Early adopters of licensed standing areas in football stadia

Report for the SGSA on the findings from the independent evaluation

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Glossary

Concourse: The internal area of a stadium between the turnstiles and the entrance to the seating or standing area.

Early adopter club: One of five football clubs that successfully applied to have licensed standing areas in their ground from 1st January 2022.

Radial gangway: The stepped passages between the rows of seating via which spectators access their seats.

Lateral gangway: Gangways that run from side to side across a section or stand.

Migration (inter-area): The movement of spectators *into* an area or stand from elsewhere in the stadium, which can increase the total number of people in that area.

Migration (intra-area): The movement of spectators *within* an area or stand which does not increase the total number of people in that area but can increase the number of people in a particular block or row.

Persistent standing: Standing to watch live sport in seated areas for prolonged periods of time, not just at moments of excitement (such as a goal celebration).

Progressive crowd collapse: Where a spectator is pushed forward due to force exerted by a spectator on the row behind and as a result exerts unintentional force on a spectator or spectators in the row in front, thus creating a 'domino effect' which results in spectators in at least three rows falling down on top of each other.

Rake: In this context, 'rake' refers to the gradient or steepness of a stand, and is measured in degrees.

Safe standing: A term largely used by campaigners to refer to standing in modern (non-terrace) stands or in areas that contain seats with integrated or independent barriers or rails.

Seats with independent barriers: A standalone barrier installed in front of existing seats rather than integrated with the seat itself.

Seats with integrated barriers: Dual purpose individual seats with a barrier or rail incorporated, which together form a continuous barrier along the length of the row.

SAG: Safety Advisory Group, co-ordinated by a Local Authority. A SAG includes representatives from the authority, emergency services, other relevant bodies and the club safety representatives, and discusses and advises on public safety.

Vomitory: The opening or entrance to a stand, usually a short passageway accessed via a concourse.

Executive summary

The introduction of licensed standing areas at early adopter football clubs since 1st January 2022 has had a positive impact on safety in areas where large numbers of spectators persistently stand. Installing barriers limits forwards and backwards movement of spectators, and so protects others, especially those in the rows below. Licensing these standing areas has reduced the potential for conflict between staff and spectators by removing the need for safety teams to make spectators sit down. The ability to sell 'standing tickets' for these areas enables clubs to enhance their customer service for both those who wish to stand and those who wish to sit. Spectators also report feeling safer in home licensed standing areas since the installation of barriers.

There is no evidence that the introduction of licensed standing areas has had a negative impact on the behaviour of spectators in those areas or led to an increase in standing elsewhere. There were behaviour management challenges in previous seasons where spectators persistently stood. Although there has been an increase in anti-social behaviour and disorder across all football clubs this season, all stakeholders involved with early adopter clubs are confident that these are not attributable to the introduction of licensed standing. Similarly, the demographic makeup of the supporters in licensed standing areas appears to be broadly in line with previous seasons. However, it will be important to monitor these areas, as any changes in the demographics of ticket holders, patterns of behaviour in licensed standing areas, or persistent standing elsewhere, are likely to emerge over time.

The SGSA and football clubs need to be mindful of the risk of falls and injuries caused by spectators climbing on the additional infrastructure, and should develop plans to mitigate it. There have been isolated incidents of spectators climbing on top of barriers, which is dangerous for both the person climbing and those immediately around them. Concerted efforts should be made to eliminate this behaviour.

Although the evidence supports the current criterion that licensed standing must be offered to both home and away spectators, more could be done to provide a better away matchday experience for those who do not wish to or are unable to stand. Clubs have tried to implement policies that respond to the needs and preferences of away supporters, but their success is largely dependent on away clubs committing time to selling tickets 'intelligently'. Currently, the away experience remains one where all spectators have to stand, and this is likely to deter some from attending.

There is a great deal to be learnt from the implementation of licensed standing areas at early adopter clubs which, legislation permitting, will be valuable to other clubs seeking to be approved to offer licensed standing in the future. In particular, the size and location of these areas and the policy on the management of children in these areas need careful consideration by safety teams and Safety Advisory Groups. Supporter groups, including the views of those who do not wish or are unable to stand, should be consulted early in the process to minimise dissatisfaction. Significant time should be allocated to planning and consultation.

1. Introduction

1.1 Context

During the 2019-20 football season, CFE Research and associates completed independent research to explore a range of approaches to managing persistent standing at football stadia. The final <u>report</u> published in August 2021 identified the key risks and behaviours associated with persistent standing and effective ways to address them based on evidence from clubs in the UK, France and Germany. It concluded, amongst other findings, that the installation of seats with barriers or rails in areas where spectators persistently stood in large numbers had a positive impact on spectator safety.

In September 2021, following CFE's research findings, the Sports Minister Nigel Huddleston instructed the Sports Grounds Safety Authority (SGSA) to move forward with a plan to create licensed standing areas. Clubs were invited to apply to SGSA for approval to offer licensed standing areas as part of an 'early adopter' programme; five clubs were successful with their application and, following the introduction of the Football Spectators (Seating) Order 2021, were licensed to allow standing in designated areas of their stadia from 1st January 2022.

Table 1 below gives details of the five clubs and their licensed standing areas for home and away spectators.

1.2 Evaluation approach

The evaluation ran from November 2021 to June 2022, and set out to address two main questions:

- What impact has the introduction of licensed standing areas had on spectator safety?
- What learning can be gathered from the implementation of licensed standing areas in early adopter grounds?

Evidence was collected from a range of sources, including analysis of club safety documentation, matchday observations, a spectator survey, and interviews with club staff, stakeholders and spectators. Further details of the full methodology are provided in Appendix 1.

Table 1: Early adopter clubs and their licensed standing areas

Club	Home spectators	Away spectators	Total number of seats	% of capacity
Cardiff City	Seats with independent barriers in the back five rows of the Canton Stand; the rest of the stand remains a 'managed standing' area: 919 seats	Seats with independent barriers in the rear of two of the away quadrant blocks: 548 seats	1,467	4%
Chelsea	Seats incorporating barriers in the entire Matthew Harding stand lower and Shed End lower; independent barriers in the Shed End upper: 9,183 seats	Seats incorporating barriers in the Shed End upper and lower, entire section: 2,994 seats	12,177	29%
Manchester City	Seats incorporating barriers in the entire South Stand lower tier: 5,011 seats	Seats incorporating barriers in the lower tier of the away section of the South Stand: 904 seats	5,915	11%
Manchester United	Seats incorporating barriers in two blocks of the NE quadrant: 1,519 seats	Seats incorporating barriers in one block of the away section: 550 seats	2,069	3%
Tottenham Hotspur	Seats with independent barriers ¹ in the South Stand lower (as per 2019-20) with an extra 1,442 at the back of the South Stand upper: 6,934 seats	Seats with independent barriers (as per 2019-20) in the entire away section: 3,073 seats	10,007	16%

1.3 Structure of this report

This report collates the evidence gathered throughout the evaluation of the early adopter programme and presents it in three sections.

Section 2 answers the key question of the evaluation by considering what impact the introduction of licensed standing areas has had on spectator safety at the five early adopter clubs. Section three outlines the management strategies in use in these areas, and factors impacting the effectiveness of these. Section four collates learning from the early adopter programme, in relation to both the requirements of the early adopter criteria set out by the SGSA, and other issues that have emerged during the course of the evaluation. It is hoped that this learning will be useful to both the SGSA and clubs that may be considering licensed standing areas in the future, if legislation allows.

The report concludes with a series of recommendations and key considerations for DCMS, the SGSA and football club safety teams.

¹ At Tottenham Hotspur these are referred to as 'seats with integrated safety bars'.

2. What impact has the introduction of licensed standing areas had on spectator safety?

2.1 The positive impact of licensed standing areas

Our 2019-20 research into the impact of installing barriers or rails in areas of football grounds where spectators previously stood in large numbers concluded that **installing barriers had a positive impact on spectator safety in these areas, particularly in mitigating the risk of a progressive crowd collapse**. We have not gathered any evidence that contradicts this finding.

Installing barriers in an area where spectators are persistently standing in large numbers continues to be effective in limiting forwards and backwards movement and in protecting others, particularly those in the rows below. Additionally, licensing these standing areas has removed the need for safety teams to make spectators sit down, thus reducing potential conflict between staff and spectators. The ability to sell tickets for these areas as standing tickets also enables clubs to enhance their customer service by responding to supporters' preferences for seating or standing, although it will likely take time for season ticket holders to move in or out of standing areas according to their preference.

The interviewees and match observations have highlighted a number of other positive impacts following the installation of barriers which are largely consistent with the previous research findings:

- celebrations are more orderly;
- the risk of injury, and the danger posed to others from spectators standing on seats or on the backs of seats should they fall forwards or back, has reduced;
- egress is more uniform because the barriers limit (but do not prevent completely) spectators' ability to climb over seats to exit the stand more quickly;
- spectators are lined up more clearly, so obvious gaps and therefore any risk of overcrowding can be identified, particularly using CCTV;
- barriers make it more difficult for spectators to move towards segregation lines;
- barriers offer stability for anyone who may require it during a match, including for people moving up and down aisles and gangways (which may also speed up egress);
- stewards can be positioned in more locations without risking obstructing sightlines; and
- spectators arriving late can reach their seats in the middle of rows faster, as others are already standing and have a barrier to lean against when latecomers pass.

There is **no evidence to date that the introduction of licensed standing areas has led to an increase in standing elsewhere in the stadia**. Safety staff at the four clubs that have installed barriers this season report that levels of persistent standing throughout the rest of the stadia are similar to previous seasons. This is most apparent where demand for standing areas outstrips supply. Furthermore, at the two clubs that participated in the research in 2019-20, current levels of persistent standing in seated areas are largely comparable to the levels observed previously. However, it will be important to continue to monitor this aspect, as any increase (or decrease) in standing outside of the licensed areas is likely to emerge gradually over time.

There is also **no evidence to date that the introduction of licensed standing areas has had a negative impact on spectator behaviour**. Club safety staff and police representatives consulted were confident that any challenges in these areas are the same as in previous seasons (when supporters stood persistently), and that a reported wider increase in disorder and anti-social behaviour amongst football supporters more generally could not be attributed to the introduction of licensed standing.

2.2 Residual risks

Table 2 lists the risks associated with persistent standing identified in the previous research, the extent to which these risks have been observed or reported since 1st January 2022, and the impact that the installation of barriers has had on the severity of this risk.

