

All-Seater Policy Enforcement Approach

July 2026



Contents

Overview	3
Introduction	6
SGSA statutory role under the Football Spectators Act 1989	7
Key roles and responsibilities of other interested parties	9
SGSA's all-seater licensing responsibilities	9
Urgent and immediate enforcement action	10
'Initial steps' and 'further action' to demonstrate compliance with the all-seater licence conditions.....	11
SGSA all-seater risk categorisation	14
Licensed standing criteria compliance assessment	17
Local authority enforcement of safety certificates under the 1975 Act	18
SGSA oversight of local authority safety certification responsibilities	18
SGSA enforcement options.....	19
Different types of spectator accommodation	23
Review	23
Impact assessment	24
Annex A: Overview of Changes	25
Annex B: Licensed standing in seated areas criteria	27
Annex C: Additional background – roles and responsibilities of all interested parties	32
Annex D: SGSA enforcement approach flow diagrams	35
Annex E: Potential enforcement action by local authorities under the Safety of Sports Grounds Act 1975	39
Annex F: Causes and potential impact of standing in seated areas.....	41
Annex G: Persistent standing risk scoring methodology	43

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Overview

In July 2022, the football sector secured a historic change of policy, with the introduction of licensed standing for grounds subject to the all-seater licence conditions. This has seen engineering solutions being used to address the known safety risks associated with persistent standing in areas designed for seating.

The introduction of seats incorporating barriers or seats with independent barriers has had a positive impact on safety and the spectator experience. Most critically, the introduction of this infrastructure drastically reduces the risk of a progressive crowd collapse. Additional benefits have also been identified around behaviour and improved crowd management.

The SGSA has taken a deliberate, targeted approach with the roll out of licensed standing and safe standing infrastructure. This has also been reflected in our All-Seater Policy Enforcement Approach and related engagement activities. We are confident in the approach being used and the improvements it makes to safety.

Since this change, the level of persistent standing and the risks it creates have reduced significantly in England and Wales due to the commitment of grounds and the sector.

But more work is needed. Spectators persistently standing in seated areas is still a significant occurrence. Established, independent research has found that persistent standing leads to involuntary and uncontrolled crowd movements and subsequent related safety risks.

This All-Seater Enforcement Approach document sets out our objectives and operating model that will be used to drive our ongoing efforts to address persistent standing in seated areas. It outlines the measured, proportionate approach that we will be taking, and reflects the fact the legislation has been in place for several years.

Our message is simple: seats without any safe standing infrastructure are for sitting only. If fans persistently stand in seated areas, whether home or away, the ground has a duty and legal responsibility to address this known safety risk.

Regulatory principles

Since its first publication in July 2019, the All-Seater Enforcement Approach has provided a framework and actions for clubs to address the risks and ensure compliance with the all-seater requirements.

This updated version builds on the previous editions and seeks to provide greater clarity and transparency on how the SGSA will conduct risk-based evaluations of whether a ground is compliant.

Our regulatory activities are based on the following principles:

- **Evidence-based** – our decisions and actions are grounded in verifiable, documented information and data, drawn from our own inspection and assessment processes other reliable sources.
- **Risk-based** – our regulatory efforts are prioritised according to the likelihood and severity of harm, with activities proportionate to the assessed risk level.
- **Collaborative** – our actions and activities are based on constructive engagement, cooperation, and dialogue in order to achieve the desired outcomes.



All-seater compliance assessment

This updated version of the All-Seater Enforcement Approach, based on the experience gathered since 2019/20, seeks to provide greater clarity and transparency with a revised approach to how the SGSA will assess compliance with the all-seater policy. As detailed fully in paragraphs 33-41, the evaluation of compliance will be based on two overarching components and supporting assessments:

- **Foreseeable risk** – the extent to which safety risks related to persistent standing could be reasonably foreseen based on the existing control measures in place. The assessment will be based on the following two factors
 - Is there currently identified persistent standing at the ground?
 - Has there been a persistent standing-related incident and/or ‘near miss’ at the ground?
- **Confidence** – the level of assurance that the ground management’s arrangements will address the risks and achieve compliance in a timely and a robust manner. The assessment will be based on the following four factors:
 - Has the ground already undertaken further action to address persistent standing?
 - Does the ground accept that more remains to be done?
 - Does the ground have a plan in place with a reasonable timeframe?
 - Are there any technical issues related to the construction/layout of the ground?

These evaluations will be based on evidence gathered from a range of sources, including matchday inspections, ground assessments, and information from the ground and local authority.

Other changes

Additionally, SGSA has taken the opportunity make some further proposed changes to aid clarity and transparency. The summary of all the changes being considered are detailed at **Annex A**.

How to use the document

This document builds on the consistent and proportionate approach adopted by SGSA in previous seasons in relation to the enforcement of the all-seater licence conditions under statutory powers in the [Football Spectators Act 1989](#). That approach has helped to facilitate ongoing constructive engagement with grounds about the spectator safety risks associated with persistent standing in seated areas, and the agreement of voluntary mitigation measures at those grounds identified as higher risk.

The SGSA will work with ground management to address issues, liaising with relevant local authorities, in line with their safety certification responsibilities. Any SGSA enforcement options under the 1989 Act will be tailored to the risk and compliance levels for each ground.



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

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



Introduction

1. The Sports Grounds Safety Authority (SGSA) is the UK Government's expert body in respect of sports ground safety. The SGSA supports sports grounds, clubs, local authorities, and others to create a safe and enjoyable experience for spectators.
2. The Government's current policy in respect of all-seated grounds dates from the start of the 1994/95 season and is enforced by way of conditions set out in the licence issued by the SGSA in respect of premises where designated football matches are played in England and Wales¹ (henceforth "ground(s)").
3. Where grounds are required to be all-seated, the SGSA is instructed by the Secretary of State for Culture, Media and Sport to include all-seater licence conditions restricting the admission of spectators to seated accommodation. Since July 2022, the Secretary of State has allowed SGSA to amend these licence conditions to enable those all-seater grounds which demonstrate compliance with licensed standing criteria to operate licensed standing areas.
4. This document explains:
 - a. SGSA's overall objective of ensuring compliance with the all-seater and licensed standing licence conditions;
 - b. What voluntary steps ground management should take to avoid breach of the all-seater and licensed standing licence conditions, in particular in relation to persistent standing² in seated areas of those grounds subject to the Government's current all-seater policy;
 - c. The enforcement options available to SGSA in relation to the all-seater and licensed standing licence conditions; and
 - d. How SGSA makes decisions to enforce the all-seater and licensed standing licence conditions.
5. This latest document builds on the consistent and proportionate approach adopted by SGSA since the original version of the document was published in 2019. That approach has helped to facilitate ongoing, constructive engagement between SGSA and individual grounds about the spectator safety risks associated with persistent standing, and the agreement of voluntary mitigation measures at those grounds identified as higher risk. This updated version seeks to provide greater clarity and transparency with a revised approach to how the SGSA will assess compliance with the all-seater policy.
6. The document also details how the SGSA will discharge its statutory oversight of local authorities' safety certification responsibilities. It supplements the SGSA's [Oversight and Licensing Policy](#), and should be read in conjunction with that Policy.

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

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



7. The SGSA believes in firm but fair regulation. When undertaking enforcement activities the SGSA is mindful of better regulation principles in the Regulators Code³ and the need for such action to be transparent, proportionate, consistent, and targeted where the risks are greatest. Additionally, SGSA's enforcement approach recognises the respective roles and responsibilities of interested parties in relation to the Government's all-seater policy, including individual grounds subject to the policy, relevant local authorities, police services, football governing bodies, and supporters.
8. In implementing this enforcement approach at SGSA licensed grounds, the outcomes SGSA wants to achieve are as follows:
 - a. Ensure arrangements, equipment and procedures at grounds are such as reasonably required to minimise risks to spectator safety;
 - b. Except in licensed standing areas, ensure spectators watch a designated football match from seated accommodation;
 - c. Except in licensed standing areas, stop the incidence of persistent standing in seated areas from occurring or continuing at designated football matches; and
 - d. Identify and address breaches of all-seater and licensed standing licence conditions and deter future such breaches.
9. As with previous editions, this document will continue to be kept under review to ensure it remains appropriate and fit for purpose and revised as necessary.

SGSA statutory role under the Football Spectators Act 1989

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

³ The Regulators' Code came into statutory effect on 6 April 2014 under the [Legislative and Regulatory Reform Act 2006](#) and provides a clear, flexible, and principles-based framework for how regulators should engage with those they regulate. For further details see: [Regulators' Code - GOV.UK](#)



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

12. Offences for breach of a licence condition, or for admitting spectators without a licence, are subject to a defence⁴ that the offence took place without the responsible person's⁵ consent and that the responsible person took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.
13. The SGSA also has powers under the 1989 Act to oversee local authorities in their regulation (under the [Safety of Sports Grounds Act 1975](#)) of safety at all football grounds that are used for designated football matches in England and Wales (see also paragraph 47).
14. The Government's all-seater policy does not allow standing accommodation at Wembley Stadium, the Principality Stadium, and the grounds used by clubs who have been in the Premier League or EFL Championship for more than three years in total since the start of the 1994/95 season, with the exception of licensed standing grounds – see paragraph 15 below. The policy is administered and enforced through two conditions in the licences issued by the SGSA (outlined in b. and c. in paragraph 15 below).
15. Following the Government announcement of 4 July 2022⁶, grounds subject to the all-seater licence conditions outlined above, and who can demonstrate compliance with licensed standing criteria (see **Annex B**), are permitted by the Secretary of State for Culture, Media and Sport to operate licensed standing areas. The licensed standing criteria have been informed by independent evaluation by CFE Research on five 'early adopter' grounds in the 2021/22 season, which confirmed the positive impact on safety of licensed standing areas⁷. The first three conditions are consistent with other all-seater grounds (with the first condition a feature of all SGSA licences), while the fourth and fifth conditions are specific conditions governing the operation of licensed standing areas:
 - a. The licence holder shall permit any person authorised by the Secretary of State or the Sports Grounds Safety Authority to:
 - i. enter at any reasonable time the premises to which this licence applies; and
 - ii. make such inspection of the premises and such enquiries relating to them as he considers necessary for the purposes of Part 1 of the Football Spectators Act 1989.
 - b. Only seated accommodation is to be provided for spectators at a designated football match; and
 - c. Spectators shall only be admitted to watch a designated football match from seated accommodation.

