Sports Grounds Safety Authority

SIA Exemption Policy Guidance

Questions and Answers

As at 25 August 2023

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Key questions

1. What are licensable activities? How is the exemption applied?

'SIA Licensable activities' at a SGSA licensed ground are:

a) Stewards searching spectators on their entry to the ground.

b) Stewards specifically tasked with physically intervening against and ejecting spectators who are in breach of ground regulations. This includes decisions on refusal of entry.

c) The supervisors of those stewards in categories a and b immediately above.

d) In a non-front-line capacity, safety officers and chief stewards.

Stewards in safety or customer service roles whose duties do not include searching, ejections or physically intervening where spectators are in breach of ground regulations are not carrying out licensable activities.

These principles were agreed by the football authorities and the then Football Licensing Authority in 2006 when the exemption was first introduced.

['Licensable activities' under the Private Security Industry Act 2001 are outlined at gov.uk: https://www.gov.uk/guidance/check-if-you-need-an-sia-licence-to-work-as-an-event-steward#licensed-premises]

Any steward undertaking SIA licensable activities must have an SIA door supervisor licence.

HOWEVER

Under the sports ground exemption, **in-house sports ground staff do not need a licence**.

INSTEAD

In-house staff conducting the SIA licensable activities must have an **equivalent level of training and vetting**.

2. Why is this guidance coming into force now?

Since 2006, it has been a legal requirement for in-house stewards carrying out security functions, such as searching spectators on entry, to be trained and vetted to a standard equivalent to SIA licensed personnel. However, there was some evidence that this issue was not well understood within the sports sector and, as a result, there is a risk that individuals are carrying out these functions without the appropriate safeguards in place.

Earlier this year, SGSA consulted on new policy guidance, which addressed this risk by introducing a requirement for clear and consistent safety certificate conditions on the training and vetting of in-house stewards.

The SGSA recognises, however, the challenges in applying the exemption's principles at individual grounds. Consequently, there is a grace period to 30 June 2023 to enable relevant

certifying authorities to introduce the new safety certificate conditions, and all SGSA licensed grounds to come into compliance.

During the grace period, the SGSA stands ready to provide additional help and advice, via local Inspectors, webinars, additional website materials, and a specific session at the SGSA annual conference 2023.

From 1 July 2023, the SGSA will be assessing compliance, for example via the local authority audit programme and regular matchday inspection activity.

3. What do I need to do as a) a local authority, and b) a SGSA licensed ground to comply with the new SGSA policy guidance by 30 June 2023?

Taking each part of the question in turn:

a) Local authorities with SGSA licensed ground(s) in their areas should make arrangements to incorporate the model conditions on the training and vetting of in-house stewards (paragraphs 18.1 and 18.2 of the SGSA policy guidance) in the safety certificates for those grounds by 30 June 2023. SGSA wrote to all relevant local authorities on 9 December 2022 to make them aware of this requirement and to offer further advice as necessary during the grace period to 30 June 2023.

b) SGSA licensed grounds need to ensure that all in-house stewards undertaking licensable activities are suitably trained and vetted by 30 June 2023 and that such training and vetting is subsequently kept up to date.

   As an immediate next step, licensed grounds should review the duties of their existing stewarding team to identify which roles have features that mirror those at question 1 above and thereby are 'licensable activities', and those that don't.

   Informed by the findings of this review, ground management can then identify what training and vetting needs to be undertaken by individual members of their in-house stewarding team ahead of 30 June 2023.

   Written records should be kept so ground management can demonstrate compliance to their local authority from 1 July 2023 onwards.

Roles

4. Can in-house stewards and SIA licensed agency stewards do the same roles?

Yes. Because of the exemption, in-house stewards that are employed by the ground/club can carry out licensable activities.

SIA staff should not carry out standard stewarding duties without the appropriate Level 2 spectator safety qualification, or confirmation they are working towards it. Before working alone, the agency staff will need to evidence they have complied with the requirements of section 4.10 of the Green Guide.

5. Are we now saying that the role of steward is licensable? ALL Stewards?

No. The key considerations are a) whether a steward is 'in-house', i.e. directly employed by the ground, and b) whether their duties include one or more of the activities detailed at question 1 above.