The majority of the residual risks identified in licensed standing areas are those that existed in these areas before barriers were installed. Although the prevalence of some risks has decreased – particularly, progressive crowd collapse and conflict between spectators and/or staff – the majority have remained the same. This highlights that introducing standing areas and the necessary infrastructure is not a panacea, and many of the challenges in areas where spectators persistently stand are likely to remain if these areas are then licensed for standing. However, whilst the prevalence of these risks remains largely unchanged, the severity of the impact of these risks (in terms of harm to spectators and staff in these areas) has reduced. For example, migration leading to overcrowding is less likely to result in injury in licensed standing areas, because the barriers prevent spectators from falling forwards; similarly, although standing on seats remains a risk, falls as a result of this are less likely, as barriers aid stability.

² We observed more persistent standing at the international fixture at the Cardiff City Stadium than at Cardiff City home matches during this and previous research.

Table 2: Residual risks in licensed standing areas

Residual risk	Prevalence	Risk to safety	
	(Green = reduced; orange = no or minimal change; red = increased)		
Migration leading to overcrowding: interarea	Low levels where standing sections are not isolated; no increase reported since installing barriers Very low levels reported by spectators	Decreased due to presence of barriers preventing falls forwards	
Migration leading to overcrowding: intra- area	Low levels in home areas where adjacent to segregation lines, small pockets elsewhere, but these decreased due to barriers limiting movement between rows Larger pockets in away sections where spectators move around more Low levels reported by spectators	Decreased due to presence of barriers preventing falls forwards	
Falls over seats	Not observed or reported; spectators report this has decreased	Decreased due to presence of barriers preventing falls forwards	
Progressive crowd collapse ³	Not observed or reported, in this or previous research Spectators report feeling better-protected from a potential surge	Decreased due to presence of barriers preventing falls forwards	
Blocking aisles, gangways and exits	Some minor encroachment in home areas; widespread blocking is rare and observed only in away sections; no increase reported since installing barriers Low levels reported by spectators in home and away areas	No change	
Standing on seats and seat backs	Minor isolated incidents involving adults, usually during goal celebrations or at the end of the match; no increase reported since installing barriers Very rare persistent standing on seats in back rows Commonly observed behaviour by children	Decreased due to presence of barriers providing stability to assist with balance	
Sitting or standing on barriers	Minor isolated incidents of standing on barriers, usually during goal celebrations or at the final whistle, largely in away sections Some sitting on barriers before and after the match	Increased due to presence of barriers as additional infrastructure in these areas	
Conflict between spectators, or between staff and spectators	Not observed Very low levels reported by spectators who wish to continue to sit	Decreased due to ability to sell tickets as standing tickets and removing the need for stewards to enforce sitting	
Anti-social behaviour/disorder	Minor isolated incidents, usually at high-risk fixtures; no increase reported since installing barriers	No change	

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³ This was not observed or reported previously, but has been identified as a risk in areas of persistent standing.

2.2.1 The misuse of licensed standing infrastructure

As Table 2 shows, the only risk to safety that can be considered to have increased in licensed standing areas is **the risk of falls and injuries caused by spectators climbing on the additional infrastructure**. During our observations, a very small number of spectators were seen climbing on top of barriers, usually for brief moments following goals or at the end of matches. This practice is dangerous for both the person climbing and those immediately around them.

Clubs reported no injuries from this type of behaviour since the barriers were installed, but accepted that away spectators in particular had been observed doing this occasionally during celebrations.

The main issue for us has been away supporters standing on the rails and having to coax them down.

Safety officer

As previous research showed that injuries to spectators often go unreported, club figures may not capture any injuries sustained in this way. One survey respondent stated that they had received an injury from someone falling from a barrier.

I was involved in an accident during the home game against [club] in January. Someone climbed on top of the safe standing bar behind me and fell off and landed on me. I have now been off work for three months and had surgery on my back.

Survey respondent, standing area

Whilst these incidents appear to be isolated, the potential to climb on and fall from a barrier – which is higher than when spectators stand on seats or seat backs – is an additional risk that clubs should be aware of when developing management plans.

2.3 Supporter insight into safety and licensed standing areas

2.3.1 Characteristics of supporters in licensed standing areas

Just over half of survey respondents (52%) have a season ticket in, or have purchased a ticket for, a licensed standing area at their home club since 1st January 2022. This proportion is similar irrespective of gender, ethnicity, sexual orientation and disability status; only older spectators are more likely to have a season ticket for a seated option. Just over half (53%) of those aged 56+ report that they have a season ticket or have bought a ticket in a seated area of a stadium, compared with 46% of those aged 16-35 and 43% of those aged 36-55. Analysis of the characteristics of respondents in home licensed standing areas demonstrates that supporters in these areas tend to be male

(88%), aged over 36 (79%), white (96%) and heterosexual (98%), although these are all very similar to the demographics of the sample as a whole.⁴

2.3.2 Perceptions of safety

All survey respondents were asked how safe they feel at their home ground. The overwhelming majority, irrespective of whether they sit or stand, report that they currently feel safe or very safe at their home ground (92%): equal proportions of those who sit and stand (95%) report that they currently feel safe.

In analysing the demographics of the small number of respondents who did not report that they currently feel safe,⁵ the majority are male (78%). However, the proportion of females in this group is higher than in the sample as a whole (23% of those who do not report feeling safe, compared with 11% of the sample overall), meaning that females are over-represented among those who do not feel safe. Similarly, almost three-fifths of those who do not feel safe are aged 56+ (58%); this age group comprises just over two-fifths of the sample overall (43%), and is therefore also over-represented among those who do not feel safe.

Respondents who had been in licensed standing areas prior to the installation of barriers were also asked whether they felt more safe/less safe/the same than before barriers were installed. Figure 1 demonstrates that just over half of those with match-day experience in previous seasons feel safer as a result of the barriers being installed (52%), compared with 5% who feel less safe. Reasons given for this are detailed in section 2.4.3.

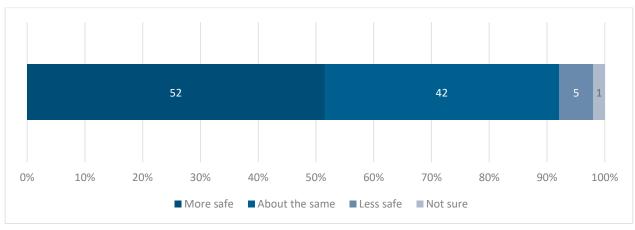


Figure 1: How safe do you feel compared to before the barriers were installed? (base = 2092)

Overall, more respondents reported feeling unsafe when they visited early adopter grounds as an away spectator than as a home spectator. Almost two-fifths of respondents who had visited at least one of the early adopter clubs did not report feeling safe (38%).

⁴ The proportion of respondents from ethnically diverse and LGBTQ+ communities is small (4% and 2% respectively). Only age is statistically significant.

⁵ The analysis split respondents into two groups: those who felt safe and those who did not feel safe. Where 'do not report feeling safe' is used, this refers to the latter group which comprises respondents who reported feeling very unsafe, unsafe, or neither safe nor unsafe in response to any question about how safe they feel.

Most of these spectators (94%) had visited the early adopter clubs in previous seasons before barriers and seats with rails were installed,⁶ and in contrast to the home experience, the additional infrastructure does not appear to have affected away supporters' feelings of safety: most feel 'about the same' in terms of safety this season as they did in previous seasons (72%). Just over one in ten report that they now feel safer (13%), compared with 6% who feel less safe.

This suggests that the barriers are perceived as having less of a positive impact on the away spectator experience than in home areas. Interviews with supporters explored their feelings of safety at away matches and those who had felt unsafe at early adopter grounds gave reasons that were similar to those discussed for any away match; most notably anti-social behaviours of those around them. Given that behaviour has not changed as a result of the installation of barriers, if negative behaviour is what drives perceptions of safety then it is unsurprising that barriers have not had an impact. Two interviewees did refer to feeling safer with barriers in away sections where overcrowding occurs; but if overcrowding in itself makes people feel unsafe, this is likely to form their overriding perception.

2.3.3 Factors influencing perceptions of safety

All respondents were given the opportunity to explain their perceptions of safety at their home ground since 1st January 2022. Over three-quarters gave reasons for their responses, 1,700 of which are from respondents in standing areas. This gives a wealth of insight into what makes people feel safe or not in these areas.

For those who felt safe, by far the most commonly reported explanation was that there was no reason to feel unsafe – 'no issues' to report. This supports the notion that home licensed standing areas, which are largely populated by long-standing season ticket holders who previously stood anyway, have not changed significantly. The most common factors that make people feel safe in these areas are fans being well-behaved and respectful (often in conjunction with comments about being surrounded by the same people for many years); areas being well-managed (with some referencing sufficient and friendly stewards, a good atmosphere or a friendly and safe environment); and the perception that barriers either prevent falls and injuries, or generally make people feel safer or more secure (Table 3 overleaf).

⁶ Away respondents who had visited to the Tottenham Hotspur stadium may have attended previously when there were seats with integrated safety bars but the section was not licensed for standing. They were able to answer 'not applicable' to the question on comparing prior experience before barriers.

⁷ Our 2019-20 research asked spectators how safe they felt at away matches; those who felt unsafe gave reasons related to anti-social behaviour, excessive alcohol consumption, migration and overcrowding and a higher risk of falling or being pushed over seats.

Table 3: Reasons given for feeling safe by those in licensed standing areas this season (base = 1,464; up to three factors per respondent)

Reason	Example responses	No. of responses	% of respondents giving safe reasons who reported this
No issues	No reason not to feel safeI don't feel threatened or unsafe	701	48%
Fan behaviour	 I have people around me that I have become friends with, and that makes me feel safe The fans are all good-natured Everyone looks out for each other 	245	17%
Well managed	 Plenty of staff, checks and organised Stewards are polite and helpful but will evict anyone being dangerous quickly and efficiently 	226	15%
Atmosphere and environment	Friendly atmosphere with no aggressive behaviourFriendly safe environment feeling	187	13%
Barrier prevents falls or crushes	 It is a lot safer as we have a barrier and cannot fall over seats when celebrating like we used to I do feel very safe knowing I have a barrier in front and behind of me, knowing I can't get crushed 	177	12%
Barrier (general)	 I have always stood at [club], and now it feels safer with the barrier in place I'm currently pregnant so am thinking about safety for the first time, the barriers make me feel much safer 	150	10%
Spacious and/or comfort in standing area	 Modern stadium, plenty of space Plenty of room where we stand, never feel crammed in like the old standing terraces 	146	10%
Design of stadium and/or section (incl. CCTV)	 I feel safe as the stadium has been designed to be the safest it can be Well designed. Good height of barriers 	94	6%
Enjoyment	Decent standing makes it more enjoyableIt's a safe, fun area to be in	31	2%
Ease of entry or exit	 With easier access and egress around the stadium there is less crowding 	24	2%
Distance from away fans	I am nowhere near the away fans	23	2%
No conflict now	 People know they will be standing, so less confrontational than previous seasons 	8	1%

The problematic behaviour of other supporters and poor management of the area are the most common reasons given by home spectators who feel unsafe. Specific problematic behaviours cited include migration resulting in overcrowding. Although unrelated to standing, a small number referred to safety concerns associated with COVID-19. As such,

the pandemic is clearly still impacting on spectators' general feelings of safety in grounds. Wider reasons for feeling unsafe relate to risks in standing areas more generally, rather than specifically to barriers (Table 4).

