibition notices, local authorities should refer to the DCMS Circular of 16 November 1995.

7.4 Procedures for issuing prohibition notices

The local authority needs to ensure that it can, if necessary, issue a prohibition notice at very short notice and without reference to senior officers or to members. In accordance with its standing orders, the local authority should formally identify the officers who may serve any prohibition notices on its behalf, the extent of their delegated powers and the circumstances in which they may be used. The officers concerned are likely to be those who already conduct inspections on event days.

The system of prohibition notices depends upon the local authority having effective administrative machinery in place. In particular, there is unlikely to be time to locate the required form and prepare a prohibition notice after the problem has arisen. The necessary documentation should be drawn up in advance on a contingency basis. Indeed, it may be advisable for the authorised personnel to carry a blank proforma that can be filled in and signed on the spot.

The local authority must send copies of any prohibition notice to the chief officer of police and, where it is not itself that authority, the fire authority or the building authority. It should be aware that no prohibition notice may include any directions, compliance with which would require the provision of police, unless the chief officer of police has consented to their inclusion. Only the chief officer of police may determine the extent of that provision.

7.5 Appeals against a prohibition notice

An aggrieved person may appeal to the magistrates' court against a prohibition notice within 21 days of the serving of the notice. However, the bringing of an appeal does not suspend the operation of the notice or of any amendment to it. If the prohibition notice is to apply to a single event, the local authority should, wherever possible, serve it well in advance so that



any aggrieved person has a reasonable opportunity to exercise this right of appeal. As indicated in section 3.11 above, any restrictions imposed under a prohibition notice remain in force unless or until amended or annulled by the court.

7.6 Penalties for contravention of the safety certificate

It is an offence for any responsible person, not merely the certificate holder, to contravene the terms and conditions of a safety certificate or a prohibition notice. These offences, along with the defence of absence of consent and due diligence, are listed in section 12 of the 1975 Act and section 36 of the 1987 Act.

Where it appears to the local authority that an offence, however minor or technical, may have been committed, it should consider its response, having regard to the facts and merits of the case and taking care to apply the normal rules of evidence. In very minor cases, particularly if the certificate holder has immediately taken action to prevent any repetition, the local authority may determine that no further action is warranted, though it may wish to warn those responsible as to their future conduct.