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

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

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

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



- d. The licence holder need not comply with conditions b. and c. above in respect of seats incorporating barriers or seats with independent barriers, where SGSA has confirmed in writing for the purpose of this paragraph that:
 - i. such accommodation meets the standards for the time being set by the SGSA; and
 - ii. the management of spectators within such accommodation meets the standard required by SGSA to ensure their safety.
- e. SGSA may at any time, by notice in writing to the licence holder, vary or withdraw any confirmation it has given in respect of accommodation for the purposes of condition d. above.

Key roles and responsibilities of other interested parties

- 16. Ground management, in most cases the club, is primarily responsible for the safety of spectators, for enforcing the ground regulations and the SGSA licence conditions, and for making 'reasonable adjustments'⁸ to provide suitable accommodation for disabled spectators. A match specific risk assessment for the ground should form the basis of how ground management discharges these responsibilities.
- 17. Responsibility for the safety certification of grounds at which designated football matches are played rests with local authorities discharging their powers under the [Safety of Sports Grounds Act 1975](#) (the 1975 Act). Under the 1975 Act a local authority⁹ is responsible for issuing a general safety certificate for a ground. The local authority needs to be satisfied that the ground management can prevent contravention of the terms and conditions of the certificate (for example through appropriate policies and procedures) to ensure the 'reasonable safety'¹⁰ of all people who attend 'specified activities' at the ground, including designated football matches. The local authority is also the enforcing authority in relation to the [Health and Safety at Work etc. Act 1974](#).
- 18. Additional background on the roles and responsibilities of all interested parties, including spectators, is at **Annex C**.

SGSA's all-seater licensing responsibilities

- 19. The primary purpose of the Government's all-seater policy is to help ensure spectators are kept safe when they watch designated football matches played at home grounds used by clubs in the Premier League or the Championship for at least three years since the 1994/95 season, plus Wembley Stadium and the Principality Stadium.
- 20. In carrying out the SGSA's statutory functions in relation to the licensing of football grounds subject to the all-seater policy, SGSA Inspectors will primarily be concerned with seeking evidence that spectator safety is being managed in accordance with the all-

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

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

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



seater licence conditions, and with securing spectator safety, including the safety risks associated with persistent standing in seated areas.

21. SGSA Inspectors will consider evidence supplied by the ground management, whether directly or via the relevant local authority, including, but not limited to:

- health and safety risk assessment(s) for the ground and associated operations manual;
- match specific risk assessment(s); and
- the persistent standing management plan.

SGSA Inspectors will consider the evidence on its merits and make judgments about a number of factors including the actions of ground management in managing persistent standing and, more generally spectator safety. In particular, whether ground management is effectively managing both the nature and scale of persistent standing and the associated risks to spectator safety, when set in the context of the specific ground's infrastructure and the history of previous breaches of the licence and/or offences.

Urgent and immediate enforcement action

22. Where SGSA Inspectors identify evidence, or have evidence brought to their attention, that represents an immediate and significant risk to spectator safety, they will take urgent action, consulting the relevant local authority as necessary (see also the flow diagram at **Annex D, Figure 1**). The type of urgent action by SGSA Inspectors will vary depending on the precise nature of the immediate and significant safety risk and it should be noted that the below are not mutually exclusive:

- a. Informing the relevant local authority, who may then judge that urgent action is needed using that local authority's safety certification powers under the 1975 Act (see also paragraphs 45-46 and **Annex E**), where the immediate and significant safety risk arises from non-compliance with one or more of the terms and conditions of the general safety certificate of the ground; and/or
- b. Using SGSA's powers under the 1989 Act¹¹ to direct the relevant local authority to include particular terms and conditions in the general safety certificate (see also paragraph 47) in appropriate circumstances. This may include, for example, cases where there is evidence that the basis on which the safety certificate was granted has altered requiring additional measures to secure reasonable safety, or where the SGSA considers that the local authority is not discharging its safety certification responsibilities appropriately; and/or
- c. Formal enforcement action by the SGSA through the licensing regime under the 1989 Act (see also paragraphs 48-63) where there is an immediate and significant safety risk arising from non-compliance with one or both all-seater conditions. This may include, for example, cases where a ground is openly selling tickets to standing areas despite this being prohibited, or selling tickets to inappropriate seated accommodation, such as where seating is locked up and therefore not available to spectators to watch the match from a seated position.

¹¹ Section 13(2) of the [Football Spectators Act 1989](#).



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

23. The SGSA will look for evidence that the ground management is visible and active in taking all reasonable precautions and in exercising all due diligence to discourage persistent standing in seated areas and thereby manage spectator safety risks. This evidence may include, but not be limited to, SGSA’s matchday inspections observations, and any ground management team matchday observations requested by SGSA (see also paragraph 51). The causes and potential impact of persistent standing in seated areas, including the safety, crowd management, and customer care issues arising from such spectator behaviour, are detailed at **Annex F**.

Initial steps

24. Initial steps to discourage persistent standing and thereby comply with the all-seater licence conditions could include one or more of the below. In taking such initial steps, the SGSA recognises that no single step alone is likely to address the safety risks comprehensively, and that such initial steps need to be kept under regular review as part of driving continuous improvement (see paragraph 24i below). The SGSA further recognises that such initial steps may also manage wider spectator safety risks beyond those associated with persistent standing:
- a. Ground management work with both home and away supporters in the context of their customer charter to identify why they are standing and how best to address this. Ground management use the information received from this spectator engagement to inform their approach to managing persistent standing.
 - b. Ground management produce and keep under review a programme for educating and persuading their home supporters about why they must sit. This covers safety, crowd management and other customer care issues (see **Annex F**) and explains the likely consequences should spectators continue to stand persistently.
 - c. Ground management ensure that season ticket holders and home supporters are clearly advised that it is a condition of entry that they sit and that a deliberate failure to do so is likely to result in the withdrawal of the ticket without compensation and refusal of entry. Season ticket holders and those receiving their tickets in advance by post, or electronically, should be given this warning in writing.
 - d. Ground management may wish to warn away supporters that if they stand in seated areas they risk losing entitlement to tickets. Ground management will need to co-operate with other grounds/clubs, to ensure they treat all spectators equally both in terms of raising awareness of the all-seater condition in the ground regulations, and in the way in which that condition is enforced.
 - e. Ground management takes positive action to ensure that all gangways and vomitories are kept clear at all times, along with such measures as may be necessary to prevent uncontrolled migration by spectators standing in seated areas, for example:
 - i. closely controlling access to certain areas;
 - ii. ticket checks;
 - iii. taking certain rows of seats, or seats near gangways, out of use; and,



- iv. raising the height of front barriers on raised seating decks (upper tiers) and vomitories.
- f. Ground management uses accessibility audits to understand how best to meet their obligations under the [Equality Act 2010](#) and thereby ensure that disabled spectators are not prevented from seeing the pitch by others standing, even for short periods, in seated areas. Where views are obstructed in this way, the ground management should take the row or rows of seats causing the obstruction out of use.
- g. Ground management, informed by knowledge of the nature and scale of persistent standing at the ground, ensures the Persistent Standing Management Plan for the ground recognises the particular triggers (excitation and thrust) which can lead to a progressive crowd collapse, details the mitigation to manage such triggers, for example, stopping crowd surfing and/or elaborate goal celebrations by spectators, and keeps the Persistent Standing Management Plan under regular review.
- h. Ground management, informed by knowledge of the nature and scale of persistent standing at the ground, ensures that the Crowd Disorder and Anti-Social Behaviour Plan for the ground mitigates the risks of anti-social behaviour, including in persistent standing areas of the ground, for example through ticket checks to ensure appropriate segregation of supporters, and bag/personal searches to stop inappropriate items entering the ground.
- i. Ground management regularly measures the nature and scale of persistent standing at the ground to assess the efficacy of the initial steps already undertaken and to inform further action as part of driving continuous improvement (see paragraph 25 below).

Further action

25. If all initial steps have been taken in a robust manner to discourage standing in seated areas and thereby comply with the all-seater licence conditions along the lines detailed in the previous paragraph, the SGSA anticipates the focus of its regulatory activity will be on working with ground management to take **further action** using voluntary measures. This is to ensure ground management manages the safety risks associated with those spectators who are continuing to stand so as to bring the ground back into compliance with the all-seater licence conditions. In such circumstances, the SGSA will liaise closely with the relevant local authority given the clear relevance of safety certification under the 1975 Act. Appropriate further action by the ground management could include use of one or more of the following options either individually or in combination with each other. **However, option a. (spectator relocation) will not on its own provide a sufficient and sustainable solution to addressing risks to spectator safety associated with persistent standing and should only be considered for use in conjunction with one or more of the other options.**
- a. Ground management, informed by evidence of persistent standing taking place by either home or away supporters, relocate spectators who persistently stand in upper tiers, or on seating decks with gradients in excess of 25 degrees, to lower tiers and seating decks with gradients less than 25 degrees. This may be accomplished using ticket sales, marketing and communications prior to match day. This should help limit persistent standing to certain discrete areas of the ground with lower gradients where the spectator safety risks are lower, but still present. In doing so, ground management must recognise that safety risks associated with persistent standing still exist at lower gradients and should therefore take all initial steps to ensure the safety of spectators in such areas. Ground management must also



accept that such an intervention is **only a short-term mitigation** on route to a permanent solution and does not address sustainably the need to bring the ground back into compliance with the all-seater licence conditions.

