

# **Licensed standing in football stadia: Post- implementation evaluation**

Report for the SGSA

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## Acknowledgements

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# Contents

<b>Executive summary</b>	<b>4</b>
<b>1. Introduction</b>	<b>5</b>
1.1 Context	5
1.2 Evaluation approach	6
<b>2. The impact of licensed standing areas on spectator safety</b>	<b>8</b>
2.1 The positive impact of licensed standing areas	8
2.2 Residual risks	10
2.3 Managing residual risks	14
2.4 Ongoing learning and considerations for clubs	18
2.5 Conclusions	25
<b>3. The future scale and scope of licensed standing</b>	<b>26</b>
3.1 Introduction	26
3.2 Clubs with infrastructure but no licence	26
3.3 Intent to install infrastructure within the next three years	26
3.4 Reasons for not planning licensed standing	28
3.5 Conclusions	30

## Executive summary

One year on from the early adopter pilot, **the positive impact of installing standing infrastructure and creating licensed standing areas** continues to be experienced at both existing and newly licensed clubs. There has been **no increase in the prevalence or severity of impact of residual risks** than those reported in previous research. There remains isolated examples of spectators **standing on barriers** which must be continued to be challenged and monitored.

Success in eradicating or significantly **reducing persistent standing levels is dependent on whether number of standing spaces meets the demand**. A number of clubs with licensed standing are only converting partial sections; as well as potentially not meeting demand, this creates a risk of migration between standing and seated areas that safety teams must manage.

**Management strategies remain largely effective** when enacted on a matchday to mitigate residual risks, and early adopter clubs continue to refine strategies where improvements have been identified. There appears to be ongoing attempts to improve stewarding consistency and effectiveness, which will help.

The **licensed standing criteria remains fit for purpose**, though the requirement for home and away sections without specifying a number or proportion has led to **some clubs having a quantity of infrastructure that does not fully address the level of persistent standing**. Whilst for some clubs there may be reasonable reasons for installing small numbers of standing infrastructure to start with, this should be in conjunction with plans to increase until persistent standing reduced to minimal levels, or clubs risk action under the SGSA All-Seater Policy Enforcement Approach.

Clubs new to licensed standing for the 2022/23 season bring more learning around the implementation of this in different contexts. Slimline seats show that **it is possible to create a licensed standing area in an old stadium with narrow seating row depths**. The creation of a supporter-driven family-friendly standing area and the transition to a new stadium are examples of different scenarios where licensed standing has been effectively implemented and learning has been gathered.

There is **likely to be an upsurge in clubs planning to install standing infrastructure and apply for a license in the next three years**. This includes a range of club and ground sizes, and is motivated by a combination of addressing risks associated with persistent standing and enhancing the spectator experience. This research suggests that there should not be a particular concern that clubs will look to install infrastructure without also undertaking the necessary steps to fulfil the licensed standing criteria.

Further, no club without any standing infrastructure at the moment reported an intent to install only home or away infrastructure – all are planning on installing for both. This suggests that **the requirement in the criteria to offer standing accommodation for home and away spectators is understood and accepted at most clubs**. Perceived cost of the installation is the most-cited reason for not planning on installing infrastructure in the future.

# 1. Introduction

## 1.1 Context

In September 2021, the Sports Minister Nigel Huddleston instructed the Sports Grounds Safety Authority (SGSA) to move forward with a plan to create licensed standing areas, in response to [research](#) concluding that the installation of safe standing infrastructure where spectators persistently stood had a positive impact on their safety. Clubs were invited to apply to the 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 1<sup>st</sup> January 2022.

CFE Research [evaluated](#) the early adopter programme and concluded that licensed standing had a positive impact on spectator safety at the five clubs offering it. In response, legislation change was enacted to the all-seater policy that now permits clubs to apply to the SGSA to offer licensed standing to spectators in designated areas, subject to meeting a set of [criteria](#).

The 2022/23 football season saw nine football clubs/grounds offer licensed standing to spectators: the five early adopter clubs from the previous season (Cardiff City, Chelsea, Manchester City, Manchester United and Tottenham Hotspur) along with Brentford, Queens Park Rangers (QPR), Wembley and Wolverhampton Wanderers.

As well as continuing to monitor the impact of licensed standing on spectator safety at those clubs with a licence to do so, the SGSA are interested in what the future landscape of licensed standing might look like, and what is either motivating clubs to consider licensed standing or preventing clubs from considering it.

It is accepted that not all clubs with all-seater stadia will have either the level of risk associated with persistent standing or the supporter demand or interest to consider installing infrastructure. However, many clubs with all-seater stadia currently have a high volume of people persistently standing in home and/or away sections and so it is expected that clubs in this position will be considering safe standing infrastructure and licensing to mitigate the associated risks.<sup>1</sup> Understanding clubs' intention within the next three years will give an indication of the likely demand for the support and infrastructure needed.

The purpose of this research was therefore twofold: to monitor the impact of licensed standing at clubs that already have a license for this, and to get a better understanding of the likely demand for licensed standing in the future.

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<sup>1</sup> The SGSA [All-Seater Policy Enforcement Approach](#) outlines the SGSA's approach in the 2022/23 football season to enforce the all-seater licence conditions under statutory powers in the Football Spectators Act 1989. Installing standing infrastructure is one action that can be taken by ground management to manage residual safety risks for those spectators who still choose to stand in seated areas once reasonable steps have been taken to ensure compliance with comply with the all-seater licence conditions.

In gathering further learning on the impact, residual risks and implementation of licensed standing areas, this report frequently refers to previous research carried out. Please see [The Safe Management of Persistent Standing in Seated Areas at Football Stadia](#) (published 2021) and [Early Adopters of Licensed Standing Areas in Football Stadia](#) (published 2022) for further insight.

## 1.2 Evaluation approach

This evaluation had two distinct methodologies.

### 1.2.1 Method: Ongoing monitoring of licensed standing

This part of the research offers an update to the evaluation of the early adopter programme conducted between January and May 2022 following the policy change to allow all-seater football grounds to offer licensed standing from 1<sup>st</sup> January 2022.

In order to provide an update on those clubs into their second season of licensed standing and draw out learning from clubs new to this, all nine clubs were subject to scoping research and three selected for more in-depth study.

Information was gathered on all clubs through:

- A document review of licensed standing applications and Matchday Inspection reports (MDIs) held by the SGSA
- Interviews with the relevant SGSA inspector.

Three clubs were selected for more in-depth research, which included the above plus interviews with:

- Up to three club staff involved in safety management at the ground
- Up to three external stakeholders involved in safety management for the club (through the police and Safety Advisory Groups)
- Up to three supporters who hold season tickets in a safe standing area of the ground.

A total of 18 individuals were included across the three clubs in the in-depth research.

The three clubs were purposefully selected to provide a range of contexts to a) understand the impact of licensed standing on the safety of spectators in the ground and b) gather learning on the implementation and maintenance of licensed standing areas that may be helpful to the SGSA and other clubs.

- **Brentford** moved to a new stadium in 2020, having previously operated terraced areas for both home and away spectators, and so had to manage the transition from unallocated standing to modern 1-1 allocated licensed standing.
- **QPR**, with an old stadium, created a licensed standing area in response to fan support for an 'atmosphere section', aiming to encourage spectators who persistently stood elsewhere to move to this area.

- **Manchester City**, as an earlier adopter club, refined their management processes as the club moved into a second year of licensed standing, and plan to expand their standing area.

### 1.2.2 Method: Future demand for licensed standing

To assess the future scale and scope of licensed standing, a survey was designed and distributed via email to the lead safety contact at all 62 clubs<sup>2</sup> subject to the all-seater policy but without a current licence for standing areas. This includes both compulsory and voluntary all-seater stadia, and a small number of clubs that have installed some standing infrastructure but have not applied for a licence. The survey was anonymous, only asking for banded stadium capacity and average attendance to look for any patterns in relation to these two factors. The survey covered the following sections:

- Persistent standing risk: self-reported persistent standing levels amongst home spectators and location (upper or lower tier) of away spectators
- Current standing infrastructure
- Plans to install standing infrastructure over the next three years for home and/or away spectators
- Reasons for installing/planning to install standing infrastructure
- Reasons for not installing/planning to install standing infrastructure
- Intention to and factors for/against applying for a licence for standing in seated areas in the future

A total of 49 complete responses were received, representing a 79% response rate.