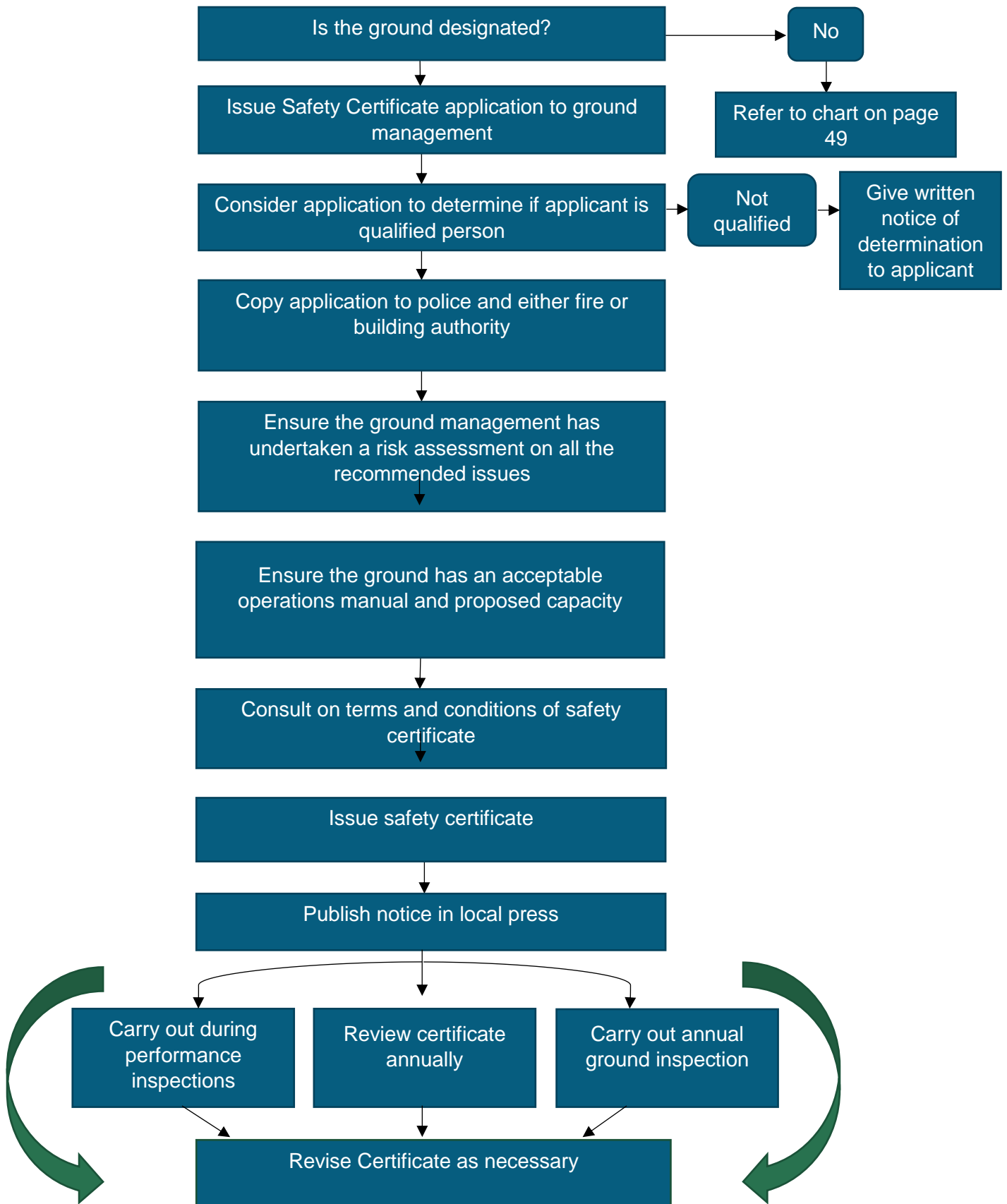
In more serious cases, for example where people have been put at risk but the offence appears to be an isolated oversight, the local authority might wish to administer a formal caution. However, in the event of persistent or flagrant breaches of a safety certificate, or those which have seriously prejudiced spectator safety, the local authority could consider bringing a prosecution under the 1975 or 1987 Act.

Whilst the primary purpose of this guidance is to provide advice to local authorities on the certification of sports grounds under the 1975 and 1987 Acts, local authorities should be mindful that action under other regulatory processes may be more appropriate in some circumstances.

The Health and Safety at Work Act 1974, the Licensing Act 2003 and the Regulatory Reform (Fire Safety) Order 2005 all provide routes by which a local authority can address safety and local authorities should ensure procedures are in place to gain the assistance of other departments or authorities where such action is appropriate.