- b. Ground management, in consultation with the relevant local authority and SGSA Inspector, take steps voluntarily to reduce capacity and density in areas of the ground where persistent standing continues to take place.
 - c. Ground management, in consultation with the relevant local authority and SGSA Inspector and informed by relevant guidance including the sixth edition of the Guide to Safety at Sports Grounds (Green Guide)¹² and Supplementary Guide 01 (SG01): Safe Standing in Seated Areas¹³, install seats incorporating barriers, or seats with independent barriers, in those remaining areas. This is in order to reduce the risk of progressive crowd collapse.
 - d. For those grounds that are subject to the all-seater policy on a voluntary basis¹⁴, ground management in consultation with the relevant local authority and SGSA Inspector and informed by relevant guidance including the Green Guide¹⁵, replaces seated areas with other forms of spectator accommodation such as terracing to prescribed standards¹⁶ or seats incorporating barriers/seats with independent barriers.
26. The SGSA will keep under regular review the way in which ground management implements voluntary measures to manage the safety risks for those spectators who are continuing to choose to stand. The SGSA will do so through matchday inspection activity, as well as regular dialogue with ground management and the relevant local authority. The SGSA will assess whether the current action being taken by ground management using voluntary measures is sufficient to manage the safety risks associated with persistent standing, and if not, whether further action is required to manage any identified residual risk.
27. In circumstances where safety risks associated with persistent standing continue to be identified at a ground, SGSA expects ground management to take action of the kind outlined at paragraph 25 above. The precise nature of that further action will depend on the specific nature of the residual risks identified and the individual characteristic of the ground in question. SGSA expects, however, the focus of such further action by ground management will be one or more of the two options articulated at paragraphs 25b-c. inclusive, so as to ensure the ground is brought back into compliance with the all-seater licence conditions.
28. The specific further action highlighted in the preceding paragraph has already taken place at a number of SGSA licensed grounds since the then Government announcement of 4 July 2022¹⁷ paving the way for the introduction of licensed standing

¹² The Guide to Safety at Sports, colloquially known as the 'Green Guide' (Sections 12.19-12.25), is the SGSA's guidance on spectator safety at sports grounds.

¹³ For further details see the SGSA website: [SG01: Safe standing in seated areas](#).

¹⁴ Defined as grounds that are used by clubs who have **not** been in the Premier League or the Championship for more than three seasons since the start of the 1994/95 season, but whose ground management has nonetheless chosen to provide seated accommodation only (see also paragraph 12 for which grounds are automatically subject to the Government's all-seater policy).

¹⁵ See Sections 13.1-13.24 of the Green Guide.

¹⁶ For further details see SGSA website: [Terracing](#).

¹⁷ Statutory instrument [SI 2022/78](#) was laid on 4 July 2022, which revoked all existing all-seater orders, and replaced them with a single direction from the Secretary of State to SGSA imposing new requirements as respects to the seating of spectators at designated football matches.



areas. Further details about the current number of licensed standing grounds are available on the SGSA website here: [Licensed standing - SGSA](#). Case study examples of effective installation of new infrastructure are available from the SGSA website here: [Licensed standing case studies - SGSA](#), highlighting what can be done to address persistent standing risk in different contexts.

29. In undertaking the further action outlined at paragraphs 25 and 27 above, the SGSA expects to see evidence of ground management undertaking meaningful engagement with their club's home supporters to help inform the nature and scale of any proposed new infrastructure. The SGSA recognises, however, that ultimately the decision about whether to install new infrastructure will be for ground management, driven by a need to address the identified risk to spectator safety and comply with the all-seater licence conditions.
30. Where ground management decides to take further action in the form of the installation of areas of seats incorporating barriers and/or seats with independent barriers, the SGSA anticipates that such infrastructure will be available for both home and away supporters to ensure equality of choice for both sets of supporters. The SGSA accepts, however, that the capacity of home and away areas may differ. Furthermore, whilst such installation of seats incorporating barriers and/or seats incorporating barriers may not result in an immediate application from ground management to operate licensed standing areas, the SGSA does expect such an application within two years of the new infrastructure first coming into use by spectators so that they can realise fully the benefits of such infrastructure in terms of improved spectator safety.
31. In exceptional circumstances where ground management can demonstrate that the demand for standing accommodation is limited to either one of home or away supporters but not both, SGSA will consider waiving the need to provide seats incorporating barriers and/or seats with independent barriers for both sets of supporters. The SGSA will consider each case on its individual merits.
32. Since the 2018/19 season SGSA licensed grounds have had the opportunity to engage with their local Inspector and local authority and then address persistent standing risk. Moreover, the Government's announcement of 4 July 2022 means there is now a well-established option available to those grounds subject to the all-seater policy to apply to operate licensed standing areas. If there is limited or no evidence of further effective action being taken along the lines outlined at paragraphs 25 and 27 in response to residual safety risks arising from persistent standing, SGSA will move to formal enforcement action as outlined at paragraph 48 onwards.

SGSA all-seater risk categorisation

33. The SGSA aims to ensure its enforcement response under the 1989 Act is proportionate, appropriate to each situation, and targeted where the risks are greatest. Without prejudice to circumstances in which urgent action is merited (see paragraph 22), SGSA will categorise spectator safety risk and the extent of compliance with the all-seater policy as a necessary pre-cursor to taking formal enforcement action.
34. The assessment of all-seater risk categorisation has two components:
 - a. the nature and scale of persistent standing and the extent to which it poses a **foreseeable risk** to the safety of spectators (paragraph 37); and,
 - b. **confidence** in the ground management's ability to address such risk to spectator safety in a timely and robust manner (paragraph 38).



35. At the outcome of the assessment process, SGSA will place each SGSA licensed ground into one of five main categories shown immediately below:
- Higher Foreseeable Risk/Lower Confidence
 - Higher Foreseeable Risk/Higher Confidence
 - Lower Foreseeable Risk/Lower Confidence
 - Lower Foreseeable Risk/Higher Confidence
 - No persistent standing risk identified
36. SGSA will assess the risk to spectator safety arising from persistent standing on an ongoing basis, using evidence from SGSA matchday inspections, together with other evidence supplied by ground management and/or the relevant local authority.
37. For each SGSA licensed ground, SGSA will use the following two factors to assess the **foreseeable risk** to spectator safety arising from persistent standing.
- Is there **currently identified persistent standing** at the ground and thereby a risk to spectator safety?

SGSA assessment will be based principally on the persistent standing risk scores for the ground, as generated following SGSA matchday inspections. The methodology used to calculate these scores is at **Annex G**. Identified persistent standing at a ground will generate a risk score in a range from 1 (lower risk) to 5 (higher risk). SGSA recognises that matchday inspections normally only happen two to three times per season at each ground, so SGSA may judge it appropriate to request additional information about levels of persistent standing from ground management and/or the relevant local authority to help supplement SGSA's own matchday inspection observations.
 - Has there been a persistent standing-related incident and/or a 'near miss'¹⁸ at the ground in the past?** For example, a progressive crowd collapse, and/or persistent standing-related injuries to spectators. If so, has there been lesson learning from the incident(s), and action taken (as defined in paragraphs 25 and 27) to avoid a repetition?

SGSA will use information from a range of sources, including, but not limited to, SGSA matchday inspections, information requests to ground management and/or relevant local authority, feedback from supporters, and desk research, to identify whether in the past there has been a progressive crowd collapse at the ground and/or injuries to spectators arising directly from persistent standing. And, whether there has been effective lesson learning by ground management following such incidents.
38. Additionally, SGSA will use the following four factors to assess for each SGSA licensed ground the extent of **confidence** in the relevant ground management team to address any identified persistent standing risk at a ground in a timely and a robust manner.

¹⁸ SGSA defines near miss consistent with the Health and Safety Executive definition of "An event that, while not causing harm, has the potential to cause injury or ill health." For further details see the SGSA website here: [Near misses - SGSA](#).



- a. Has the ground management **previously undertaken any of the further action** outlined at paragraphs 25 and 27 above to start to address robustly the historic observed persistent standing risk at the ground, but more remains to be done?

SGSA will use its own written records to confirm whether ground management has previously undertaken some of the further action to address persistent standing risk as outlined at paragraphs 25 and 27.

- b. **Does ground management accept that more remains to be done** in terms of further action as outlined at paragraphs 25 and 27 to address robustly the current identified persistent standing risk at the ground?

SGSA will use its own written records, most notably exchange of correspondence with the senior decision maker in ground management and lead officials at the relevant local authority, to confirm whether ground management has accepted that more needs to be done at the ground in terms of further action as outlined at paragraphs 25 and 27.

- c. **Does ground management have a detailed and funded plan to undertake further action in a reasonable timeframe** to address the current identified persistent standing risk at the ground?

SGSA will use its own written records, most notably exchange of correspondence with the senior decision maker in ground management and lead officials at the relevant local authority, to judge whether ground management has a detailed and fully funded plan in place to address persistent standing risk at the ground in terms of further action as defined at paragraphs 25 and 27. The written plan will need to demonstrate how the work will be funded and completed:

- i. in a timely manner; and
 - ii. in a robust manner, using one or more of the further action options at paragraphs 25 and 27 to mitigate effectively the identified persistent standing risk and to sustain supply/demand equilibrium, thereby providing sufficient seats with standing infrastructure for the number of fans who choose to stand at the ground.
- d. Are there **technical issues** associated with the construction/layout of the spectator accommodation in the areas where identified persistent standing risk is taking place at the ground which make it disproportionately challenging to be able in a phased manner to install seats incorporating barriers or seats with independent barriers? Will such technical issues delay installation until:
- i. an international break/close season; and/or
 - ii. identified structural/physical issues can be addressed fully, for example through construction of a new stand/ground?

SGSA will use its own written records, and exchange of correspondence with the senior decision maker in ground management and lead officials at the relevant local authority to judge whether there are identifiable technical issues that make it disproportionately challenging for ground management in a phased manner to install seats incorporating barriers or seats with independent barriers infrastructure in the areas of the ground where persistent standing is taking place.



Note – SGSA will NOT consider fixture congestion to be a technical issue within scope of this factor.

