

# Guide to Safety Certification

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# Contents

<b>1.</b>	<b>Introduction</b>	<b>6</b>
1.1	Background to the guidance	6
1.2	Purpose of the guidance	6
1.3	Responsibility for safety	7
1.4	Responsibility of the certifying authority	7
1.5	Applying the guidance	7
1.6	Supporting materials	7
<b>2.</b>	<b>General principles of safety certification</b>	<b>9</b>
2.1	Definition of a sports ground	9
2.2	Designated sports grounds	9
2.3	Safety certificates	9
2.4	Regulated stands	11
2.5	Safety certification process	11
2.6	Special safety certificate	13
2.7	Other legislation	13
2.8	Policing	14
2.9	SGSA oversight	14
<b>3.</b>	<b>Application process</b>	<b>16</b>
3.1	Designation of a sports ground	16
3.2	Safety certificate application	17
3.3	Consultation and co-ordination	17
3.4	Qualified person	18
<b>4.</b>	<b>Certificate contents</b>	<b>19</b>
4.1	Format of a safety certificate	19
4.2	Core section – general requirements	19
4.3	Risk-based certificate	20
4.4	Prescriptive certificate	23
4.5	Regulated stand certificate	25
4.6	Special safety certificate	26
4.7	Safe capacity	27



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4.8	Red-line boundary	29
4.9	External factors	30
4.10	Specified events	31
4.11	Deviations from guidance	32
4.12	Demountable structures	32
<b>5. Administrative processes</b>		<b>34</b>
5.1	Local authorities policies and procedures	34
5.2	Rights of appeal	35
5.3	Fees	35
5.4	Notices by the local authority	36
5.5	Safety certificate review, amendment and replacement	36
5.6	Review after an incident	37
5.7	Business continuity and resilience planning	38
<b>6. Monitoring</b>		<b>39</b>
6.1	The need for monitoring	39
6.2	Annual inspection	40
6.3	During performance inspection (DPI)	41
6.4	Frequency of inspections	41
6.5	Inspection personnel	42
6.6	Records of inspections	43
<b>7. Safety Advisory Groups</b>		<b>44</b>
7.1	Purpose of Safety Advisory Groups (SAGs)	44
7.2	SAG management and procedures	44
7.3	Membership	46
7.4	Safety Advisory Group agenda and papers	48
7.5	Minutes of the Safety Advisory Group	49
7.6	Audit trail and record keeping	50
7.7	Frequency of meetings	50
7.8	Combined Safety Advisory Groups	51
7.9	Safety Advisory Groups sub-groups	51
<b>8. Enforcement</b>		<b>53</b>
8.1	Enforcement options	53
8.2	Reduction in the capacity of a sports ground	53

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8.3	Appeal against a reduction in capacity	<b>54</b>
8.4	Prohibition notices	<b>54</b>
8.5	Procedures for issuing prohibition notices	<b>55</b>
8.6	Appeals against a prohibition notice	<b>55</b>
8.7	Penalties for contravention of the safety certificate	<b>55</b>
8.8	Consistency and procedures	<b>57</b>
8.9	Conflict of interest	<b>57</b>
	<b>References and links</b>	<b>58</b>

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# 1.0 Introduction

## 1.1 Background to the guidance

The **Safety of Sports Grounds Act 1975** (the 1975 Act) introduced a system of safety certification of sports grounds by local authorities (the county council, unitary authority, metropolitan or London borough, referred to collectively as 'local authorities' in this guidance). This legislation was established following the Ibrox Stadium Disaster in January 1971 and the subsequent public inquiry led by Lord Wheatley. It remains the fundamental legislation for sports ground safety certification.

Under the 1975 Act, the local authority is required to issue a safety certificate to a designated sports ground which will include:

- the safe capacity of the ground; and
- such terms and conditions as the local authority considers necessary or expedient to secure the reasonable safety at the ground.

The **Fire Safety and Safety of Places of Sport Act 1987** (the 1987 Act) was introduced following the Bradford Fire Disaster in 1985. The 1987 Act extends the provisions for local authority safety certification to include covered stands with accommodation for more than 500 spectators in sports grounds not designated under the 1975 Act. These are known as 'regulated stands'.

## 1.2 Purpose of the guidance

The Sports Grounds Safety Authority (SGSA) has produced this Guide to Safety Certification to support certifying authorities with safety certification responsibilities. It provides an understanding of the certification process from the application stage through to monitoring and enforcement.

Whilst the guide directly relates to grounds where designated football matches are played, it will be of value to all authorities that issue safety certificates to any type of sports grounds under the 1975 or 1987 Acts.

This guidance covers the interaction between safety certification and measures that may be taken by local authorities under the Regulatory Reform (Fire Safety) Order 2005, the Licensing Act 2003, the Health and Safety at Work etc. Act 1974 and its related Regulations, the Building Safety Act 2022, Building Regulations and any other requirements that may affect the safety of those at a sports ground. It does not, however, provide guidance on these, except where there is a direct impact upon the process of safety certification or the contents of the certificate.



### 1.3 Responsibility for safety

Responsibility for safety at a sports ground lies at all times with the ground management. This will normally be the owner or lessee of the ground, who may not necessarily be the promoter of the event or the club playing matches at the ground. This responsibility should not be assumed by either the local authority or any other authority or agency. Nor should the local authority become involved in the design and management of events or take any action that could be interpreted as involvement.

The responsibility for safety relates to the safety of *all* people present. 'All people' includes not only spectators or audience members but any individual who is in attendance at the event, in whatever role, such as players, athletes, participants and performers, competition officials, venue staff, event staff, representatives of the emergency services, representatives of the media, and so on.

### 1.4 Responsibility of the certifying authority

Under the 1975 Act, the county council, unitary authority, metropolitan or London borough is the certifying authority responsible for issuing and enforcing a safety certificate in respect of sports grounds designated by the Secretary of State. The 1987 Act lays a similar responsibility upon those bodies in relation to regulated stands at non-designated sports grounds.

Under the provisions of the Act, any authorised persons from the certifying (local) authority, police, fire and rescue authority and the building authority may enter and make inspections of the sports ground at any reasonable time. The Act also makes provision for the certifying authority to issue a notice prohibiting or restricting the entry of spectators to all or part of a sports ground where, in its opinion, there is a serious risk to their safety.

This power extends to all sports grounds not just those which have been designated, or that contain a regulated stand, by virtue of section 10 of the 1975 Act, as amended by the 1987 Act.