Table 4: Reasons given for feeling unsafe by those in licensed standing areas this season (base = 193, up to three factors per respondent)

Reason	eason Example responses		% of respondents giving unsafe reasons who reported this
Home fan behaviour	 Because of the climbing on the seats and barriers and falling about and pushing With standing, many fans have become more rowdy Many older people who are unable to stand. A few arguments have started over this. 	63	32%
Poor management	 Drunk people around me, never even looked at by the stewards Stewards don't stop people moving to the front or standing in different seats 	48	24%
Migration	 Other fans have started to squeeze in from other areas of the ground, making it very uncomfortable The aisle is packed with people who shouldn't be there 	35	18%
Overcrowding	 Too many people in my allocated section At least five people to three seats next to me at every game 	35	18%
Away fan behaviour	 Away fans too close, objects thrown/threats made The area where we sit is often filled with away fans at CL games which does make me feel more unsafe 	31	16%
Personal preference	 Old man now can't stand up for 90 minutes I paid for a seat and now I have to stand. Not enjoying attending matches now 	24	15%
COVID	 Lack of COVID safety measures such as mask wearing 	13	7%
Less space	The stadium is not large enough to incorporate rail seating. We feel penned in. It's too tight	8	4%
Facilities	 My seat is at the end of a row and the barrier does NOT extend far enough 	7	4%
Egress	Unable to climb over the seats to escape quickly in case of an emergency	7	4%

Although it is important to acknowledge the factors that contribute to spectators feeling unsafe in licensed standing areas, and clubs should consider whether they can take any action to address them, those reporting concerns represent a very small proportion of the overall sample.

2.3.4 The impact on the matchday experience

Respondents in licensed standing areas were also asked whether the introduction of barriers and licensed standing areas in their home ground had impacted on their matchday experience. Three-fifths (59%) perceive that it had improved and 27% that it had stayed the same; 11% reported that it had deteriorated.

For those who felt the match-day experience had improved, the most common reason (given by around one-third of respondents) was that the atmosphere was better. The other commonly reported factor, and linked to a more positive atmosphere, was that being permitted to stand this season has removed any tension associated with being asked to sit either by stewards or other spectators.

The atmosphere is much better when we are treated like adults and not told to sit down every five minutes.

- Survey respondent, standing area

Removed the constant war of attrition with stewards about standing (when the overwhelming majority pitchside -I'm front row - have always wanted to stand). Much more relaxed and sensible. Better relations with stewards.

Survey respondent, standing area

For the 11% (231 people) who stated that the experience had got worse, by far the most common response was their personal preference to sit, including references to people standing around them who were not previously doing so. There were also a small number of references to negative behaviours of those around them, including anti-social behaviour and overcrowding rows and gangways.

I would much prefer to watch the game from a fully seated position but because of the change I have to stand for most of the game.

Survey respondent, standing area

More people standing in area they shouldn't. Tickets in other blocks moving to our block. No challenge from [club] or stewards.

- Survey respondent, standing area

General aggression has increased.

- Survey respondent, standing area

These findings suggest that clubs should strive to understand the demand to stand in different sections of their ground, as being forced to stand to see can clearly have a detrimental impact on the matchday experience. Overall, clubs should be cognisant of the factors that have led to a small proportion of spectators in these areas feeling less safe or enjoying the experience less; however, these are a minority compared with the high number who have a positive experience in these areas, in terms of both safety and enjoyment.

2.3.5 Opinions on the introduction of licensed standing areas

On balance, the majority of survey respondents support the change in policy to allow licensed standing areas (84%). Further analysis suggests that males (86%), non-disabled (85%) and younger spectators (95% of those aged 16-35; 90% of those aged 36-55) are significantly more likely to support the change in policy than females (69%), disabled supporters (76%) and those aged 56 and over (74%). Although the majority of respondents, irrespective of where they sit, support the change in policy, almost a fifth of those who sit elsewhere⁸ in a stadium are not in agreement with it. This is compared with 9% of those who stand, and 7% of those who sit in an area adjacent to a standing section. Safety concerns are likely to be a key reason why some supporters do not agree with the policy change: 46% of those who feel unsafe in their home ground do not support the change, compared with 9% of those who feel safe. Responses as to why they disagree with the change indicate that for some, there is still an association of modern licensed standing with standing on traditional terraces.

Other reasons why some spectators do not support the change in policy, particularly the higher proportion of those who sit away from these areas, could include a fear that, in time, standing will be permitted in more areas of stadia. When asked to explain their reasons for disagreeing with the policy change, almost half referred to either their own personal preference to sit, or not wanting their view (or the view of others, such as children or those who cannot stand) to be blocked. Many of these respondents also referred to their own frustration at not being consulted or listened to, which will also impact their view of the wider change.⁹

If it's licensed then people like myself who cannot stand for long periods lose the enjoyment of watching games.

Survey respondent, seated elsewhere

I said No [to agreeing with the change in policy] – not because I object to safe standing areas per se, but mainly because of the way they were implemented – without discussion and forced upon existing season ticket holders without any alternatives.

Survey respondent, standing area

Overall, satisfaction with and support for licensed standing areas was high, but the SGSA and clubs should be mindful of the minority who disagree and the reasons for this.

⁸ Not in a licensed standing area or an area adjacent to a licensed standing area.

⁹ The introduction of licensed standing areas mid-season gave clubs limited opportunity to consult with spectators in advance, particularly as these are largely occupied by season ticket holders who will have purchased their ticket at the end of the previous season.

3. The management of residual risks in licensed standing areas

Many of the residual risks evident in licensed standing areas are the same as those identified in any area of the stadium where spectators persistently stand, and club staff and stakeholders stress that these risks and challenges are similar to those experienced in these areas prior to the installation of barriers.

Table 5 (overleaf) lists the risks associated with persistent standing identified in the previous research, the extent to which these have been observed or reported in licensed standing areas since 1st January 2022, and the strategies in place for managing these.

SGSA 'Supplementary Guidance 01: Safe Standing in Seated areas' (SG01)¹⁰ considers standing as safe where safety management procedures are in place to:

- mitigate against encroachment onto the gangways;
- manage the **numbers of spectators entering** the safe standing accommodation (inter-area migration);
- manage the **behaviour** of spectators.

3.1. Preventing encroachment onto the gangways

We have found no evidence that the blocking of aisles and gangways, which is closely linked to migration, has increased since the introduction of licensed standing areas. In fact, staff at two of the clubs report that they find aisles and gangways are *clearer* since barriers were installed. During observations, the blocking of aisles and gangways in licensed standing areas was similar to that in persistent standing areas identified in the previous research. This remains a risk for licensed standing areas, in the same way that it does for any area where large numbers of supporters stand.

 $^{^{10}\,\}underline{\text{https://sgsa.org.uk/wp-content/uploads/2021/09/SG01-Safe-standing-in-seated-areas.pdf}}$

Table 5: Risks associated with persistent standing

Risk	Management strategies	Extent of strategies observed or reported	Factors impacting effectiveness
Migration leading to overcrowding: inter-area	Secondary ticket checks at vomitory entrances	Some observations of this, but not at all clubs Half of spectators report seeing this most/all of the time	Difficult at peak times E-tickets more challenging to check and spot duplicates
Migration leading to overcrowding: intra-area	Spot-checks of tickets where stewards observe overcrowding Stewards in aisles and gangways to discourage lateral movement Radial barriers to limit movement	Very few spot-checks of tickets observed Stewards often positioned in aisles Some spectators report seeing stewards asking fans to return to their seats, but others that this is ignored	Difficult to spot overcrowding whilst in the section – CCTV needed
Blocking aisles, gangways and exits	Stewards positioned in aisles and gangways, patrols where necessary to keep them clear	Limited patrols, but often cleared if not fully blocked Half of spectators report seeing this most/all of the time	Narrow gangways Spectators entering late If spectators are unable to find their allocated seat
Standing on seats and seat backs	Steward instructed to ask adult spectators to climb down	Limited efforts to do this, and mixed success No observed action taken when children stand on seats in order to see Spectators report seeing stewards intervene some of the time	Difficult if spectators doing this are in the middle of a row, particularly if this is during goal celebrations
Standing on barriers	Stewards instructed to ask spectators to climb down	Limited observations of this Spectators report seeing stewards intervene some of the time	As above
Conflict between spectators, or between staff and spectators	Tickets sold as licensed standing tickets	Observed stewards moving those who wished to sit, to reduce conflict potential	Only possible if seats available No control over ticket sales outside of the club channels
Anti-social behaviour or disorder	Behaviour management strategies for the entire stadium; dynamic risk assessments of away spectators prior to the match depending on the opposition Less attention given to risk behaviours of home spectators	Limited observations of interventions for smoking or vaping Stewards observed responding to specific complaints, and challenging those with alcohol Minimal steward intervention for anti-social behaviour reported by spectators	Segregation lines challenging to manage, more so where home and away standing areas are adjacent Increase in challenging behaviours more widely

Managing encroachment into aisles and gangways in licensed standing areas is more challenging in certain situations or locations, many of which are again no different from the challenges faced in areas of persistent standing:

- **Narrow gangways**: Old grounds may have some narrow aisles and gangways. Where these are too narrow to allow a steward to be positioned and still leave space for spectators to pass, blockages are more likely.
- **Away sections**: It is more common in away sections for spectators to be either unable to find, or choose to not go to, their allocated seat. These spectators are more likely to stand at the end of rows and migrate into aisles and gangways.
- **If spectators enter late:** A rush of spectators around kick-off can lead to more people standing in gangways or squeezing into the end of rows.
- **Match-by-match ticket holders:** Where home spectators are able to buy tickets for a single match (for example Cup fixtures), they can be less familiar with the area and as such find it more difficult to locate their seat.
- Close to the segregation line: Where home standing areas are adjacent to away sections, there is a greater risk of migration towards the segregation line which can result in more people in aisles and gangways. Club safety staff suggest that in these areas, barriers make it more difficult for spectators to move towards the line, but this remains a risk to be managed.
- Where 'spaces' are created by barriers with no seat behind: Certain locations which are not designated seats or spaces can be used by spectators to stand. These are a) the spaces either side of the vomitory entrance, where spectators will lean on the rear barrier of the row in front of them; b) at the back of stairways above a vomitory; and c) behind the rail that forms the back of a row below a lateral gangway.
- Where the labelling of rows is unclear: If rows are labelled on the barrier itself, it can be unclear whether this is referring to the row in front or behind the barrier. Spectators who are unable to find their allocated seat, particularly close to kick-off, are more likely to stand at the end of rows and migrate into aisles and gangways.
- If there are not sufficient numbers of stewards located on gangways:
 On some occasions stewards are diverted from their position in the aisles and gangways, in order to respond to a risk elsewhere. Sometimes there may be insufficient stewards available to cover all gangways throughout the match. In these cases, without patrols or monitoring, aisles and gangways are more likely to become blocked, particularly if combined with one or more of the risks above.