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<sup>2</sup> This figure is correct for the 2022/23 football season but changes year on year as a result of movement into both the football league and the EFL Championship.

## 2. The impact of licensed standing areas on spectator safety

### 2.1 The positive impact of licensed standing areas

Research across all clubs currently offering licensed standing underlines previous findings that **these areas have a positive impact on spectator safety in areas where spectators persistently stand in large numbers**. We have gathered no evidence that these positive impacts diminish, or residual risks increase, as clubs move into a second year of operating licensed standing areas and spectators become more familiar with them. Clubs new to licensed standing for the 2022/23 season demonstrate that the positive impacts seen for early adopter clubs continue to be evident in different contexts and stadia types.

The main positive impact of spectator safety, as with previous findings, is that the infrastructure prevents forward movement of spectators and therefore reduces the risk of a progressive crowd collapse. Club safety staff, external stakeholders including local police, and spectators all recognise and cite this positive impact.

Other positive impacts reported at clubs that have introduced licensed standing this season include:

- Clearer aisles and gangways, as spectators are more aware of their space and use the bar to lean on
- Offering stability for spectators who may be unsteady on their feet whilst standing for long periods of time
- A more positive relationship between stewards and spectators in those areas as stewards do not have to attempt to get standing spectators to sit down (this is particularly evident at Brentford where spectators who wish to stand and watch football were able to do this prior to moving to the new stadium).

This final point was also extended to matchday police officers, where the risk of conflict with spectators as a result of persistent standing has also been removed.

[Prior to licensed standing] the club were coming to us on a regular basis with vomitories and aisles blocked by people standing and persistent standing and that takes a resource to deal with, and with that resource as well as brings risk, because officers are putting themselves in a position where their actions can be seen as illegitimate in forcing somebody to sit down.

Local police representative

Club staff and police largely agreed that rail seating areas provided easier access to spectators in the middle of rows when needed than seated areas as people are already standing. Further, the rails offer protection from forwards movement to staff whilst accessing the area as well as spectators.



It's actually easier to get in and deal with something in a mid-section of a standing area than it is to get into a mid-section of a seated area... People are used to people moving past them if they're standing up.

Safety officer

The railing does offer that element of support for officers going down that particular line as well... when stewards have had cause to go in, the movement has been a lot freer because obviously you've not got the seats in the way. It's just been easier for them to get through and to where they need to get to.

Local police representative

Overall, the positive impacts of licensed standing at the newly licensed clubs are largely in line with those previously reported and therefore appear to hold up in different contexts and stadia thus far.

### 2.1.2 Persistent standing elsewhere in the stadium

Installing licensed standing infrastructure does not in itself eradicate persistent standing, but if the number of spaces installed is equal to or exceeds the demand for standing spaces, it can greatly reduce it. Figure 1 below lists the scale of the licensed standing offer across all nine grounds; this ranges from 2% to 35% of capacity.

Unsurprisingly, where only small percentages of home or away sections are converted to standing infrastructure, persistent standing remains in larger numbers.

**Licensed standing infrastructure can only eradicate persistent standing if a sufficient number of standing spaces are installed.** This has been achieved at Chelsea and Brentford, the only clubs with licensed standing where 0% persistent standing is repeatedly reported. Judging the demand for standing spaces is challenging and may take time to get right, as discussed further in section 2.5.3; however for some clubs, particularly those with the highest levels of persistent standing across the 2022/23 season, supply falls considerably short of demand.

There remains a risk that there will be a small amount of persistent standing in blocks adjacent to licensed standing sections. This is inconsistent across clubs – some have seen this and others have not. Where this does happen, the practicalities of extending standing sections, particularly in terms of sightlines, should be considered.

Club	Home spectators			Away spectators			% of overall capacity with licensed standing
	No. of standing spaces 21/22	No. of standing spaces 22/23	% of capacity with licensed standing	No. of standing spaces 21/22	No. of standing spaces 22/23	% of capacity with licensed standing <sup>3</sup>	
Brentford	N/A	4,368	28%	N/A	1725	100%	35%
Chelsea	9,183	9,183	25%	2,994	2,994	100%	29%
Wolverhampton Wanderers	N/A	7,668	26%	N/A	585	19%	26%
Tottenham Hotspur	6,934	6,934	12%	3,073	3,073	100%	16%
Manchester City	5,011	5,011	10%	904	904	28%	11%
Cardiff City	919	919	3%	548	1841	67%	8%
QPR	N/A	1000	7%	N/A	250	8%	7%
Manchester United	1,519	1,519	2%	550	1,813	60%	4%
Wembley	N/A	861	2%	N/A	861	2%	2%

Figure 1: The scale of licensed standing across the nine grounds, compared to 2021/22 where relevant

## 2.2 Residual risks

Previous research identified a number of residual risks that can occur in areas where spectators stand in large numbers. This research supports previous findings that the majority of the residual risks identified in licensed standing areas existed in these areas before infrastructure was installed and although the prevalence of some risks has decreased – particularly, progressive crowd collapse and conflict between spectators and/or staff – the majority remain the same. The nature and prevalence of residual risks from the early adopter evaluation and, where relevant, updates from this season are listed in Figure 2. We continue to conclude that even where prevalence remains the same, **the severity of the impact of these risks (in terms of harm to spectators and staff in these areas) is reduced** in licensed standing areas compared to persistent standing in seated areas.

We should stress that the research team did not carry out any matchday observations this season; findings for 2022/23 are based on SGSA inspector observations and reports alongside interviews with club staff, wider stakeholders, and spectators.

<sup>3</sup> Clubs are required to offer both standing and seated accommodation for away spectators to comply with the licensed standing criteria. As seats are not permitted to be locked in the upright position, seating is still an option where standing infrastructure is installed, so clubs installing this in 100% of the away section still comply with this requirement.

Residual risk	Prevalence in the 21/22 early adopter evaluation	2022/23 season update
Migration leading to overcrowding: inter-area	Low levels where standing sections are not isolated	Low levels reported where migration is physically possible, mostly reported by spectators to clubs
Migration leading to overcrowding: intra-area	Low levels in home areas where adjacent to segregation lines Larger pockets in away sections where spectators move around more	Low levels reported, rarely picked up by CCTV so reported by spectators to clubs Brentford had early challenges related to transition from unallocated terracing
Blocking aisles, gangways and exits	Some minor encroachment in home areas Widespread blocking rare and observed only in away sections	Low levels reported, worse in away areas where spectators arrive late and are not instructed to move by stewards
Standing on seats and seat backs	Minor isolated incidents involving adults, usually during goal celebrations or at the end of the match Very rare persistent standing on seats in back rows Commonly observed by children	Low levels reported, rarely by adults but more commonly by children
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	Low levels reported, staff keen to stress that stewards act promptly when this happens
Conflict between spectators, or between staff and spectators	Not observed Very low levels reported by spectators who wish to continue to sit	None reported at football matches Minor levels reported when stadium used for alternative sports (see section 2.5.8)
Anti-social behaviour/disorder	Minor isolated incidents, usually at high-risk fixtures; overall rise in ASB in general at sport since COVID	Low levels reported in home areas, including pyro at high-risk fixtures; away high-risk spectators more challenging

Figure 2: Residual risks identified previously and in the 2022/23 season

### 2.2.1 Migration

**Inter-area migration** (moving into the standing area from a seated area) leading to overcrowding remains the biggest risk in situations where the standing area is not isolated from the rest of the stadium. Where standing areas are not isolated, either due to the open design of the stadium or where only a partial area of a stand has barriers or rail seating, spectators without standing tickets may attempt to migrate. This is most likely where:

- Demand for standing tickets exceeds supply
- The match situation makes it more attractive to be in the standing area (for example, if the standing area is behind the goal and the team are shooting in that direction, or a match goes to extra time or penalties).

