Sports Grounds Safety Authority

Policy Guidance

SIA Sports Ground Exemption – Regulatory Controls for SGSA Licensed Grounds

November 2022 (revised May 2023)

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Foreword

As part of ongoing work by the Sports Grounds Safety Authority (SGSA) to provide relevant help and advice to enable the safety of all those who attend live sport, we have prepared this policy guidance.

This policy guidance is aimed primarily at certifying authorities with SGSA licensed grounds in their areas, focused specifically on the existing exemption in the Private Security Industry Act 2001 ('the 2001 Act') for those in-house staff at sports grounds undertaking Security Industry Authority (SIA) licensable activities.

This policy guidance seeks to encourage common understanding of the genesis of this sports ground exemption from SIA regulation. It also seeks to ensure a consistent approach to the future application of the existing exemption by using SGSA's existing powers under the Football Spectators Act 1989 to direct certifying authorities to insert a model general safety certificate condition regarding the training and vetting of directly employed in-house stewards employed at those grounds. For completeness, it further recommends a model general safety certificate condition regarding the training and vetting of agency stewards.

Although this policy guidance is aimed primarily at those certifying authorities with SGSA licensed grounds in their areas, it also highlights that the model safety certificate condition is an appropriate approach for consistent application of the SIA sports ground exemption at other sports grounds. Most notably, for those certifying authorities with other sports grounds in their areas that are either designated sports grounds under the Safety of Sports Grounds Act 1975 or which contain regulated stands under the Fire Safety and Safety of Places of Sport Act 1987.

This policy guidance forms part of wider work by SGSA with the SIA, the Department for Digital, Culture, Media and Sport (DCMS), the Home Office, the football governing bodies, and other sports governing bodies, about the sports ground exemption under the 2001 Act.

We will keep this document under review and revise again as necessary to maintain alignment with this ongoing wider work.

Martyn Henderson
Chief Executive

8 November 2022 (revised 9 May 2023)

Introduction

1. This Sports Grounds Safety Authority (SGSA) policy guidance outlines the origins of the existing exemption for directly employed in-house stewards at sports grounds from the requirements of Security Industry Authority (SIA) licensing for which that sports grounds' safety certificate has effect.

2. This guidance is aimed primarily at those certifying authorities with SGSA licensed grounds in their areas where designated football matches are played. It is also applicable for those authorities with other sports grounds in their area that are designated sports grounds under the Safety of Sports Grounds Act 1975 or that contain regulated stands under the Fire Safety and Safety of Places of Sport Act 1987 (see paragraph 6).

3. This guidance is consistent with, and builds upon, SGSA's Oversight and Licensing Policy, which outlines how the SGSA will discharge its statutory licensing and local authority oversight responsibilities under the Football Spectators Act 1989 ('the 1989 Act').

4. This guidance is not exhaustive. Certifying authorities and other interested parties should seek independent legal advice if they are in any doubt as to whether any specific proposed ground safety procedures comply with the law.

Status and disclaimer

5. This guidance is non-statutory, except for paragraph 18 which represents a formal direction by the SGSA under the terms of Section 13(2) of the Football Spectators Act 1989 to certifying authorities with SGSA licensed grounds in their areas to insert specific model General Safety Certificate conditions in relation to the training and vetting of in-house stewards. Additionally, those model conditions at paragraph 18, together with the model condition at paragraph 27, have statutory force as and when they are incorporated in individual safety certificates.

6. This guidance, when read in conjunction with other relevant SGSA guidance, most notably the Guide to Safety at Sports Grounds (Green Guide) and Supplementary Guidance 03: Event Safety Management (SG03), is designed to help certifying authorities at SGSA licensed grounds in England and Wales ensure that ground management teams comply with the existing law in relation to the admission of spectators to live outdoor sporting events at SGSA licensed grounds at which designated football matches are played. However, certifying authorities must ultimately satisfy themselves that any sporting events staged by ground management teams comply with applicable laws, including health and safety legislation.