All clubs have a management strategy for ensuring standing spectators do not migrate into aisles and gangways. In the situations or locations described above, it may be necessary to place greater emphasis on this aspect of the safety management plan, and for stewards to be encouraged to be proactive in keeping aisles and gangways clear. Effective strategies include:

- Where infrastructure allows, stewards to be **positioned at the top of aisles and gangways** from the time the gates open. This gives them a clear view down the aisles below.
- Additional stewards to be **positioned at the bottom of aisles and gangways** if necessary (where there are particular infrastructure features and/or greater risk of migration at the front of the section).
- **Regular steward patrols,** either timed or in response to migration into the aisles and gangways, to keep them clear.

We have observed limited use of timed patrols; however, when stewards respond by moving up and down the gangway and asking spectators to move in, this can successfully clear them. Stewards need to be motivated and confident enough to move from their gangway position and respond to spectators standing in aisles, and may need prompting by supervisors. It is not sufficient for stewards to remain at the vomitory entrances, particularly in away sections.

Where there is significant migration into an area or row, it is likely that the aisle will become blocked again. Controlling migration will make it easier to keep aisles clear; thus, any strategy for managing aisles and gangways should be implemented in conjunction with a strategy for managing migration, such as ticket spot-checks. Stewards need to be prepared to go beyond asking spectators to squeeze into the nearest row if it looks like this is already full, to checking their tickets and encouraging them to return to their allocated seat if necessary. To be most effective, checks need to occur as the rows fill up and before migration becomes unmanageable.

Effective stewarding for migration and maintaining gangways

Cardiff City has a generous number of stewards allocated to the area where spectators stand, to allow for various different positions to be occupied on a matchday. As the barriers cover the back five rows of the stand, one steward is positioned on each radial gangway at the start of the barriers to undertake secondary ticket checks. A further two stewards are positioned in each gangway in the section with barriers, to prevent lateral movement between the blocks.

Two stewards are also positioned on the concourse side of each vomitory, to check all tickets of those entering the stand. As the majority of spectators in this stand are season ticket holders, and the process is the same at every match, they expect these checks and often have tickets ready for inspection. Season tickets are still physical cards, which speeds up the process.

All stewards on secondary ticket checks are briefed once in position on their individual role, as well as in the wider stand briefing. This is especially useful for those on the entrance to the section with barriers, as they are the only ones inside the stand who need to ask to see tickets.

3.2 Managing inter-area migration

We have not observed any significant migration into licensed standing areas and the addition of the barriers does not appear to have increased the risk of this happening. However, some spectators report migration, and combined with the fact that we saw limited secondary ticket checks, it is likely that this has occurred without being visibly noticeable within the sections. Further, the popularity of these areas could increase, particularly if they become known for an enhanced atmosphere and match-day experience. As a result, the risks of migration from other areas (inter-area migration) and overcrowding could also increase. As was found in the previous research, two factors primarily reduce the risk of inter-area migration:

- where **supply meets demand** for tickets in the standing section;
- where the standing section is **isolated** from the rest of the stadium and **self-contained** (only accessible from certain turnstiles).

At grounds where isolating the standing section is not possible, the following dynamic management strategies on matchdays help to mitigate the risk of migration into the area:

- secondary tickets checks on entrances to standing areas;
- **spot-checks of tickets** in sections with suspected overcrowding;
- **CCTV monitoring** and communication with response teams.

Stewards can be employed to undertake secondary ticket checks and ensure that everyone in the licensed standing area has a relevant ticket. Implementing secondary ticket checks does, however, present some challenges. At times of peak flow, and in stadia where it is possible for spectators to move between seated and licensed standing sections (for example at Cardiff City and Tottenham Hotspur), secondary ticket checks slow the ingress of spectators, which can cause blockages. Ensuring there are sufficient stewards to perform the secondary ticket checks is therefore imperative.

Clubs with seated and licensed standing areas in the same section should be mindful of the risk of migration into areas without barriers, as a result of effective secondary ticket checks on the entrance to standing areas. If this were to result in overcrowding of persistent standing rows without barriers, the risk to safety in this case would be greater than if the same overcrowding happened in rows with barriers, as there is no protection from falls.

The use of **e-tickets** has increased considerably since the previous research was undertaken, both as a COVID-19 precaution and to combat ticket touting and resale. This is only likely to increase. At most observations this season, entrance to the grounds was predominantly via e-tickets on mobile phones. This has implications for managing migration into licensed standing areas:

E-tickets are more difficult to check quickly: We previously found that
having different-coloured paper tickets was a fast and efficient way of undertaking

secondary ticket checks. Secondary checks on mobile e-tickets was observed to be a slower process. This may be a reason why we have seen much lower numbers of secondary ticket checks this season than on previous observations.

• **Screenshots can be shared**: Once inside the ground, spectators are able to share screenshots of a ticket for a particular location to gain access to that space. As with the risk of migration more generally, this is more likely in popular areas where supply does not meet demand. Stand supervisors acknowledged that this was a difficulty for them.

Finally, it can be difficult to identify overcrowding as a result of migration when working within these areas, so it is not reasonable to expect stewards to be able to do this as well. Monitoring of these areas on CCTV from the control room can help to identify overcrowding, and this can be communicated to response teams who can then instigate spot-checks of tickets.

Understanding levels of migration

At **Tottenham Hotspur**, electronic overhead counters are being installed in the vomitories into the home licensed standing area. These are being put in place initially for concerts over the summer to monitor numbers at those events, but they will be maintained for football matches to help the club to gather a better understanding of the number of people entering the area, and if there is any significant migration or overcrowding.

3.3 Managing the behaviour of spectators

3.3.1 Current behavioural concerns

Club interviewees acknowledged that spectators who occupy the areas with barriers tend to be (though not exclusively in the early adopter sample) the ones who previously persistently stood, and these people are the most challenging to manage. In most cases, this was the main reason why these areas were selected for licensed standing and so similar behaviours are to be expected. Safety staff assert that behaviour management strategies would be required for these spectators, regardless of the type of accommodation they were in. Nobody expressed the opinion that problematic behaviour has increased as a result of introducing barriers or specific standing areas.

Clubs acknowledge that, since the return to full stadiums, there has been an increase in challenging behaviour from a minority of spectators. All club safety officers and police representatives at early adopter clubs agreed that this has been an issue for them this season, but all were confident that this is not connected to the introduction of licensed standing areas. The reasons for a reported increase in challenging behaviour are likely to be multi-faceted, but all agreed that the long absence of spectators due to the COVID-19

pandemic was the primary driver. All SGSA inspectors agreed, highlighting that this is an issue at many sports grounds.

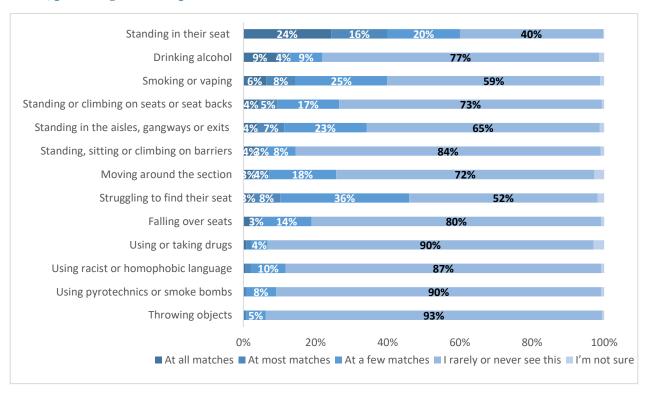
Risk behaviours observed in licensed standing areas, which require close monitoring and management are:

- occasional climbing and standing on barriers, usually during goal celebrations and at the end of the match; most commonly in away sections, but occasionally in home sections;
- occasional missile throwing, pyro use, offensive chanting and slurs, pitch incursions, and consumption of alcohol in view of the pitch, although these have been observed in all areas of the stadium;
- **intra-area migration**, most commonly in away sections where some spectators migrate to the back of stands or to be with their friends; but it has also been observed in home sections next to segregation lines.

Spectators' observations of the behaviour of other supporters, and whether this has changed since barriers were installed, were explored in the survey.

demonstrates that although most behaviours are observed in most areas of stadia at least at some matches, the most prevalent problematic antisocial behaviours are drinking alcohol and smoking or vaping.

Figure 2: Frequency with which supporters' behaviours are observed by spectators in their section of stadia, percentage of all respondents



Similar proportions of spectators who stand and sit observe others drinking alcohol in the stand and smoking or vaping at *all* matches. However, a higher proportion of respondents who stand report that they rarely or never see other spectators drinking alcohol (82%) compared with supporters who sit (73%). There could be a number of reasons for this: drinking alcohol may be less prevalent in standing sections, or alternatively, it could be that supporters who are drinking are more difficult to spot among people who are standing.

The majority of respondents in licensed standing sections rarely or never see spectators standing, sitting or climbing on barriers (85%); however, a small minority (4%) have observed this behaviour at all matches they have attended.

Risk behaviours appear to be more prevalent in away sections, with higher proportions of respondents reporting that they have seen most of these behaviours compared with the proportion of home supporters who report seeing them at least at a few matches. The main exception is spectators struggling to find their seat. Similar proportions of respondents report seeing other supporters drinking alcohol in both the home and away sections.

When home spectators were asked whether the behaviours they have seen have increased, decreased or stayed the same compared with previous seasons, approximately three-fifths of respondents perceived that they have stayed the same. Although only a minority of respondents reported that they have observed the use of drugs, smoke bombs or pyrotechnics, and the throwing of objects in licensed standing areas this season, these are the behaviours most commonly perceived to have increased: 30%, 24% and 15% of respondents respectively perceive that these behaviours have increased compared with previous seasons.

Notwithstanding the wider increase in challenging behaviours evident across live events (referred to at the start of this section), club and wider safety interviewees stressed that behavioural challenges in licensed standing areas are no different from those experienced previously when these areas had large numbers of spectators persistently standing. It was also asserted that home standing areas do not pose a significant concern in terms of problematic behaviour, and that safety teams' attention was largely focused on away sections. Our observations this season support this point.

Factors that can make behaviour more challenging to manage include:

- the location of home standing areas in relation to away areas;
- **narrow segregation lines** that bring opposing spectators close to each other and limit the number of stewards who can occupy the area.