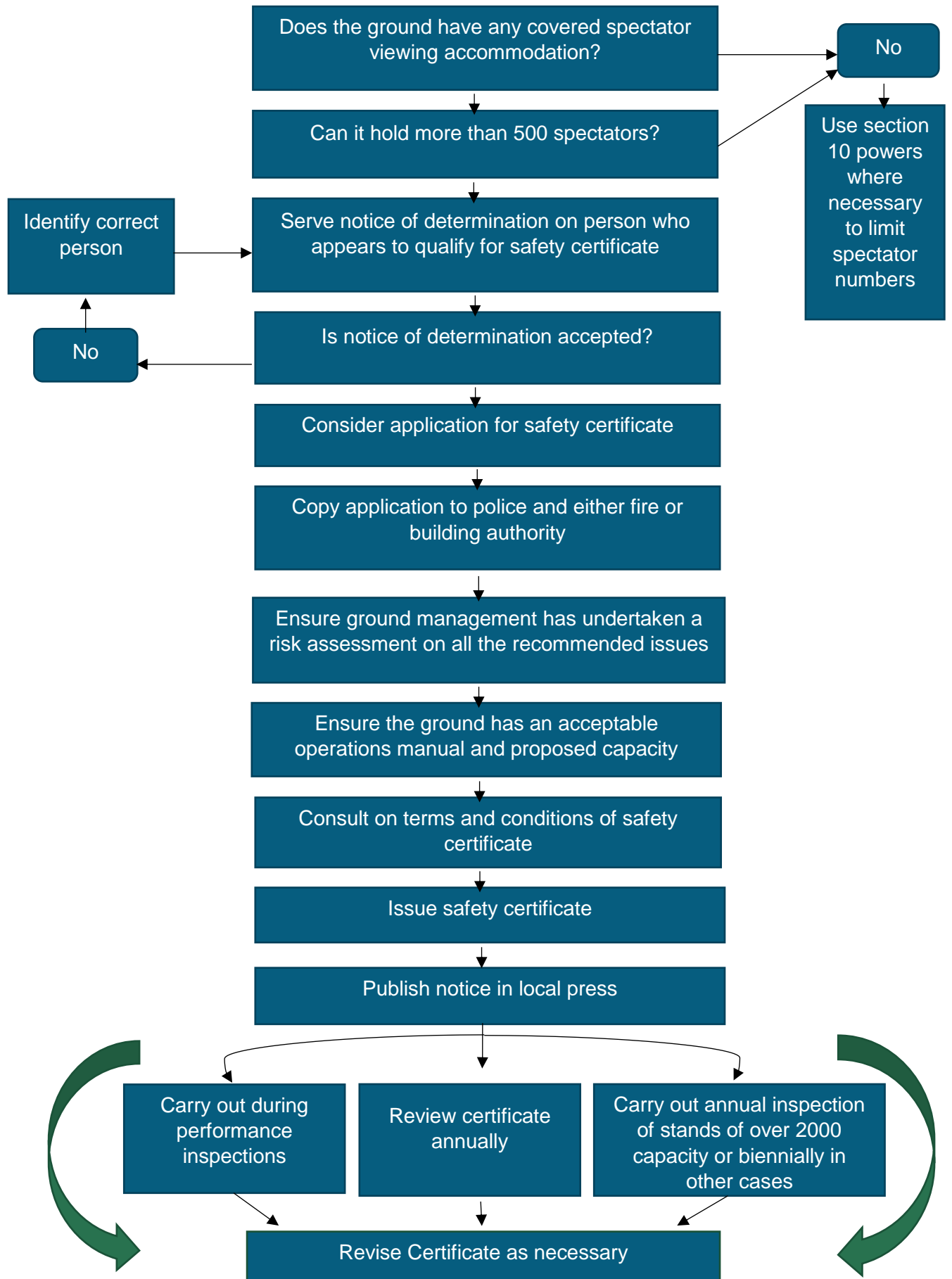


Annex A – Model risk based certificate process





Regulated stand certification process





Annex B Matchday Inspection Report

IN ATTENDANCE	
Club Safety Officer:	
Police Match Commander:	
Fire & Rescue Service Officer:	
Ambulance Service Officer:	
Other: i.e. FA, Sport delegate.	
Who has overall control of the event in terms of safety?	
Does there appear to be a clear understanding of responsibilities? (e.g. is there Statement of Intent or equivalent in place?)	
Weather conditions	
Score	

ATTENDANCE	
Whole Sports Ground	
Home	
Visitors	

COMMUNICATIONS		COMMENTS
Is the PA system consistent with recognised standards of best practice? (E.g. Is the PA clearly audible in all parts of the stands/ground/spectator area? Can the safety officer communicate directly with spectators?)	Y/N	
Is the CCTV consistent with recognised standards of best practice?	Y/N	



(E.g., does the CCTV cover all parts of the ground and is it capable of operating in all lighting conditions?)		
Is the CCTV being operated by trained personnel?	Y/N	
Are the stewards, supervisors, medical staff, and police radios working correctly?	Y/N	
FIRE		
Is there a fire detection system?	Y/N	
Has the fire alarm/system been checked? If so, by whom and when?	Y/N	
Is the fire alarm panel in the control room?	Y/N	
Are all designated fire doors/closing devices appear to be in good order	Y/N	
Are all means of escape routes throughout the venue/stadium clear	Y/N	
Are all exit doors/gates able to open without difficulty, are there observations on any holding devices.	Y/N	
Are emergency exits and exit route signage consistent with recognised standards of best practice?	Y/N	
Has there been a check condition of stairways – slip resistance, trip hazard, adequacy of lighting	Y/N	
Are all areas clear of accumulated litter? Does provision for waste storage/disposal appear adequate?	Y/N	
Is there any observations on location/availability of fire safety items?	Y/N	
GROUND CONDITIONS		
Are the exit doors and gates clearly marked? (If plan is available, do they conform?)	Y/N	
Do barriers and separating elements appear sound and risk free?	Y/N	