39. Additional to the six factors outlined in paragraphs 37 and 38, SGSA Inspectors will also take account of any other information they collect in the course of undertaking SGSA regulatory responsibilities¹⁹, that is relevant to the assessment of the risk of persistent standing-related incidents at the ground and/or SGSA's confidence that ground management will address the risk in a timely and a robust manner. Such information will include, but not be limited to, information gathered through ground assessments and local authority audits²⁰, and through an assessment of club-supporters' groups dialogue. For example, information relating to planned ground redevelopment, away fan relocation, short notice ground sharing by two or more clubs, successive promotions resulting in sharp increases in ground attendances and/or frequency of high-risk fixtures.
40. Throughout this risk categorisation process for each SGSA licensed ground, there will be an ongoing dialogue between the SGSA, ground management, and, as appropriate, the relevant local authority. Additionally, the SGSA will undertake ongoing internal oversight of the risk categorisation process to ensure it is being applied consistently and using the best available evidence in order to support a risk-based enforcement approach.
41. The flow diagrams at **Annex D** (Figures 1-2) illustrate how the SGSA's risk categorisation approach is anticipated to work in practice, with any formal SGSA enforcement action under the 1989 Act targeted where the identified risks are greatest.

Licensed standing criteria compliance assessment

42. For those grounds subject to the all-seater policy and operating licensed standing areas, SGSA Inspectors will periodically assess compliance with the safety management aspects of the licensed standing criteria, using evidence supplied by ground management and/or the relevant local authority, as well as evidence from SGSA matchday inspection activity. They will do so by identifying:
 - a. the nature and scale of any non-compliance with the safety management aspects of the licensed standing criteria and associated risk to spectator safety;
 - b. the likelihood of any identified risk to spectator safety from step a. above actually occurring;
 - c. the potential impact/consequence if the risk to spectator safety were to materialise; and
 - d. the nature of any relevant mitigation already in place to manage the risk.
43. The licensed standing criteria compliance assessment outlined above will inform the nature and timing of any remedial action identified by the Inspector to enable the ground to come back into compliance with all the criteria, which the Inspector will then communicate to the ground in writing, copied to the relevant local authority.
44. The licensed standing criteria compliance assessment process outlined above complements the all-seater risk categorisation process (see paragraphs 33-41), with licensed standing grounds subject to both processes. For example, in circumstances

¹⁹ Sections 10(8), 13(6) and 13(7) of the [Football Spectators Act 1989](#).

²⁰ For further details about ground assessment and local authority audits see: [SGSA licence - SGSA](#).



where a licensed standing ground is found to be non-compliant with the licensed standing criteria, but is compliant with the all-seater conditions, then any remedial action identified by SGSA will focus on bringing the ground back into compliance with all the licensed standing criteria. By contrast, in circumstances where a ground is compliant with the criteria in terms of operating licensed standing areas, but spectators continue to choose to stand in seated areas of the ground, the all-seater risk categorisation process will inform the SGSA's enforcement approach.

Local authority enforcement of safety certificates under the 1975 Act

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

SGSA oversight of local authority safety certification responsibilities

47. If the SGSA judges that the relevant local authority is failing to take all appropriate enforcement action under the 1975 Act²¹ to require the ground management to ensure the 'reasonable safety' of all people who attend designated football matches at the ground, the SGSA has the power under the 1989 Act²² in an appropriate case to require the relevant local authority to insert conditions in the safety certificate for the ground. In such circumstances, the SGSA's potential enforcement action will be consistent with the examples of potential local authority enforcement action at Annex E. The SGSA also has the power under the 1989 Act²³ to impose additional terms and conditions in the ground's licence to prevent or minimise the effects of non-compliance with the licence. The SGSA's powers to require the relevant local authority to insert conditions in the safety certificate are subject to the SGSA undertaking a statutory consultation process²⁴.

²¹ Section 2(1) of the [Safety of Sports Grounds Act 1975](#).

²² Section 13(2) of the [Football Spectators Act 1989](#).

²³ Section 10(10) of the [Football Spectators Act 1989](#).

²⁴ Section 13(3) of the [Football Spectators Act 1989](#).



The SGSA's powers to impose additional terms and conditions in the licence are subject to affording ground management the opportunity to make representations²⁵.

SGSA enforcement options

All-seater grounds

48. The SGSA aims to ensure enforcement action under the 1989 Act is proportionate, appropriate to each situation, and targeted where the risks are greatest. In taking enforcement decisions, SGSA staff will use their professional judgment and discretion, taking account of the risk categorisation process outlined above (see paragraphs 33-41 and **Annex D Figures 1-2**), and all other relevant factors. Paragraphs 64-71 below outline the SGSA's enforcement options specifically in relation to licensed standing areas.
49. Except where immediate and significant safety risks necessitate urgent action (see paragraph 22), SGSA's enforcement approach under the 1989 Act will use an **escalating scale of action** (see also **Annex D Figure 3**) designed to:
 - a. give ground management the opportunity to take all initial steps and further action (as defined at paragraphs 24-25) to comply with the all-seater licence conditions before formal enforcement action is taken;
 - b. help ground management to identify appropriate and proportionate further action to manage residual safety risks associated with those spectators who still choose to stand despite ground management taking initial steps and further action (as defined at paragraphs 24-25) to ensure compliance with the all-seater licence conditions (for grounds with licensed standing areas, this includes managing the safety risks associated with spectators continuing to stand in seated areas of ground); and
 - c. keep the relevant local authority informed of developments at every stage given the local authority's related safety certification responsibility for the ground.
50. The following **enforcement options** are anticipated to be used, tailored to the risk categorisation profile for each ground (see paragraphs 33-41).
51. In the first instance the SGSA will provide ground management, and the relevant local authority, with **advice and guidance** about any additional initial steps and associated timescales for ground management to comply with the all-seater licence conditions. This will cover anything deemed necessary or expedient to ensure spectator safety at the ground in the context of compliance with the all-seater licence conditions, including but not limited to one or more of the initial steps detailed at paragraph 24. It may also include a requirement for the ground management team to supply SGSA with regular written reports of that team's own matchday observations of the nature and scale of persistent standing at designated football matches hosted by the ground, to supplement SGSA's matchday inspection observations at the ground.
52. Depending on the particular risk categorisation profile for the ground, the SGSA's advice and guidance may also include any further action and associated timescales to manage residual risk associated with spectators who still choose to stand, including but not limited to one or more of the further actions detailed at paragraph 25.

²⁵ Section 10(11) of the [Football Spectators Act 1989](#).



53. Subject to the response of ground management to the advice and guidance, the SGSA will then seek to agree **voluntary measures** to encourage ground management to implement the actions detailed in the SGSA's advice and guidance.
54. If the ground management fails to co-operate and/or take timely action to minimise the incidence of persistent standing in seated areas including but not limited to one or more of the further action at paragraph 25, the SGSA will **advise** the relevant local authority. The SGSA anticipates that the relevant local authority will then determine what action is appropriate, including potential enforcement action under the 1975 Act. However, if the SGSA considers that the local authority is failing to take appropriate action under the 1975 Act, SGSA may **direct** the local authority to insert conditions in the general safety certificate (see paragraph 47).

Enforcement of SGSA licence conditions

55. Irrespective of the steps outlined at paragraph 54, if the SGSA determines that enforcement action is merited, for example, if the SGSA determines spectator safety will not be wholly managed under paragraph 54, the SGSA may use its direct licensing powers under the 1989 Act and as outlined below, in which case the SGSA will inform the local authority that it is minded to take enforcement action against the ground management.
56. If the ground management fails to co-operate and/or take timely action to minimise the incidence of persistent standing, the SGSA will issue a **written warning** to ground management.
57. The written warning will explain clearly the necessary actions and associated timescales for taking reasonable steps to comply with the all-seater licence conditions, and the potential consequences of non-compliance. Potential consequences may include the SGSA using its enforcement powers under the 1989 Act to vary the terms and conditions (including the all-seater conditions) of the licence to admit spectators, or suspend, revoke or not renew all or part of the licence for the ground. The SGSA's judgment as to whether or not enforcement action should be targeted at all or part of the licence will be informed by whether non-compliance with the all-seater licence conditions is associated with part or all of the ground and the nature of the residual risk.
58. A draft of the written warning will be shared with ground management, so they have an opportunity within 21 calendar days to make representations. The final version of the written warning will be copied to the Secretary of State for Culture, Media and Sport and the relevant football governing body. The SGSA will also keep the relevant local authority informed of developments.
59. If the ground management still fails to take the necessary action in a timely and robust manner²⁶, the SGSA will take enforcement action under the 1989 Act either directly or through the variation of the terms and conditions of the licence, including new terms and conditions where appropriate. Such action will be:
 - a. **Suspension of part or all of the licence** – the SGSA is more likely to use this approach if it is confident that ground management will take all initial steps and appropriate further action to comply with the all-seater conditions in a reasonable timeframe and/or a robust manner; or

²⁶ See paragraph 38c.



- b. **Revocation** – the SGSA is more likely to use this approach if it cannot foresee that ground management will take all initial steps and appropriate further action to comply with the all-seater conditions in a reasonable timeframe and/or a robust manner during the course of a licensing period; or
 - c. **Non-renewal of all or part of the licence** – the SGSA is more likely to use this approach on receipt of an application to renew a licence if it does not consider that ground management has taken all initial steps and appropriate further action to comply with the all-seater conditions in a reasonable timeframe and/or a robust manner ahead of a new licensing period.
60. Unless there is an urgent issue which poses a serious and immediate risk justifying immediate suspension²⁷ of the licence (see paragraph 22), all of the above actions will be commenced by a written notice to ground management detailing the proposed action and giving them the opportunity to make representations. In respect of suspension, revocation or the imposition of varied/new terms and conditions this will require a response within 21 days from date of service²⁸; in respect of non-renewal this will require a response within 28 days from the date of service²⁹. The SGSA will take these representations into account in making its decision which it will communicate to ground management after the relevant period has elapsed.
61. The SGSA recognises the outcome of any enforcement action as described above for non-compliance with the all-seater licence conditions is likely to be that ground management, when hosting designated football matches at their ground, will not be allowed to permit spectators to part or all of the ground. This will be an unwelcome outcome for all concerned, including spectators. With that in mind, the SGSA will seek to proceed by means of advice, persuasion and agreement, with use of statutory powers a last resort, except in circumstances where the SGSA considers urgent action (paragraph 22) and/or enforcement (paragraph 62) is merited.
62. Nevertheless, the SGSA will take formal enforcement action if all other approaches have been exhausted and it considers based on the available evidence that the risk of spectator safety is unacceptably high and/or the ground management is failing to co-operate or act in a timely and/or robust manner to comply with the terms and conditions (including the all-seater licence conditions) of the licence to admit spectators.
63. If the SGSA considers that the risk gap created by non-compliance with SGSA licence conditions is extreme (i.e. there is a high residual risk, the risk is likely to materialise, and the consequences are likely to be severe), or where there is a wilful breach of the law (such as admitting spectators to unlicensed grounds) and all reasonable steps were not taken by ground management, it will consider taking immediate enforcement action³⁰, which may include, as a last resort, taking a prosecution for breach of the ground's licence conditions³¹.