3.3.2 Management strategies

Clubs have management strategies to identify and deal with anti-social behaviour throughout the stadium, not just in licensed standing areas. Given the focus on away supporters, both the management strategy and the extent of the police presence on a matchday differ depending on the opposition. The following management strategies are in place at all early adopter clubs:

- Comprehensive and high-quality **CCTV coverage and monitoring** of licensed standing areas, to enable spectators engaging in anti-social behaviour and disorder to be identified and tracked, and a response team to be deployed as necessary. CCTV captures evidence if further action is required.
- **Away club stewards** are invited to support the local safety team.
- Codes of Conduct for licensed standing areas (although these have not been seen on display at any of the early adopter clubs and spectator engagement with these is minimal);
- Clear procedures for **reporting and escalating incidents** to response teams.
- Working closely with the police when planning for high-risk matches, through DFOs (Dedicated Football Officers), 11 Operational Football Officers (OFOs formerly spotters) and PSUs (Police Support Units) where necessary.

As barriers limit forwards movement down rows, it can be expected that if gangways are also kept clear, pitch incursions would be more difficult in licensed standing areas. However, whilst barriers limit forward movement down rows, they do not limit access from the gangways.

Further dynamic strategies are needed in addition to the above on a matchday, to manage specific challenges:

- **Proactive stewarding:** Additional stewards can be useful prior to kick off in licensed standing areas to assist spectators to find their allocated row and ensure that they move along the row to their allocated space.
- **Limiting the misuse of barriers:** Stewards should warn spectators about persistently standing on seats or seat backs in licensed standing areas, in the same way that they would warn those persistently standing in seated areas. Extra effort should be made to stop spectators climbing on barriers.

Although current levels of standing on barriers remain low, there is the need to curb this practice to avoid it becoming more widespread, given the potential injury to others, as well as to the spectator engaged in the misuse. Disciplinary action should be taken against any spectator who climbs or stands on a rail or barrier. One safety officer acknowledged the challenge of managing this:

We've got in our in our visitor guides that get sent out [to away spectators] ahead of fixtures telling them that they're now coming into a safe standing area, etc. We might need to expand on that about standing on rails, but does that then put an idea into the heads of people that wouldn't normally do it? To be honest, it's not large scale, so at

¹¹ See https://www.college.police.uk/app/public-order/policing-football

the moment it is manageable. But is it going to grow like persistent standing did? I don't know, but we need to be mindful.

Safety officer

One strategy could be to enhance the Code of Conduct and ticket terms and conditions to specifically prohibit particular types of seat and barrier misuse, identifying this as a danger to safety and an offence for which a spectator will be excluded.

However, there was limited awareness of the Code of Conduct for these areas amongst spectators, and so this and T&Cs may have limited impact on behaviour, yet they would at least empower clubs legally to take action. Additional measures should therefore also be considered, to demonstrate that this is not tolerated; for instance, the use of signage at the entrances to licensed standing areas, which expressly prohibits certain forms of barrier/seat misuse. Such signage may assist enforcement and fan self-regulation.

Managing intra-area migration with additional infrastructure

Tottenham Hotspur identified that the central areas behind the goal were the ones most at risk from intra-area migration, as these are the most popular with spectators. Two radial barriers have been installed to compartmentalise the South Stand lower licenced standing area into thirds, to prevent migration to the centre of the area.

Any infrastructure strategy such as this must be done in conjunction with secondary ticket checks, as the barrier only prevents migration within the row. Strategies are still needed to prevent people without tickets for that block from moving down radial gangways.

3.3.3 Perspectives of local police at early adopter clubs

Local police representatives¹² were interviewed at each early adopter club to capture their perceptions of the impact that the introduction of licensed standing areas had on their matchday operations.

Overall, interviewees reported that they had no reason to object to the implementation of licensed standing areas. All were happy that the club safety teams were responsible for managing spectators inside the stadium, whether they were standing or not, and had appropriate plans, procedures and staff in place to manage these areas effectively.

From a police point of view, we should only speak up when we've got a reason to say something and object. Is there a reason to say no? I don't think there is. It's either within the capabilities of the club to manage it, or it's not. I don't think we can have a negative stance on that topic.

Police representative

¹² Across the five clubs these included a DFO and Bronze and Silver Match Commanders, and Constable, Sergeant, Chief Inspector and Superintendent ranks.

There has been minimal or no impact on police operations at the five clubs following the introduction of licensed standing areas. All interviewees reported that there had been no changes in the way they operate on or plan for a matchday.

We're not doing anything differently, the deployments haven't changed inside that ground... it's not obstructive in any way, you've still got room to manoeuvre and go in, so in respect of that I don't think it's changed anything at all.

Police representative

Only one of the interviewees indicated that they might have to slightly adapt how they instructed officers to address an incident in a licensed standing area, if required. As the barriers prevent access between the rows within a section, officers would have to access the area from the side. This was described as a planning consideration rather than a particular issue or concern.

Although none of the officers could recall needing to instruct colleagues to enter the licensed standing areas this season, two speculated that the barriers could be beneficial in the event that they had to enter the areas for two reasons:

- Officers would be protected, either if they were pushed, or from others falling onto them from the rows above.
- Movement between rows would be limited, which would help to prevent other spectators from gravitating towards the incident.

It was also acknowledged that tension between those who wish to stand and stewards asking them to sit can cause conflict; removing that tension may have a positive impact on behaviour.

I think an awful lot of fans get a lot of enjoyment from standing and, therefore, a certain element, which I'm sure is why the pilot's been introduced, is about improving the fans' experience. In a policing capacity, do I want fans to enjoy themselves? Well, of course I do. So, I would certainly welcome that. And I think, yes, if people are happier they're less likely to misbehave

Police representative

Surely they are more likely to behave in a good way or respond to stewarding in a positive way if they're not being told to sit down.

Police representative

Wider behavioural challenges have been evident across all football clubs (and other events) this year (discussed in section 3.3.1). Whilst all police interviewees acknowledged that there had been an increase in incidents this season, they described these as occurring outside the stadium or in the concourse, and were therefore confident that this

could not be attributed in any way to the introduction of licensed standing areas. Challenges in these areas, such as migration and behaviour around segregation lines, were considered to be no different from previous seasons.

You can't say since the rail seating's been installed it's had an impact on the behaviour of football supporters, within that particular area there's no change to what it was previously.

Police representative

The only additional behavioural challenge mentioned was at one club, where it had been noticed that flags had been hung on barriers and been used to mask risk behaviour. However, it was acknowledged that without barriers, flags could be held and used in the same way. This issue was not therefore considered to be directly related to the introduction of barriers.

4. Learning from the early adopter programme

4.1 Requirements of the early adopter criteria

The SGSA produced an 'early adopter' criteria outlining the infrastructure, safety management and SAG engagement requirements for clubs wishing to offer licensed standing.¹³ Clubs needed to demonstrate how they would meet each of these points in their application.

4.1.1 Infrastructure guidance

SG01 recommends barriers to be a minimum of 800mm high, with a recommended height of 900mm. Given that climbing onto barriers has been observed, with small numbers climbing over them on egress, we considered the implications of a higher barrier. Increasing barrier height could potentially reduce the risk of fans climbing onto or over barriers, but it would also increase the safety risk to those misusing barriers, and fans around them, in the event of a fall. In stands with a shallower rake, a higher barrier would also be more likely to interfere with sightlines of those remaining seated. The current guidance appears appropriate given that falls over barriers were not reported by safety staff, but this should be monitored on an ongoing basis.

In terms of clearways and seat depths, grounds are largely restricted by existing infrastructure. The three early adopter clubs with newer stadia have more space available per seat than the older stadia; unsurprisingly, spectators with experience of the newer ground appreciated the spaciousness of the seats, and only those from the older stadia reported feeling cramped.

4.1.2 Ensuring a seating option for away spectators

"Licensed standing areas must be made available to both home and away supporters. In achieving this, away supporters should also be offered seated accommodation within the provision." (Point 2)

Supply and demand for away licensed standing areas also needs to be considered. Our previous research showed that the levels of persistent standing amongst away supporters was close to 100% at most matches. However, a significant proportion of away supporters reported that they *stood in order to see*, rather than through choice. We also found that where a seating option was offered to a small number of away spectators, and opposition ticket offices sold these as seating-only tickets, this option was taken up by spectators. Elderly people, ambulant disabled and anyone else who is unwilling or unable to stand for the duration of the match, should be catered for as an away spectator. Table 1 on p.7 shows that two of the five early adopter clubs have installed barriers throughout the away sections, leaving no away seats without safe standing barriers.

¹³ See https://sgsa.org.uk/wp-content/uploads/2021/09/Licensed-standing-areas-early-adopter-criteria-.pdf

- At Old Trafford and The Etihad, the vast majority of away spectators were observed standing across all areas, with or without barriers. At The Etihad, the blocks without barriers for away spectators are on the middle and upper tier, and so have a steeper rake than the lower tier away area, where barriers are present.
- Tottenham Hotspur has for part of the season attempted to designate the first few rows of one block in the away section as reserved seating. This requires the cooperation of the opposition ticket office to sell these tickets only to those spectators who wish to sit. During both match observations at this ground, all spectators in this block were observed standing.
- At the Cardiff City Stadium, barriers have been installed at the rear of two of the three blocks designated for away spectators which allows the dynamic movement of those who might prefer to sit (see box below).

Our observations of away sections at the early adopter grounds have highlighted that aside from Cardiff City, these continue to be almost 100% standing, regardless of the amount of the area given over to licensed standing.

Ensuring a seating option for away supporters is not possible without the cooperation of the opposition club when selling tickets. This is a league-wide issue. All clubs need to agree (and consistently implement) a ticket selling strategy that allows home and away spectators who wish to sit to buy specific seats, while recognising that implementation for away spectators will require co-operation by the visiting club when selling the away ticket allocation. Stewarding teams will then be better placed to enforce this on a matchday. It is important that stewards have easy access to the seated sections, to ensure that fans do not migrate into these areas and that these rows remain seated.

Strategies for offering a seated option to away spectators

Cardiff City has a strong customer service focus for its own and visiting spectators. This has resulted in strategies to attempt to offer seating in away sections. On a matchday, those who want to sit occupy seats in the front of the away blocks and those who wish to stand move to the back. This was highlighted as good practice in the previous research, and continues to be effective for matches where away clubs do not take the full allocation. The club plans to extend the current barrier section for away fans across all rows above the vomitories. This will leave the front 12 rows without barriers, which creates a clearly defined section where fans who want to sit can be relocated and stewards can try to enforce sitting.