Definitions

7. For the purposes of this guidance:
    a. 'Certifying authority' means the local authority responsible for issuing a General Safety Certificate under the Safety of Sports Grounds Act 1975 ('the 1975 Act') or the Fire Safety and Safety of Places of Sport Act 1987 ('the 1987 Act')
    b. 'Ground management team' means the team in the venue operator with primary responsibility for the safety of spectators at the ground.

8. For the purposes of this guidance, 'designated football match' uses the definition contained in the Football Spectators (Designation of Football Matches in England and Wales) Order 2000:

    "Any association football match which is played at Wembley Stadium, at the Millennium Stadium [Principality Stadium] in Cardiff or at a sports ground in England and Wales which is registered with the Football League or the Football Association Premier League as the home ground of a club which is a member of the Football League or the Football Association Premier League at the time the match is played."

9. 'Designated sports ground' means those grounds with a capacity of over 10,000 (5,000 in the case of grounds in the Premier League or the English Football League) designated by the Secretary of State for Digital Culture Media and Sport as requiring a general safety certificate from the certifying authority under the 1975 Act. The certificate covers all matches and spectator events at the ground that are detailed in the certificate as 'specified activities'. Other activities require a special safety certificate to be issued by the local authority.

10. 'Regulated stand' means a sports ground with a covered stand with a seated or standing capacity of 500 or more and that requires a general safety certificate from the certifying authority under the 1987 Act. The certificate covers all matches and spectator events at the ground that are detailed in the certificate as 'specified activities'. Other activities require a special safety certificate to be issued by the local authority.

11. For the purposes of this guidance:
    a. SIA Licensable activities are as defined on gov.uk.
    b. 'Level 2 in Spectator Safety qualified staff' means a steward who holds a current Level 2 Certificate in Spectator Safety or the previous NVQ Level 2 in Spectator Safety. For further details on this current Level 2 qualification see box immediately below.

National Occupational Standards (NOS) – the Spectator Safety suite of qualifications are based upon the current NOS for Spectator Safety, which were developed by Skills Active UK[1] and date from 2019.

These competency-based qualifications were informed by the stated requirements of the live sport sector that included widespread input from employers during the development and consultation stages. The sector, including professional football representatives, were very clear about the need for stewards to demonstrate occupational competency as well as having the appropriate knowledge and understanding for the job role.

For further details see the UK Standards website.

[1] Skills Active UK is the Sector Skills Council and Standard Setting Body for Sport and Recreation.

Sports ground exemption from the Private Security Industry Act 2001

12. Safety management at sports grounds relies to a great extent upon the deployment of an appropriate number of well trained and suitably equipped individuals whose role is to provide a safe, secure, and welcoming environment. Collectively, this role is known as stewarding. Stewards – known at some sports grounds as marshals – provide a direct and ongoing interaction between the ground management and spectators. As such, the individual efforts and attitudes of stewards can have a strong bearing on achieving safe conditions. Further advice on the role and responsibilities of stewards are contained in the sixth edition of the Guide to Safety at Sports Grounds (Green Guide) and Supplementary Guidance 03: Event Safety Management (SG03). Both publications are available to purchase from the SGSA website.

13. Under section 4(6) of the 2001 Act in-house stewards carrying out licensable activities at certified sports grounds are exempt from licensing by the Security Industry Authority (SIA) as long as the sports ground is covered by a safety certificate. This exemption is commonly known as the 'SIA sports ground exemption'.

14. For the purposes of applying the SIA sports ground exemption in the context of professional football in England and Wales, having regard to the definition of 'licensable conduct' in the 2001 Act[2], the football authorities and the then Football Licensing Authority (FLA), identified the following in-house football club stewards as being covered by the sports ground exemption from the requirements of the 2001 Act when they are working in licensed areas:

    a. Stewards searching spectators on their entry to the ground
    b. Stewards specifically tasked with intervening against and ejecting spectators who are in breach of ground regulations
    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 (supervisors).

15. At the same time, the football authorities and the then FLA identified the following stewarding categories as being **not** within scope of the 2001 Act:

    a. Stewards directly employed by the host club who are not tasked with any of the functions listed in the paragraph immediately above
    b. Stewards directly employed and paid by the visiting club, save where such stewards are performing licensable activities.

