

Changes to spectator accommodation – Process for SGSA consideration of changes at grounds where designated football matches are played

1. Introduction

- 1.1 The Sports Grounds Safety Authority (SGSA) has powers under the Football Spectators Act 1989 to issue licences to admit spectators to sports grounds which are used for designated football matches in England and Wales¹. The 1989 Act makes it an offence for a club/stadium operator to admit spectators for such matches without a SGSA licence.
- 1.2 **Clubs/stadium operators are required² to inform the SGSA of any proposed changes to spectator accommodation at grounds where designated football matches are played**, and which are covered by the SGSA licensing system.
- 1.3 This note includes specific guidance on proposed changes to spectator viewing accommodation at clubs with SGSA licensed grounds subject to the all-seater policy (Sections 2 and 3) and other SGSA licensed grounds (Section 4). Section 5 details the process clubs/stadium operators should follow when planning any infrastructure changes at SGSA licensed grounds, not only spectator viewing accommodation but also other changes, for example, concourses, hospitality areas, and turnstiles.
- 1.4 The SGSA recognises that clubs/stadium operators now have a range of engineering solutions available to them beyond traditional seating areas or terracing, in making changes to spectator accommodation at football grounds, including the installation of seats with barriers or seats incorporating barriers, subject to the relevant standards being met. In summary:
 - SGSA licensed grounds subject to the all-seater policy have the following spectator accommodation options available:
 - traditional seating areas (see Section 2).
 - areas with seats incorporating barriers or seats with independent barriers, to operate as seated areas (see Section 2).
 - areas with seats incorporating barriers or seats with independent barriers, licensed by SGSA to operate as licensed standing areas (see Section 3).

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

² This requirement is formalised in SGSA licence conditions.



- Other SGSA licensed grounds have the following spectator accommodation options available (see Section 4):
 - traditional seating areas
 - areas with seats incorporating barriers or seats with independent barriers, within existing seated areas
 - traditional terracing

2. All-seater policy

- 2.1 The Government believes that all-seater stadiums are currently the best means of ensuring the safety and security of spectators at designated football matches in England and Wales. The origins of the Government's all-seater policy are the Taylor report following the Hillsborough Stadium disaster in 1989 which concluded, amongst other things, that *"there is no panacea which will achieve total safety and cure all problems of behaviour and crowd control [but] seating does more to achieve those objectives than any other single measure."*
- 2.2 Prior to the 2021/22 season, the all-seater policy did not allow standing accommodation at the grounds of clubs who have been in the Premier League or Championship for more than three years since the start of the 1994/95 season.
- 2.3 In recognition that a significant number of spectators want the choice to stand, the government announced on 22 September 2021 that grounds could apply to be licensed by the SGSA for part of the 2021/22 licensing period to be 'early adopters' of licensed standing areas, subject to meeting specific criteria (see Section 3). Subsequently on 4 July 2022 the government, informed by an independent evaluation of the early adopter grounds in the 2021/22 season³, announced that grounds could apply to SGSA for a licence to operate licensed standing areas from the 2022/23 season onwards (see Section 3 below).
- 2.4 The all-seater policy continues to be administered and enforced through two conditions in the licences issued by the SGSA⁴.
- 2.5 Clubs/stadium operators whose grounds are subject to the all-seater policy, but who do not wish to apply to operate licensed standing areas, can still be permitted to install seats incorporating barriers or independent barriers within existing seated areas, subject to meeting strict conditions. In particular, the club/stadium operator must demonstrate how the ground will continue to comply with the two all-seater licence conditions (see footnote 4 below) by taking all reasonable precautions and all due diligence to encourage spectators to use seated areas (whether traditional seats, seats incorporating barriers or independent barriers in existing seated areas) to view the activity from a seated position.

³ The independent evaluation was undertaken by CFE research. The final research report is available here: [CFE-Research-evaluation-July-2022.pdf](#)

⁴ The two all seater licence conditions are: 1. Only seated accommodation is to be provided for spectators at a designated football match; and 2. Spectators shall only be admitted to watch a designated football match from seated accommodation.



- 2.6 The standards for seats with independent barriers and seats incorporating barriers are contained within the latest (sixth) edition of the *Guide to Safety at Sports Grounds* (the Green Guide) – see Sections 12.19 to 12.23.
- 2.7 In addition, SGSA published on 22 September 2021 Supplementary Guidance to the Green Guide (*Supplementary Guidance 01: Safe Standing in Seated Areas* (SG01)), detailing the main design and safety management issues associated with installing seats with independent barriers and/or seats incorporating barriers. SG01 also highlights the benefits of installing either independent barriers or seats incorporating barriers to mitigate the risks of progressive crowd collapse. The second edition of SG01 was published on 4 July 2022, informed by the independent evaluation of the early adopter programme (see paragraph 2.3 and footnote 3 above).
- 2.8 Clubs/stadium operators whose grounds are subject to the all-seater policy also have the option to install new areas of traditional seating, subject to compliance with the relevant Green Guide standards (see Chapter 12, including Section 12.16).

