Sports Grounds Safety Authority

Oversight and Licensing Policy

August 2017 (revised March 2019[1], March 2022[2], July 2022[3] and July 2026[4])

About this document

This document sets out the Sports Grounds Safety Authority's (SGSA's) policy on how it will discharge its oversight and licensing powers under the Football Spectators Act 1989.

Regulatory role

1. Under the provisions of the Football Spectators Act 1989 (1989 Act) the SGSA has two regulatory responsibilities:
   a. To keep under review the discharge by local authorities of their functions under the Safety of Sports Grounds Act 1975 (1975 Act) in relation to grounds at which designated football matches are played (section 13 of the 1989 Act); and
   b. To issue licences to admit spectators to any premises for the purpose of watching any designated football match played at those premises (sections 10-12 of the 1989 Act).

   Designated football matches are defined as those matches played at the home grounds of clubs in the Premier and English Football Leagues, Wembley and the Principality Stadium[5].

2. This policy sets out the SGSA's regulatory objectives and how it will discharge its statutory responsibilities under the 1989 Act.

Regulatory objectives

3. The SGSA's principal purpose is to ensure sports grounds are safe for everyone.

4. The SGSA will use its regulatory powers in a risk-based and proportionate way to ensure reasonable safety is maintained at the home grounds of clubs in the Premier League and English Football League, Wembley and the Principality Stadium. Flow diagrams at Annex A summarise how SGSA will use its regulatory powers, which is outlined in more detail below.

[1] March 2019 version reflects the publication of the sixth edition of the Guide to Safety at Sports Grounds (Green Guide).
[2] March 2022 version reflects the introduction of licensed standing areas from 1 January 2022.
[3] July 2022 version reflects the ongoing operation of licensed standing areas beyond the 2021/22 season – see paragraph 38.
[4] July 2026 version includes an amendment to paragraph 16 and a new paragraph 24 that clarify SGSA's approach to Local Authority oversight under Section 13 of the Football Spectators Act 1989, and an additional final sentence in paragraph 38 about licensed standing areas.
[5] For full statutory definition see: Football Spectators (Designation of Football Matches in England and Wales) Order 2000.

5. Safety is a broad term which means that people present at a sports ground are protected against dangers of physical harm or injury arising from being present. In today's changing world, such dangers could arise from a range of factors including sports ground structures, safety management arrangements, terrorism, crowd disorder and other anti-social behaviour by individuals or groups which may cause physical harm or injury. Safety at a sports ground is not limited to the safety of spectators; it includes the safety of all people present at the ground. This will include measures to ensure the protection of groups such as club employees, stewards, agency staff, medical staff, players and officials during an event. However, it does not extend to any risks inherent from participation in the sporting or competitive activity.

6. Responsibility for safety at a ground where designated matches are played rests with ground management. This is regulated by the safety certificate issued by a local authority under the 1975 Act.

7. In overseeing how local authorities discharge their functions and in taking licensing decisions, the SGSA will seek to satisfy itself that appropriate provision is being made to secure reasonable safety at a ground. The SGSA believes that true safety comes when those who are responsible understand and believe in it for themselves. It cannot be imposed or achieved through external regulation alone.

8. The SGSA will therefore work in partnership and seek to ensure the provision of reasonable safety at sports grounds at which designated football matches are played through education, guidance and persuasion. If such an approach fails and the SGSA is concerned that reasonable safety is being compromised by the actions or inactions of others, the SGSA will use its regulatory powers to ensure reasonable safety is maintained.

9. The SGSA reserves the right, however, to take urgent action using its direct regulatory powers if a significant safety issue occurs in or around a SGSA licensed ground that merits such an approach (see paragraphs 25-29).