### 1.5 Applying the guidance

This guidance provides local authorities with information to enable them to take reasonable decisions in individual cases after having considered the particular facts on their merits. It is given in good faith but does not purport to cover every eventuality.

Further specific advice is available from the SGSA, either by contacting the local inspector for the ground in question or emailing [info@sgsa.org.uk](mailto:info@sgsa.org.uk).

### 1.6 Supporting materials

To support local authorities in their safety certification responsibility, a range of materials are available:

#### a. Government Circulars

There are a wide-ranging set of Government Circulars (in particular from the Home Office) which provide detail on the interpretation and application of primary legislation.



The most pertinent originate from the 1975 to 1978 period and the 1986 to 1988 period, in respect of the 1975 and 1987 Acts. All are still relevant and provide a crucial understanding of the application of the legislation, for example on the following:

- Inspections of designated sports ground;
- How to determine a regulated stand; and
- Inspections of regulated stands.

Relevant Circulars are identified throughout this guidance and **[copies can be found on the SGSA website.](#)**

**b. Guide to Safety at Sports Grounds (Green Guide) and Supplementary Guidance**

The **[Guide to Safety at Sports Grounds](#)** (also known as the Green Guide) provides detailed guidance on the building, planning and management of safety at sports grounds. The Green Guide has no statutory force but many of its recommendations will be made statutory at individual grounds where reference is made within safety certificates. The latest (sixth) edition of the Green Guide was published in 2018 by the SGSA.

Elements of the Green Guide are expanded upon in additional guidance documents, in particular:

- **[Supplementary Guidance 01: Safe standing in seated areas](#)**; and
- **[Supplementary Guidance 03: Event Safety Management](#)**.

**c. Templates**

The SGSA has produced a number of templates and checklists for local authorities to use and adapt. These are referred to throughout this guidance, and are **[available within the safety certification section of the SGSA website](#)**:

- General safety certificate application form
- Regulated stand certificate application form
- Model risk-based safety certificate
- Variation / deviation from the Guide to Safety at Sports Grounds (Green Guide) template
- Issue and review of safety certificate policy template
- Monitoring and inspection policy template
- During performance inspection (DPI) checklist template
- Enforcement policy template
- Prohibition notice template
- Operations manual audit template
- Annual inspection checklist



# 2.0 General principles of safety certification

## 2.1 Definition of a sports ground

The 1975 Act defines a sports ground as:

“a place where sports or other competitive activities take place in the open air, and where accommodation has been provided for spectators, consisting of artificial structures, or of natural structures artificially modified for the purpose.”

The 1975 Act does not apply to indoor arenas where sports are played. If it has a permanent roof it comes under the Licensing Act 2003. However, stadia design has moved on since the 1975 definition of a sports ground, with some venues, such as the Principality Stadium, having a retractable roof. So long as some sports are played in the open air, it remains a sports ground within the definition of the 1975 Act.

## 2.2 Designated sports grounds

The 1975 Act defines a designated sports ground as those grounds, in the opinion of the Secretary of State for Culture, Media and Sport, that have a capacity of over 10,000, or 5,000 in the case of grounds in the Premier League or the English Football League.

Once a ground has been designated it is an offence to admit spectators to the ground unless an application has been made to the local authority.

The designation order remains in force unless or until it is formally revoked by the Secretary of State. If a designated sports ground is demolished or is permanently modified, so as to reduce the capacity below the designation threshold, the local authority should formally notify the Secretary of State and request that it be de-designated. If the local authority does not do so, the certificate holder may apply directly to the Secretary of State.

## 2.3 Safety certificates

In essence, a safety certificate contains such terms and conditions as the local authority considers necessary or expedient to secure reasonable safety at the sports ground when it is in use for a specified activity or activities.

Section 1(3) of the 1975 Act provides that a safety certificate shall be issued in respect of the use of all designated sports grounds, for an activity or activities specified in the certificate, irrespective of the nature and level of the sport played there:



- either for an indefinite period commencing with a date so specified (general safety certificate);
- or on an occasion or series of occasions so specified (special safety certificate).

Section 26(10) of the 1987 Act contains similar provisions in respect of safety certificates for regulated stands.

There is no provision in the Act for a general safety certificate to be issued for a finite period. It must be assumed, therefore, that such a certificate should run indefinitely, unless or until it is revoked, replaced or surrendered. However, as a matter of good practice it should be regularly reviewed by the local authority to ensure that the contents remain up to date and applicable to current conditions at the ground.

This guidance outlines two styles of safety certificate:

**a. Risk-based certificate**

This style of certificate requires ground management to conduct risk assessments to identify the mitigating actions needed to secure reasonable safety at the ground, and then to produce an Operations Manual setting out how these will be put into practice. The Operations Manual, once thoroughly checked, scrutinised and accepted by the local authority, is incorporated in a schedule to a relatively short safety certificate.

This is the preferred style of certificate.

**b. Prescriptive certificate**

This is often a lengthier document containing a list of prescriptive conditions that the ground management must comply with.

While risk-based safety certification is strongly recommended it is not mandatory for a local authority to move to this approach.

It is also possible to have a hybrid certificate that contains aspects of both risk-based and prescriptive certificates. For example, where there would normally be detailed conditions relating to medical or stewarding requirements the certificate instead refers to the plan the club has produced which is then appended to the certificate. A hybrid certificate can assist in the gradual progression from a prescriptive style to a risk-based certificate as it can be done in stages.

Where local authorities choose to use prescriptive certification, this guidance explains how this may need to be modified to comply with current obligations. For example, there may be tensions within the safety certificate between the prescriptive sections and those, such as fire safety, where other requirements, such as the Regulatory Reform (Fire Safety) Order 2005, legislate for a risk-based approach.

Whether the safety certificate issued for the ground is risk-based, prescriptive or a hybrid of the two, the certification process will demonstrate the ground's commitment to providing a safe and welcoming environment for everyone who attends events there.



## 2.4 Regulated stands

The 1987 Act extends the provisions for local authority safety certification to include covered stands with accommodation for more than 500 spectators in sports grounds not designated under the 1975 Act. These are known as 'regulated stands'.

Under the 1987 Act, the local authority is required to determine whether any, and if so which, of the stands at sports grounds in its area are regulated stands. In making that determination, the local authority is required to follow the statutory guidance given in Home Office Circular 97/1988. **Section 4.5** provides further detail on regulated stands.