Unless both of these considerations apply, a steward will be outside the scope of this guidance on the SIA sports ground exemption.

6. Do safety officers require an SIA licence?

If the safety officer is employed directly by the ground, they do not need to have an SIA licence but must be subject to a DBS check. However, if not employed directly by the ground, they will need an SIA licence.

7. Do CCTV operators require an SIA licence?

If employed by the ground, they do not need to have an SIA licence. However, if not employed by the ground, they will need an SIA Public Space Surveillance licence.

For CCTV operators, it will also be useful for them to complete Public Space Surveillance training.

8. What if a steward is just used to spot but not intervene?

See questions 1 and 5.

Stewards (in-house or agency) simply 'spotting' or advising against breaches of ground regulations are not undertaking licensable activity and are therefore out of scope for this guidance.

However, staff called to address such breaches of ground regulations would be undertaking licensable activity and, if they are in-house, thereby subject to the SIA exemption.

Additionally, ground management would need to demonstrate there were sufficient numbers of such 'response' staff deployed in appropriate locations around the venue to handle breaches of ground regulations in a timely and appropriate way.

9. Who can search supporters?

Searching is a licensable activity. Therefore, only agency staff with a SIA Door Supervisor licence or in-house staff with equivalent training and vetting can carry out searching – as outlined in question 1.

10. Can agency stewards who are not licensed by SIA undertake searching?

No. Only SIA licensed agency/contract staff or in-house stewards with equivalent training and vetting can conduct searching.

11. Is it true that in-house stewards cannot work at other sports grounds unless they are licensed by the SIA?

No, in-house stewards may work at other sports grounds if they are performing non-licensable activities. They may also work at another sports ground and perform licensable activities if they are directly employed by the visiting team. However, in all other circumstances, they would require an SIA license.

12. Is it possible to have a typical example of a dot plan with a blended provision, identifying the different roles etc?

We will consider this as part of wider stewarding guidance being developed. However, developing a typical example will be difficult as the stewarding requirements are unique to each ground. The principles outlined at question 1 about what is licensable activity should provide grounds with a suitable framework from which to identify which roles in their stewarding plan do or do not undertake SIA licensable activity (and thereby do or do not need to demonstrate training and vetting equivalent to SIA licence holders).

13. The definition of the guidance relates to the PRIMARY role of a steward, not additional duties that might occur occasionally.

If stewards are deployed to roles involving searching or ejections, however infrequently, then they must be SIA licensed or trained and vetted to an equivalent level.

14. Is it correct that if you deploy SIA licensed staff to deal with ejections and breach of ground regulations, the rest of the staff, such as pitch side gates, gangways, etc, are not doing licensable activities?

Yes, that's right. See answer to question 1 and 5.

The requirement for a licence is subject to the roles and responsibilities for each position which needs to be specified.

For example, if the role of a person on pitch side gates is purely to open the gate in the event of an emergency to facilitate a forward evacuation on to the pitch that may not be licensable. However, if the role includes intervening against a spectator gaining unauthorised access to the pitch then that would be licensable.

15. Reading the guidance, it could be argued that many stewards do not undertake licensable activities. Is that right?

Yes, that's right. In many events, the majority of stewards will not perform licensable activity as part of their normal duties.

16. Can I safely employ agencies to undertake the response role who only have an SIA licence? Or do they require a Level 2 qualification as well?

If the roles and responsibilities for the job role refer to specific security tasks, and the staff are not identifiable as stewards and not included as stewards on the safety and security plan, then they will only require the SIA Door Supervisor licence.

In other circumstances, agency stewards should possess or be working towards their Level 2 Spectator Safety qualification and meet the requirements of section 4.10 of the Green Guide.

17. A vomitory steward showing people where they are sitting or directing isn't licensable activity. But what if they are stopping people coming into the stand with alcohol at a designated football game – does that then become licensable activity?

See question 8. If a steward's duties are to advise spectators that they may not drink alcohol in view of the playing area, and to alert 'response' staff where a breach occurs, then this is not a licensable activity.

18. The guidance includes a table (at Annex B) which suggests using a radio or reporting a defect is licensable activity, surely that's not right?

No, activities such as using a radio or reporting defects are not licensable activities.