10. The SGSA's regulatory powers to insert a condition in a safety certificate issued by a local authority to any ground at which designated football matches are played (section 13 of the 1989 Act) and to issue licences to admit spectators (section 10 of the 1989 Act) are complementary and are not mutually exclusive. The SGSA is able to use both powers to regulate safety if it considers it appropriate to do so. The SGSA's licensing powers are particularly wide and, in addition to enforcing the Government's all-seater policy (see paragraph 34), can extend to other issues relating to the admission of spectators and the arrangements to which they are admitted, including facilities for disabled people.

11. Any condition inserted into a licence would only apply when the ground is being used for a designated football match, while a condition in a safety certificate would apply more widely to any activities specified in the certificate.

12. In line with the Hampton principles[6], the SGSA will take a risk-based approach to all its regulatory activity, ensuring that the focus of attention is on those sports grounds where the actions or inactions of the ground management or the local authority threaten to compromise the reasonable safety of those at the ground.

[6] *Reducing Administrative Burdens: Effective Inspection and Enforcement*, Philip Hampton, March 2005, included within the Regulators' Code: https://www.gov.uk/government/publications/regulators-code

Relationship with other agencies and regulatory bodies

13. The SGSA recognises the scope of its responsibilities extends into areas where other agencies are involved and other regulatory regimes exist; for example the safety of those working at a sports ground will also be covered by the Health and Safety at Work legislation. In such circumstances of regulatory overlap, the overriding principle should always be that the more specific legislation shall have primacy. In such cases the SGSA will seek to reach agreement with the other regulatory body with a view to ensuring that there is no duplication of regulatory control.

14. Where an issue within the SGSA's remit is being appropriately addressed by another specialist agency the SGSA would not normally seek to take regulatory action.

Oversight of local authorities

15. Under the provisions of the 1975 Act where a sports ground has been designated by the Secretary of State for Digital, Culture, Media and Sport as requiring a safety certificate, the local authority is required to issue a certificate containing such terms and conditions as it considers necessary or expedient to secure reasonable safety at the sports ground when it is in use for any activity specified in the safety certificate, to monitor compliance with that certificate and where necessary take any appropriate enforcement action.

16. Under the provisions of section 13 of the 1989 Act the SGSA has a statutory responsibility to keep under review the discharge by local authorities of their functions under the 1975 Act in relation to sports grounds at which designated football matches are played. The SGSA, in discharging that responsibility, may examine the safety certificate as a whole, to the extent that matters contained within it relate to or materially affect the safety of spectators at designated football matches. The SGSA will provide detailed advice and guidance on all aspects of safety certification and, at appropriate intervals, examine whether the local authority's policies, decisions and actions on the following matters are reasonable:

    a. the issue, revision and amendment of the safety certificate;
    b. the terms and conditions of the safety certificate, especially the prescribed capacity; and
    c. the certificate holder's compliance with the terms and conditions of the safety certificate.

17. The SGSA needs to be satisfied that terms and conditions in safety certificates, or the content of accompanying operations manuals, are sufficient to ensure the reasonable safety at the ground. These terms and conditions should be consistent with the particular circumstances at the ground concerned. The SGSA shall seek to encourage and persuade all local authorities to issue risk-based safety certificates.

18. The SGSA will not merely concern itself with the contents of safety certificates but also with the procedures adopted by the local authorities for determining the contents, for monitoring and for enforcing compliance. It will promote consistency and good practice. The process of local authority oversight is outlined below and in a flow diagram in Annex A, Figure 1.

19. The SGSA will not intervene formally where it considers terms and conditions to be excessively stringent provided that these do not put the safety of those at the ground



at risk. Action by the SGSA is not a substitute for ground management's statutory right to appeal to the courts.

20. The SGSA will carry out its statutory review function by:

    a. attendance at Safety Advisory Groups, meetings with the local authority and with such other parties that it may consider appropriate;
    b. monitoring the contents of the safety certificate, the records required to be kept under the terms and conditions of the safety certificate, and such other documents as it may consider relevant;
    c. a regular cycle of audits of local authorities' safety certification procedures, with the baseline exercise conducted in the 2021/22 season informing a subsequent risk-based approach on the frequency of such audits[7]; and
    d. proactive monitoring of compliance with the requirements and conditions of the safety certificate by way of matchday inspections to the sports grounds concerned.