## 2.5 Safety certification process

The safety certification process for both designated sports grounds and regulated stands are outlined in Figure 1 overpage. The detail of these processes are outlined throughout this guidance.

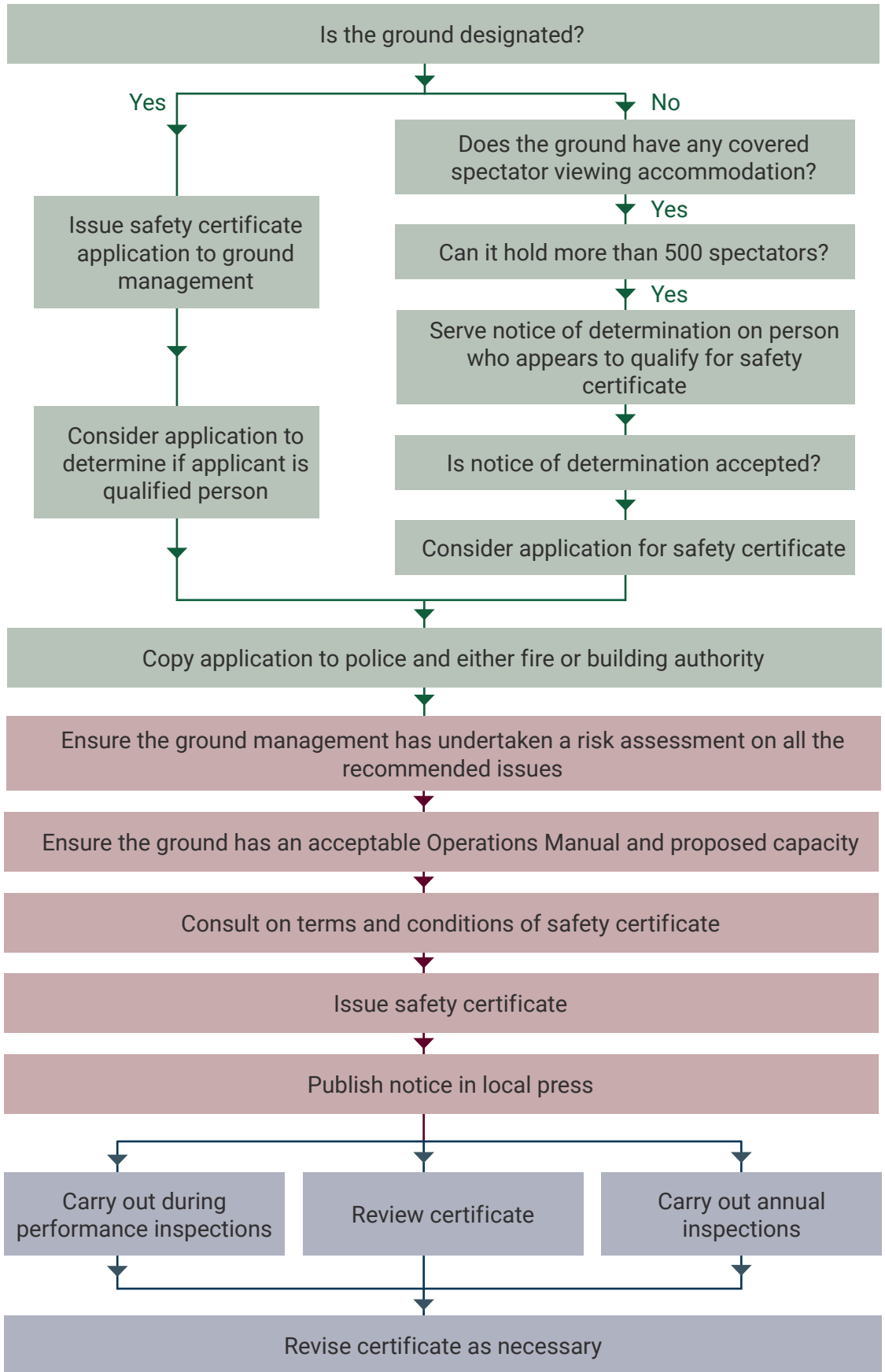


**Figure 1 Certification process flowchart**

**Application process**  
(Section 3.0)

**Certificate contents**  
(Section 4.0)  
**Administrative process**  
(Section 5.0)

**Monitoring**  
(Section 6.0)  
**Safety Advisory Groups**  
(Section 7.0)  
**Enforcement**  
(Section 8.0)





## 2.6 Special safety certificate

A special safety certificate is one issued where a general safety certificate is in force (both at designated sports grounds and regulated stands), but the event/series of events intended to be held are considered to be too diverse and therefore cannot be included in the specific activities within the safety certificate.

Information on the application and processes for special safety certificates is at **section 4.6**. Detailed guidance on special safety certificates and their use is outlined in Home Office Circular 187/1976.

## 2.7 Other legislation

The legislative backdrop for safety at sports grounds is complex. Local authorities are strongly advised to work closely with their legal departments when implementing any safety certification procedures.

The **[SGSA website contains a useful section on legislation](#)** related to sports grounds safety. Some of the most relevant include:

### a. Regulatory Reform (Fire Safety) Order 2005

The **Regulatory Reform (Fire Safety) Order 2005** (sometimes referred to as the Fire Safety RRO) imposes a requirement on a venue's management to risk assess, plan, organise, control, monitor and review the necessary preventive and protective measures against the risk of fire and to record these arrangements in writing. Similar approaches are adopted in regulations under the Health and Safety at Work etc Act 1974 and the Licensing Act 2003. These requirements will all apply to some degree to sports grounds.

Under the Fire Safety RRO, the local authority is the enforcing authority for fire safety related issues at sports grounds. For indoor venues that responsibility remains with the fire authority.

### b. Football Spectators Act 1989

The **Football Spectators Act 1989** (the 1989 Act) was introduced as a result of the Hillsborough Disaster. It was created to control the admissions of spectators at designated football matches in England and Wales.

A designated football match is defined in the Football Spectators (Designation of Football Matches in England and Wales) Order 2000 as any association football match, which is played either at Wembley Stadium, the Principality Stadium, or at a sports ground in England or 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. The 1989 Act relates to men's football matches only.

The Football Licensing Authority was replaced by the Sports Grounds Safety Authority (SGSA) in 2011 (under the Sports Grounds Safety Authority Act 2011). However, the regulatory responsibilities remain the same:

- i. issue licences to admit spectators to designated matches, and
- ii. to oversee local authorities' safety certification functions at international stadia and Premier League / English Football League grounds in England and Wales.