When Cardiff City played at Anfield in February 2022, an allocation of 6000 tickets was taken. The club spent a significant amount of time selling these tickets intelligently, to ensure that spectators were grouped together. This helped matchday management and improved the customer experience, including for elderly supporters and others who preferred to sit at the front. This strategy is achievable, but requires time and commitment from clubs.

4.1.3 One seat/space per person

"Each seat/space must be allocated to only one spectator." (Point 3)

Safety staff at early adopter clubs are satisfied with current guidance that does not allow for more than one person to occupy one seated space. They acknowledge that there may be value in revisiting this in the future, particularly for newer grounds with more generous seating dimensions, but do not perceive a particular demand for this at present.

The spectator survey did not specifically ask about this requirement, but the number of respondents who felt that the spaciousness of standing areas was a factor in their feelings of safety on matchdays, and the sensation of feeling cramped being associated with feeling unsafe, is relevant here.

4.1.4 Seats remaining in place and unlocked

"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." (Point 4)

Observations highlighted that many spectators sit on their seat before kick-off and at half-time (largely in opposition to the way spectators in seated areas sit through the match but stand at half-time). Some also sit during the match, particularly on front rows or corners, in Cup matches where more tickets are available to non-season ticket holders, and during low-risk matches or quiet times in the match. Safety staff and supporter representatives are largely happy that keeping seats unlocked offers choice to spectators in those areas. This is supported by data from the spectator survey, where 41% of respondents in licensed standing area stated that they used their seat on a matchday, and a further 13% indicated that they would prefer to sit.

Further evidence from the supporter interviews demonstrates that spectators in licensed standing areas largely appreciate having the choice to sit.

People tend to sit at half-time. So, I think that actually if someone wants to sit, they are entitled to, at any point. People might feel a bit unwell, so if they want to sit down for a moment even in the middle of a match, that is important.

Spectator interview, standing area

It would disadvantage if you couldn't sit down at all. If it was like that I would have to sit somewhere else.

- Spectator interview, standing area

Another interviewee explained that he liked having the option to sit at half-time, and this avoided him having to go into the busy concourse. Older grounds with narrower concourses can get particularly busy, and so any strategy that might encourage more people to use the concourse should be avoided.

One interviewee offered an alternative opinion, suggesting that there is likely to be a minority of spectators who would prefer seats to be locked:

No point in the hybrid approach -I'd rather you took the seat away. The seat is a trip hazard. I want to stand. If I want to sit there are plenty of other places I can go to do that.

- Spectator interview, standing area

Unlocked seats do allow spectators to stand on flip-up seats, with the associated risk of falling off. Whilst barriers provide some stability to those who stand on seats and help to protect those in the rows in front and behind from falling spectators, if seats are to remain unlocked, plans must be implemented to limit this practice and mitigate the risk of injury. In the previous research we observed spectators standing on seat backs where seats were locked in an upright position; locking seats does not prevent spectators from climbing and standing on the available infrastructure, and safety teams must expect and be prepared to deal with this practice at all times.

One way in which barrier misuse could be reduced would be to remove seats altogether, thus preventing spectators from using the seats and seat backs as steps to climb onto or over barriers. However, we have already noted the fact that many spectators in licensed standing areas still wish to utilise their seats. Furthermore, removing seats would increase the ease with which spectators can engage in migration between rows.

4.1.5 The clear labelling of rows

"Each seat and seat row must be clearly identifiable." (Point 5)

As discussed in relation to the management of migration and gangways, unclear row labelling can result in spectators being unable to find their allocated seat, particularly close to kick-off. In this situation, they are more likely to stand at the end of rows and migrate into aisles and gangways. Where labels are placed on the barriers themselves, it can be unclear whether this relates to the row in front or behind, and they can be easily obscured. Row labels are clearest when positioned on the gangway step, in large print and centrally placed.

4.1.6 Incorporating disabled viewing areas

"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" (Point 7)

Four of the early adopter clubs have disabled platforms on 'super risers' above their licensed standing areas. This gives wheelchair users, their personal assistants and others requiring disabled spaces the option to be part of that section without their view being obstructed. All of these platforms on super risers existed in their current format prior to this season as they were needed for clear sightlines over areas where spectators persistently stood. Our observations showed that these areas are popular with disabled spectators and largely offer clear views. Given their clear views and the space they offer, there is a risk of spectators migrating to disabled platforms; this requires the positioning of stewards at the entrance, who should be prepared to challenge anyone standing there and request that they return to their allocated space.

Open-question responses to the survey by disabled spectators suggest that the vast majority of them are not in wheelchair bays but are ambulant disabled spectators in the licensed standing areas. This is an important group to understand, as they will not benefit from the viewing areas on the super-risers, but may have mobility issues or illnesses that impact their ability to stand for the whole match. For those who reported feeling safe, reasons were largely similar to the wider sample – barriers protecting from falls, and not seeing any issues – but a small number highlighted the positive benefit of the barrier in relation to their disability.

90 minutes is a long time to stay standing, so it's good to have a rail to hold and lean onto to help stretch and ease my back pain.

Survey respondent, standing area

Some disabled respondents did report, regardless of how safe they felt, that they were unhappy being in a licensed standing area, as they did not want or were unable to stand themselves.

I am unable to stand for the game so viewing is impaired. As a supporter who has mobility issues I feel the overall enjoyment in my area has deteriorated.

Survey respondent, standing area

For this group, the experience has been negatively impacted by the introduction of licensed standing areas and clubs should consult with all supporter groups, including Disabled Supporter Associations, to fully understand the ambulant disabled perspective alongside that of those using wheelchair bays.

4.1.7 Informing ticket buyers

"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" (Point 8)

As the early adopter programme was introduced mid-season, it was not possible to inform season ticket holders in advance that their area would be a licensed standing area, as at that time applications had not been made. Some spectators who responded to the survey were unhappy that they had not been informed in advance that their seat was going to be in a licensed standing area. This is likely to be a more straightforward process if clubs can communicate this in advance of season ticket sales.

The main challenge occurs when spectators buy matchday tickets through means other than the home club ticket office, as the club cannot control what information they receive. For away spectators, early adopter clubs were reliant on away club ticket offices informing ticket buyers clearly that they were purchasing tickets in a licensed standing area. In reality, away ticket buyers largely expect to stand, but if more efforts are to be made to offer a seated option, extra clarity will be needed on the types of away ticket available (seated or standing).

Those purchasing matchday tickets from sources other than the club ticket office (secondary sales sites, ticket exchanges or through friends) are less likely to be informed of the type of ticket being purchased, and some we spoke with on matchdays were not aware in advance they would be in a licensed standing area. Stewards reported that this could be difficult to manage on matchdays if spectators arrived and did not want to or were unable to stand. As most of the standing spaces across the five clubs are occupied by season ticket holders, this is a minor issue, but one that needs to be acknowledged by clubs with a higher number of ticket resales, or at particular matches where tickets are more likely to be exchanged. As with away tickets, clubs have no control over the information provided to those who purchase from other sources.

4.1.8 Code of Conduct

"A Code of Conduct must be introduced" (Point 9)

All clubs have a specific Code of Conduct for the licensed standing areas, though these are generally taken from the suggested wording in the criteria rather than tailored to their ground or fan base. Safety staff do not object to the requirement for a Code of Conduct for licensed standing areas, but perceive that a dedicated policy is not particularly necessary because the expected behaviours in these areas also apply to the other areas of the stadium. Clubs are conscious of the volume of information that is sent to season ticket holders in particular, and would not want to overburden them with more.

Spectators were asked if they were aware of the Code of Conduct for the licensed standing area. Most were only aware of a generic behaviour code and were not able to recall a specific Code for the licensed standing area, suggesting that this has not been an effective way to communicate the particular requirements for this area.

I'm aware that with our season tickets, we will get a thing through about rules and regulations and all that kind of stuff. Not sure anybody reads it though. I can't remember it in that much detail to even comment, to be honest

- Spectator interview, standing area

4.1.9 Steward briefing

"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" (Point 10)

This point in the criteria relates particularly to controlling migration, which is covered in section 3. On the wider point of steward matchday briefings, these are largely generic to the ground and match, and can be extensive. Often the same briefing that is used for senior staff and supervisors is cascaded word for word to stewards in each section. In some cases, stewards are in smaller groups and have their particular role outlined; in others, particularly where the stewarding group is fairly consistent, there is only a large generic group briefing. In the early observations, there was a focus on licensed standing areas, and the particular requirements for managing these. However, as the early

adopter programme progressed, there was less emphasis on this. Stewards in licensed standing areas do need tailored information, and small group briefings for those in that area would be the best way to communicate this.

4.2 Emerging issues for consideration

4.2.1 Supply and demand

Ensuring that the supply of home standing tickets meets the demand from spectators who want to be in standing areas is one of the biggest issues that clubs will face when implementing these areas. There is no simple equation for this, as each club will have its own level of demand; even within clubs, this demand may fluctuate over time and in different match contexts. An assessment of the likely demand for standing is, however, needed in order to determine the appropriate size and location of the area. The number of supporters who persistently stand in areas without barriers or rail seating will provide an indication of the likely demand. Financial considerations are likely to determine the number of barriers or seats with rails that smaller clubs are able to install, which may or may not be sufficient to meet demand.

Across the five early adopter clubs, different approaches to supply and demand have been taken, which have had implications for both safety and customer service. Table 1 on p.7 shows that the percentage of the stadium allocated to safe standing seats ranges from 3% at Old Trafford to 29% at Stamford Bridge. This provides the opportunity to understand some potential impacts of having large or small areas.

- At Stamford Bridge, barriers have been installed in two areas where spectators previously stood, and one area where spectators previously sat. We have observed spectators sitting in the front two-thirds of this area and standing nearer the back. Staff reported an increase in people standing in this area since 1st January 2022 (this was when the area was licensed for safe standing and signage was introduced to this effect, *not* when the barriers were first installed at the start of the season), and 81 move requests as of February 2022. Spectator survey responses also highlighted this change. Clubs should therefore be aware that installing barriers in areas where spectators are currently seated may lead to an increase in standing which can cause discontent amongst those who wish to remain seated.
- At Old Trafford and the Cardiff City Stadium, previous levels of persistent standing are much higher than the number of safe standing seats installed.
 Unsurprisingly, at both of these grounds, levels of persistent standing in seated areas (without barriers or rails) remain higher than at the other three clubs.
 However, there does not seem to have been any increase in migration into these areas as a result of their small size.

There is no evidence from early adopter clubs so far that supply and demand has changed significantly from previous persistent standing levels, but it will be important to continue to monitor this.

4.2.2 The location of licensed standing areas

As barriers or rails have been installed to enhance the safety of those who persistently stand in large numbers, the location of home standing areas has largely been predetermined by previous patterns of persistent standing. There are therefore some differences in the location of licensed standing areas in relation to away sections among the five early adopter clubs, which influence how these are managed.