21. Day-to-day contact with individual local authorities will be handled by SGSA inspectors. Contact will normally be with the officer with delegated responsibility for safety certification who may or may not be the Chair of the Safety Advisory Group. If issues cannot be resolved at this level, they will be escalated to the SGSA's Head of Inspectorate.

22. If the SGSA is unable to persuade the local authority to take the appropriate action and, as a consequence, it is felt that reasonable safety is being compromised the SGSA shall exercise the power provided by section 13(2) of the 1989 Act to issue a notice to the local authority to add a relevant condition to the safety certificate, in accordance with the statutory consultation requirements[8]. Any such notice will be issued by the SGSA Chief Executive and the local authority's enforcement of the condition monitored by the SGSA inspector.

23. Should a local authority fail to satisfactorily enforce any condition inserted into a safety certificate under the provisions of section 13(2) of the 1989 Act, the SGSA shall consider, subject to the consultation required under section 10(11) of the 1989 Act, whether to insert a condition[9] into the licence issued in respect of the ground. Compliance with any such condition shall be monitored by the SGSA inspector and any non-compliance dealt with as a breach of a licence.

Events other than designated football matches

24. Additional to discharging statutory responsibilities for the oversight of local authorities as outlined at paragraphs 15-23, the SGSA may also engage as appropriate with ground management, the relevant local authority, and the relevant Safety Advisory Group, in circumstances where a SGSA licensed ground is hosting an event other than a designated football match. Such SGSA engagement, however, will be limited solely to the provision of advice and guidance. Ground management will be responsible for safety at the ground for the event (see paragraph 6), and the relevant local authority will be responsible for issuing the safety certificate with appropriate terms and

[7] High-risk local authorities will be audited more frequently than medium and lower risk authorities. Medium and lower risk authorities will be audited more frequently if SGSA is made aware of new information since the previous audit to merit such increased frequency.
[8] Section 13(3) of the 1989 Act.
[9] Section 10(10) of the 1989 Act.



conditions to secure reasonable safety at the sports ground for the event (see paragraph 15).

Responding to a significant safety issue

25. Without prejudice to the stated approach outlined above as to how the SGSA will discharge its oversight powers under the 1989 Act, the SGSA may take direct action using its regulatory powers under sections 10-13 of the 1989 Act if a significant safety issue occurs in or around a SGSA licensed ground. A significant safety issue is defined here as any event at a SGSA licensed ground that:

    a. represents a significant risk to spectator safety, and

    b. in the judgment of the SGSA, requires urgent remedial action to be undertaken before spectators can safely be re-admitted.

26. In such circumstances, the SGSA will (as outlined in Annex A, Figure 3):

    a. write to the relevant licence holder in ground management, copied to the local authority, seeking a detailed report of the incident, including the likely causes of the incident and remedial action being taken to prevent a recurrence;

    b. work with the local authority and other partners to determine whether urgent amendments are required to the ground's safety certificate and/or the way in which all relevant partners coordinate the management of Zone Ex (see the Guide to Safety at Sports Grounds (Green Guide) sixth edition Section 6.10);

    c. notify the SGSA Board in writing and if appropriate convene a meeting of the Board at the earliest opportunity to inform the Board of the situation;

    d. determine whether direct regulatory action by the SGSA is necessary and, if so, what form of regulatory action is necessary in the circumstances, having regard to the facts of the individual case; and,

    e. assess whether a significant safety issue at a particular SGSA licensed ground has strategic implications for other SGSA licensed grounds and, if so, take action accordingly (see also paragraph 30).