The Act also gives the SGSA the power to direct a local authority to insert a condition into a safety certificate (see [section 2.9b](#) below).

## 2.8 Policing

Responsibility for safety at a sports ground lies at all times with ground management. However, at certain sports grounds and/or for certain matches or events the presence of the police may be required to maintain public order and prevent the commission of offences.

The local authority has no responsibility for operational policing either inside or outside the sports ground. Both the 1975 and 1987 Acts state explicitly that, where a condition within a safety certificate requires a request being made for the attendance of police at an event, the number of police deployed is entirely a matter for the chief officer of police. All operational issues concerning the deployment of police officers within a sports ground are for the police themselves.

The Operations Manual, or conditions in a prescriptive certificate, should include details of when and how the sports ground management will inform police about an event and the consultations that may occur to inform decisions on police attendance.

Following a risk assessment, sports grounds will likely demonstrate the need for a crowd disorder and anti-social behaviour plan. This will outline the various responsibilities for the ground management and police to protect people against this threat.

Ground management and police should produce a written [statement of intent](#) to clarify their various responsibilities. The local authority may require the certificate holder to use their best endeavours to agree such a statement with the police. This should be included as a schedule to the Operations Manual or kept with the safety certificate.

A condition in a safety certificate may reasonably require the certificate holder to notify the police of particular events and, if appropriate, request their attendance. However, the certificate cannot require the ground management to secure the attendance of the police. Nor may it direct the police to attend.

If the chief officer of police believes that police officers need to attend a particular event, but the management of the sports ground disagrees, the local authority must consider whether the absence of police would adversely affect safety at the ground. It should consider any mitigating measures offered by the ground management. It is for the certificate holder to satisfy the local authority that the event can proceed safely without the police being present. If the local authority is not satisfied, it could close part or all of the sports ground or reduce its permitted capacity to a level that it considers reasonably safe for the event concerned. Local authorities should have a formal dispute resolution policy in place to address circumstances such as this. [A template policy is available from the SGSA](#). The options available to the local authority are described later in this guidance within [section 8 – Enforcement](#).

## 2.9 SGSA oversight

The SGSA is responsible, under the provisions of section 13 of the Football Spectators Act 1989 (the 1989 Act) for keeping under review the discharge by local authorities of their functions under the 1975 Act. This legislation covers Wembley Stadium, the Principality Stadium and all Premier League and English Football League grounds.



The SGSA carries out its statutory review function by a combination of:

- meetings with the certifying authority and other appropriate parties;
- attendance at meetings of the safety advisory group;
- monitoring of the safety certification procedures and records required to be kept under the terms and conditions of the safety certificate;
- inspections and observations at the sports grounds concerned on match and non-match days; and
- request information and/or documentation in order to ensure compliance with the Act.

**a. Local authority audits**

As part of discharging this local authority oversight duty, the SGSA carries out regular audits to inform its ongoing level of involvement with individual local authorities and the football clubs regulated under the 1989 Act. These assess how well a local authority is ensuring compliance with relevant safety at sports grounds legislation by the ground(s) in its area.

The audit covers nine key areas of the local authority's performance:

- i. Compliance with actions from previous audit;
- ii. Safe capacity;
- iii. Safety Advisory Group (SAG) governance and performance;
- iv. Safety certification;
- v. Monitoring;
- vi. Enforcement;
- vii. Training and expertise;
- viii. Business continuity and resilience planning; and
- ix. Confidence in the local authority's discharge of duties and safety culture.

**b. Safety certificate conditions**

Under section 13(2) of the 1989 Act, the SGSA may require a local authority to include in a safety certificate such terms and conditions as it may specify in its written notice. Before exercising this power, the SGSA must consult the local authority, the chief officer of police and, where these are not the local authority, the fire authority or the building authority.

As part of its oversight, the SGSA may also require the local authority to provide it with such information relating to the discharge of its safety certification functions as it may require. SGSA inspectors may undertake such inspections of any ground as they consider necessary and may examine and take copies of the safety certificate and its schedules (including the relevant sections of the Operations Manual) and any records kept under the 1975 Act.

The SGSA role goes beyond ensuring that local authorities set and enforce such terms and conditions as are necessary for reasonable safety at sports grounds. It promotes the adoption and maintenance of a safety culture and is a source of advice and good practice.

# 3.0 Application process

## 3.1 Designation of a sports ground

Under the provisions of the 1975 Act, the local authority is responsible for issuing and enforcing a safety certificate in respect of a sports ground designated by the Secretary of State for Culture, Media and Sport.

The 1975 Act empowers the Secretary of State to designate any sports ground which has accommodation for more than 10,000 spectators, or 5,000 in the case of Premier League and Football League grounds in England and Wales.

The Secretary of State will normally be aware of major new sports grounds under construction but may not always have been informed of developments that might increase the capacity of an existing sports ground above the threshold for designation. It is therefore incumbent upon the local authority to notify the Secretary of State of any sports ground likely to require designation. It should give at least 10 weeks' notice so that the Secretary of State has sufficient time to be satisfied that the sports ground meets the criteria. As part of this process, the Secretary of State will formally consult the local authority, the sports ground owner, the emergency services and, where it will have a statutory role, the SGSA.

The notification to the Secretary of State should include the proposed capacity of the sports ground, together with its full postal address as soon as this is known. While this may appear pedantic and can be difficult to supply for new sports grounds where the precise address has not been fixed, it is the only certain means of identification – while the name of the sports ground may change, the postal address rarely does.

The designation order remains in force unless or until formally revoked by the Secretary of State. If a designated sports ground is demolished or is permanently modified, so as to reduce the capacity below the threshold, the local authority should formally notify the Secretary of State and request that it be de-designated. Should the local authority fail to do so, the certificate holder may apply directly to the Secretary of State.

If an EFL League Two club is relegated to the National League and thereby falls outside the threshold, the same de-designation processes apply.

The Department for Culture, Media and Sport (DCMS) maintains a list of designated grounds.





## 3.2 Safety certificate application

Once a sports ground has been designated, it is an offence under section 12 of the 1975 Act to admit spectators until an application has been submitted to the local authority for a safety certificate. The requirements governing the submission and handling of applications are set out in section 3 of the 1975 Act.