Where clubs do see this, it tends to be movement during the game or at half time. However, even where this has been identified as a risk, this does not appear to be a common issue this season at either early adopter or newly licensed clubs, and management strategies have been put in place to mitigate it (see section 2.4.2).

**Intra-area migration** (moving around the standing area) has been reported, particularly towards segregation lines or other popular areas specific to the ground, such as the back of the section behind the goal. This is not thought to be of a level to cause concern in relation to overcrowding. Club staff acknowledged that low-level migration is difficult to identify whilst in the stands or on CCTV, but are aware of this as a result of spectators in the area occasionally reporting it to the club. It tends to be explained by people wanting to stand with friends who they were unable to get tickets with.

Brentford spectators in the home licensed standing area were reported to have been migrating within the stand more than at other clubs, which is perhaps to be expected as the club manages the transition from a terrace to licensed standing. Many of these spectators are used to unallocated ticketing in a terrace where they are able to move around to be with friends or watch from a different position.

### 2.2.2 The misuse of licensed standing infrastructure

The early adopter evaluation identified climbing or standing on infrastructure, particularly the barriers, as an additional risk that clubs must plan for and manage when standing infrastructure has been installed.

Similar levels of this behaviour have been reported this season. This remains isolated, largely in response to goal celebrations or the end of the match, and is more prevalent in away standing areas. The highest risk of this behaviour is perceived to be among away spectators at European fixtures. An additional situation where this type of incident was reported this season was at the end of matches when spectators stand on barriers to gain height in attempt to get players to throw their shirts into the crowd. One club reported a spectator falling off a barrier, but not reporting an injury or medical intervention as a result.

The only issues that we've had have been towards the back end of the season with some of the European fixtures where we've seen some of the European fans standing on the stanchion bit of the safe standing element, having the ability to actually get themselves to a much higher position to be able to throw items at the opposing fans.

Local police representative

As concluded in the early adopter evaluation, misusing barriers in this way is uncommon and isolated. However, this must continue to be monitored by all clubs to ensure it does not escalate into larger numbers doing this either individually or as a group.

### 2.2.3 Anti-social behaviour

Spectators who prefer to stand, and who are therefore most likely to occupy licensed standing areas, are also likely to be the most challenging to manage. Again, safety staff and police acknowledge that any identified poor behaviour by spectators is not a result of standing. At Brentford, safety staff report a *reduction* in behavioural issues in the licensed standing area at the new stadium compared to the terrace at the old stadium, likely attributable to the combination of allocated ticketing and enhanced CCTV allowing efficient identification and tracking of individuals if needed.

The larger of the home licensed standing sections at QPR is a former family area and is now adjacent to the family section. The club has marketed this as an 'atmosphere section' and so is expected to be noisier and present a potential risk of anti-social behaviour. However, to date, there have been no reports of anti-social behaviour from within the section itself or the adjacent family area.

Because we created an atmospheric area, that's now a little bit more rowdy than it was before. But it's all within tolerable limits, so nothing of concern.

Safety officer

The early adopter evaluation reported that during the time of the programme (the 21/22 season), there was some challenging behaviour from a minority of spectators, largely explained by a return to live sport following a lengthy COVID-19 enforced break. This included pitch incursions, pyro use and offensive chanting and slurs.

This challenging behaviour has continued this season, with police and club staff agreeing that although it was not receiving the high-profile attention, a minority of spectators still posed a challenge. Drug use in particular was an issue across all football clubs, as well as at other sports and risk events such as music festivals. All were keen to stress that this was not attributable to licensed standing.

I don't think we've seen any real increase or issue that I would in any way, directly or indirectly, sort of, attribute to safe standing. We obviously have to cover it and we've seen a huge spike in ASB and general criminal offences and disorder, but that's nothing to do with safe standing, that's to do with fan behaviour after being cooped up.

Local police representative

None of the early adopter clubs report a rise in anti-social behaviour in the licensed standing areas from last season as spectators become more used to the areas.

Away spectators continue to be the most challenging at all clubs. Brentford however report the lowest level of behavioural issues with away spectators, attributed to the small size of their stadium and away ticket allocation (approximately 1700 compared to around 3000 at most Premier League stadia). As it is difficult to get a ticket for the Brentford fixture as an away spectator, particularly for fans of the top clubs, they are thought to be less likely to be willing to reduce their chances of securing future away tickets with negative behaviours.

## 2.3 Managing residual risks

The SGSA 'Supplementary Guidance 01: Safe Standing in Seated areas' (SG01)<sup>4</sup> 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.

### 2.3.1 Mitigating encroachment onto the gangways

Very minimal encroachments onto aisles and gangways has been reported in licensed standing sections this season, suggesting that a) in some cases licensed standing reduces the likelihood of this, particularly in home areas, as spectators are more likely to recognise their 'space' as behind the barrier than in the aisle, and b) management strategies, mainly stewards positioned in gangways and regularly patrolling these to keep them clear of spectators, is largely effective when done proactively and confidently by stewards.

### 2.3.2 Managing the number of spectators entering the area

The most effective way to mitigate the risk of inter-area migration (additional spectators attempting to move into the licensed standing area without tickets for that section) is by isolating the standing area and ensuring that it is physically inaccessible from other areas of the stadium (both via the concourse or pitch side).

In most cases, whether the licensed standing section is physically inaccessible or not is related to the design of the stadium and so is out of the control of the safety management team. However, the decision to install standing infrastructure in only part of a/multiple block(s) or stand – such as a number of rows to the rear of a section – is an additional factor that prevents the standing area from being physically separated from seated areas. Chelsea is the only club that has physically inaccessible standing areas for both home and away spectators, so most clubs with licensed standing have to manage the risk of migration from seated to standing areas through alternative measures.

Low levels of inter-area migration are difficult to identify, so clubs are reliant on spectators bringing this to the attention of stewards on the day or the club through their reporting system if they see extra people in their row to. This has been reported and clubs have put in further mitigation strategies as a result.

Management strategies include:

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<sup>4</sup> <https://sgsa.org.uk/wp-content/uploads/2021/09/SG01-Safe-standing-in-seated-areas.pdf>



- One club has installed **sensors with electronic counters** on vomitories to monitor the number of spectators entering the standing area, an example of proactively managing this risk.
- All clubs (apart from Chelsea where the physical isolation of standing areas makes this unnecessary) have, as part of their management plan, additional stewards **undertaking secondary ticket checks** either on vomitory entrances or at the row where standing sections start.
- **Stewards are instructed to look out for pockets of overcrowding** and undertake soft ticket checks to identify and move anyone not in the right place. However, staff acknowledge that it is easier to prevent people from entering in the first place than moving them once they are in the wrong place, and so would always strengthen ticket checks at entrances as a priority.
- Brentford, with a new bowl-type stadium design, installed **physical barriers within the concourse and pitch side** to segregate the standing section and prevent migration. The barrier within the stand is however fairly low and the narrow space available means stewards have to observe this from pitch level.
- Manchester City placed **additional stewards in the gangways**, including at each end of the safe standing section, to prevent both inter and intra-migration once spectators are within the licensed standing area.

Club staff and police are confident that while migration remains a risk, it is one that effective stewarding can mitigate.

You do get people, especially in some of the Premier League popular games, where they want to be together with their friends so you might get overcrowding in a particular area where they've all ended up there, but that has to be down to the stewarding to be stricter on it.

Local police representative

### 2.3.3 Managing behaviour

As reported above, behavioural challenges in licensed standing areas are to be expected but all involved in safety assert that these challenges would exist with or without licensed standing. Behaviour continues to be most challenging amongst away spectators and close to segregation lines, but police and club staff acknowledge that the biggest challenge in managing away spectators is outside of the stadium and so unconnected to licensed standing.