27. If the SGSA determines that direct regulatory action by the SGSA is necessary it may, depending on the seriousness of the case, use its statutory powers to take one or more of the following courses of action:

    a. direct the relevant local authority to insert a condition in the safety certificate for the ground[10];

    b. change or insert additional licence conditions in the SGSA licence for the ground[11]; and/or

    c. in serious cases where the SGSA determines that the remedial action proposed by the licence holder will not address the relevant safety risks, including where the

[10] Section 13(2) of the 1989 Act.
[11] Section 10(10) of the 1989 Act.



licence holder fails to cooperate with the SGSA's investigation (see paragraph 26 a and b), the SGSA may suspend the ground's licence with immediate effect[12].

28. In determining the timings of the steps outlined at paragraphs 26-27 above, the SGSA will take into account the seriousness of the safety issue, the timing of the next designated football match scheduled to be hosted by the ground, and the statutory notice periods required under the 1989 Act[13].

29. For further information on the statutory notice periods required by the 1989 Act, please see paragraphs 52-53.

National safety issues

30. The SGSA recognises that there may be national safety issues which call for a consistent approach across all grounds at which designated football matches take place. In such cases, once it has first sought to educate and persuade, including discussing the issue with local authorities, the SGSA shall consider whether the nature of the issue is such that it should consult and then issue a notice[14] to all local authorities requiring an appropriate condition to be inserted into a safety certificate or the management of the issue to be included within an operations manual. The local authority's enforcement of such conditions shall be monitored by the SGSA inspector. Should the local authority fail to satisfactorily enforce the condition the SGSA shall consider, subject to the consultation required under section 10(11) of the 1989 Act, whether to use powers under section 10(10) of the 1989 Act to insert the condition into the SGSA licence issued to the ground.

Licensing

31. Under the provisions of section 10 of the 1989 Act, the SGSA issues an annual licence on 1 August each year with a licensing period that runs to 31 July the following year, to allow spectators to be admitted to a ground at which a designated football match is to take place in England and Wales. The process involved is set out below, and in Annex A, Figure 2.

32. As set out above under "Regulatory objectives", SGSA's licensing powers can be used to regulate safety and can also extend to other issues relating to the admission of spectators and the arrangements to which they are admitted.

33. A key purpose of the licence issued to those grounds concerns the risks attached to standing by spectators. The SGSA's approach is to ensure that:

    a. the Government's policy in respect of all-seater stadiums is enforced at those grounds to which the policy applies (see paragraphs 34-37);

    b. those grounds subject to the all-seater policy who wish to operate licensed standing areas meet SGSA's licensed standing criteria, including Supplementary

[12] Section 12(1) of the 1989 Act. Please note that in urgent cases the SGSA has the power to suspend a licence without carrying out a prior consultation – see section 12(5) of the 1989 Act and paragraph 54 of this policy.
[13] Section 13(3) (powers to direct a local authority to insert a safety certificate condition) and section 10(11) (powers to vary the SGSA licence) of the 1989 Act.
[14] Section 13(2) (issuing notice) and 13(3) (associated consultation) of the 1989 Act.



Guidance 01: Safe Standing in Seated Areas (SG01) (second edition) standards, for such areas[15] (see paragraph 38); and,

c. at any other ground, any conventional terraced standing accommodation is of the prescribed standard (see paragraphs 39-42).

All-seater grounds

34. The requirement for football grounds in the top two divisions of English football to have all-seater stadia has been in place since 1994. It is recognised that it would be unreasonable to expect a club that is promoted to the Championship for the first time to immediately replace any existing terracing with seating. However, they are expected to do so before they commence their fourth season in either the Championship or Premier League.

35. Once a club has been in the Championship or the Premier League for three seasons (cumulative), the Secretary of State for Digital, Culture, Media and Sport will consider instructing the SGSA to include conditions into the licence issued to the ground in respect of the seating of spectators, but before doing so the Secretary of State is required to consult the SGSA.

36. Where the SGSA wishes to make recommendations to the Secretary of State, and in particular where it is aware a club will be seeking an extension to the deadline, the SGSA is required, under the provisions of 11(5) of the 1989 Act, to consult with the local authority in whose area the ground is situated. Although there is no similar statutory requirement for the SGSA to consult with the licence holder, the SGSA will do so before making any recommendations to the Secretary of State. Further details on how it will consult in such circumstances are at Annex B.