An application for a safety certificate for a designated sports ground must be in the form prescribed in the schedule to the Safety of Sports Grounds Regulations 1987 (the 1987 Regulations) or in a form of like effect. Local authorities should make provision for applications for a safety certificate to be made online. **[Template application forms for both a general safety certificate and a regulated stand certificate are available from the SGSA.](#)**

The application should be accompanied by detailed information regarding the structure, proposed capacity and safety management systems. The local authority may, by notice in writing, require the applicant to submit within a reasonable period such information and plans as it considers necessary to enable it to determine what terms and conditions to include. Where a risk-based safety certificate is to be issued, this information should be set out in full in an Operations Manual.

Since the safety certificate should relate to the actual condition of the sports ground, local authorities should seek further information when they consider this necessary in the interests of safety at the ground.

## 3.3 Consultation and co-ordination

The safety certificate should be seen as part of a total, integrated system for managing health, safety and security at the sports ground. While the local authority alone is responsible for issuing the safety certificate, safety cannot be achieved by one agency acting in isolation.

The local authority is under a statutory duty to consult with the chief officer of police and, where it is not itself that authority, with the fire authority and the building authority upon receipt of the application. It is good practice to consult the ambulance authority and to have regard to the views not merely of the certificate holder but also to those of any other regular users of the sports ground and those who live and operate in areas in close proximity to the sports ground and, where relevant, representative supporters of the sports club(s) concerned. It may also need to consult the authorities responsible for emergency planning and health and safety.

The local authority needs to ensure that there is no conflict between the safety certificate, or any Operations Manual produced as a requirement of the safety certificate, and any requirements imposed under the Management of Health and Safety at Work Regulations 1999 or other Regulations under the Health and Safety at Work etc. Act 1974. As a general principle, where the two overlap, the specific provisions of the safety certificate take priority over the general requirements under the Health and Safety at Work etc. Act 1974 where an incident occurs during a specified activity requiring regulatory action.

Local authorities should ensure that protocols are in place between different departments in the authority dealing with the various legislation to clarify their responsibilities regarding the sports ground.



In areas where there are two tiers of local authority, the certifying authority under safety at sports grounds legislation will be a county council and the enforcing authority under the Health and Safety at Work etc. Act 1974 will be a district or borough council. In these areas, county councils may find themselves in the position of identifying a risk to the safety of non-spectators but a reduction in the S factor will not mitigate the risk, and amending the conditions will not resolve the issue in a timely manner. They will therefore be reliant on colleagues in the district council to take enforcement action under health and safety legislation.

Where there are concerns about the safety of non-spectators which the county council believes can only be effectively resolved under health and safety legislation, it should make the appropriate representations to the relevant district council. It will be essential for those with responsibility for sports grounds safety in county councils to build a strong relationship and develop protocols with health and safety colleagues in the relevant district council. This could take the form of a Memorandum of Understanding if appropriate. In addition, the relevant health and safety officers from the district council should be invited to join the Safety Advisory Group (SAG) (see [section 7.3](#)).

### 3.4 **Qualified person**

Before a safety certificate for a designated sports ground may be issued, the local authority must determine whether the applicant is a “qualified” person. This is defined in the 1975 Act as a person who is likely to be in a position to prevent any contravention of the terms and conditions of a safety certificate.

The certificate holder should hold a position of authority within the management of the sports ground. This could include the chair, chief executive, club secretary, sports ground manager, operations manager or a director, depending on the sports ground management structure. The holder should be empowered to approve the allocation of funding for safety.

The applicant may also be the body corporate responsible for the sports ground management, in which case the Board of Directors, or other similar entity, takes responsibility for compliance with the terms and conditions of the safety certificate.

If the local authority determines that the applicant is a qualified person, section 3(2) of the 1975 Act requires it to issue the safety certificate. If it determines to the contrary, it must notify the applicant in writing. The applicant may appeal this determination to the magistrates’ court within 28 days (seven days in the case of a special safety certificate).

The same principles apply if the local authority receives an application to transfer the safety certificate to another holder. If it determines that the applicant is not a qualified person, and therefore will not transfer the certificate, it must formally notify both the existing certificate holder and the applicant in writing and give reasons for the refusal.

#### **Regulated stands**

Under the 1987 Act, the definition of a person qualified to hold the safety certificate for a regulated stand is more tightly drawn. In the case of a general safety certificate, it is the person responsible for the management of the sports ground; for a special safety certificate, it is the person responsible for organising the activity being watched by the spectators. Aside from this distinction, the procedure mirrors that for issuing the safety certificate for a designated sports ground.

# 4.0 Certificate contents

## 4.1 Format of a safety certificate

It is strongly recommended that local authorities issue all safety certificates in a modular form, as follows:

- a. a **short core section**, containing a general statement of the duties laid upon the certificate holder and the safe capacity of the ground. In a risk-based certificate this would primarily consist of a requirement to undertake appropriate risk assessments, to set out in an Operations Manual how reasonable safety is to be maintained and a requirement to adhere to the Operations Manual. In a prescriptive certificate this would generally consist of a requirement to ensure that all terms and conditions within the certificate are complied with;
- b. **schedules**, either comprising the Operations Manual or the detailed conditions inserted by the local authority setting out what the certificate holder must do to ensure reasonable safety at the ground;
- c. **annexes**, setting out the specified activities to which the certificate applies and the capacities of the sports ground as a whole and of each element of spectator accommodation for each activity; and
- d. **appendices**, including plans of the ground and other documents and sources of information referred to elsewhere in the certificate.

The safety certificate should be both easy to follow and complete within itself. The terms and conditions with which the certificate holder must comply should be clear, specific to the sports ground concerned and achievable. They must not be unfair, illegal or physically impossible. General provisions, such as outlining tasks that must be undertaken to the satisfaction of the local authority, the chief officer of police, the chief fire officer or any other person, should be avoided. Similarly, a safety certificate should not require the holder to comply with a general recommendation in the Green Guide. It can, however, make reference to specific sections within the Guide.

The safety certificate should also include the timescales of when the certificate conditions are in force, for example two hours before an event until one hour after the event. These timings will depend on local circumstances and agreements.

## 4.2 Core section – general requirements

Whatever form of certification is adopted, the core section should include the following information:



- a. the Act under which the certificate is issued;
- b. the responsible local authority;
- c. the holder of the certificate;
- d. the sports ground or regulated stand(s) to which it applies; and
- e. the specified activities to which the certificate applies (although these may be more conveniently listed in an annex).