16. To help clarify what the sports ground exemption means in practice, SGSA and the SIA published jointly a flow chart in February 2022 explaining when a SIA licence is needed at a sports ground, including a football ground. A copy is at **Annex A**. and can also be accessed from the SGSA website.

[2] Section 3(2) of the Private Security Industry Act 2001.

17. SGSA recognises that the existing SIA sports ground exemption requires a consistent and robust approach to the training and vetting of those in-house stewards at SGSA licensed grounds. SGSA considers that the best way to ensure such an approach continues to apply is to mandate model conditions for inclusion in both prescriptive and risk-based safety certificates.

18. Consequently, SGSA hereby directs[3] certifying authorities with SGSA licensed grounds in their areas to include the following two model conditions on the training and vetting of in-house stewards in prescriptive certificates. Certifying authorities with SGSA licensed grounds in their areas with risk-based certificates should make alternative arrangements to reflect the following two model conditions, anticipated to be via suitable amendments to the Operations Manual (see also paragraph 24).

18.1 *Model General Safety Certificate Condition – Training*

All directly employed in-house stewards shall be trained, assessed, and have achieved a Level 2 spectator safety qualification within the National Qualifications Framework or be undergoing such training.

Stewards should not work unaccompanied until they have satisfied the following criteria:

a) they have received training to provide the underpinning knowledge for the following units in the latest National Occupational Standards (NOS) at Level 2 for Spectator Safety:

   i) Prepare for spectator events

   ii) Control the movement of spectators and deal with crowd issues at events

   iii) Deal with incidents at spectator events

b) they have attended four events as a steward; and

c) they have completed the Action Counters Terrorism (ACT) awareness e-learning counter terrorism and Basic Life Support Skills training that are prerequisites for obtaining a Level 2 Spectator Safety qualification.

All in-house stewards shall complete their training, assessment, and qualification within 12 months of commencement.

18.2 *Model General Safety Certificate Condition – Vetting*

All directly employed in-house stewards undertaking licensable activities as defined in the Private Security Industry Act 2001, shall be subject to initial and ongoing vetting every three years comprising:

i) Identity check informed by relevant gov.uk guidance[4]; and,

[3] Under the terms of Section 13(2) of the Football Spectators Act 1989
[4] Relevant gov.uk guidance on identify checks

ii) Standard Disclosure and Barring Service (DBS) check[5] (criminal records check)

Such initial and ongoing vetting will be undertaken in accordance with relevant guidance and best practice, including SGSA policy guidance on the SIA sports ground exemption.

19. The model condition at paragraph 18.1 above is based on the recommended model safety certificate condition that SGSA consulted on in May 2021 in the advent of the then new National Occupational Standards (NOS) for Spectator Safety. This recommended condition was subsequently finalised and circulated in July 2021 to all certifying authorities with SGSA licensed grounds. Additionally, the model condition at 18.1 references the ACT awareness e-learning counter terrorism and Basic Life Support Skills training that are prerequisites in the latest NOS for Spectator Safety for obtaining such a Level 2 qualification. Those in-house stewards who obtained a Level 2 qualification prior to the latest NOS for Spectator Safety must demonstrate subsequent completion of these two training requirements. For further details about the latest NOS for Spectator Safety see paragraph 11 and the UK Standards website.

20. SGSA, and indeed the live sport sector (see paragraph 11), considers the Level 2 Certificate or NVQ in Spectator Safety qualification to be the most appropriate training for all stewards working at live events within sports grounds, as that qualification is specifically targeted at those working in sports grounds and includes a competency-based skills assessment as well as knowledge and understanding assessment. The table at **Annex B** includes an indicative list of appropriate stewarding roles and responsibilities at a sports ground for staff holding a Level 2 in Spectator Safety qualification, most notably safety specific related roles, consistent with the sixth edition of the Green Guide and SG03: Event Safety Management. SGSA recognises, however, that holders of a SIA licence-linked Door Supervisor qualification are suitable to be employed as agency stewards for a range of security-facing stewarding roles to help deliver an agreed stewarding plan for a sports ground (see Agency Stewards section below and Annex B).