- Both Tottenham Hotspur and Cardiff City made a deliberate decision to position
 their home 'standing supporters' (at the time, those who were persistently
 standing in large numbers) at the opposite end of the stadium to the away section
 when they moved to new stadia, and so licensed standing areas are now in these
 locations.
- Chelsea has home licensed standing areas both at the opposite end and adjacent to the away spectators.
- Manchester United has located its small licensed standing area of home supporters away from the away section, but there are other large areas of persistent standing around the stadium, including adjacent to away spectators.
- At Manchester City, the away section is bordered on both sides by a home licensed standing area.

Blocks next to segregation lines can be challenging to manage, whether these are licensed for standing or not. Safety staff at all clubs accept that there will always be home spectators who wish to locate themselves by the segregation line, in order to engage in provocative or otherwise problematic behaviour with opposition spectators (who will likely also persistently stand whilst doing this).

Where home standing areas are separated further from away sections, safety teams are satisfied that this largely keeps rival 'risk' supporters apart, both inside the stadium and when entering and exiting. This leaves a smaller number of challenging spectators to manage by the segregation line, and allows home spectators who are solely interested in antagonising or confronting visiting supporters to be identified more easily.

If home and away standing areas are adjacent to each other, this contains the more challenging spectators in one area of the stadium. Concentrated resources can be deployed to this area, helping to make it easier to manage.

Given that licensed standing areas are a safety measure to be introduced where persistent standing is already happening in large numbers, clubs may feel they have little control over the location of their licensed standing sections. Moving to a new stadium, or significant stadium redevelopment, gives a club the opportunity to consider carefully where they locate spectators who wish to stand. In existing stadia, the creation of licensed standing areas presents a once-in-a-generation opportunity for clubs to manage the location of their different sub-cultures of support, develop atmosphere-generating sections, move some challenging spectators away from segregation lines, and reduce the potential for conflict at turnstiles and exit gates outside the stadium. As a result, clubs

should engage with all relevant stakeholders when making decisions over the location of licensed standing areas, including fan groups, the police, and the Safety Advisory Group.

4.2.3 Children in licensed standing areas

Early adopter clubs are taking different approaches to managing children in licensed standing areas. Three have imposed minimum age restrictions (either 14 or 16) in those areas; two have no age restrictions currently and leave this to the discretion of parents.

Club staff acknowledge that there are advantages and disadvantages of allowing children in these areas. On the one hand, those under a certain height are unable to see the pitch and are therefore more likely to stand on seats or seat backs, or in the aisles or gangways to watch, which both present safety risks. Small children less able to support themselves independently are being held by adults while they are sat or stood on the barrier in front, or being sat on the shoulders of their parents. On the other hand, children are better protected in areas with barriers than they were previously in areas of persistent standing – the barrier offers them protection from others falling, and gives them something to hold for stability.

It's a safe environment now we've got the rails in. I'd be more concerned without the rails, but we didn't do anything then. So now we've made it an even better environment, I've got no concerns in relation to occupation by, if a dad wants to take his nine-year old son in there, it's his dad's risk assessment that's the important bit here.

- Safety officer

When asked, supporters had mixed views about the presence of children in these areas, given that they cannot see over standing adults, and the behaviour that can occur in some sections.

This is the first season I have started taking my young lad who is currently six. As an adult the aggressive behaviour around me doesn't intimidate me, but my young boy can often be frightened.

Survey respondent, standing area

Clubs and SAGs need to determine their policies on children in licensed standing areas, to balance the risk of children standing on seats with the impact on the overall stand demographic if children and families are not present in these areas.

Reviewing policies for children in licensed standing areas

Manchester United set minimum age limits for the licensed standing areas at the start of the early adopter period: 13 for the home area and 14 for the away area (which covers only a small part of the away section).

In the away section with barriers, children continue to attend. One steward suggested that parents get around the policy by buying non-concession tickets for their children. Some then ask to move so they are able to see, which, depending on availability at the front of the section, might be possible. The club realised, however, that having an age limit for the section with barriers - but not the rest of the away section where supporters, including children, stand without the barriers to protect them from falling forwards - was not appropriate. The approach was then changed to remove the age restriction. It is now made clear to parents at both the point of sale (although this is reliant on the away club communicating the information) and entrance to the section that this is a safe standing area. If they are not happy, parents can request to move, which the club will try to accommodate but cannot guarantee.

In the home section, two families with children under 13 were asked to move out of the area before the start of the season. Other young children have attended matches in the area by acquiring tickets (via secondary sites or through friends). In line with the policy for the away standing area, the club will review the home area policy with the SAG and consider whether to allow parental discretion in the same way.

4.2.4 Persistent standing in seated areas elsewhere in the stadium

Although we have not observed, or been informed of, an increase in persistent standing elsewhere in the stadium, the implementation of licensed standing areas has not eradicated it completely. There is a particular risk of persistent standing in seated areas next to segregation lines, especially at high-risk fixtures, and early adopter clubs have had mixed success in addressing this. Almost a quarter of survey respondents in areas that are *not* designated licensed standing areas report having seen supporters standing in seats during play at *all* of the matches and a further 16% have observed this behaviour at *most* of the matches they have attended. Clubs, therefore, still need a robust and effective persistent standing management plan alongside licensed standing areas.

Persistent standing in upper tiers with a steep rake and no barriers remains a safety risk, and clubs should seek to address this as an immediate priority. If and when supply increases over time, it should be possible to move those who wish to stand into a licensed standing area and reduce persistent standing elsewhere in the stadium. Even if the number of spectators persistently standing is not deemed sufficient to cause a risk of progressive crowd collapse, this is a customer service issue that the introduction of licensed standing areas aims to eradicate.

4.2.5 Stewarding challenges

The live events sector is currently facing a labour shortage; as a result, sports grounds across the country are experiencing challenges in maintaining the required level of

stewards and other security personnel.¹⁴ There is a concern over both current levels of recruitment and the experience of stewards. Many stewards left the industry as a result of the COVID-19 enforced break, and these have been replaced with less-experienced staff. Whilst not directly related to the change in licensed standing, any development of management strategies – particularly the need for robust, confident and consistent stewarding of licensed standing areas, and additional staff to undertake extra ticket checks and gangway patrols – needs to take this wider context into account.

Early adopter football clubs, as with most large clubs, use a mixture of their own and agency stewards on a matchday. Most recognise the value of having their own stewards for consistency, with agency staff a vital addition to reach targets. Where agencies are used to steward licensed standing areas, clubs use the same agency at every match.

We also now have a big drive on to bring more of it in-house because of, well a number of reasons. One, we want better control over who we're training and looking at the buy-in into the club and really stepping up our customer service. That's one issue. Also, the quality of some of the staff that are coming through agencies is less and they're less experienced. So, we may as well have our own people who are less experienced that we can move through our own training programmes.

Safety officer

Steward recruitment and retention strategies

Clubs described a number of strategies adopted to increase recruitment and retention of stewards. **Manchester United** has historically had a large proportion of its own stewards, and to maintain this, has implemented the following incentives:

- **'Refer a friend'** where if an existing steward refers someone to the role who completes a minimum number of matches, both receive a cash bonus.
- A £100 bonus for stewards who work a **minimum of ten games** in a season.
- Paying stewards for attending training.
- Cash bonus for 'steward of the week' (several available each week).
- Potential **increase to the hourly rate** to make the role more attractive.

Tottenham Hotspur is reviewing internal recruitment and retention processes for stewarding staff, to increase the number of in-house stewards available for matchdays. The club has tried to make the stewarding role at the new stadium as attractive as possible to help with recruitment and consistency of staff. This includes:

- A minimum six hour working day;
- A **hot meal** on every shift:
- A **financial bonus** for stewards who work 100% of matches between the start of the season and the end of the year.

¹⁴ In an attempt to understand more about these challenges, the SGSA recently published research commissioned on their behalf on this topic: see Owen, R., Ruscott, E. & Chowdhury, R. (2022), Stewarding Labour Market: Summary of findings, NatCen. Available at https://sgsa.org.uk/wp-content/uploads/2022/03/Stewarding-Labour-Market-Summary-of-Findings.pdf

5. Recommendations and key considerations

5.1 Recommendation for DCMS

1. Overall, our view is that the trial of licensed standing areas had been a success in both home and away sections. Given the positive impact on the safety of fans and the lack of any evidence that it increases disorder or anti-social behaviour, we recommend that all clubs, in consultation with the SGSA and SAGs, be **given the opportunity to implement licensed standing areas**, and that the necessary amendments to the legislation are made as soon as possible.

5.2 Key considerations for SGSA

- 2. SGSA should consider adding further detailed recommendations for the implementation and management of licensed standing areas **into the most recent version of SGo1**.
- 3. Guidance for clubs should **reiterate the need to eliminate the climbing and standing on barriers by spectators**. Clubs should be required to demonstrate how they will ensure that all spectators in the area are aware that this is prohibited, and what action will be taken to identify and sanction those who do this. This aspect should be monitored by SGSA inspectors.
- 4. At this point, we do not see it necessary to make any change to current guidance for seats to remain unlocked. Staff at all early adopter clubs and the majority of spectators appreciate the choice to sit or stand in these areas, particularly before the match and at half-time.
- 5. SGSA should **continue to gather evidence on the implementation of licensed standing areas at different types and sizes of grounds**. Aside from learnings at Cardiff City, the current evidence base is related to large, full-capacity Premier League stadia and particular nuances and learning are likely to emerge from implementation at smaller and lower-league grounds.

5.3 Key considerations for clubs

5.3.1 Infrastructure

6. Given the safety benefits of licensed standing areas, clubs should **introduce rails or barriers in areas of their stadium where large numbers of spectators currently persistently stand** to reduce the risks identified with persistent standing in those areas. Care should be taken with any decision to extend this to areas where spectators do not currently stand in large numbers; in this case, spectators who wish to sit in these areas should be asked if they wish to move to rows at or near the front, where there is less chance of being forced to stand. If spectators are required to move, either

within the stand or elsewhere in the stadium, this should be at no additional cost to them.

- 7. To help keep them clear, **radial gangways** in licensed standing areas should be **wide enough for a steward and a spectator to pass at the same time**.
- 8. **Segregation lines** between home and away spectators, particularly where these both involve standing spectators, **should be wide enough for two lines of stewards or other security staff, so that neither have their backs to spectators**. This will assist in the management of spectators and protect stewards from falls from barriers. In some grounds, this may require a widening of the sterile zone.
- 9. Rows in licensed standing areas need to be very clearly labelled. Where a label is on the barrier itself, this can cause confusion, and so numbers should be centrally located on stairways, as these more clearly indicate a particular row, and are less likely to be obscured by spectators standing partially in a radial gangway.
- 10. Clubs should consider, alongside reciprocal intelligent ticketing strategies (below), infrastructure solutions to work towards ensuring that a seating option is offered for away spectators, such as designating the first two or three rows at the front of a block as seated-only. There should be a clear differentiation between these rows and the rest of the area, such as leaving these seats without barriers (lower tier only); or there should be very clear signage on each seat and the entrance to these rows to help stewards enforce sitting on matchdays, and assist with fan self-regulation.