As we have set out licensable activities are as follows:

a) Stewards searching spectators on their entry to the ground.

b) Stewards specifically tasked with physically intervening against and ejecting spectators who are in breach of ground regulations. This includes decisions on refusal of entry.

c) The supervisors of those stewards in categories (a) and (b) immediately above.

d) In a non-front-line capacity, safety officers and chief stewards.

If an activity is not included in the definition above, it is not licensable.

The purpose of the table at Annex B is to show that, while a Level 2 qualification equips individuals to perform the full range of stewarding roles, the SIA Door Supervisor licence-linked qualification has a more limited application in a sports ground.

The table is not exhaustive and we will continue to refine it in consultation with the sports sector.

Agency staff

19. Do agency staff have to hold a SIA licence when contracted or can they be undertaking training towards a SIA licence (akin to stewards who can operate at grounds, providing their training is completed within 12 months)?

Agency staff carrying out licensable activities must hold a SIA licence. Any agency staff carrying out licensable activities without a SIA licence will be guilty of an offence.

20. Who is responsible for checking that the individual has a valid/in-date licence when working at the stadium? Is it the ground management, certifying authority, SIA or agency?

It is in the first instance, the responsibility of the agency supplier to provide licence details and training records to the ground management. Ground management should confirm with the agency the details of each agency steward supplied.

21. Does an agency steward require an SIA licence if they are not undertaking licensable duties, i.e. just working as a normal steward?

No. If an agency steward is not undertaking licensable activities, they do not need an SIA licence. However, the agency should have a very clear specification from the client club regarding the work activity being undertaken by each agency steward and this should form part of the contract for services.

22. Does an agency need to be licensed with the SIA if they are providing SIA Staff?

No, there is no requirement for an agency to be licensed by the SIA.

There is a voluntary Approved Contractor Scheme (ACS) for security companies that may be considered as part of the due diligence when selecting a supplier.

Vetting

23. Do all stewards need an enhanced DBS check?

No. Those stewards undertaking licensable activities need a standard DBS check as outlined at paragraph 18.2 of the SGSA policy guidance, as part of demonstrating equivalence with SIA licence holder vetting arrangements.

24. Does a gate steward need to be vetted?

It depends what activities a gate steward at a particular ground is being tasked to undertake by the ground management. If they are licensable activities, then yes. See answer to Question 1 and 5.

25. To put all 100 in house stewards through a DBS check appears to be perhaps risk averse. Many stewards work eight hours a month and do not work in the family area, with disabled fans and vulnerable adults nor in response. The risk is held by the clubs.

Not all in-house stewards are scope of this guidance, as the vetting requirement only applies to those carrying out licensable activities.

26. Do the stewards supplied from a security company or agency need to have a standard DBS check, specific to the ground / stadium?

No. The DBS check is specific to the individual not the ground/stadium.

27. The model General Safety Certificate condition on vetting talks about identity checks. What are they?

Paragraph 18.2 of the SGSA policy guidance includes a model General Safety Certificate condition on vetting for those in-house stewards undertaking licensable activities. The vetting has two elements – identity checks and standard DBS checks – and needs to be undertaken on first employment and subsequently every three years.

The policy guidance includes links to additional information about what constitutes a suitable and sufficient identify check and standard DBS check for the purposes of satisfying the model General Safety Certificate condition. Those links are shown immediately below for ease of reference:

- Identity checks – see: https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual/how-to-prove-and-verify-someones-identity
- Standard DBS checks – see https://www.gov.uk/government/collections/dbs-checking-service-guidance--2

Steward numbers

28. When will a countrywide 'register' of all Level 2 and Level 3 qualified stewards be forthcoming...similar to what can be viewed for SIA badged stewards?

The SGSA has no current plans to develop such a register.

Safety certificate

29. Why do in-house stewards that undertake licensable activities need to be trained and vetted in the way outlined in the model General Safety Certificate conditions?

The SIA Sports Ground Exemption was granted by Ministers in 2006 on the basis that sports ground stewards were trained and vetted to standards equivalent to the training and vetting required of SIA licence holders.

The model General Safety Certificate conditions in the new SGSA policy guidance endeavour to ensure a consistent and robust approach by SGSA licensed grounds on the training and vetting of in-house stewards undertaking licensable activities, in order to demonstrate that the original intention of the exemption is being maintained.