21. When implementing the model condition at paragraph 18.2, SGSA licensed grounds may make employment decisions using their own recruitment policies which are relevant to public safeguarding. In the absence of clear internal policies, SGSA licensed grounds may use the SIA's 'Get Licensed' guidance, including the list of relevant offences annexed to that guidance, when making such employment decisions.

22. The model condition at 18.2 explicitly references relevant guidance on identity checks, available from gov.uk. SGSA licensed grounds should demonstrate a sound process for undertaking identity checks informed by that guidance. The model condition builds on the vetting undertaken by the SIA in relation to SIA licence holders (see paragraph immediately above).

23. It should be noted that because of the changes necessary to both prescriptive and risk-based styles of safety certificate, the requirements of regulation 5(5) of the Safety of Sports Grounds Regulations 1987 should be followed in relation to advertising the change.

[5] The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions about potential employees. Detailed guidance is available on the gov.uk website.

24. The Operations Manual appended to the safety certificate should provide more detail on arrangements for the training and vetting of in-house stewards by the ground management team.

Agency stewards

25. SGSA recognises that many SGSA licensed grounds use a mixture of in-house and agency stewards to meet the requirements of the agreed stewarding plan within the operations manual for the ground. This is reflected in the table at Annex B which includes an indicative list of appropriate roles and responsibilities for staff with different SIA licences and/or a Level 2 in Spectator Safety qualification. The table illustrates that those individuals that hold SIA licence(s) and a Level 2 qualification can be deployed more flexibly.

26. Whilst agency stewards are out of scope of the SIA sports ground exemption, it is the responsibility of ground management teams at SGSA licensed grounds to be assured by their contractors that agency staff performing SIA licensable activities each hold a valid and appropriate front line SIA licence that demonstrates they are suitably trained and vetted. It is a criminal offence pursuant to the 2001 Act[6] ('the 2001 Act')where the following occurs:

    a. Contractor(s) supply individual(s) to undertake licensable conduct, where the individual(s) do not hold a valid frontline SIA licence.
    b. Individual(s) undertake licensable conduct and do not hold a valid front line SIA licence.

27. To ensure a robust approach to stewarding at SGSA licensed grounds, certifying authorities should ensure that ground management teams are checking that:

    a. those agency stewards (or temporary event staff) being supplied to undertake licensable activities, as defined in the 2001 Act, have valid and appropriate SIA licences; and,
    b. **all** agency stewards undertaking stewarding duties hold, or are working towards, the Level Certificate 2 in Spectator Safety (see also paragraph 20).

    For completeness, SGSA recommends that certifying authorities include a safety certificate condition formalising these requirements. A model condition is shown below for certifying authorities to use, although SGSA recognises there may be limited circumstances that justify a departure from such an approach. Alternatively, certifying authorities may choose to use the model conditions relating to stewarding contained in paragraphs 19 and 21 of the SGSA risk based model General Safety Certificate template[7].

27.1 *Model General Safety Certificate Condition – Agency Stewards*

    The ground management team may choose to employ agency stewards to undertake licensable activities as defined in the 2001 Act to deliver some or all of the agreed stewarding plan to host designated football matches (as defined in SI 2000 No 3331) at the ground. In such circumstances, the ground management team shall undertake checks in advance to satisfy themselves that those agency stewards undertaking

[6] Section 3(1) of the Private Security Industry Act 2001
[7] Template available from the SGSA website: https://sgsa.org.uk/guide-to-safety-certification/

licensable activities at the ground each hold a valid and appropriate Security Industry Authority (SIA) licence. Additionally, the ground management team shall undertake checks to be satisfied that all agency stewards undertaking stewarding duties are each trained, assessed and have achieved a Level 2 Certificate in spectator safety within the National Qualifications Framework or be undergoing such training.

Agency stewards should not work unaccompanied until they have satisfied the following criteria:

a) they have received training to provide the underpinning knowledge for the following units in the latest National Occupational Standards (NOS) at Level 2 for Spectator Safety:

   i) Prepare for spectator events

   ii) Control the movement of spectators and deal with crowd issues at events

   iii) Deal with incidents at spectator events

b) they have attended four events as a steward; and

c) they have completed the Action Counters Terrorism (ACT) awareness e-learning counter terrorism and Basic Life Support Skills training that are prerequisites for obtaining a Level 2 Spectator Safety qualification.