5.3.2 Stewarding and other operations

- 11. **Pre-match steward briefings could be better tailored to licensed standing areas,** with this time being used to brief individual positions on their specific duties. For example, the responsibilities outlined below should be individually explained to those in these roles by supervisors.
- 12. In away licensed standing areas and any home areas where there are large numbers of spectators unfamiliar with the area, **additional stewards should be deployed to help spectators find their allocated row**, and to ensure that they are moving down the row to their allocated seat. In the hour before kick-off, stewards should be proactive in doing this.
- 13. Where spectators are standing in any area that is not a designated space, **stewards should check tickets and instruct spectators to move to their allocated space**. This should start as soon as individuals occupy these areas, including both lateral and radial gangways.
- 14. Stewards should be instructed to be more responsive in **instructing spectators standing on seats to desist**. Where this happens during goal celebrations it usually does not last long enough for an intervention, but if it does, stewards or other response staff should be more proactive in preventing this from continuing. Where spectators **climb or stand on barriers**, **intervention should be immediate** and CCTV should be used to help identify perpetrators.

5.3.3 Ticketing and communications

- 15. Every effort should be made to **communicate to spectators that climbing and standing on rails will not be tolerated**. This could include stressing in season ticket and matchday ticket T&Cs that this is prohibited and offenders will be ejected
- 16. **Signage, particularly at vomitory entrances**, should communicate the express prohibition of climbing on seats and barriers, as well as the expectation for spectators to have their tickets ready to be checked on entering the standing area.
- 17. Given the challenges associated with secondary ticket checks for e-tickets, clubs should consider returning to **physical season ticket cards** for season ticket holders in licensed standing areas.
- 18. Where e-tickets are in use, clubs should investigate the **technology available to prevent screenshots being taken** when the ticket is on the screen, as in the case of other apps that require additional security, such as internet banking.
- 19. More effort should be made on a league-wide basis to **offer a seated option for away supporters**. The success of this depends entirely on away clubs committing the time to sell these tickets to those who request a seated ticket. It is recognised that there are spectators who do not attend away matches because they are unable or unwilling to stand for ninety minutes. This area could also be used for families with young children.
- 20. **Disabled supporters should be consulted**, particularly ambulant disabled spectators who do not utilise the wheelchair bays, to understand any concerns they might have and respond to any wishes to move by those unwilling or unable to stand for a whole match. Clubs should consider whether as front row seats become available, they could be reserved for disabled supporters currently with tickets elsewhere in licensed standing sections who may wish to relocate.

5.3.4 Planning and strategy

- 21. The creation of licensed standing areas should be seen as a once-in-a-generation opportunity for clubs to manage the location of their different sub-cultures of support. Segregation lines are more challenging to manage where home and away standing areas are adjacent to each other, and so clubs should consider avoiding this if possible. However, the location of standing areas should be decided in consultation with the SAG and fan groups to determine the best location and the potential challenges that might arise from this decision.
- 22. Clubs and SAGs should determine the **policies for allowing young children into licensed standing areas**, and balance the risk of a) children standing on seats or being unable to see and b) the appropriateness of current behaviour in the area for young children, with the risk of altering the demographic and potentially the dynamic of those areas if families are prohibited. A policy could, for example, prohibit very young children (under five years old) who are more likely to be balanced on barriers by parents in order to see the match. **Any policy needs to be very clearly communicated**, including to those sharing season tickets with others, and people who purchase tickets through secondary ticketing sites.

Appendix 1: Methodology

CFE Research developed a mixed-methods approach for this review of the early adopter programme. The approach combines an analysis of club safety documentation, matchday observations, a spectator survey, and qualitative research on the perceptions and experiences of those with a stake in crowd safety, and of supporters themselves. The methodology was delivered in three stages, details of which are set out below.

Stage 1: Scoping

Applications and safety management plans for licensed standing areas at the five early adopter clubs were reviewed in order to understand the decision-making process behind the applications, and the proposed plans to effectively manage the areas.

Stage 2: Primary fieldwork with early adopter clubs

2.1: Matchday observations

The primary purpose of the visits was to observe:

- The extent to which the risks of standing, identified during the scoping stage, were evident in the stadia.
- The extent to which the strategies for managing these risks were being implemented.
- The effectiveness of these strategies in managing identified risks.
- The ways in which spectators responded to these strategies.

Typically, two or three members of the team attended each match to independently observe the management of the crowd. Data were recorded using an observation framework and cross-checked to ensure consistency. Photographic evidence of the behaviour observed was captured during the matches. Club safety briefings were also attended prior to kick-off, to better understand club approaches to standing that were specific to each match.

A total of 11 matches (see below) were observed between January and May 2022. The timing of the early adopter programme has limited the range of observations available. We selected high-risk matches, where available, to see these licensed standing areas and safety operations when under maximum stress, and so we recognise that these are not likely to be typical matches. Based on this evaluation and the learning from the 2019-20 research, we would expect any risks identified to be less prominent at lower-category matches.

Match observations at case study clubs

Home team	Opposition	Kick-off time	Police category ¹⁵	Competition
Manchester United	Aston Villa	20.00 Monday	Medium	FA Cup
Manchester United	Chelsea	19.45 Thursday	Medium	Premier League
Tottenham	West Ham	16.30 Sunday	High	Premier League
Tottenham	Arsenal	19.45 Thursday	High	Premier League
Manchester City	Chelsea	12.30 Saturday	Medium	Premier League
Manchester City	Manchester Utd	16.30 Sunday	High	Premier League
Chelsea	Tottenham	16.30 Sunday	High	Premier League
Chelsea	Newcastle ¹⁶	14.00 Sunday	Low	Premier League
Cardiff	Nottingham Forest	16.00 Sunday	Low	Championship
Cardiff City	Swansea	15.00 Saturday	High	Championship
Wales ¹⁷	Austria	19.45 Midweek	Low	International

2.2: Interviews with club staff and stakeholders

Interviews were undertaken with 36 key individuals who were directly involved in safety management at the five early adopter clubs. The purpose of the interviews was to explore the impact of management strategies, and identify any ongoing issues and concerns relating to standing at football stadia. The interviews were conducted remotely by video or telephone, with some supplemented by matchday discussions during visits.

Initial interviews with the SGSA inspectors and safety/operational leads at each of the case study clubs were undertaken prior to observations to identify the following: particular risks and challenges they face in relation to managing standing spectators; the rationale for their strategies to manage these risks; perceptions of their effectiveness; and further detail on their approach as an early adopter club. These interviews were repeated at the end of the season. This allowed those in both roles to discuss their plans and expectations before the early adopter programme started, and also to reflect on four months of licensed standing, and discuss any likely future adaptations as a result of learning. The table below sets out the number and roles of stakeholders interviewed during this review.

 15 A standardised set of categories is used by the Police to highlight the risk of disorder associated with individual football matches.

¹⁶ The observation team had planned to attend a higher-risk fixture in April but sanctions placed on the club owner Roman Abramovich on 16th March meant that this proposed fixture might not be played at full capacity or with away spectators. The Newcastle fixture was instead chosen to ensure that a second observation could be conducted when the ground was at full capacity.

¹⁷ Cardiff City is currently the only Championship club in the early adopter programme, and fixtures this season tend to attract attendances around half of the capacity of the stadium. An additional observation at the Cardiff City Stadium for an international fixture was added to the schedule to observe the stadium (and safety management teams) at full capacity.

The formal interviews were supplemented with informal conversations with safety staff, stewards and police, at appropriate points during observations.

Number of club staff and other stakeholders interviewed across all five early adopter clubs

Safety/ operational lead	Other safety staff, incl stand supervisors	SAG/ other external safety ¹⁸	Local police	SGSA inspectors ¹⁹	SLOs ²⁰ or other supporter reps	Total
5	9	6	5	4	7	36

Stage 3: Supporter consultation

3.1: Spectator survey

An online spectator survey exploring perceptions and experiences of safety at football matches was administered in March and April 2022. Clubs used their existing season ticket databases to identify and disseminate the link – consequently the overwhelming majority (99%) of all responses to the survey were season ticket holders. Early adopter clubs sent the link to those with season tickets located either within or adjacent to the licensed standing areas at the early adopter clubs since 1st January 2022. Both Manchester United and Chelsea sent the link to all season ticket holders. The link was also provided to the Football Supporters Association, for dissemination amongst their network of supporter groups at early adopter clubs, as well as clubs who had away fixtures at early adopter stadia. Below we provide an overview of the respondent sample.

Response rate by club

Home club	No.	%
Manchester United	411	9.4
Manchester City	659	15.1
Chelsea	1094	25.1
Tottenham Hotspur	1741	40.0
Cardiff City	323	7.4
Any of the above as an away spectator	124	2.8
Total	4352	100.0

 $^{^{18}}$ SAG at each club plus one medical professional

¹⁹ One SGSA inspector has responsibility for two of the early adopter clubs, so only four inspectors cover the five clubs.

²⁰ Supporter Liaison Officer, see https://thefsa.org.uk/our-work/slos-and-dlas/

Respondent profile by age group

How old were you on 1st August 2021?	No.	%
56+	1858	42.7
36 – 55	1613	37.1
16-35	880	20.2
Total	4351	100.0

Respondent profile by gender

What best describes your gender?	No.	%
Male	3634	87.4
Female	469	11.3
Other / prefer to self-describe	8	0.2
Prefer not to say	46	1.1
Total	4157	100.0

Respondent profile by disability

Do you consider yourself to have a disability?	No.	%
Yes	309	7.5
No	3742	90.5
Prefer not to say	84	2.0
Total	4135	100.0

3.2: Follow-up interviews

Telephone or video interviews were conducted with a sample of 25 survey respondents who agreed to be re-contacted. As the survey involved several open questions asking respondents to give reasons for their feelings of safety, matchday experience and opinion on licensed standing more generally, and because the vast majority were in support of licensed standing, we gained a significant amount of qualitative data from the survey on the reasons for this support. Interviewees were therefore purposefully selected to gather further depth from two minority groups: a) those who reported that they felt *unsafe* at football matches since 1st January 2022 and/or disagreed with the change to allow licensed standing, and b) under-represented demographics (female, disabled, ethnic minority, or LGBTQ+ supporters).

These insights are used in the report to highlight the thoughts of people in either (or both) of these groups, but are not considered representative of the wider survey group, given their minority status in the overall sample.					