30. Should a prescriptive safety certificate prescribe which locations (and what provision) need to be manned by SIA or equivalent operatives/stewards?

There is no expectation the local authority should specify the locations and qualifications of stewards. That is a matter for the certificate holder, as they have primary responsibility for developing and implementing the stewarding plan for the venue.

In a prescriptive safety certificate, the certificate holder should present a plan/schedule detailing the locations of stewards and indicating the minimum safe staffing levels for the ground to open and a similar plan detailing the optimum staff resources to provide high levels of safety security and service

Local authority oversight

31. Given the complexity of steward deployment, what degree of scrutiny is expected of club stewarding plans by local authorities?

Local authorities should consider other agencies and stakeholders within the SAG process to help review whether the safety management documentation supplied by the ground management, including the stewarding plans, is fit for purpose.

32. What alternative arrangements should certifying authorities with risk-based certificates make to ensure compliance, as this would not be a condition in the certificate?

The new SGSA policy guidance has been issued to local authorities, detailing conditions relating to the training and vetting of in-house stewards undertaking SIA licensable activities that should be inserted into each safety certificate for a SGSA licensed ground no later than 30 June 2023. The guidance indicates that the model safety certificate conditions are equally suitable for risk-based, prescriptive and hybrid certificates.

Training and qualifications

33. If the SGSA policy guidance is saying that in house stewards undertaking licensable activities need to be trained, what does 'trained' mean?

The model General Safety Certificate condition at paragraph 18.1 outlines the training requirements for in-house stewards undertaking licensable activities, including that they cannot work unaccompanied until they have satisfied specific criteria, and that all in-house stewards undertaking licensable activities should complete all their training, assessment and qualification within 12 months of commencement. However, any in-house steward working towards their Level 2 must have completed the Level 2 conflict management module and the SIA physical intervention training prior to undertaking any physical intervention.

34. If a steward is not searching or part of the response team, do they need to have a Level 2 qualification?

Yes. A steward, as defined in the Guide to Safety at Sports Grounds (Green Guide) and Supplementary Guidance 03: Event Safety Management, is a person:

a. who has met the training requirements set out in the Green Guide, or

b. who is undergoing training and assessment towards the meeting of such requirements

and

c. who is employed or contracted by management to act in accordance with the general recommendations of the Green Guide, and, where appropriate, the specific requirements of the ground's safety certificate, and

d. who is appropriately attired, equipped and briefed.

However, matchday personnel whose role relates to customer service and does not have safety- or security-related duties do not need to have a Level 2 qualification.

35. There are different Level 2 spectator courses, which ones are acceptable?

Stewards should hold either the previous NVQ level II in Spectator safety or from 2021 level 2 Certificate in Spectator safety.

The Level 2 Award may be used as a pre-employment qualification though the expectation is the employee will complete the additional training and assessment within 12 months to secure the new Level 2 Certificate.

36. Can first aid training be delivered in-house or does it need to be as part of the Level 2 qualification?

Basic life support skills is not part of the L2 spectator safety qualification. However, there is requirement for the learner to present evidence to the Assessor and the Awarding Organisation that they have completed the prerequisite Basic Life Support Skills training prior to certification.

Many existing stewards may not have had training in basic life support skills therefore this training need should be addressed as part of their CPD. In order to maintain the necessary skills basic life support skills training should also form part of refresher CPD training for each steward

SIA Licensing

37. We understand there are a significant number of fraudulent licences in circulation and a number of ongoing criminal investigations. Will there be licence vetting training?

The SIA have identified an increase in the number of fraudulent licences in circulation which have resulted in several criminal investigations being conducted by our Criminal Investigations Team. We are confident that our increased intelligence led inspection activity and other approaches introduced to counter this offending have resulted in these increased detections. We are aware of the public safety implications that can arise when a fraudulent licence is used by an individual and this remains an operational priority for the SIA. The SIA in conjunction with NaCTSO earlier this year delivered a 'train the trainer' session to Counter Terrorism Security Advisors (CTSAs) across the UK covering the identification and subsequent reporting of fraudulent SIA licences.