37. Once the consultation is complete, unless the Secretary of State agrees to any extension or other variance, the SGSA will be directed by the Secretary of State to include conditions into the licence of any club that has spent three years or more in the top two divisions of English football since the 1994/95 season. These conditions are a matter for the Secretary of State but currently provide that:

    a. Only seated accommodation shall be provided for spectators at a designated football match.
    b. Spectators shall only be admitted to watch a designated football match from seated accommodation.

Licensing standing areas

38. Initially, SGSA licensed grounds with licensed standing areas were limited to five ‘early adopter’ grounds subject to the all-seater requirement which successfully applied in autumn 2021 to join an ‘early adopter’ programme of grounds to operate such areas from 1 January 2022 to the end of the 2021/22 football season. An independent evaluation of the programme informed subsequent SGSA advice to the Secretary of State in June 2022 recommending licensed standing areas continue beyond the 2021/22 football season. On 4 July 2022 the Government accepted this SGSA advice and allowed the ongoing operation of licensed standing areas, subject to SGSA licensed grounds demonstrating compliance with SG01 and associated licensed

[15] The licensed standing criteria and Supplementary Guidance 01 (SG01) – Safe standing in seated areas can be accessed here: SGSA licensed standing.



standing criteria[16]. Grounds which successfully apply and meet the licensed standing criteria will be issued with an updated SGSA licence which confirms that the ground does not need to comply with the all-seater licence conditions (outlined at paragraph 37 a and b) in respect of seats incorporating barriers or seats with independent barriers, if the accommodation and management of spectators meets the SGSA's requirements.

Standing accommodation at the prescribed standards

39. Clubs not subject to the all-seater requirement will be permitted to continue using conventional terraced standing accommodation provided it is of the prescribed standard in respect of the layout, strength and positioning of barriers. In considering whether to licence the use of each individual terrace the SGSA will have regard to the following criteria:

    a. whether the layout:

        i. comprises continuous crush barriers between radial gangways, as outlined in paragraph 11.9 and illustrated in Figure 19 of the sixth edition of the Guide to Safety at Sports Grounds (Green Guide); and
        ii. is such that all spectators are within 12 metres of a gangway or exit as measured along a line of unobstructed travel from the viewing position (see paragraph 13.5.b of the sixth edition of the Green Guide).

    b. whether the spacing, strength and construction of all the crush barriers conform to paragraph 11.2 and Figure 14 of the sixth edition of the Green Guide.

    c. whether the height and positioning of all the crush barriers accord with paragraph 11.11 and Figure 20 of the sixth edition of the Green Guide.

40. It should be assumed that level standing areas or non-stepped sloping areas will not form part of the viewing accommodation that will be licensed for spectator use.

41. Any club entering the English Football League for the first time will have three seasons to bring any terracing up to the prescribed standard. Any applications from such clubs to extend the three-year deadline will be considered against the criteria set out in paragraphs 39-40 above. The SGSA recognises that there may be a small number of existing terraces at clubs entering the English Football League for the first time which consist of non-continuous crush barriers, but which were built strictly in accordance with the edition of the Green Guide in place at the time of building and now comply fully with paragraph 11.10 of the sixth edition of the Green Guide. The SGSA will consider sympathetically applications to licence any terraces that fully satisfy these criteria.

42. Where a club in the Premier League or the Championship faces a deadline for meeting the all-seater requirement, or a club in Leagues 1 or 2 for bringing its terraces up to the prescribed standard, the SGSA will, when considering any licence application during the three-year deadline, seek to satisfy itself that the licence holder has achievable plans for meeting the deadline.