²⁷ Section 12(5) of the [Football Spectators Act 1989](#).

²⁸ Section 12(4) and section 10(11) of the [Football Spectators Act 1989](#).

²⁹ Section 10(3) of the [Football Spectators Act 1989](#).

³⁰ Relevant offences for admission of spectators without a licence and for breach of licence conditions are created by s9(1) and s10(13) respectively of the [Football Spectators Act 1989](#).

³¹ Paragraph 1, Schedule 1 of the [Sports Grounds Safety Authority Act 2011](#).



Licensed standing areas

64. The SGSA's approach to enforcement action in relation to licensed standing grounds will continue to follow the same approach as outlined above in respect of compliance with the all-seater licence conditions for the seated areas of those grounds.
65. In relation to compliance with the licensed standing conditions for operating licensed standing areas, SGSA enforcement action under the 1989 Act will be proportionate and based on the licensed standing criteria compliance assessment outlined at paragraphs 42-44.
66. In circumstances where there is evidence at a licensed standing ground of non-compliance with one or more of the published licensed standing criteria, the SGSA will inform ground management of the steps required to bring the licensed standing area back into compliance. However, if ground management fails to co-operate and/or take timely action to bring the licensed standing area back into compliance with all the criteria, the SGSA will adopt a **sliding scale of action** (see **Annex D, Figure 4**). Initially, the SGSA will **advise the relevant local authority** that it is minded to move towards enforcement action under the 1989 Act for non-compliance with the licensed standing conditions.
67. If ground management fails to co-operate and/or take timely action to bring the licensed standing area into compliance with all the licensed standing criteria, the SGSA will issue a **written warning** to ground management indicating that if they fail to take the necessary action, the SGSA will commence enforcement action under the 1989 Act for non-compliance with the ground's licence. A draft of the written warning will be shared with ground management, so they have an opportunity within 21 calendar days to make representations. The final version of the written warning will be sent to ground management, copied to the Secretary of State for Culture, Media and Sport and the relevant football governing body. The SGSA will also keep the relevant local authority informed of developments. The written warning will include:
- a. the measure(s) that the SGSA considers are required to bring the licensed standing area back into compliance with the licensed standing criteria;
 - b. the timescales within which ground management must put in place the required measures; and
 - c. notice that the licensed standing conditions may be withdrawn if the required measures are not put in place within the relevant timescales.
68. If, following the receipt of the written warning described above, ground management at a licensed standing ground fails to take the required action set out in the warning, the SGSA will consider taking **enforcement action** under the 1989 Act. Depending on the individual circumstances, the SGSA may remove the licensed standing conditions (thereby prohibiting the continued operation a licensed standing area) and/or make other variations to the terms and conditions of the licence, for example, taking a specific part of the ground out of use.
69. Unless there is an urgent issue which poses a serious and immediate risk justifying immediate suspension³² of the licence (see paragraph 22), the enforcement action outlined in the preceding paragraph will be commenced by a written notice to ground management detailing the proposed action and giving them the opportunity to make

³² Section 12(5) of the [Football Spectators Act 1989](#).



representations. Given the action will involve the imposition of varied/new terms and conditions this will require a response within 21 days from service³³. The SGSA will take these representations into account in making its final decision, which it will communicate to ground management after the relevant period has elapsed.

70. As with the all-seater enforcement approach, the SGSA recognises that enforcement action as outlined in the preceding paragraph will be disruptive and unwelcome by ground management and spectators. It will therefore only be taken as a last resort if the SGSA determines that other approaches have been exhausted and/or that ground management is failing to co-operate or act in a timely and/or robust manner to comply with the licensed standing conditions.
71. If the SGSA considers there is a wilful breach of any of the licensed standing criteria, it reserves the option to take such immediate enforcement action under the 1989 Act as it sees fit, which may include, as a last resort, taking a prosecution for breach of the ground's licence conditions³⁴.

Different types of spectator accommodation

72. The SGSA appreciates that, in certain circumstances, whilst a ground management team is able to manage effectively the identified spectator safety risks, they may wish to choose to invest in different types of seated spectator accommodation, such as seats incorporating barriers, or seats with independent barriers. If a ground management team chooses to adopt such an approach, the SGSA will consider such proposals on their individual merits and in accordance with existing established guidance, most notably the Green Guide, SG01: Safe standing in seated areas and SGSA guidance on spectator accommodation changes³⁵. Additionally, in such circumstances the SGSA will remind the ground management team about the Government's all-seater policy, where specified grounds hosting designated football matches are expected to comply with the existing all-seater licence conditions (see paragraph 14), and that once seats incorporating barriers, or seats with independent barriers are installed a licensed standing application should be submitted within two years (see paragraph 30).
73. The SGSA also recognises that ground management at licensed standing grounds may determine once they start operating licensed standing areas that the size and location of such areas needs to change to reflect the high demand from spectators for such areas. In those circumstances, the SGSA will consider each proposal from ground management on its individual merits and in accordance with existing established guidance, most notably the Green Guide and SG01: Safe standing in seated areas). In doing so, the SGSA will remind ground management about the ongoing requirement to comply with the licensed standing criteria (see **Annex B**).

Review

74. The SGSA's enforcement approach will be kept under review and adapted as necessary as new technologies are developed in terms of the provision of spectator accommodation, and as new evidence is gathered about the characteristics and

³³ Section 12(4) and section 10(11) of the [Football Spectators Act 1989](#).

³⁴ Section 10(13) respectively of the [Football Spectators Act 1989](#) and Paragraph 1 Schedule 1 of the [Sports Grounds Safety Authority Act 2011](#).

³⁵ For further details see SGSA website: [Spectator Accommodation Changes](#).



effective management of safety risks associated with persistent standing in seated areas.

75. The approach will also be kept under review to ensure it remains appropriate and fit for purpose, for example to reflect: the emergence of any new safety risks arising from changes in crowd behaviour, especially at moments of excitement, for example, new ways of celebrating when goals are scored.

Impact assessment

76. This document outlines the SGSA's current approach to enforcement of the existing all-seater licence conditions under statutory powers in the Football Spectators Act 1989. When originally published in 2019, and subsequently updated in 2023, the SGSA considered the document to be a Non-Qualifying Regulatory Provision for the purposes of Business Impact Target Reporting³⁶ under the Enterprise Act 2016. The SGSA considers that business impact continues to be centred principally on relevant ground management and relevant local authorities familiarising themselves with this latest document, which is based substantively on the corresponding document published in 2023.

³⁶ For further details see Gov.uk website: [Business Impact Target Reporting](#).



Annex A: Overview of Changes

Most of the document narrative is unchanged from the previous version of July 2023. However, the following changes have been made:

- **New Overview and Revised Introduction** – reflecting the current position in relation to licensed standing implementation as at July 2026 and signalling the changes made to the document in the July 2026 version. New paragraphs 4 and 8 help clarify the outcomes SGSA wants to achieve through implementation of the enforcement approach.
- **General** – the removal/amendment of references to specific seasons so that the document remains current beyond one season until such time as an updated version is published.
- **Paragraph 21** – additional text highlighting that SGSA Inspectors will take account of the actions of ground management, and the history of any previous licence breaches or offences.
- **Paragraph 22** – minor amendment with a new footnote in sub-paragraph b. that references the relevant section of the Football Spectators Act 1989.
- **Paragraph 23** – shortened to focus the narrative on steps ground management should take to avoid a breach of licence conditions.
- **Paragraph 24g** – additional new final clause clarifying that the Persistent Standing Management Plan should be kept under regular review by ground management.
- **Paragraph 25** – amended to be clear that the relocation of standing supporters to lower tiers and gradients of less than 25 degrees is only a short-term mitigation, and that risks to spectator safety arising from persistent standing are still present even at lower tiers/rakes. Additional narrative here (and in paragraph 27) highlighting the overall objective of the further action options taken by ground management is to remove as far as reasonably practical all safety risks associated with persistent standing. Additionally, some minor amendments to avoid unnecessary repetition and to ensure consistent terminology.
- **Paragraph 26** – reference to risk categorisation deleted to avoid any potential confusion with the risk categorisation process outlined at paragraphs 33-41.
- **Paragraph 27** – removal of sub-paragraphs to avoid repetition with the further action options at revised paragraph 25. Additional narrative about the overall objective of the further action options at paragraph 25.
- **Paragraph 28** – updated narrative to reflect the latest position in relation to the implementation of licensed standing areas up to July 2026.
- **Paragraph 31** – minor amendment to clarify the paragraph is about circumstances involving home supporters or away supporters but not both.
- **Paragraphs 33-41** – SGSA's refined approach to all-seater risk categorisation based on six factors. The first two factors help SGSA assess the nature and scale of persistent standing and the extent to which it poses a foreseeable risk to the safety of spectators.



The other four factors help determine SGSA's confidence in ground management's ability to address persistent standing risk at a ground in a timely and a robust manner.

- **Paragraphs 48, 50, 52 and 57** – minor consequential amendments to reflect the revised approach to risk categorisation in paragraphs 33-41.
- **Paragraphs 56-58, and 67** – amendments to reflect that the written warning to ground management will initially be shared in draft form to allow ground management time to make representations against the SGSA enforcement decision before the written warning is formalised and shared with the Secretary of State, the relevant football governing body and the relevant local authority.
- **Paragraphs 63 and 71** – amendments to each of these paragraphs and the associated footnotes to make explicit reference to the potential, as a last resort, for prosecution under the terms of the Sports Grounds Safety Authority Act 2011.
- **Annex D, Figures 1-4** – consequential amendments to each of the flow diagrams to reflect the changes at paragraphs 33-41.
- **Annex G** – new annex outlining SGSA's methodology for calculating a persistent standing risk score for each SGSA licensed ground (see also paragraph 37).