All agency stewards shall complete their training, assessment, and qualification within 12 months of commencement.

Grace period

28. SGSA recognises that while the existing SIA sport ground exemption is well-established, the proposed new arrangements outlined in this guidance, most notably the introduction of the model safety certificate conditions, may take time to implement in full. Consequently, SGSA will allow certifying authorities and ground management teams until 30 June 2023 to come into compliance with this policy guidance, most notably paragraphs 18 and 27.

29. From 1 July 2023, SGSA will use existing local authority oversight powers (see section immediately below) to test compliance with this policy guidance, and then initiate remedial/enforcement action as appropriate in accordance with SGSA's stated oversight and licensing policy and published enforcement approach (see section immediately below).

SGSA oversight and licensing powers

30. Under the Football Spectators Act 1989, the SGSA is responsible for overseeing the discharge by local authorities of their safety certification responsibilities at International, Premier League and English Football League (EFL) football grounds in England and

Wales[8] at which designated football matches[9] are played. The SGSA is also responsible under the 1989 Act[10] for issuing licences to admit spectators to those football grounds.

31. In discharging its regulatory functions, the SGSA will routinely undertake inspections at those International, Premier League, and EFL football grounds in England and Wales that are SGSA licensed grounds. Such inspections will assess adherence to conditions in the safety certificate, including those measures put in place for the sports ground exemption from SIA regulation.

32. Subject to prior consultation with local authorities, police and building authorities, under the terms of the 1989 Act11 the SGSA may direct certifying authorities to include additional specific terms and conditions in a safety certificate, including in relation to the SIA sports ground exemption.

33. The SGSA considers that certifying authorities will be best placed to take enforcement action if required in relation to non-compliance with the model safety certificate conditions at paragraph 18 above, drawing on their relevant spectator safety management expertise to identify any instances of non-compliance and take appropriate and proportionate enforcement action. This is consistent with the position in the SGSA's existing Oversight and Licensing Policy that it is first and foremost the relevant certifying authority's responsibility to ensure sports ground safety in accordance with the 1975 Act. This is also consistent with the SGSA's existing enforcement approach.

34. Although the inclusion of a condition in the safety certificate is the preferred route for ensuring appropriate steward training and vetting is undertaken to justify the exemption from SIA regulation for those stewards undertaking licensable activities, the SGSA reserves the right to impose licence conditions in relation to stewarding on a specific ground subject to SGSA licensing at the start of a licensing period (1 August each year). SGSA will do so using its general licensing powers under the 1989 Act[12] if these do not conflict with any Direction as to seating imposed by the Secretary of State under Section 11 of that Act.

35. Equally, the SGSA reserves the right to use powers during a licensing period (1 August to 31 July each year)[13] to vary the terms of a licence for a specific ground to include a condition in relation to stewarding, subject to statutory consultation requirements[14]. Breach of any licence conditions is an offence under the 1989 Act[15]and the SGSA may revoke or suspend the licence in these circumstances.

Other designated sports grounds and regulated stands

36. This policy guidance is targeted specifically at certifying authorities with SGSA licensed grounds in their areas. SGSA considers, however, the proposed approach to ensuring a

[8] Section 13 of the Football Spectators Act 1989
[9] Defined at paragraph 8
[10] Section 11 of the Football Spectators Act 1989
[11] Sections 13 (2) and 13 (3) of the Football Spectators Act 1989
[12] Section 10 (5) of the Football Spectators Act 1989
[13] Section 10 (10) of the Football Spectators Act 1989
[14] Section 10 (11) of the Football Spectators Act 1989
[15] Section 10 (13) of the Football Spectators Act 1989

robust and consistent implementation of the SIA sports ground exemption, centred around model safety certificate conditions in relation to training and vetting of in-house stewards, and a separate model condition in relation to agency supplied stewards, is equally applicable to certifying authorities with other designated sports grounds and/or sports grounds with regulated stands in their areas.

37. With that in mind, SGSA recommends that certifying authorities with other designated sports grounds and/or sports grounds with regulated stands in their areas consider using the model safety certificate conditions contained in this policy guidance.