Non-safety issues

[16] For further details about licensed standing, including the associated criteria and Supplementary Guidance 01 (SG01) – Safe Standing in seated areas, see: SGSA Licensed Standing



43. Licences issued by the SGSA can encompass issues wider than the Government's all-seater policy and ensuring any permitted standing accommodation is of the specified standard. The SGSA's licensing powers can be used to regulate safety and can also extend to other non-safety issues relating to the admission of spectators and the arrangements to which they are admitted. If an issue which cannot be addressed through a safety certificate is brought to the SGSA's attention and it is persuaded that the licence would be the most effective way of addressing it, consideration shall be given to including appropriate conditions within the licence.

44. The SGSA's current policy is not to take the facilities provided for disabled people into consideration when issuing licences. Instead, the SGSA will seek to work in partnership with the Equality and Human Rights Commission (EHRC), other relevant stakeholders and with clubs, and encourage good practice in this area by providing advice and guidance.

Licensing process

45. When considering the renewal of a licence the SGSA will wish to be satisfied that further licence conditions are unnecessary. When submitting its licence application, the applicant may be required to provide information in respect of the safety of the ground, including its safety management systems and procedures, or any other issue which the SGSA considers relevant to its licensing decision. Where such information is to be requested licence applicants will be given a minimum of two months' notice of what will be required to be submitted with the licence application.

46. In addition to the information requested of clubs already subject to the SGSA's licensing requirements, any club seeking promotion to League 2 of the English Football League will be asked to supply the following additional information/documentation:

    a. a copy of the ground's safety certificate or any regulated stand safety certificates;

    b. a copy of the capacity calculations for the ground and each individual section of the ground, together with an assessment of the (P) and (S) factors[17]; and

    c. a copy of either the operations manual or event day management plan.

    Prior to the SGSA considering any licence application from a club seeking promotion an SGSA inspector will visit the ground on a matchday to validate the capacity calculation and whether the physical conditions at the ground and the ground's safety management would support the (P) and (S) factors if the club secured promotion.

47. On receipt of each licence application, the relevant SGSA inspector will prepare a written report for the SGSA Chief Executive, taking into account the information submitted in the licence and the inspector's knowledge of the ground as a result of the SGSA's oversight activity. In doing so the inspector will have regard to the specific matters outlined in section 10(12)(c) of the 1989 Act. The written report will be reviewed by the SGSA Deputy Heads of Inspectorate and approved by the SGSA Chief Executive. The report will include a licensing recommendation, along with the following:

    a. Ground overview, including structures and installations

[17] An explanation of (P) and (S) factors is provided in section 2,4 of the Green Guide.



b. Club overview, including governance and safety leadership

c. Safety management team

d. Persistent standing/fan disorder

e. Competence of local authority

f. Risk assessment and summary.

48. The SGSA will act proportionately when considering licence applications, as outlined above and in a flow diagram in Annex A, Figure 2. The reasonable safety of those at the ground will be treated as an overriding consideration. The SGSA Chief Executive will prepare an overview report informed by individual inspector written reports (see paragraph 47), for the Board's information. Once the process is complete and based on the SGSA's Chief Executive's decision, unless there are issues of concern (see paragraph 49 onwards), the licence will be issued.

Compliance and enforcement

49. Where there are issues of concern identified from the documents supplied by the applicant which impact on the reasonable safety at the ground, the SGSA inspector will liaise with the applicant and local authority to agree how the issues should be addressed before making a licensing recommendation. The SGSA will take a similar approach in the first instance if issues which impact on the reasonable safety at the ground arise during a licensing period after a licence has been issued.

50. If the issues cannot be resolved by education and persuasion the SGSA will consider issuing a notice[18] requiring appropriate conditions to be inserted into the safety certificate. Only if that fails to achieve the required improvement would the SGSA consider addressing the issue by acting using its licensing powers under Sections 10-12 of the 1989 Act. This could involve inserting additional licence conditions (see paragraphs 51-52) or, if the circumstances merit it, revoking, suspending or declining to issue a licence (see paragraphs 53-54). The process is also outlined in a flow diagram at Annex A, Figure 2.