Annex B: Licensed standing in seated areas criteria

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

To become licensed standing ground, management teams must:

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

Application criteria

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

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

A. Compliance with guidance

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

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

- a. the design and installation of the proposed area(s) including testing/sign off of new seats with barriers/independent barriers by a competent person³⁷; and
- b. the safety management procedures put in place in advance of spectators being admitted to the area(s) in question, including the provision of suitably qualified/trained stewards.

B. Infrastructure

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

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

³⁷ To validate the design and quality of installation, the ground is required to carry out proof of load testing to a minimum of 5% of the installation to ensure that required loadings can be achieved.

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

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



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

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

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

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

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

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

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

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

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

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

C. Safety management procedures

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

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

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

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

A *Code of Conduct*, enforced by ground management, to maintain high standards of spectator behaviour in the proposed areas must be provided to all ticket holders. This must reflect the entry conditions outlined in the *Supplementary Guidance* (see Section 2.4.c of SG01). An example of such a *Code of Conduct*, which can be tailored for local circumstances, is at Appendix A.



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

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

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

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

D. Safety Advisory Group (SAG) engagement

14. There must be meaningful consultation with the SAG.

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

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

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

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

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

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

16. There must be continued engagement with the SAG.

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



Code of Conduct for licensed standing areas

Background

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

Management considerations

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

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

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



Example Fan Code of Conduct in licensed safe standing areas

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

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

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

Thank you for your support and co-operation.



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

1. **Premier League and English Football League ground regulations** adopted by all Premier and Football League clubs include as a condition of entry to the in relation to spectator accommodation (to note, it is regulations 14 – 17 for the Premier League and 12 – 15 in the EFL:
 14. *All persons entering the Ground may only occupy the seat allocated to them by their ticket (including those who have tickets to a Licensed Standing In Seated Area pursuant to paragraph 17 below) and must not move from any one part of the Ground to another without the express permission or instruction of any steward, officer of the Club and/or any police officer.*
 15. *Nobody may stand in any seating area whilst play is in progress (except those persons who have tickets to a Licensed Standing In Seated Area pursuant to paragraph 17 below). Persistent standing in seated areas other than in Licensed Standing In Seated Areas whilst play is in progress is strictly forbidden and may result in ejection from the Ground.*
 16. *The obstruction of gangways, access ways, exits and entrances, stairways and like places is strictly forbidden. Nobody entering the Ground shall be permitted to climb any structures within the Ground.*
 17. *To the extent that the Club operates licensed standing in seated accommodation areas at the Ground as part of the UK Government's scheme on safe standing in conjunction with the Sports Grounds Safety Authority (the "**Licensed Standing In Seated Areas**"), only ticketholders who have tickets to the Licensed Standing In Seated Areas are permitted to access the Licensed Standing In Seated Areas. Ticket holders who have tickets to the Licensed Standing In Seated Areas shall:*
 - 17.1 *occupy the space in front of the seat allocated to them on their ticket only and must not move to different spaces within the Licensed Standing In Seated Areas or to different areas of the Ground;*
 - 17.2 *expect that other spectators will be standing while play is in progress (although of course they may sit on their allocated seat before and after the activity, or during an interval or halftime break);*
 - 17.3 *not sit or stand on the rails, or stand on the seats in the Licensed Standing In Seated Areas;*
 - 17.4 *not be permitted to admit anyone who does not have a ticket to the Licensed Standing In Seated Areas to the Licensed Standing In Seated Areas;*
 - 17.5 *be respectful towards staff, stewards, and other fans at all times;*
 - 17.6 *behave appropriately in the Licensed Standing In Seated Areas – anti-social behaviour will not be tolerated;*
 - 17.7 *unless needing to use facilities, not move around in the Licensed Standing In Seated Areas and shall stay in the designated space only as described on the relevant ticket and in accordance with paragraph 17.1;*
 - 17.8 *not be permitted to stand in the gangways or on the steps in the Licensed Standing In Seated Areas to watch the Match and acknowledges that these are for accessing and leaving seats only; and*



17.9 acknowledge that any failure to comply with the conditions set out in this paragraph 17 may lead to ticketholders being ejected from the Ground and/or banned from all Matches, and the Ground may lose the right to maintain the Licensed Standing In Seated Areas.

2. **Ground management (in most places the club)** is primarily responsible for:
 - the safety of spectators;
 - customer care;
 - making ‘reasonable adjustments’³⁸ to club policies, procedures, and the physical environment, to provide suitable accommodation for disabled spectators;
 - enforcing the ground regulations, including the conditions relating to seated areas detailed above; and
 - the safety of employees/workers (under the Health and Safety at Work etc Act 1974)

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

3. While responsibility for the safety of all people present in a ground lies at all times with ground management, at certain sports grounds and for certain events the presence of the **Police** may be required, or requested, to maintain public order and prevent the commission of offences. If there is to be a police presence in or at the sports ground, management should consult with police in advance and draw up a Statement of Intent. This sets out the division of responsibilities and functions and makes clear who will assume responsibility in particular circumstances. Ground management should not, however, rely on the presence of police officers to overcome inadequacies in the safety management operation at a ground.
4. Primary responsibility for certifying ground capacities and imposing terms and conditions on safety matters rests with **local authorities** in the context of their safety certification role at sports grounds. Ground management are responsible for the safety of spectators as well as their employees. If the **local authority** considers ‘reasonable safety at the ground’ is being compromised they have the statutory responsibility to take appropriate enforcement action under the provisions of the Safety of Sports Grounds Act 1975.
5. The **Sports Grounds Safety Authority (SGSA)** is the UK Government’s expert body of sports ground safety. The SGSA’s core statutory functions are set out in the Football Spectators Act 1989 and the Sports Grounds Safety Authority Act 2011. These include an important statutory responsibility to regulate local authorities in their oversight of safety at the 92 football clubs in the Premier League and the English Football League, and at Wembley and the Principality Stadium. The SGSA also issues licences to those 94 stadia through which the Government’s all-seater policy is implemented and enforced.
6. The causes and potential impact of persistent standing in seated areas, including the safety, crowd management, and customer care issues, are detailed at **Annex F**.

³⁸ Under the terms of the [Equality Act 2010](#).