Clubs have management strategies to identify and deal with anti-social behaviour throughout the stadium. Those identified in previous research – high quality CCTV, inviting away club stewards, a code of conduct for the licensed standing area, and extensive risk planning with other safety stakeholders for each fixture – continue to be effective in managing the risk of challenging behaviour (see Figure 3 below).

## 2. The impact of licensed standing areas on spectator safety

Residual risk	Management strategies from 21/22 evaluation	Factors impacting effectiveness	2022/23 season update
Migration leading to overcrowding: inter-area	Secondary ticket checks at vomitory entrances	Difficult at peak times E-tickets more challenging to check and spot duplicates	Segregation barriers can be retro-fitted to open bowl stadia – Brentford example Most challenging in sections that are part standing and part seating – extra ticket checks needed
Migration leading to overcrowding: intra-area	Spot-checks of tickets where stewards observe overcrowding Stewards in aisles and gangways Radial barriers	Difficult to spot overcrowding whilst in the section – CCTV needed	Clubs responded to spectator complaints with additional ticket checks Good sightlines help – prevents spectators moving for a better view
Blocking aisles, gangways and exits	Stewards positioned in aisles and gangways, patrols where necessary to keep them clear	Narrow gangways Spectators entering late If spectators are unable to find their allocated seat	More likely where away spectators arrive late, so strategies were trialled to attract them in earlier Steward patrols from start of match most effective
Standing on seats and seat backs	Steward instructed to ask adult spectators to climb down Tolerance of children standing on seats in order to see	Difficult if spectators doing this are in the middle of a row, particularly if this is during goal celebrations	Reasonable tolerance of children standing on seats adopted at QPR after initial steward approach to stop this caused some conflict
Standing on barriers	Stewards instructed to ask spectators to climb down	As above	Additional signage put up about this in entrances
Conflict between spectators, or between staff and spectators	Tickets sold as licensed standing tickets	Only possible if seats available No control over ticket sales outside of the club channels	Intelligent ticketing is the most effective strategy – ensure spectators who wish to sit are in a part of the stadium where they can do so
Anti-social behaviour or disorder	Behaviour management strategies for the entire stadium; dynamic risk assessments of away spectators Less concern with behaviours of spectators in home standing areas	Segregation lines challenging to manage, more so where home and away standing areas are adjacent Increase in challenging behaviours more widely	Good CCTV allows identification and tracking of individuals – good operators are essential Make spectators feel comfortable reporting issues – and ensure staff respond effectively to encourage self-policing

Figure 3: Management strategies identified previously and updated for 2022/23 season

**CCTV** in particular allows efficient identification of those engaging in problematic behaviours. Police representative gave examples of being able to identify individuals from incidents and track their movements throughout the stadium in order to locate and apprehend them. It was also acknowledged however that a CCTV system is only as good as those who operate it. Staff need to know how to track individuals and anticipate their movements.



**Maintaining separation between home and away standing spectators** continues to be an effective strategy for mitigating the risk of conflict between the most challenging home and away spectators (see section 2.2.1). Most newly licensed clubs/grounds (Brentford, QPR and Wembley) have home licensed standing areas at the opposite end of the stadium to away standing areas and are satisfied that this is an effective strategy for reducing challenging behaviour at segregation lines. Where home and away standing spectators are adjacent to each other, this is an additional challenge but can be managed through effective stewarding of the segregation line.

**Effective communication with spectators** in general can support behaviour management. Communicating the regulations of the area, including the code of conduct, means that everyone is aware that a) they are buying a standing ticket and therefore people around them will be standing and b) there are specific regulations, particularly not to climb on barriers. Having these reinforced in signage within the stadium gives something for stewards to direct spectators to who do not comply.

**Effective stewarding** is crucial to managing challenging behaviour, in licensed standing areas as well as elsewhere inside the stadium. The early adopter evaluation highlighted a labour shortage in the live events sector that had created challenges for sports ground safety management. Clubs stress that although these challenges are ongoing, they are continuing to improve in-house steward retention and recruitment. They are also developing relationships with agencies to ensure that agency staff are as effective as possible, particularly in the licensed standing areas. Effective stewarding is influenced by:

- **Balancing agency and in-house staff:** Clubs appear more likely to give the management and stewarding of away sections to an agency that can provide staff who work in away sections at other stadia, and are therefore used to some of the challenges in these areas. Home standing areas may use agency or in-house stewards (or a combination) but are more likely to have in-house supervisors who have experience of the section and can build a relationship with the spectators.
- **Stand-specific briefings:** This was noted as a potential area for improvement in the early adopter evaluation. Both Brentford and QPR have provided introductions to standing areas for stewards and updated steward handbooks. The main differences, compared to regular steward briefings, are related to the particular infrastructure chosen.
- **Working with away club stewards and supervisors:** Inviting the away club to provide a number of its own stewards or supervisors who are known to travelling spectators can support the home club stewarding teams effectively.
- **Individual steward skills and confidence:** To effectively steward licensed standing areas, stewards must be confident in their role in relation to preventing and addressing migration and keeping aisles and gangways clear.
- **Having police support:** In particularly challenging scenarios, such as maintaining segregation lines or ejecting spectators from this area, police

officers can provide support to stewards if needed. However, police support is usually not necessary and is only generally used as a back-up.

Overall, managing behaviour in these areas is not believed to be significantly different to the rest of the stadium.

We set up contingency plans, we understand the makeup of the stadium, the exit, evacuation routes and also the quality of the stewarding. I think, the only difference is someone is stood up rather than sitting down.

Local police representative

## 2.4 Ongoing learning and considerations for clubs

### 2.4.1 The licensed standing criteria

Safety staff at the newly licensed clubs were both satisfied that the licensed standing criteria is reasonable and fit for purpose and did not feel like any changes were necessary. A small number of comments were made in relation to particular points.

- The requirement for **infrastructure in both home and away sections** was understood and agreed with generally. The only concern expressed was by clubs that do not have either the supporter demand or level of persistent standing risk to warrant installing infrastructure in a home section but wish to install to mitigate risk in their away section.
- The requirement for **'no impact' on disabled spectators** could suggest clubs include disabled spectators in licensed standing areas, though this would be dependent on the existing stadium infrastructure and financial input to an extent. Addressing the risks of persistent standing should remain the primary focus of infrastructure development.
- The **medical team** should also be consulted in the planning process.

### 2.4.2 Infrastructure considerations

The range of infrastructure on the market for licensed standing areas is growing and there are now different options available at different price points. As this continues, sharing feedback on the strengths and limitations of the infrastructure in different contexts across clubs is important. Clubs with licensed standing reported hosting staff from other clubs considering infrastructure so they were able to see the product 'in action' and obtain advice on the planning, procurement, and installation processes. Clubs that have been through the installation process recommend:

- Leave plenty of time to liaise with the local authority and the SGSA
- Give plenty of notice to contractors to book the installation
- Factor in manufacture and delivery times, particularly if shipping the product into the UK
- Use the advice offered by the SGSA and other clubs who have been through the process

- Have one staff member responsible for overseeing the project and liaising with all of the different parties involved.

Once installed, infrastructure should be monitored as it ages – as with all parts of the stadium – for issues that might develop over time with products that are relatively new to the UK market. Inspectors at two early adopter clubs reported that handrails had come loose in some areas, and one club found bolts could be removed.

### **Slimline rail seating at Queens Park Rangers**

QPR has installed slimline rail seating, chosen to make best use of the narrow seating row depth often found older stadium. The flush fitting combined metal seat and rail has an overall closed depth of 50mm (compared to around 170-190mm for a standard plastic seat in the upright position). No other clubs currently licensed for standing have installed this particular product, with others opting for either independent barriers over existing plastic flip up seats or proprietary replacement plastic seats incorporating barriers.