If you, or your staff/teams wish to undertake this free training you will need to make a direct approach to your regional CTSA.

38. Can people who hold a security guard SIA licence work at sports grounds or do they have to hold a door supervisor SIA licence?

There are several licence categories issued by the SIA which are dependent on the nature of the licensable activity being undertaken. There are also differences in the licence linked qualification training that needs to be completed before the specific licence type is applied for and again this reflects the type of licensable activity likely to be undertaken with that role. Regarding a Door Supervisor licence the need for this arises when an operative is undertaking activities subject to additional controls. It applies when licensable activity as defined in the PSIA 2001, is being carried out by a security operative in relation to licensed premises open to members of the public at times when alcohol is being supplied for consumption on, or regulated entertainment is being provided on, the premises. In relation to these additional controls, they apply equally to contracted security services and in-house (employed) operatives. The training undertaken for a Door Supervisor licence reflects the different scenarios that such a deployment is likely to encounter and therefore be competent in handling. Details of the content of the training modules can be found in the SIA Get Licensed publication. One very significant difference between the Security Guard licence

linked training and the Door Supervisor training is the inclusion of the Physical Intervention Skills Unit for the latter.

Can a Close Protection licence holder carry out licensable activities in a sports ground?

Yes, if they have completed their physical intervention training module, which is mandatory for any Close Protection licence applications from 1 October 2022.

Security Industry Authority specific

39. What steps are being taken to ensure that door supervisor staff have competency in speaking English?

For all SIA licence categories there is a requirement for the applicant to have completed licence linked qualification training. The SIA does not deliver training courses, award qualifications, or provide funding for training. The SIA sets what training needs to cover in the "knowledge and skills specifications" which can be found on the SIA website. It also endorses awarding organisations so that they can develop qualifications, approve training providers, oversee the standard of assessment and award qualifications that the SIA recognises for licensing. Training Centres must ensure that every learner is sufficiently competent in the use of the English and/or Welsh language and all assessment must take place in English and/or Welsh. In the course of operational inspection work SIA staff will test the competency of operatives in this regard.

40. Is the SIA still authorising local authority staff as "inspectors" to assist with their checking?

Yes, indeed the SIA are and they would warmly welcome additional applications to increase the number of local authorities being granted delegated authority under Section 19 of the PSIA 2001. Enquiries should be sent to IEAdmin@sia.gov.uk.

41. Do SIA do spot checks on the standard of SIA licensed people at venues as concerns raised with standard of SIA Staff since return from COVID

Yes, a very significant part of the work undertaken by the SIA Compliance & Inspections Team is inspection activity based on intelligence and risk which involve the checking of individual licences. We recognise the need for this activity and how it contributes to public safety. This level of activity has doubled each year for the last 2 years and is an operational priority for the SIA.

Regulated stands related

42. To clarify, Staff outside the regulated stand are not exempt?

The SIA sports ground exemption only applies where a safety certificate is in place. Areas outside of the stand are not included in the certificate therefore staff in these outside areas are not exempt from SIA licensing.

43. In a ground with just a regulated stand who is responsible for ensuring those stewards outside the stand are SIA qualified? I assume it's not the certifying authority

It is a matter for the ground management to ensure compliance, otherwise the individual staff will be committing an offence.

Other

44. Does this not also apply to other sports, e.g. rugby or cricket?

Yes, the exemption applies at any sports ground subject to a General Safety Certificate or with a regulated stand. The SGSA's guidance is specific to football, as this is the only sport in which we have a regulatory role, but we anticipate that it will form the basis of Government guidance for other sports in due course.

45. Is there any chance of removing the requirement to place a public notice re changes / issue of GSC / SSC in the local press, which costs us c.£170 each time? Fewer and fewer people read the paper, many more people look at the online version.

This remains a statutory requirement.

46. Do exemptions for music events only applies to in-house staff?

Where a certificated sports ground is being used to host an outdoor live music event under a special safety certificate the in-house staff are exempted from SIA licencing.

47. Is there any assistance going to be forthcoming from e.g. the EFL to help lower level clubs meet the cost of this guidance?

No. The new SGSA policy guidance on the SIA sports ground exemption is not imposing any new obligations. Rather, it is clarifying the exemption that has been in place since 2006.