Review

38. The SGSA does not anticipate at this stage needing to use its existing licensing powers to include a specific stewarding condition in relation to SGSA licences for football grounds in England and Wales subject to SGSA licensing.

39. The SGSA will, however, keep this guidance under review, and reserves the right to use its oversight and licensing powers to amend the model safety certificate conditions at paragraph 18 above and/or include a specific stewarding condition in SGSA licences if a change of circumstances merits such an approach.

40. If the SGSA does judge that such a change of approach is merited, advance notice will be given in accordance with the statutory consultation requirements under the 1989 Act.

References

SGSA related

Oversight and Licensing Policy: https://sgsa.org.uk/wp-content/uploads/2022/07/Oversight-and-Licensing-Policy-July-2022.pdf

Guide to Safety at Sports Grounds (Green Guide): https://sgsa.org.uk/greenguide/

Supplementary Guidance 03: Event Safety Management (SG03): https://sgsa.org.uk/safetymanagement/

Understanding the steward exemption flowchart: https://sgsa.org.uk/understanding-the-steward-exemption/

Enforcement Approach: https://sgsa.org.uk/enforcement-approach/

Security Industry Authority (SIA) related

SIA Licensing guidance: https://www.gov.uk/guidance/check-if-you-need-an-sia-licence-to-work-as-an-event-steward

SIA Licensing Criteria: https://www.gov.uk/government/publications/sia-get-licensed

Gov.uk links

DBS checks: detailed guidance: https://www.gov.uk/government/collections/dbs-checking-service-guidance--2

How to prove and verify someone's identity: https://www.gov.uk/government/publications/identity-proofing-and-verification-of-an-individual/how-to-prove-and-verify-someones-identity

Legislation

Safety of Sports Grounds Act 1975: https://www.legislation.gov.uk/ukpga/1975/52
Fire Safety and Safety of Places of Sport Act 1987: https://www.legislation.gov.uk/ukpga/1987/27
Football Spectators Act 1989: https://www.legislation.gov.uk/ukpga/1989/37/contents

Private Security Industry Act 2001 https://www.legislation.gov.uk/ukpga/2001/12/section/3

Football Spectators (Designation of Football Matches in England and Wales) Order 2000: https://www.legislation.gov.uk/uksi/2000/3331/contents/made

Other

UK Standards Spectator Safety National Occupational Standards: https://www.ukstandards.org.uk/NOS-Finder#k=spectator%20safety

Action Counters Terrorism (ACT) e-learning: https://ct.highfieldelearning.com/

Annexes

A. Understanding the stewarding exemption flowchart
B. Appropriate roles and responsibilities for Level 2 qualified staff and SIA Licence Holders