This installation demonstrates that a narrow seating row depth should not preclude the installation of infrastructure for licensed standing. Feedback from club staff, stakeholders and spectators has been positive about the space offered by using a slimline rail seating product.

I genuinely think safe standing is a lot, lot safer and it's a lot more comfortable as well because at QPR it's very tight on the legroom so when you're sat down, especially me, I'm six foot two, so you always have to sit at an angle, because my legs scrape on the seat in front. Whereas, safe standing, you don't have that problem. The first thing that people always comment on when they walk in is how much room there is... Everyone's like, 'God, how much more comfortable is it?'

**QPR supporter**

The style of rail seating that QPR have got, it creates a lot more room in the aisle for you to walk up and down. So, if you're stood in front of your seat and somebody wants to go past you, you've got room to move back without banging your legs, or the seat digging into the back of your legs.

**QPR supporter**

The key difference between this product and others is that as there is no counter balance to return the seat to its closed position (which enables the narrow depth), a latch is used to keep seats in an upright position. This latch can be released by the spectator in order to sit on the seat. Once released, the seat then remains down (unlike plastic tip up seats which will return to an upright position), so if people do not push the seat back upright it will take up some of the space available for other spectators to walk past. Stewards needed to be shown how to work the seats and spectators had to familiarise themselves with the operation of the latch.

External stakeholders did however note that there was a concern with the latch (which is a metal bar) coming loose on some seats which a) impacts the function of the seat and b) could be used as a weapon (but to date has not been the case).

### 2.4.3 Supply and demand

Gauging the 'right' number of standing spaces for a particular ground is very difficult and may take time to get right. Clubs with licensed standing range from installing infrastructure in 2% to 35% of their stadium (see Figure 2 and section 2.1.2). The early adopter evaluation reported that licensed standing areas that oversupply for the demand may create some conflict between spectators who wish to remain seated and those who wish to stand, if they have not been offered or taken the opportunity to move out of the area before it became licensed standing. Conversely those without enough supply to meet demand will continue to see high levels of persistent standing elsewhere in the stadium.

Of the five early adopter clubs, Manchester United and Cardiff City had the lowest proportion of safe standing spaces available for either home or away spectators. Both have installed additional infrastructure for away spectators in 2022/23, but no additional infrastructure for home spectators where they continue to experience persistent standing.

Of the newly licensed clubs, both Brentford and Wolverhampton Wanderers have reduced persistent standing levels amongst home spectators to almost zero. Both have dedicated an entire stand, where spectators were previously persistently standing, to licensed standing. Wembley, with only 861 licensed standing spaces to the rear of each lower tier behind the goals still have much work to do to address demand, and QPR, in creating a new area for licensed standing where spectators previously sat, have dedicated a much smaller proportion of the stadium to licensed standing.

#### Assessing perceived demand at Brentford

The demand for licensed standing at Brentford when moving to a new stadium was judged by a combination of the number of season ticket holders and usual capacity of the terrace in the old stadium and consultation with supporters who may wish to move into the area in the new stadium. Making it slightly larger than the current demand allowed for some matchday sales and more season ticket holders to move into the area in the following years.

From this experience, advice to other clubs gauging interest in this situation is:

- Start the consultation process as early as possible to allow time for people to register their interest in standing season tickets
- Undertake as much consultation with different fan groups and representatives as possible to ensure as broad a fan base as possible is aware of the move and able to put their interest forward
- Encourage fans, and offer the option, to block book season tickets in groups as early as possible to allow people to get tickets with friends – this also helps with managing the risk of migration
- Continue to offer the option to move in or out once the standing area is in operation – spectators may change their mind about being in the area or not once they have had a matchday experience.

#### 2.4.4 Ensuring a seated option for away spectators

Three of the four newly licensed clubs have installed standing infrastructure in a proportion of their away section rather than the entire section. Whilst in theory this leaves a seated option for away spectators who do not wish to stand, clubs and inspectors report that at the majority of matches, all away spectators continue to stand. Intelligent ticket sales – selling tickets at the front to those who wish to sit, which is essential for the offer of a seated option to work – still does not appear to be happening on any scale.

Most clubs with licensed standing do recognise the benefit and importance of offering a seated option, which is encouraging. Brentford safety staff feel that people who want to sit in the away section tend to gravitate to the front two rows, despite the whole section being licensed standing. This requires a level of tolerance from stewards and proactively encouraging those who wish to stand who have seats at the front to move further towards the rear.

#### 2.4.5 The location of licensed standing areas

The location of standing sections at early adopter clubs remains as per last season, with four of the five separating licensed standing for home and away spectators. Manchester City have home standing sections adjacent to the away standing section on both sides, as this is where home and away spectators were persistently standing prior to the installation of infrastructure. Police representatives at the club were however satisfied that the away section remains in the best place for safe ingress and egress of both sets of spectators. The segregation line remains challenging to manage, but has been widened slightly for high-risk fixtures by reducing the away allocation. This allows more space for both stewards and police to move up and down the line.

Given that licensed standing is 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 the design of the new stadium at Brentford, the home and away licensed standing sections were deliberately placed at opposite ends of the stadium to physically separate the two sets of spectators. Further, blocks adjacent to the away section were not offered to season ticket holders.

We made a conscious decision not to sell season tickets in the two blocks either side of the away section. Not that we have a massive antisocial behaviour group here, but we made that decision so that it would say to people, 'Those seats aren't available if you want a season ticket. If you want to come in and you want to be noisy, go to the West Stand,' and it's the furthest away from the aways. And we've had minimal issues between home and away supporters because of it.

Safety officer

Wembley also has licensed standing sections at opposite ends of the stadium to keep opposing standing spectators apart, though with only 861 spaces in each section for most domestic fixtures, this is not large enough to meet the demand from spectators who currently stand.

### Encouraging persistent standing spectators to move to a new location at Queens Park Rangers

QPR took a different approach to locating their main standing section for home spectators to all other clubs. Although the club had some persistent standing, a major driver for installing standing infrastructure was in response to fan demand for an 'atmosphere section'. The Lower Loft had previously been general allocation seating before being converted to the family stand, displacing spectators in the process. Following an extensive consultation with fans, part of the Lower Loft was proposed as a standing 'atmosphere section', with the aim of encouraging those who persistently stood elsewhere – particularly in the block adjacent to the away spectators – to move into it.

Converting part of a family stand to a licensed section might have been controversial, but club staff and stakeholders believe it has been popular for a number of reasons:

- **The extent of the fan consultation process.** The club used many different avenues to communicate their intentions to access as many people as possible to give them the opportunity to air their views over a two and a half year period.
- **The process was fan-driven.** The idea initially came from a supporters group rather than the club deciding to create something, so there was already a degree of buy-in from spectators.
- **The section has retained a family feel,** and so is appealing to all groups. Few families chose to relocate when it was changed to licensed standing and there is no age limit in the area.

The standing section is also located next to the control room, so is closer to matchday safety leads who can monitor the area.

As a measure designed to entice people who persistently stood next to the away section to move, it has been a partial success. The number of people persistently standing has reduced, but there are still a good proportion who do not want to move and continue to stand. The club will continue to encourage standing spectators to move to the licensed standing area, and feel that some will do this following the success of the first year of operation. It is however accepted that an alternative approach could still be needed, which might necessitate the installation of more rail seats in the block adjacent to the away section.

#### 2.4.6 Children in licensed standing areas

Previous research has highlighted the complexity of the decision to permit children in licensed standing areas. Children under a certain height are unable to see when adults around them are standing up and this can lead them to stand on the seats;



there was also some concern from spectators in the early adopter evaluation that the language and behaviour of standing spectators can be inappropriate for young children. However, if children are not permitted, this can change the demographics of the area and take away the choice of parents with children – and the children themselves – to experience modern standing and the atmosphere it can generate.