It should also require the holder to:

- f. produce a written statement of the ground's event safety policy and appoint a person responsible for its implementation;
- g. draw up a plan of action to cover all reasonably foreseeable contingencies; and
- h. appoint a safety officer, and deputy safety officer, of sufficient competence, status and authority to take day to day responsibility for event day safety. The safety officer should have a written job description.

The certificate should also provide that the local authority is entitled to inspect, investigate and take copies of documents at any reasonable time in order to fulfil its enforcement obligations.

The local authority needs to be satisfied that the appointed safety officer is competent and that the event safety policy and contingency plans are sufficiently clear and comprehensive. However, it is not up to the local authority to 'approve' the employment of the individual concerned. Similarly, the local authority is not required to 'approve' the safety policy and contingency plans or risk assessments underlying any Operations Manual. These must remain, and be seen to remain, the responsibility of the certificate holder. If not satisfied on any of these matters, the local authority should reduce the (S) factor and hence the capacity of the ground.

Moreover, the holder should be required to supply the local authority with details of all forthcoming events. The local authority should consider how much advance notice it requires. The safety certificate may reasonably require the certificate holder to notify the police of particular events. Where appropriate, the holder may also be required to notify the other emergency services.

### 4.3 Risk-based certificate

A risk-based certificate requires the ground management to produce safety management documents and risk assessments to secure reasonable safety at the ground and record them in an Operations Manual. The Operations Manual, once checked and accepted by the local authority, is then incorporated in a schedule to the safety certificate (this may be in the form of a digital link to the manual held by the ground).

It is recommended that a risk-based safety certificate should be a comparatively short document which, by condition, requires the holder to:

- undertake appropriate risk assessments;
- produce an Operations Manual; and
- comply with the policies, plans and procedures set out in the Operations Manual.



**A model risk-based safety certificate is available from the SGSA website.**

The latter condition is particularly important in order to ensure a local authority is able to take appropriate enforcement action if the holder deviates from the approach described in the Operations Manual.

**a. Core section of a risk-based certificate**

In addition to the core section contents, outlined in **section 4.2**, the core section of a risk-based certificate should also require the holder to undertake suitable and sufficient risk assessments, which should be made available to the local authority if requested, and in the light of those assessments draw up an Operations Manual. The core section should also require the holder to comply with the policies, plans and procedures set out in the Operations Manual.

A risk-based certificate should not be issued until the ground management has undertaken its risk assessments and has drawn up and submitted its Operations Manual and this has been scrutinised by the local authority. Failure to follow this procedure could lead to the local authority prescribing a capacity for the ground on the basis of work that is to be undertaken in the future and not on the actual circumstances at the ground.

The core section should require the certificate holder to notify the local authority in advance of any changes the holder proposes to make to any Operations Manual and any other change of circumstances that may affect the terms or conditions of the safety certificate. Moreover, where a risk-based certificate is in place, the certificate holder should be required to commission or undertake a formal review of its risk assessments every year, even if nothing untoward has occurred, and should formally confirm or amend its recommended capacities and (P) and (S) factors.

The stadium management should be required to clearly set out details of the safe capacity of the ground for each specified activity as a whole and by area, including an assessment of the (P) and (S) factors.

Detailed guidance on the preparation of safety policies and contingency plans and on what should be included in an Operations Manual can be found in the Green Guide and SG03: Event Safety Management.

**b. Risk assessments**

It is strongly recommended that the ground management should be required to commission or undertake risk assessments on all matters relating to the safe management of the ground when in use for a specified activity. These should include arrangements for facilities maintenance, crowd management, crowd disorder and anti-social behaviour stewarding, medical and first aid arrangements, counter terrorism and fire safety. Management should not rely on the local authority or the SGSA, where it has a regulatory role, to undertake this work on its behalf.

Under the Regulatory Reform (Fire Safety) Order 2005, the responsible person – in practice someone nominated by the ground management – must undertake a risk assessment. Thereafter it is the duty of the responsible person to implement the preventive and protective measures which have been identified as necessary by the risk assessment. This forms part of the general duty to ensure that general fire precautions are in place for the safety of all employees



or of any other relevant persons such as spectators. Common sense dictates that the performance of this duty should form part of any Operations Manual.

**c. Operations Manual**

On the basis of the risk assessments outlined above, ground management should produce a comprehensive Operations Manual setting out how it will achieve reasonable safety at the ground.

Irrespective of what type of certificate or even if there is no certificate at all, the ground management should be encouraged to draw up an Operations Manual for the ground. However, it is a requirement for a risk-based certificate.

The Operations Manual and any proposed amendments should be submitted to the local authority for consideration to enable it to determine whether to accept the holder's proposed capacity. The safety certificate should set out what the holder must do in order to operate the sports ground at its permitted capacity.

Provided that the local authority is satisfied that the Operations Manual is compatible with the advice in the Green Guide and SG03: Event Safety Management, and that it is based on a series of relevant risk assessments undertaken by competent persons, it should be able to accept it. If, however, the Operations Manual does not follow the guidance in the Green Guide and SG03: Event Safety Management, the local authority should ask the ground management to demonstrate that the proposed deviation from the Green Guide provides an equivalent or higher standard of safety. This is further detailed in **section 4.11**.

If the local authority is not persuaded that the procedures set out in the Operations Manual will provide reasonable safety for those at the ground, it should reduce whichever of the (P) or (S) factors applies, and hence the permitted capacity. It should at the same time discuss with the ground management how they might improve their procedures.

The permitted capacity of a sports ground should always reflect its current circumstances, not those which are intended or expected to apply at some future date. Accordingly, the safety certificate should not require the holder to submit an Operations Manual in the future but should require it to comply with that which it has already submitted.

The Operations Manual should cover all areas to which people have access in relation to a specified activity, including restaurants, licensed bars, and concourses.

It should also cover any other areas and all matters, over which the ground management has either direct or indirect control (through a contract with a commercial provider), which may affect the safety at the sports ground. This could encompass offices or players' facilities within a stand, media facilities, club or leisure facilities, satellite buildings and access and egress to and from car parks. For detailed guidance on the contents of the Operations Manual see the Green Guide and SG03: Event Safety Management.

Staff working under a franchise or agency agreement should be required as a condition of their contract or agreement to comply with the ground's Operations Manual. The certificate holder could be liable for any breach of the Operations Manual and hence of the safety certificate by franchisees or agency staff.