Annex A – Understanding the steward exemption flowchart

Sports Grounds Safety Authority

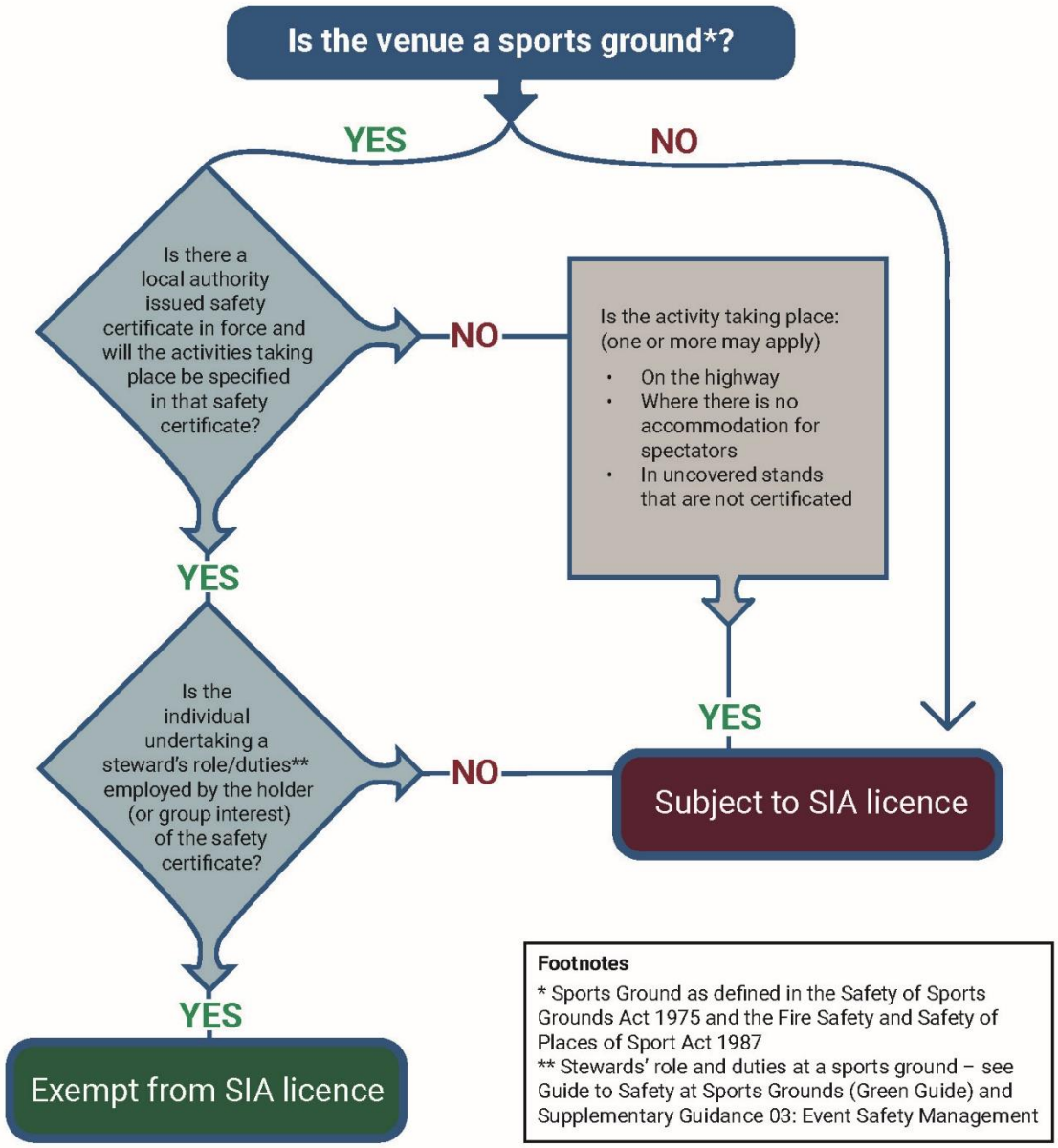
Security Industry Authority

Understanding the steward exemption

The Security Industry Authority (SIA) is the regulator of the UK's private security industry.

Under the Private Security Industry Act (PSIA) 2001, some security roles undertaken in sports grounds in England and Wales are exempt from SIA licensing. However, the exemption only applies in certain circumstances, and it may not always be clear whether an SIA licence is needed.

The flowchart below will help clarify when a SIA licence is needed at a sports ground.



Footnotes

* Sports Ground as defined in the Safety of Sports Grounds Act 1975 and the Fire Safety and Safety of Places of Sport Act 1987

** Stewards' role and duties at a sports ground – see Guide to Safety at Sports Grounds (Green Guide) and Supplementary Guidance 03: Event Safety Management

Sports Grounds Safety Authority

Security Industry Authority

Steward exemption scenarios

To help clarify when this exemption applies, the Sports Grounds Safety Authority (SGSA) and SIA has put together some examples of how it works.

This guidance is not exhaustive. You should seek legal advice if you are unsure whether the exemption applies.

EXAMPLE SCENARIOS

1 **A sports ground with an athletics track has open terracing and one covered stand. The local authority issues a regulated stands safety certificate for the covered stand under the Fire Safety and Safety of Places of Sports Grounds Act 1987. Are all stewards working at the ground exempt from SIA regulation?**

No. Stewards performing a crowd management/security function within the covered stand area are exempt. This is because they are working in an area bound by the regulated stands certificate. All stewards performing crowd management/ security functions in other parts of the sports ground are subject to SIA regulation.