3. Licensed Standing Areas

- 3.1 The government announced on 4 July 2022 that all-seater grounds can apply to be licensed by SGSA to operate licensed standing areas from the 2022/23 season onwards, provided those grounds demonstrate compliance with specific criteria for the operation of those areas.
- 3.2 Licensed standing areas contain seats with independent barriers and/or seats incorporating barriers which meet the required standards (see paragraphs 2.6 and 2.7). Spectators will be permitted to watch the match from a standing position in such areas at grounds which are successful in their applications to operate licensed standing areas from 1 August 2022 onwards. This contrasts with the requirements placed on the use of such equipment at other grounds subject to the all-seater policy (see paragraph 2.5 above).
- 3.3 Further details on the government's announcement of 4 July 2022, including the associated licensed standing criteria, are available via the SGSA website: [SGSA Licensed Standing](#).

4. Standing accommodation

- 4.1 Standing accommodation is still permitted at other clubs/stadium operators whose grounds host designated football matches in England and Wales. This covers the grounds of those clubs in Leagues One and Two and who have not been in the Premier League or the Championship for more than three years since the start of the 1994/95 season. Additionally, any clubs with grounds newly subject to the all-seater policy who have applied to the Department for Digital, Culture, Media and Sport (DCMS) and been granted a time limited exemption by the Secretary of State, have the option to operate standing accommodation for the duration of that exemption.
- 4.2 Standing accommodation at those grounds should aim to meet the required standards set by the SGSA in the Green Guide (Chapter 13). These standards are



taken into account by the SGSA when considering the annual licensing application from those grounds.

- 4.3 Additionally, those grounds have the option, subject to compliance with the relevant Green Guide standards, to install:
- seats with independent barriers or seats incorporating barriers within existing seated areas (see Green Guide Sections 12.19 to 12.23, and SG01); and/or
 - new areas of traditional seating (see Green Guide Chapter 12, including Section 12.16).

5. Outline licensing process

- 5.1 The licence holder (i.e. club/stadium operator) discusses proposals for changes to spectator viewing accommodation, concourses, hospitality areas, turnstiles, and any other infrastructure with the local certificating authority and Safety Advisory Group and secures the support of the local authority to the planned installation⁵.
- 5.2 The licence holder informs the SGSA in writing of the planned installation, and requests confirmation that the SGSA's licence would apply to this area. The licence holder may do so as part of the annual licensing application process or separately at any time.
- 5.3 The SGSA seeks further information from the licence holder in relation to the planned area of installation, as set out in Annex A. For applications to operate licensed standing areas, SGSA will require information to be framed around the licensed standing criteria (see paragraph 3.3 above), using a specific licensed standing application form available on request from SGSA.
- 5.4 The SGSA considers the application, including taking views of stakeholders such as the relevant local authority in relation to the general safety certificate for the ground.
- 5.5 The SGSA informs the licence holder of its decision.
- 5.6 If the SGSA confirms issue of a licence, subject to satisfactory installation, then the licence holder may proceed with the installation, mindful of any associated requirements from the relevant local authority in the general safety certificate for the ground.

⁵ For change proposals involving new barriers, the licence holder will need to arrange for the necessary testing of any new barriers to be undertaken - a minimum of 10% of each unique or different type of product or fixing, location, gradient and different substrate. The licence holder will also need to arrange for the associated test results to be approved by the local authority. The minimum figure of 10% is without prejudice to any additional testing requirements of the local authority under its powers in relation to the General Safety Certificate.



6. Further information

- 6.1 Any questions or further information about this process should be sent to the SGSA at info@sgsa.org.uk. Alternatively, if you would like to discuss with a member of SGSA staff, please contact your local SGSA Inspector or our Headquarters on 0207 930 6693.

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Version 2.3



Annex A – Information requested from licence holder in relation to proposed changes to spectator accommodation

[NB Separate process for grounds applying to operate licensed standing areas – see Section 3 and paragraph 5.3 of main guidance note above]

NEW SPECTATOR ACCOMMODATION COMPLIANCE

Club:

Ground:

Stand where proposed new spectator accommodation to be located:

INFORMATION REQUIRED

I attach full details of:

- the layout, spacing, strength, construction, height and positioning of the proposed new spectator accommodation (whether traditional terracing, traditional seating, seats incorporating barriers or independent barriers in existing seated areas)
- the product specification, including details of crush barriers (where appropriate, including barrier test results and local authority approvals) and/or seating arrangements (where appropriate)
- capacity calculations, sightline calculations, layout plans and drawing
- proposed safety management measures to ensure safe and appropriate use of the new spectator accommodation
- *[for those grounds subject to the Government's all seater policy]* the proposed safety management measures that take all reasonable precautions and all due diligence to encourage spectators to use seated areas (whether traditional seats, seats incorporating barriers or independent barriers in existing seated areas) from a seated position.

Intended action

Details of scheduled timeframe for installation of proposed new spectator accommodation and impact on any ongoing events:

**Ground plans / structural details**

I attach the following ground plans / structural details:

Signed:

Name:

Position:

Organisation:

Date:

Notes:

1. Separate details should be provided for each area of new spectator accommodation. It may be completed by the applicant or by a professional consultant acting on behalf of the applicant.
2. The SGSA reserves the right to check any or all of the information supplied.