If a sports ground is not always used with a capacity attendance, or is used to host a variety of sports or activities which attract different numbers of attendees, the Operations Manual should identify event day operation scenarios for these different levels of attendance. These could be in the form of an alternate section, or alternative version, of the Operations Manual. A similar approach may be adopted in relation to a prescriptive certificate.

## 4.4 Prescriptive certificate

A prescriptive certificate, as the name suggests, is far more detailed in its terms and conditions. Whilst an Operations Manual may be in place at a sports ground, it is not included as part of the prescriptive certificate.

The certificate is often a very lengthy document containing many conditions, definitions, appendices, and so on, and can easily reach over 40 pages.

### a. Core section

Similar to the risk-based certificate, the core section of the prescriptive certificate should include the information outlined in [section 4.2](#). In addition, it should lay upon the certificate holder the general requirements to:

- i. ensure that the capacity of the sports ground or stand as a whole and of its separate areas is not exceeded (the capacities should be laid out in the safety certificate);
- ii. provide the necessary equipment, supervisory staff and stewards, for monitoring, directing, controlling and assisting spectators;
- iii. ensure the provision of first aid and medical staff, equipment, facilities and accommodation;
- iv. ensure that all permanent and temporary buildings, structures and installations, including means of ingress and egress, are maintained in such condition that they safely fulfil their required function;
- v. take all reasonable precautions to prevent the outbreak and spread of fire, maintain suitable equipment and train staff to deal with an outbreak of fire; and
- vi. maintain and make available for inspection as required, full records of inspections and tests of the buildings, structures, installations and safety management systems;

subject in each case to the detailed requirements of the related schedule.

### b. Terms and conditions

The terms and conditions may “involve alterations or additions to the sports ground”, in the sense that the certificate holder may need to undertake certain modifications in order to achieve compliance and thereby avoid a reduction in capacity. The conditions should not, however, consist of a list of specific improvements or alterations to be implemented at some future date. If these are required in order to secure an increased capacity, the local authority should notify the certificate holder separately.

Similar to the risk-based certificate, a prescriptive certificate should set out what the holder must do in order to operate the sports ground at its safe



capacity. If the holder is unable to comply with one or more of these terms or conditions, the local authority, using the (P) or (S) Factor, should reduce the capacity to whatever figure it considers necessary to ensure reasonable safety at the sports ground. This capacity should always reflect the current circumstances at the sports ground, not those it is planned or hoped to achieve in the future. The local authority should ensure that it determines the permitted capacity reasonably, proportionately and in accordance with due process.

Where a particular sports ground is rarely filled to capacity or where it regularly hosts a variety of sports or activities that attract different numbers of spectators, the local authority may base its requirements on the actual levels of attendance provided that, as in the case of risk-based certificates, the overall permitted capacity and those of each separate area are calculated accordingly.

### **c. Schedules and appendices**

Where a prescriptive style certificate is in place, the detailed requirements of a ground should be set out in a series of schedules. Even where the certificate holder has not produced a detailed Operations Manual, there is no reason why it should not draft some or all of the detailed conditions, for promulgation by the local authority. Indeed, this approach is to be encouraged since it gives the certificate holder a greater sense of ownership of the safety management of the sports ground.

The local authority should structure the schedules and appendices for a prescriptive certificate according to local need. In most cases, the best approach is to include definitions and written requirements as schedules and to attach any plans, tables and lists as appendices.

Thus, the schedules might cover all requirements relating to:

- safety management, stewarding and crowd control;
- counter terrorism measures;
- prevention of crowd disorder and anti-social behaviour;
- buildings, structures and installations;
- fire and firefighting;
- first aid and medical facilities; and
- records and certificates relating to training, briefing, tests and inspections.

The appendices could include plans of the sports ground along with details of its permitted capacity. If they are not included in the Operations Manual, the following should be attached as appendices:

- i. the event safety policy;
- ii. the ground contingency plans;
- iii. the statement of intent between the ground management and the police;
- iv. any detailed lists of equipment or installations to be maintained by the certificate holder, such as first aid equipment and supplies; fire-fighting equipment; and control room equipment; and
- v. an index of the key locations and details of all exit gates and doors.





#### d. Hybrid certificate

It is also possible to have a hybrid certificate that contains aspects of both risk-based and prescriptive certificates.

A hybrid certificate can assist in the gradual progression from a prescriptive style to a risk-based certificate as it can be done in stages. The move from an existing prescriptive style certificate to one based on risk assessments and an Operations Manual should ideally be by agreement between the local authority and ground management. However, the final decision rests with the local authority. The necessary documentation should be completed before the risk-based certificate is introduced.

A hybrid certificate may, for example, be in the format of a prescriptive certificate. But for some areas, such as medical or stewarding requirements, where there would normally be detailed conditions, the certificate could instead refer to the Stewarding Plan or Medical Plan the club has produced which is then appended to the certificate.

### 4.5 Regulated stand certificate

Under the 1987 Act, a local authority has a responsibility to determine whether any stand at a sports ground is a regulated stand. In making that determination the local authority must follow the statutory guidance on how to determine whether or not a stand provides covered accommodation for 500 or more spectators given in Home Office Circular 97/1988 (as opposed to using the Green Guide methodology). For the precise details local authorities should refer to the Circular. In brief, the local authority is required to count:

- a. the number of individual seats and / or marked places on bench seats; and
- b. the number of places available on bench seating allowing 530mm per person and disregarding any shorter lengths left over; and
- c. the number of spectators who can be accommodated on a terraced or sloped viewing area at a rate of 2.7 per square metre after disregarding gangways, stairways and landings; and
- d. the number of spectators who can be accommodated in the front two metres of a flat standing area at a rate of 2.7 per square metre.

It is stressed that this methodology should be used **only** for determining whether the stand in question should be a regulated stand. Its safe capacity does not depend only on the amount of accommodation available. When calculating the permitted capacity for inclusion in the safety certificate, the local authority should follow the methodology set out in the Green Guide. This may well result in a substantially lower capacity, which may even fall below 500.

The local authority may at any time revoke any determination that a stand is a regulated stand if it no longer provides accommodation for 500 or more spectators, as determined in accordance with the criteria in the Home Office Circular.

Where a local authority has determined that a stand is a regulated stand, the Act requires that the authority notify the appropriate person of their preliminary determination. The Act provides for an appeal to be made against the local authority's preliminary determination, but in the absence of such an appeal it becomes a final determination after two months.