There is no easy solution, and clubs continue to either limit the age of children able to buy tickets in the standing areas (usually 14) or tolerate children standing on seats in order to see the pitch, acknowledging that they are safer standing on seats with a barrier in front of them to hold than without. Even where child tickets are not sold for standing sections, parents can still bring them in on adult or borrowed tickets, and there were again reports of matchday home spectators (non-season ticket holders) and away spectators not being aware that they had purchased standing tickets until they arrived in the section.

As described above, in creating a standing section in what was previously a family area, QPR have attempted to retain a family feel to this section and report that it is being well used by children. Those who cannot see over the adults standing in front of them are encouraged to move to the front of the section – it is rarely at capacity so there is the tolerance to do this on a matchday – but others stand on seats. The flat metal design of the slimline rail seating the club has installed is considered more stable than a plastic, curved tip-up seat. Club staff are therefore happy that this does not present a particular safety risk and that parents are responsible for holding their children if needed. All QPR spectators interviewed stressed that they supported children being allowed in the area.

I'm for a family stand. I think there's nothing better than going to football with your dad and standing next to your dad if your dad's with his mates. And that's what QPR's gone back to now. I'm very lucky, all my friends around my age have got their two or three kids that they bring with them. So now when my boy comes, he's five, he's got other kids that go with their dads and we're all in the safe standing... my boy stands on the seat next to me and he's then at the same height as me, but he still has the rail in front. It's a no-brainer, it really is.

**QPR supporter**

Where children are permitted in licensed standing areas, clubs can mitigate any risk to their safety proactively by encouraging and facilitating the purchasing of tickets for families towards the front of stands. This should be supported by dynamic stewarding on a matchday, with stewards instructed to monitor any risk to children and supporting them to move, if deemed necessary, either to the front of the stand or elsewhere.

### **2.4.7 Managing 'stage by stage' installation and use**

Clubs are assessing supply and demand in conjunction with their financial position and the physical layout of the stadia to determine the number of seats converted to licensed standing. The SGSA criteria specifies that licensed standing areas must be

made available to both home and away supporters but does not specify a scale or number. There is some concern at the SGSA that clubs could install a minimal number of standing spaces in either home or away sections to fulfil this aspect of the criteria, rather than in relation to levels of persistent standing or risk. In these cases, SGSA inspectors are continuing to work with clubs to ensure that where only partial sections are converted to licensed standing that do not match the levels of persistent standing, clubs have formalised plans to expand these sections or enforce seating in line with the SGSA All-Seater Policy Enforcement Approach.

Clubs that have installed small sections of infrastructure that do not meet the demand for standing cite the following reasons:

- **Testing the demand:** getting the balance between supply and demand is challenging, and so installing in stages prevents the risk of an immediate oversupply.
- **Piloting a standing area:** starting with only a small section gives the club and SAG the opportunity to test management strategies, the reaction of spectators and their behaviour in the area before expanding.
- **Financial limitations:** getting the board to commit to a large investment can be challenging for some clubs with more limited means, and a stage-by-stage installation spreads the cost.
- **Addressing the highest risk first:** particularly in away sections, by putting infrastructure in a number of back rows or upper sections where previous research demonstrated the highest risk of a progressive crowd collapse is.

Converting only a partial section to standing, however, has implications for the management of these areas.

- As discussed above, **additional strategies are required to manage migration** where movement is possible between standing and seated areas, such as secondary ticket checks.
- **Stewards need to be given different instructions** for the standing and seated sections, most notably that those in a seated area should be seated during normal play.
- Having two different stewarding approaches in the same section can **cause conflict between stewards and spectators who wish to stand**. It can be difficult to enforce sitting in a seated area that is for example directly below a standing area where spectators are allowed to stand. Having on entire section with the same rules on standing can ensure a clarity of messaging.
- There may be more of an **issue with sightlines** where a standing section is planned adjacent to a seating section.

### 2.4.8 Using stadia for other events

Where standing infrastructure is installed in stadia that host events other than football, there is the potential for some confusion and conflict between spectators in a



section with standing infrastructure. For example at Brentford, where the stadium is also used for Rugby League matches, it was reported that at these matches some spectators would stand behind the rail as is normal at football matches, but others would want to sit. In multi-use stadia it is therefore important to have an appropriate ticketing strategy, along with clear communication with ticket buyers, if standing is to be expected/permitted in this area for non-football events.

Manchester City also have concerts at the Etihad stadium. These take place at the end of the football season, so the stadium can be transformed into 'concert mode' whereby the standing infrastructure is removed. Other clubs that host non-football events have not reported similar issues so far, but they were not involved in the in-depth part of this research.

## 2.5 Conclusions

One year on from the early adopter pilot, **the positive impact of installing standing infrastructure and creating licensed standing areas** continues to be experienced at both existing and newly licensed clubs.

Success in eradicating or significantly **reducing persistent standing levels is dependent on whether number of standing spaces meets the demand**. A number of clubs with licensed standing are only converting partial sections; as well as potentially not meeting demand, this creates a risk of migration between standing and seated areas that safety teams must manage.

There has been **no increase in the prevalence or severity of impact of residual risks** than those reported in previous research. There remains isolated examples of spectators **standing on barriers** which must be continued to be challenged and monitored to ensure this does not become more widespread.

**Management strategies remain largely effective** when enacted on a matchday to mitigate these residual risks, and early adopters continuing to refine strategies where improvements have been identified. There appears to be ongoing attempts to improve stewarding consistency and effectiveness, which will help.

The **licensed standing criteria remains fit for purpose**, though the requirement for home and away sections without specifying a number or proportion has led to **some clubs having a quantity of infrastructure** that does not fully address the level of persistent standing. Whilst for some clubs there may be reasonable reasons for installing small numbers of standing infrastructure to start with, this should be in conjunction with plans to increase until demand is met and persistent standing reduced to minimal levels or risking action under the SGSA All-Seater Policy Enforcement Approach.

Clubs new to licensed standing for 2022/23 bring more learning around the implementation of this in different contexts. Slimline seats show that **it is possible to create a licensed standing area in an old stadium with narrow seating row depths**. The creation of a supporter-driven family-friendly standing area and the transition to a new stadium are examples of different scenarios where licensed standing has been effectively implemented.

## 3. The future scale and scope of licensed standing

### 3.1 Introduction

Now legislation allows any club with an all-seater licence to apply for licensed standing areas, there is the need to understand and anticipate what future demand for this might be in order for the SGSA to effectively plan and work with clubs to support this.<sup>5</sup> This section discusses the results of a survey to all clubs in England and Wales with an all-seater licence but no licensed standing. 49 responses were received and analysed, representing 79% of clubs in this situation.

### 3.2 Clubs with infrastructure but no licence

A small number of clubs have installed standing infrastructure as a safety management strategy but have not yet applied for a licence. In most of these cases, the infrastructure has been installed to address the current risk in either a home or an away section only, and so the requirement to offer a standing area to both home and away spectators in the licensed standing criteria has not been met.

Five clubs with standing infrastructure but no licence completed the survey, and four of the five intended to apply for a licence in the next three years once this requirement had been met. The club that is not intending to apply for a licence in the near future stated that they would not meet the requirement to provide for both home and away spectators.

### 3.3 Intent to install infrastructure within the next three years

18 clubs (38%) reported that they intend to install some standing infrastructure within the next three years (see Figure 4). Two clubs planned to do this before the start of the 23/24 season, suggesting the need for the remainder to be supported to start working with architects and contractors to prepare for potential peaks in demand prior to the 24/25 and 25/26 football seasons. Extrapolating this intent to all all-seater grounds in England and Wales suggests a potential 22 clubs intending to install infrastructure in two close seasons. If this is the case, it may put high demand on contractors, steel suppliers and others involved in the process such as architects.

All 18 also planned to apply for a licence for these standing areas within the same time frame. The SGSA should therefore be reassured that this suggests, even taking into account non-responders, that there is unlikely to be a large number of clubs planning to install infrastructure without applying for a licence.

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<sup>5</sup> Intent to install infrastructure was asked in relation to one year, three year and 'at some point in the future' timescales. These were arbitrary timings used in this survey to give an overview of what the future demand might be within one and three years. In reality the timescales will be influenced by the All-Seater Policy Enforcement Approach and the risk of persistent standing at each individual club.