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



Annex D: SGSA enforcement approach flow diagrams

Figure 1: All-seater policy: SGSA enforcement approach – overview

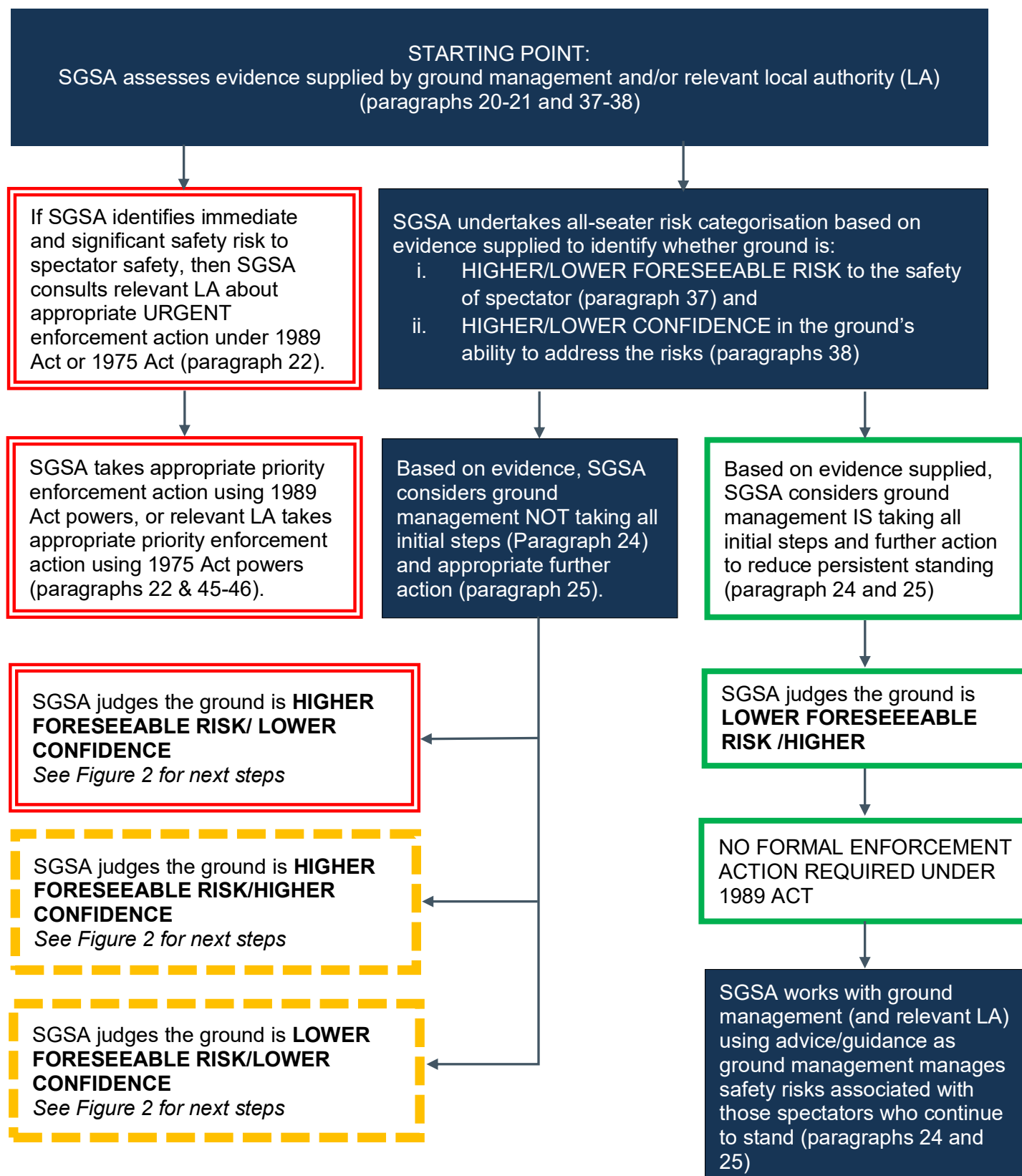




Figure 2: All-seater policy: SGSA enforcement approach – detail

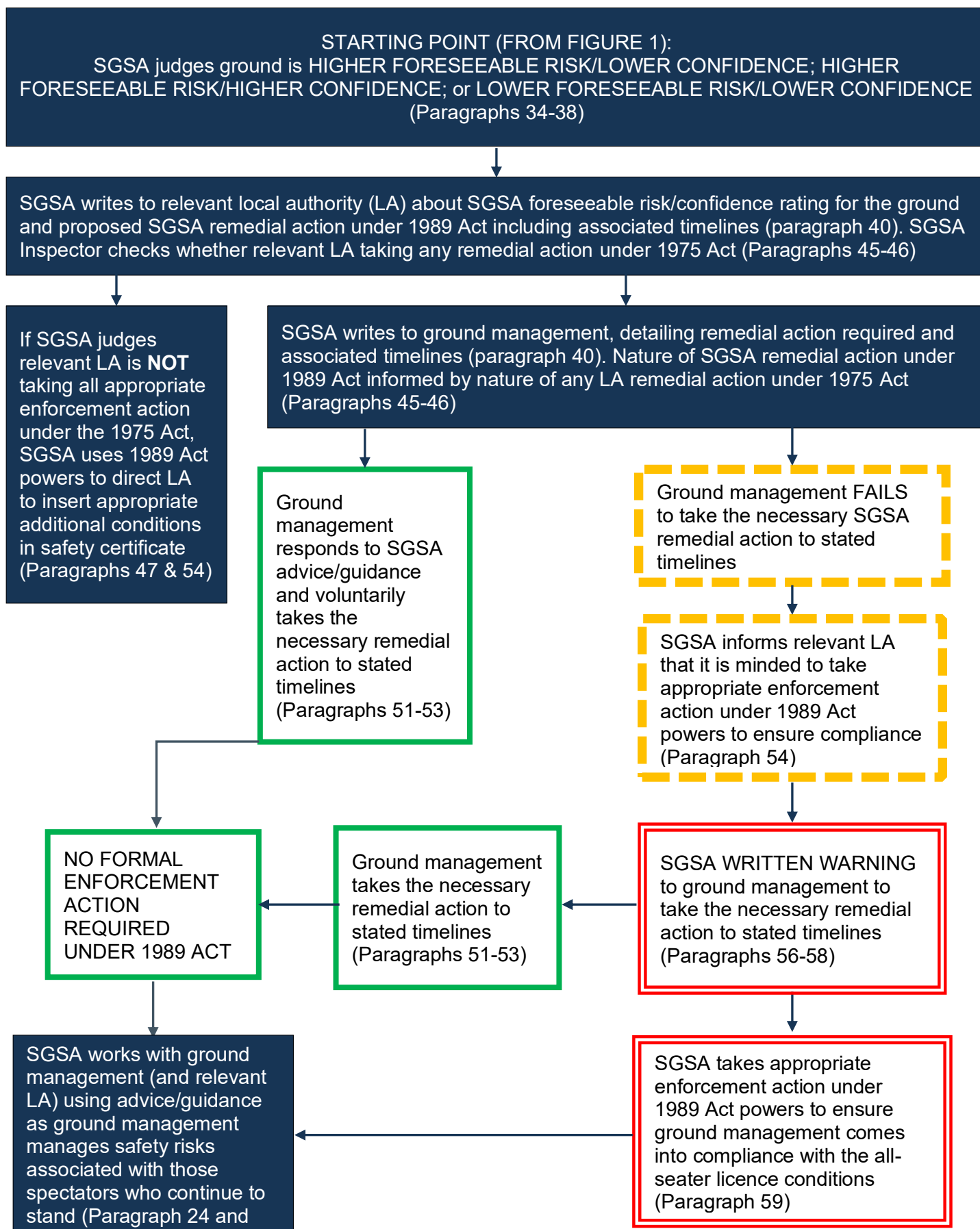




Figure 3: All-seater policy: SGSA enforcement approach – sliding scale of enforcement options where evidence suggests ongoing non-compliance with all-seater conditions (under 1989 Act powers unless otherwise stated)

SGSA works with ground management (and relevant local authority) to give ground management every opportunity to come into compliance prior to formal enforcement action being taken (Paragraphs 52 & 54)

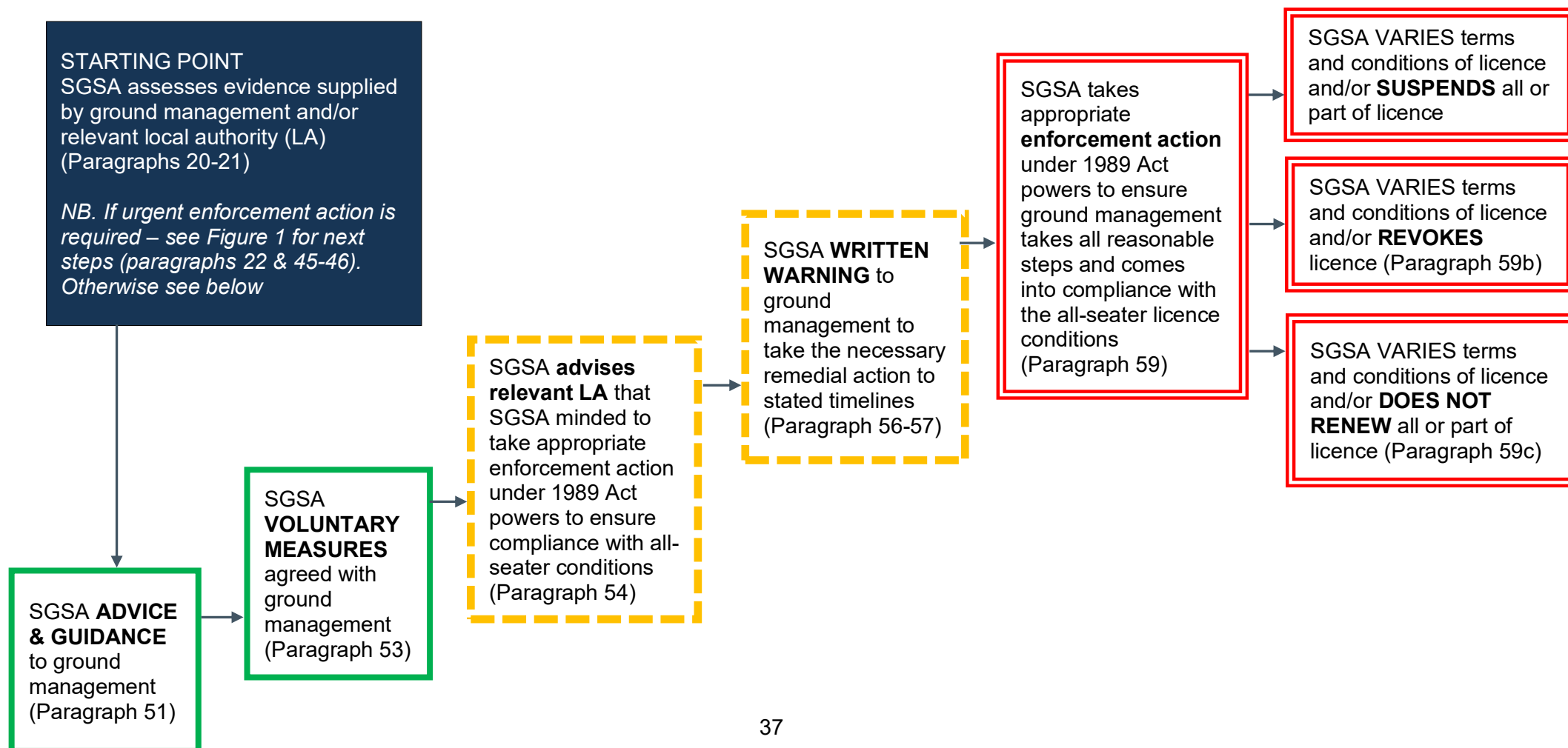
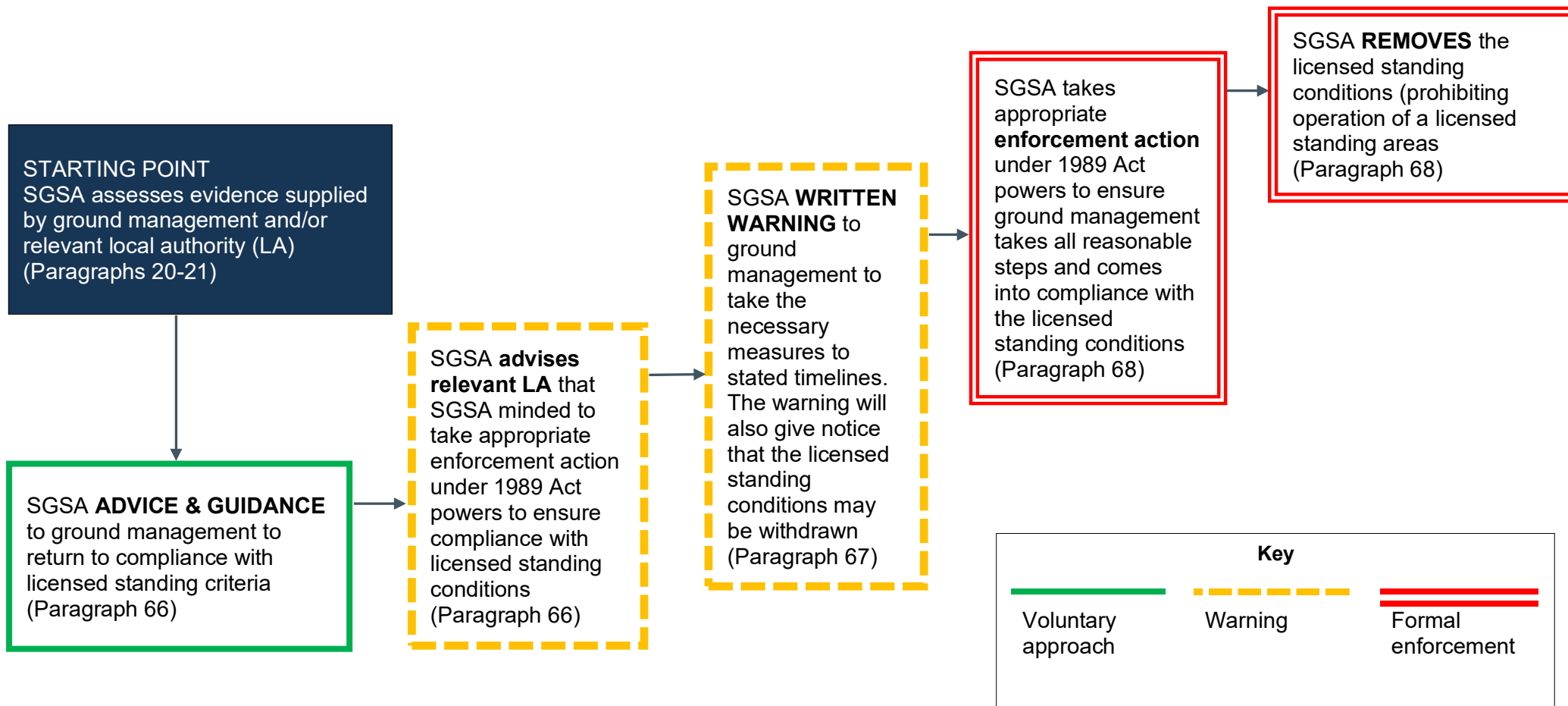