51. Any decision to insert a new licence condition[19], whether safety or non-safety related, will only be taken after the statutory consultation required under section 10(11) of the 1989 Act which provides that SGSA shall not vary the terms or conditions of a licence without:

a. notifying the licence holder in writing of the proposed alterations or additions;

b. giving the licence holder an opportunity to make representations about them within the period of 21 days beginning with the service of the notice; and

c. taking any representations so made into account in making the decision.

52. A decision as to whether to insert a new licence condition will be made within 21 days of the end of consultation with the licence holder. The SGSA will provide full reasons for any decision to insert a condition.

[18] Section 13(2) of the 1989 Act, and following consultation as required by section 13(5) of the 1989 Act.
[19] Section 10(10) of the 1989 Act.



53. In considering whether to revoke, suspend or decline to issue a licence[20], the SGSA will have regard, alongside any other relevant circumstances, to the matters outlined in section 10(12)(c)[21] of the 1989 Act. The SGSA will also endeavour to consult the licence holder, the local authority and the Secretary of State before reaching a decision, taking into account the statutory consultation required under section 12(4)[22] of the 1989 Act which provides that the SGSA shall not revoke or suspend a licence without:

    a. notifying the licence holder in writing of the proposed revocation/suspension and the reasons for it;

    b. giving the licence holder an opportunity to make representations within the period of 21 days beginning with the service of the notice; and

    c. taking any representations so made into account in making the decision.

Urgent risk to spectator safety

54. The SGSA may determine, however, that the nature of outstanding remedial action represents an urgent risk to spectator safety. In such circumstances the SGSA may suspend the licence with immediate effect and, in parallel, notify the licence holder, the local authority, and the Secretary of State as soon as practicable of the grounds for such immediate suspension[23]. The licence holder may apply to the SGSA for the licence suspension to be lifted at any time. In doing so, the licence holder must demonstrate to the SGSA's satisfaction that the risk to spectator safety that led to the suspension has been resolved or adequately mitigated.

[20] Section 12 of the 1989 Act.
[21] This includes, but is not limited to, whether the equipment provided, procedures used and other arrangements in force at the premises are such as are reasonably required to prevent the commission or minimise the effects of offences at designated football matches.
[22] The consultation period prescribed under s12(4) of the 1989 Act is subject to s12(5), which enables the SGSA to suspend a licence without observing the requirements of s12(4) if it is satisfied that the urgency of the case requires such a course of action – please see paragraph 54.
[23] Section 12(5) of the 1989 Act.

Annex A – Flow diagrams

Figure 1: Oversight of local authorities

SGSA's responsibility to maintain oversight of local authorities.

This includes:

a. Attendance at Safety Advisory Groups
b. Monitoring contents of the safety certificate
c. Audits of local authorities' safety certification procedures
d. Monitoring of compliance with conditions of safety certificate via matchday inspections.

See paragraphs 20-21.

If a local authority does not take appropriate action, the SGSA can issue a notice to the local authority to add a relevant condition to the safety certificate (section 13(2) of the 1989 Act).

See paragraph 22

If a local authority fails to enforce any condition inserted into a safety certification, the SGSA shall consider inserting a condition in the SGSA licence (section 10(11) of the 1989 Act).

See paragraph 23.

National safety issues

As necessary, the SGSA will issue a notice to all local authorities requiring an appropriate condition to be inserted into a safety certificate (section 10(10) of the 1989 Act).

See paragraph 30.

Figure 2: Licensing

The SGSA licence is issued annually for the period from 1 August to 31 July. This licence allows spectators to be admitted to a designated football match.

All-seater licence

- Applicable for clubs in Premier League or Championship for three seasons (cumulative) since 1994/95.
- Licence includes conditions that only seated accommodation shall be provided.

See paragraphs 34-37.

Licensed standing licence

- Applicable to grounds that meet SGSA's licensed standing criteria
- Allows standing in seated accommodation in limited areas, with appropriate infrastructure.
- All-seater licence conditions apply elsewhere in ground.

See paragraph 38.