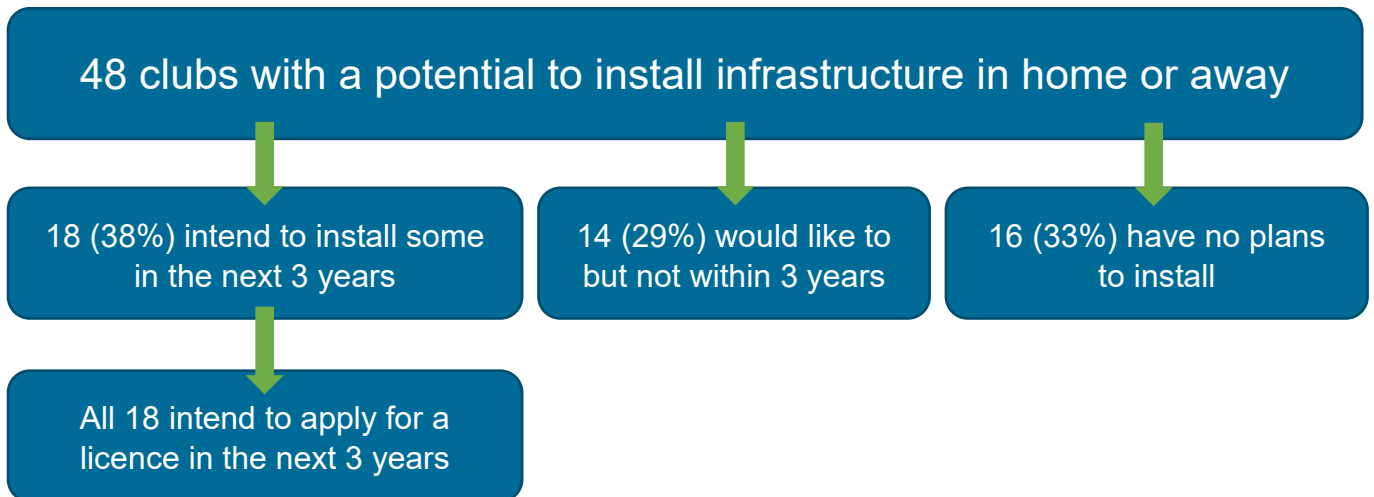


Figure 4: Intent to install infrastructure and apply for a licence (home and/or away)

### 3.3.1 For home spectators

Disregarding the four clubs in the sample that already have infrastructure in place for home spectators, just over a third intend to install infrastructure in the next three years *and* apply for a licence. Another third of the sample have no plans to install standing infrastructure, and the remainder (just under a third) are considering this but have no plans to do this in the next three years.

We also looked at intent to install infrastructure in conjunction with the self-reported level of persistent standing amongst home spectators, dividing clubs into those reporting a figure of under or over ten per cent.

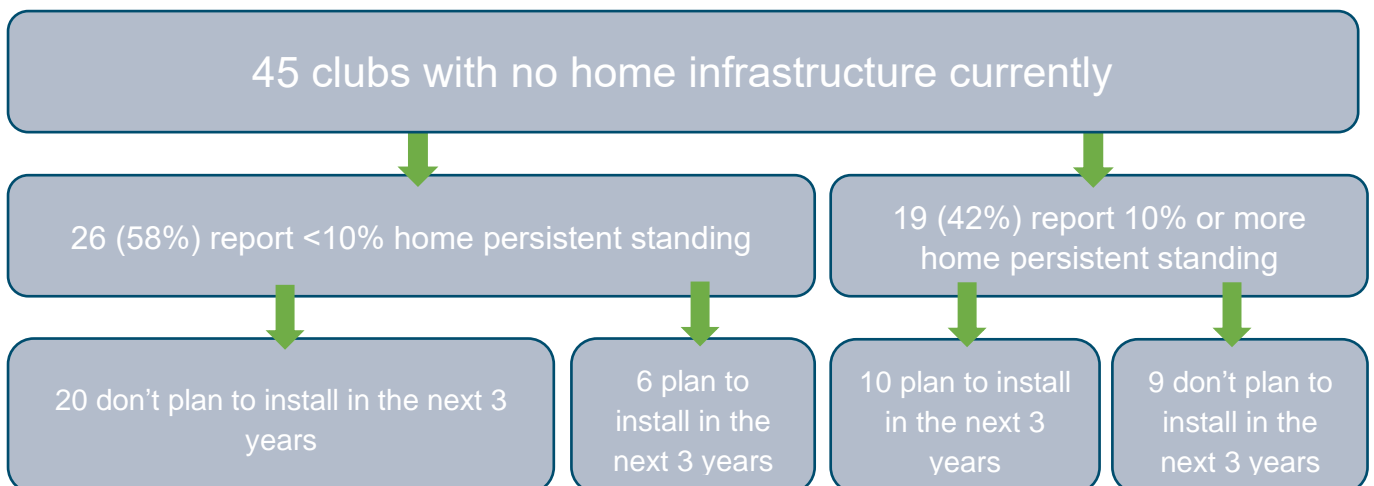


Figure 5: Intent to install infrastructure by level of persistent standing in home areas

Figure 5 shows that amongst those reporting less than ten per cent persistent standing in home areas, the majority (77%) do not plan to install infrastructure in these areas in the next three years. Amongst those reporting higher levels of persistent standing, the split is roughly even, with nine of these (47%) not planning install. This gives a total of 29 clubs that don't plan to install standing infrastructure. The reasons for this are explored in section 3.4.

### 3.3.2 For away spectators

A similar pattern emerges when looking at intent to install standing infrastructure in away areas. Just over a third plan to install infrastructure in the next three years *and* apply for a licence within the same time frame.

As with home sections, this was then examined in relation to persistent standing risk (Figure 6). As the level of persistent standing amongst away spectators can vary depending on the opposition, and is often at or close to 100%, the location of away standing areas was used as a rudimentary assessment of risk (acknowledging that a full risk assessment would take other factors into account).

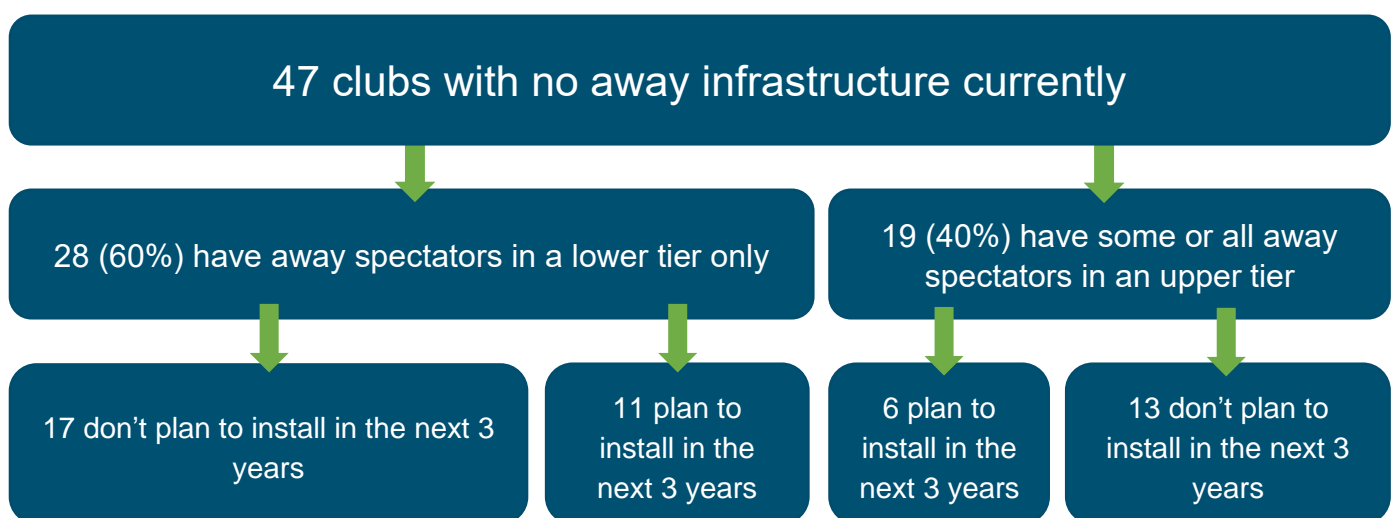


Figure 6: Intent to install infrastructure by location of away section

Of the 19 clubs that house away spectators in an upper tier, 13 (68%) do not plan to install infrastructure for these spectators in the next three years.