Is the ground free of any potential missiles? If no, what action is being taken?	Y/N	
Do any structural elements appear defective?	Y/N	
Are there adequate lighting levels in all areas assessable to spectators?	Y/N	
Are directional/advice signs in place and visible?	Y/N	
Is pitch perimeter fencing in place? If so what provision is there to allow evacuation onto pitch?	Y/N	
Are there any access issues (Wheelchair spaces, facilities, refuges and evac-chairs, viewing restrictions)	Y/N	
MEDICAL PROVISIONS		
Is there a medical plan?	Y/N	
Are the facilities consistent with recognised standards of best practice?	Y/N	
Have medical staff been briefed?	Y/N	
Have medical staff been issued with designated roles?	Y/N	
Number of first aiders?		
Number of Nurses/Doctors?		
Are any First Aid posts clearly identified?	Y/N	
What accident/injury records are kept?		
ATTENDANCE		
Are observations / assessments made of the crowd waiting to enter?	Y/N	



Are the numbers of spectators admitted being recorded? A) To the Ground B) By each section of the ground	Y/N	
Is the attendance within the permitted capacity? A) Stand / section B) Ground	Y/N	
Are turnstiles or method of monitoring entry working satisfactorily?	Y/N	
STEWARDS		
Is there a stewarding plan?	Y/N	
Number (and type) of supervisors: Number (and type) of stewards:		
Are stewards easily identified?	Y/N	
Is a record kept of stewards for later identification?	Y/N	
If stewarding plan provides details, are stewards in agreed positions?	Y/N	
Do steward positions appear to be consistent with recognised standards of best practice?	Y/N	
Are stewards: Trained Instructed & briefed Aware of emergency alert system Aware of emergency actions	Y/N	
Are there additional observations on the effectiveness of stewarding operation	Y/N	
EVENT LOG		
Has the Safety Officer carried out a pre-event safety check?	Y/N	



Paper check seen?	Y/N	
Comments made?	Y/N	
If any action is required has it been carried out?	Y/N	
Has action been checked? By whom?	Y/N	
Emergency power check carried out?	Y/N	
Has risk assessment has been carried out for the event?	Y/N	
Any observations on risk assessment?	Y/N	
EVENT MONITORING		
Do entry flow rates appear satisfactory?	Y/N	
Are all gangways kept clear?	Y/N	
Are there any pinch points evident from crowd observation or plan?	Y/N	
Is there crowd segregation?	Y/N	
Are there any signs of overcrowding, crowd discomfort or unrest?	Y/N	
Are all persons seated in seated areas?	Y/N	
If no, what action is being taken?		
Are there restricted viewing or quality issues?	Y/N	
POLICIES AND DOCUMENTATION		
Is there an event safety policy?	Y/N	
Is there a match day Operational plan (Segregation, ticketing, traffic ,etc)?	Y/N	
Is there a match Specific Risk Assessment?	Y/N	



Are Contingency Plans in place?	Y/N	
Is there an Emergency Plan?	Y/N	

GENERAL OBSERVATIONS (including overview of safety management and any safety related issues that occur during the inspection)



Annex C Sports Ground Design/Operation Variations – Risk Assessment

Name of sports ground:

Risk Assessment Number:

Risk Assessment prepared by:

Name:

Position:

Date of Assessment:

Element

E.g. exit width, barrier design, emergency lighting

**Design Standard /
Guidance / Code**

E.g. BS 8899, Green Guide, Technical Standards for place
of Entertainment, Building regs

**Detail of deviation or
variation**

**Reason for deviation or
variation**

Justification for deviation

**Mitigation factor(s) to
manage or limit the
impact of the deviation or
variation.**



Evidence that the proposed mitigation(s) provide a similar standard as the Standard / Guidance / Code

Details of drawings containing the proposed deviation or variation.

Implications of implementing the proposed deviation or variation

Implications of not implementing the proposed deviation or variation