Figure 4: Licensed standing areas: SGSA enforcement approach – sliding scale of enforcement options where evidence suggests ongoing non-compliance with licensed standing criteria (under 1989 Act powers unless otherwise stated)

SGSA works with ground management (and relevant local authority) to give ground management every opportunity to come into compliance prior to formal enforcement action being taken (Paragraphs 42-44)





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

Where local authorities are not satisfied that any management plans provide for the reasonable safety of spectators, they can consider limiting capacity to a level where ground management are able to ensure that spectators observe ground regulations and sit on the seats provided. Instances where action may be required by a local authority include:

- a. If the gradient of the seating deck is above 25 degrees, persistent standing must be regarded as unsafe by definition (on the basis that the Green Guide does not allow standing in areas with rakes exceeding that). The local authority may require any such seating deck area where spectators are standing to be taken out of use on safety grounds. Additionally, it must be recognised that safety risks associated with persistent standing on seating decks with gradients below 25 degrees still exist at the lower gradients. Therefore, the local authority will consider each case on its individual merits and may take similar action as set out above, where considered appropriate.
- b. If persistent standing occurs in the front rows of an elevated seating deck, there is an additional risk of a fall from height arising from a progressive crowd collapse. . In such circumstances, the local authority should, notwithstanding any other proposed actions, require the ground management to take out of use any front rows likely to be impacted.
- c. Where significant numbers of spectators are standing, the local authority may reduce the holding capacity of the area concerned by recognising the additional space taken up by standing spectators and allocating each spectator a width of 550mm, rather than the 460mm of the typical seating configuration, to prevent them spilling out into gangways. Ground management and spectators should be aware that this alone would result in one in every six seats in the area concerned being taken out of use.
- d. In addition, if the ground management is failing to manage the crowd, the local authority should consider reducing the (S) factor³⁹ for the area concerned to a level where safety management can ensure that spectators observe ground regulations and sit on the seats provided to deliver necessary levels of spectator safety. Where the area concerned is occupied by visiting spectators, the reduction should be specific to each game and relative to the known and expected behaviours of the visiting spectators.
- e. As an alternative to the previous option, the local authority could also require the closure of particular rows (radial or lateral) or could limit the use of certain areas to particular groups of spectators (for instance, home supporters or disabled spectators)⁴⁰. The progressive closure of rows from the front would effectively deal with the main transgressors and warn those behind that they may also lose their places for subsequent matches if they do not sit down.

³⁹ In order to calculate the holding capacity of a sports ground, each part of the ground's viewing accommodation should be assessed according to the quality of the safety management in that area. This assessment is known as the (S) factor. Further information on the (S) factor can be found in Section 2.4 of the sixth edition of the Green Guide.

⁴⁰ Closure of particular rows may contain seats for disabled spectators, such as identified easy access and amenity seats. In such circumstances, the seats for disabled spectators should remain operational, subject to being adequately stewarded.



- f. If the ground management fails to take measures to educate and persuade supporters that they must sit down, with a consequent impact on safety, the local authority should reduce the (S) factor and therefore the ground capacity.
- g. If the rake is so shallow that it impacts upon C values and positively encourages spectators to stand, the local authority should reduce the (P) factor⁴¹ accordingly. In appropriate cases, the SGSA could consider whether to impose a licence condition limiting the use of such areas.

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

⁴¹ In order to calculate the holding capacity of a sports ground, each part of the ground's viewing accommodation should be assessed according to its physical condition. This assessment is known as the (P) factor. Further information on the (P) factor can be found in Section 2.4 of the sixth edition of the Green Guide.



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

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

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

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

Safety

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

- a. Spectators standing in these circumstances are not protected by any crush barriers. Instead they have a seat back in front of their legs. In the event of an incident which may be as simple as a push from behind, there would be nothing to prevent them from falling forwards onto the heads and upper bodies of the spectators in front. The falling spectators could themselves incur injuries from the seats. The risk is exacerbated if spectators stand on the seats themselves.
- b. The risk associated with such falls, and the likelihood of a cascading effect, known as a progressive crowd collapse, increase along with the gradient of viewing accommodation. The Green Guide considers areas of conventional terracing with gradients in excess of 25 degrees to be potentially hazardous and as such should be avoided. This fact is supported by research carried out by CFE Research. However Green Guide compliant seating accommodation, including seats incorporating barriers or seats with independent barriers, is permitted to a maximum gradient of 35 degrees.
- c. A further significant safety hazard arises if spectators stand on an upper or elevated tier. This is because the design parameters for such areas are based upon a compliant seated crowd and any spectators who are standing in these areas are at risk of falling from height if pushed from behind.
- d. In cases where this unsafe condition occurs the local authority should seek to prevent the use of front rows likely to be impacted by a potential progressive crowd collapse.
- e. Spectators standing side by side will occupy a greater lateral space (typically 550mm per person) than those who remain seated (typically 460mm). If the stand is full, standing spectators are likely to spill out into the gangways and vomitories, which become blocked. This not only impedes the safe circulation and exit of spectators; it also makes it difficult for stewards and first aid staff to undertake their safety duties. Keeping gangways clear is a fundamental safety requirement.
- f. Spectators standing in radial gangways are, moreover, the most prone to falling, both during moments of excitement and when others are pushing their way through. The



SGSA is aware of incidents where spectators have been injured by other spectators falling down the gangways in which they were standing. It should be remembered that gangways are unlikely to have handrails and may have a significant number of risers permitted in one consecutive flight.

- g. Spectators purchase a seat in the reasonable expectation that the ground management team will ensure compliance with ground regulations and that they will be able to see the match from a seated position. If those in front are standing, smaller spectators, in particular children, and those who are unable to stand for the period of the match, may be unable to see unless they stand on the seat. This constitutes a significant safety hazard.

Crowd management

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

- a. It is important for ground management and stewards to be able to secure the co-operation of spectators on a match day. Spectators who stand in seated areas are expressing a wish to watch the match from a standing position which may lead to confrontation with stewards and the authorities generally.
- b. Even where this does not lead to confrontation, standing spectators may not comply with requests (in particular, to keep the gangways and exits clear – see above) that may be for their own safety.

Customer care issues

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

- a. Once the spectators at the front of a seating deck stand, those behind them have no alternative but to do likewise, whether they wish to or not. Those who are unable to stand for prolonged periods, or who prefer not to are likely to suffer a significant loss of enjoyment. They cannot remedy this themselves.
- b. Spectators who do not wish to stand may feel threatened and intimidated by those who do. The SGSA is aware of spectators being assaulted when they asked those standing to sit down.
- c. Over the past 20 years, there have been significant increases in the number of women, children and older people attending matches. If they are prevented from seeing or enjoying matches in popular areas, they may choose to stop coming rather than move to other areas, and hence may be lost to the game, and reduce the diversity of spectators which has grown in recent years.
- d. Disabled spectators, including but not only wheelchair users, cannot satisfactorily be accommodated among, or in many cases behind, standing spectators. If spectators stand in seated areas, they may prevent ground management from making 'reasonable adjustments' to club policies, procedures, and the physical environment to provide suitable accommodation in all parts of the ground for disabled spectators in accordance with the Equality Act 2010.



Annex G: Persistent standing risk scoring methodology

The following diagram summarises the persistent standing risk criteria and mitigation used as part of SGSA matchday inspections to generate persistent standing risk scores for every ground in England and Wales subject to SGSA licensing.

Persistent Standing Risk Criteria and Mitigation

Four Risk Criteria (weighting %) (each scored from 1 (lower risk) to 5 (higher risk))

1. Number of distinct and separate areas of persistent standing (10%)
2. Numbers of spectators who persistently stand (60%)
3. Tiers and Gradients in areas where persistent standing occurs (20%)
4. Nature of crowd behaviour in areas where persistent standing occurs (10%)

Pre-mitigation score:

Risk scores, derived from each of the four risk criteria shown above are added together

Mitigations limited to:

- a) Seats Incorporating Barriers/Seats with Independent Barriers and
- b) Higher barriers on front walls of upper tiers

Proportion of seats where persistent standing (PS) observed and where a physical environment mitigation is present	Mitigation a) – reduction to PS risk score	Mitigation b) – reduction to PS risk score
90% or above	80%	10%
60%-89%	60%	5%
31%-59%	40%	5%
11%-30%	20%	0%
10% or below, or not present	0%	0%

Post-mitigation score:

Mitigations a) and b) from the table above are added together and then applied to the Total Pre-mitigation score