Terracing licence

- Applicable to clubs not subject to all-seater requirements.
- Terraced standing accommodation must meet prescribed standards within the Green Guide.

See paragraphs 39-42.

Licence application submitted, with information including safety management systems and procedures.

Where new/additional information is needed, the SGSA will give a minimum of two months' notice of what will be required. *See paragraphs 45-46.*

Written report prepared for the SGSA Chief Executive by SGSA Inspector, including licensing recommendation, taking into account the information submitted in the licence application and the inspector's knowledge of the ground, based on oversight activity. *See paragraph 47.*

SGSA Chief Executive overview report on all licence applications considered at Board meeting for their information. Except where any compliance concerns are raised, licence granted. *See paragraph 48.*

Compliance and enforcement – issues identified

The overriding consideration in compliance and enforcement decision making is the reasonable safety of those at the ground.

Step 1 – SGSA inspector to liaise with ground and local authority to agree how issues should be addressed, before making licensing recommendation.

Step 2 – If issue cannot be resolved, SGSA will consider issuing a notice requiring a condition in the safety certificate.

Step 3 – Should a condition in the safety certificate not deliver the necessary improvement in spectator safety, the SGSA will consider inserting an additional licence condition in its licence.

Any new licence condition can only take place after consultation with the licence holder.

Step 4 – Once previous steps exhausted, the SGSA will consider revoking, suspending or declining to issue a licence.

See paragraphs 49-53.

Figure 3: Responding to a significant safety risk

Significant safety incident/risk at SGSA licensed ground

(see paragraph 25 for definition)

Step 1

The SGSA will:

- Write to licence holder seeking details report of incident/risk.
- Work with local authority and others to determine if urgent amendments needed to safety certificate.
- Inform SGSA Board and convene a meeting if appropriate
- Determine if direct regulatory action is necessary. Assess if incident/risk has implications for other licensed grounds.

See paragraph 26.

Step 2

If SGSA determines regulatory action is necessary, one or both of the following courses of action will be taken:

- Direct local authority to insert a condition in safety certificate.
- Change or insert additional condition in the SGSA licence.

The choice of course of action will be determined on a case-by-case basis.

See paragraph 27 a and b.

Step 3

In serious cases, the SGSA may suspend the ground's licence where:

- Planned remedial action will not address the relevant safety risks, and/or
- The licence holder fails to co-operate with the SGSA's investigation.

See paragraph 27 c.

Annex B – SGSA consultation about requests for an extension to the all-seater deadline

(see also paragraphs 34-37)

1. In considering any case made by a licence holder and/or local authority for an extension to the deadline for meeting the all-seater requirement, the SGSA shall seek to be fair both to the licence holder who is seeking the extension and to other licence holders who have previously met the all-seater requirement within the specified deadline.

2. The SGSA would expect to support extensions only in the most exceptional circumstances. The SGSA shall not seek to lay down criteria because every case shall be judged strictly on its merits but by way of illustration, the SGSA would expect any licence holder seeking an extension to demonstrate to its satisfaction that:

   - its circumstances were wholly exceptional (i.e. not shared by other clubs)
   - the reasons for delay could not reasonably have been foreseen
   - the delay could not be attributed to the actions or inaction of the club.

3. Should a licence holder be seeking an extension because a club is in the process of moving to a new ground and wishes to avoid expenditure on its existing ground, the SGSA will not normally consider supporting a relaxation of the deadline until it has clear evidence that this would be for a strictly limited period and that the club concerned could realistically complete its relocation within a reasonable and definite timescale. In considering such cases the questions to which the SGSA will require clear answers are likely to include:

   - has the club received detailed planning permission?
   - has the site been acquired?
   - has the design of the ground and related facilities been finalised and approved by all relevant authorities?
   - has the necessary financial package been secured?
   - has the contract to build the ground been let?
   - has work started on site or has a start date been settled?
   - has a firm date for completion been fixed and are there safeguards against delay?
   - has the disposal of the existing site been agreed?