2 **A racecourse has a total capacity of 25,000. This includes three stands covered by a regulated stands safety certificate. The venue has a special safety certificate from the local authority to stage a pop concert. This will take place in front of the three covered stands and part of the paddock. Are stewards managing the crowd at this event exempt from SIA regulation?**

No. If the stewards are performing crowd management/security functions within the area of the regulated stands, the SIA exemption applies. If they are not, then they are subject to SIA regulation. The type of event taking place at the sports ground does not matter.

3 **An event is taking place at a venue that is not designated under the Safety of Sports Grounds Act 1975. It does not contain any regulated stands. The venue has a premises licence issued by the local authority. Are stewards performing a crowd management function at the event exempt from SIA regulation?**

No. Because there is no safety certificate in place for the venue the stewards will each require a door supervisor (DS) SIA licence.

4 **A large sports ground uses a team of in-house CCTV operators to maintain and operate CCTV cameras throughout the ground. Are these CCTV operators exempt from SIA regulation?**

Yes, as the CCTV operators are employed directly by the sports ground. CCTV operators only need a Public Space Surveillance SIA licence if they are providing a service under contract.

Annex B – Appropriate stewarding roles and responsibilities in a sports ground for Level 2 in Spectator Safety qualified staff and SIA Licence Holders

This is a list of typical roles and responsibilities for stewards at a sports ground but it is not exhaustive.

See also Sections 4.1 and 4.6 of the sixth edition of the Guide to Safety at Sports Grounds (Green Guide) and Section 4.16 of Supplementary Guidance 03: Event Safety Management (SG03).

The table does **not** indicate that all staff need to hold all such SIA licences and the Level 2 qualification but does show those individuals that hold SIA licence(s) and Level 2 qualifications can be deployed more flexibly.

Roles and responsibilities	In-house Level 2 in Spectator Safety qualified staff[16] [17]	SIA Door Supervisor Licence Holder	SIA Public Space Protection Licence Holder	SIA Close Protection Licence Holder
Provide protection to players and officials on the field of play	Yes	N/A	N/A	Yes
Operate CCTV system	Yes	N/A	Yes	N/A
Assist with the security needs of all spectators	Yes	Yes	N/A	N/A
Demonstrate interpersonal skills	Yes	Yes	N/A	N/A
Investigate and report on an incident; describe accurately and record incidents that they have witnessed or experienced, for reporting, reviewing and auditing purposes:	Yes	Yes	N/A	N/A
Confident and competent in the use of technology and equipment supplied by the management, such as radios, digital devices and loud hailers	Yes	Yes	N/A	N/A

[16] As defined at paragraph 11 b)

[17] 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 role involving physical intervention

Roles and responsibilities	In-house Level 2 in Spectator Safety qualified staff[16] [17]	SIA Door Supervisor Licence Holder	SIA Public Space Protection Licence Holder	SIA Close Protection Licence Holder
Undertake specific duties as directed by the Safety Officer, for example: i. support compliance with the conditions of entry as set out in the venue's regulations and, the safety certificate ii. where required, and where legal powers permit, search spectators prior to entry as a condition of admittance iii. to staff entrances, exits and other strategic points (for example, the pitch or area of activity), or any exit doors or gates that are not continuously secured in the open position whilst the venue is in use iv. where required, refuse entry to the venue v. where directed by the Safety Officer, to support the emergency services in the safety management operation.	Yes	Yes	N/A	N/A
Assist with the circulation of spectators: that is to control or direct spectators who are entering or leaving the venue, and to help achieve a safe, even flow of people in, to and from the viewing areas	Yes	N/A	N/A	N/A
Monitor and control crowd movements and density within viewing areas, so as to prevent overcrowding	Yes	N/A	N/A	N/A
Reduce the likelihood and incidence of anti-social behaviour and/or disorder by monitoring and, where appropriate, responding to incidents and alerting the control point	Yes	Yes	N/A	N/A
Identify and report any potential hazards; for example, trip hazards, defective services or fire hazards	Yes	Yes	N/A	N/A
Respond to incidents (such as the early stages of a fire, a medical incident, or structural defect); to communicate with the control point, and to take the necessary immediate action	Yes	Yes	N/A	N/A