### 3.4 Reasons for not planning licensed standing

The survey explored the factors delaying or preventing clubs from planning to install standing infrastructure, particularly where there was an identified level of risk associated with persistent standing.

Figure 7 lists the reasons given by the 20 clubs that were considered 'high risk'<sup>6</sup> for the purpose of the analysis for *not* planning on installing standing infrastructure in the next three years.

<sup>6</sup> Clubs were defined as high risk for the purpose of this survey if more than 10% of home spectators persistently stand and/or away supporter stand in an upper tier. The SGSA will incorporate a number of other factors when considering risk.

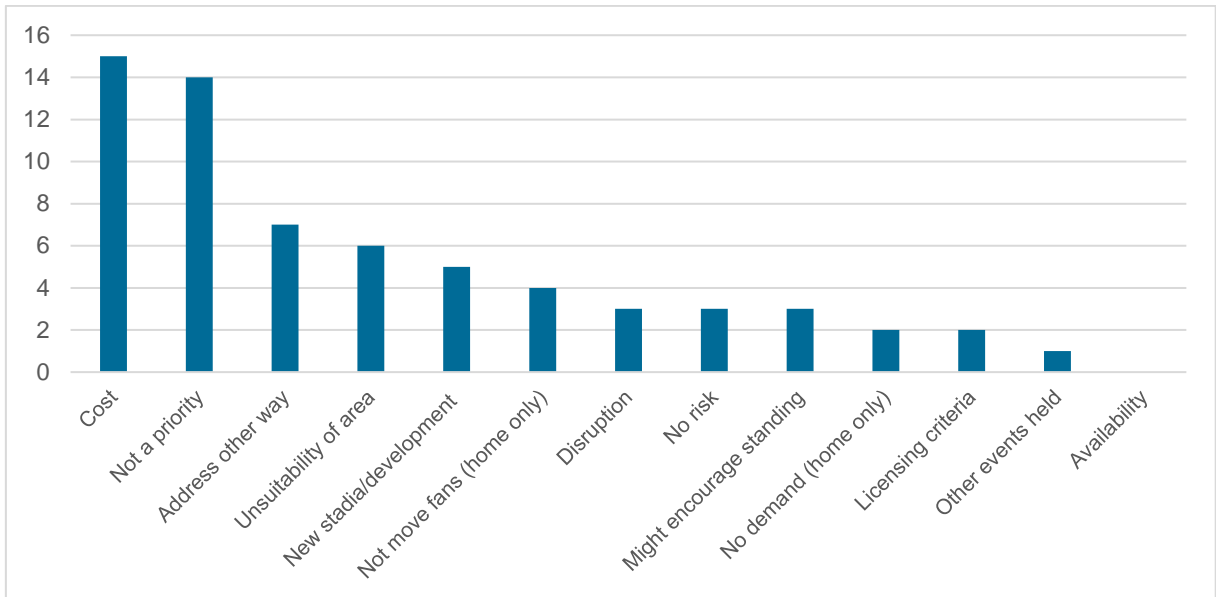


Figure 7: Factors delaying or preventing clubs from installing infrastructure

Unsurprisingly, the cost of infrastructure was the most common answer, closely followed by the club not seeing licensed standing as a priority.

Clubs were also asked what support might help them. Figure 8 shows the responses to this question from the same sample of 20 clubs.

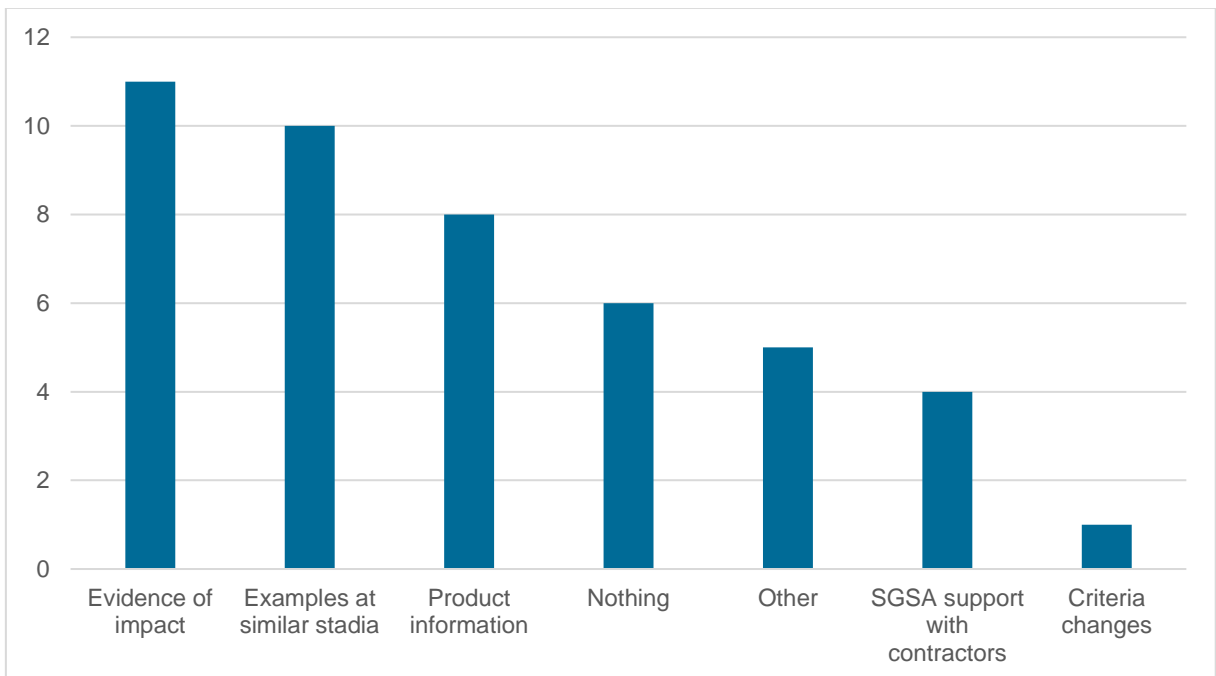


Figure 8: Clubs' perceptions of the support that might help them in their decision-making

### 3.5 Conclusions

**Around a third of clubs who responded plan to install standing infrastructure and apply for a license in the next three years.** Only one of the club respondents that has standing infrastructure already does not intend to apply for a licence. From this sample, this indicates that there **should not be a particular concern that clubs will look to install infrastructure without also undertaking the necessary steps to fulfil the licensed standing criteria.**

No club without any standing infrastructure at the moment reported an intent to install only home or away infrastructure – all are planning on installing for both. This suggests that **the requirement in the criteria to offer standing accommodation for home and away spectators is understood and accepted across the sample.** However, as discussed in the previous chapter, clubs can meet this requirement by installing a minimal amount of infrastructure that does not fully meet the level of persistent standing as part of a stepped approach to determining the level of demand.

**A range of clubs plan to install standing infrastructure** – not just those with high levels of home persistent standing or away fans located in an upper tier. This includes a range of ground sizes too. There are clubs planning this to enhance the fan experience in the ground, likely to be important for clubs hoping to attract new spectators.

However, this does mean there are **some clubs that could be considered high risk who do not intend to install in the next three years.** The cost of the installation is cited as the major limiting factor for these clubs.