It is an offence under the Act to admit spectators to a stand meeting these criteria, which has been determined to be a regulated stand, unless a safety certificate for the stand is in place. The provisions and processes for determining terms and conditions in the Safety Certificate and the scope of any enforcement action, mirror the provisions in the 1975 Act but are limited to the regulated stand, or stands only, rather than the sports ground as a whole.

The local authority may, and in practice should, issue a single certificate in respect of two or more such stands at the same sports ground. Different conditions may apply to the various stands.

The form of the application is laid down in the Safety of Places of Sport Regulations 1988. The local authority may require the same information as for a designated sports ground. It is under the same duty to consult the police and other agencies. As with a safety certificate for a designated ground the local authority should make provision for online applications. **[A template regulated stand application form is available from the SGSA website.](#)**

Similar to the general safety certificate, there is no provision in the Act for a regulated stand certificate to be issued for a set period so it should run indefinitely, unless or until it is revoked, replaced or surrendered. As with the general safety certificate, the local authority should put in place procedures to conduct regular reviews to ensure the terms and conditions of the safety certificate are being met.

## 4.6 Special safety certificate

As outlined in **section 2.6**, a special safety certificate is one issued where a general safety certificate is in force (both at designated sports grounds and regulated stands), but the event/series of events intended to be held are not included in the specific activities within the safety certificate or where events within a sports ground are of such a different nature that inclusion within specified events is not deemed appropriate. For example, where the viewing of the event is from positions other than those areas of designed viewing accommodation for a sporting event. When this occurs, an application should be submitted to the local authority for a special safety certificate. (A template special safety certificate application form is included as Part II within the template application forms for designated sports grounds and regulated stands.)

Such applications should normally be made at least three months in advance of the proposed event. However, the local authority may vary this period at its discretion. Often the planning starts as soon as the event is known, with special Safety Advisory Groups (SAGs) being set up for discussions on the event.

The procedure for granting a special safety certificate is slightly different from that for a general safety certificate. Detailed guidance on special safety certificates can be found in Home Office Circular 187/1976.

In brief, the key considerations include:

### a. Applicant / qualified person

Unless the applicant is already the holder of a general safety certificate, the local authority must first determine whether the applicant is a qualified person.



Whilst the local authority is obliged to grant a general safety certificate provided that the applicant is a qualified person, it has the discretion to refuse to issue a special safety certificate. In reaching its decision, the local authority must act reasonably. The applicant has the right to appeal within seven days against any refusal.

**b. Capacity considerations**

A different safe capacity may be required in a special safety certificate for certain events. A pop concert, for example, may have spectator accommodation on the pitch, while a fireworks display may require certain sections of the sports ground to be kept clear of people. Some events may give rise to dynamic forces on stands due to rhythmic crowd movements that were not specifically taken into account in the design of the structure. In these cases, it may be necessary to restrict the use of the areas concerned. The SGSA's [Alternative Uses of Sports Grounds guidance](#) provides further information.

**c. Information requirements**

The applicant of a special safety certificate may be required to supply whatever information the local authority needs in order to discharge its functions. This should include:

- i. details of any proposed changes to the normal accommodation or arrangements, in particular to the safety systems;
- ii. crowd management and stewarding arrangements;
- iii. toilet and medical provision; and
- iv. fire precautions.

Where there is a risk-based safety certificate, these should be set out in a revised Operations Manual supported by the relevant specific risk assessments.

## 4.7 Safe capacity

The most important condition in the safety certificate sets the maximum number of people that may be accommodated for the ground as a whole and for each separate area. Where there are regulated stands, it should set the capacity for each such stand.

Chapter 2 of the Green Guide provides detailed and comprehensive guidance on how to determine the safe capacity of sports grounds. In brief, the safe capacity of each venue is a factor of the:

**a. Entry capacity**

The entry capacity is the number of spectators who can pass through all the entry points or turnstiles serving the sports ground, or a section of the sports ground, within a period of one hour.

**b. Holding capacity**

The holding capacity is the number of spectators that can be safely accommodated in the viewing accommodation of the sports ground, or in a specific section.



i. Seated accommodation

In the case of seats, this will be determined by the actual number of seats, less any that cannot be used safely owing to seriously restricted views or inadequate condition.

ii. Standing accommodation

In the case of a standing area, this will be determined by several factors, including an assessment of the space available and the appropriate density measure, crush barrier strengths and layouts and any seriously restricted views.

iii. (P) and (S) Factors

For both seated and standing accommodation, the holding capacity will also be assessed according to its physical condition (also known as the (P) Factor and the safety management of that area (the (S) Factor).

A single (P) factor and a single (S) factor should be set for each separate area of the spectator viewing facilities.

To help in the assessment of (P) and (S) factors, it is recommended that each should be given a numerical value. This value should be quantified as a factor of between 0.0 and 1.0, as demonstrated in the examples below:

Where the physical condition of the viewing accommodation is of a high standard, a (P) factor of 1.0 should be applied.

Where the physical condition is extremely poor, a factor of 0.0 should be applied (which, as explained below, would have the effect of imposing a zero capacity on the area).

The same considerations should then be made in respect of the safety management competence with the same outcome applied.

An intermediate assessment might result in, for example, a (P) factor of 0.6, or perhaps an (S) factor of 0.8.

This lower number of 0.6 should then be multiplied by the capacity identified for the seated/standing accommodation, as identified in points (a) and (b) above. The lower number should then be noted as the holding capacity for the section of a ground or ground as a whole. Demonstrations of this calculation are included in the capacity calculation **[worked examples available on the SGSA website.](#)**

Owing to the wide variation of conditions and facilities to be found at sports grounds, the Guide does not seek to place specific values on any of the elements likely to be considered when assessing (P) and (S) factors. Instead, the assessment should reflect a considered and reasonable overall judgement of the physical condition or safety management of the area in question.

Again, the (P) and (S) Factor evaluation should be conducted by a competent person. To support this, the SGSA has provided examples of the type of indicative questions that need to be addressed when conducting this assessment. These are available at **[Annex A and Annex B of the Green Guide, and are freely available on the SGSA website.](#)**



**c. Exit capacity**

The exit capacity is the number of spectators that can safely exit from the sports ground, or from a section of the sports ground, under normal conditions. The calculations should take into account whether the exit route is flat or stepped.

In addition, it should be calculated based on the exit width of the narrowest point, for example this may be a vomitory or staircase leading to the final exit, rather than the width of the exit gate itself.

**d. Emergency exit capacity**

The emergency exit capacity is the number of people (that is, spectators and all other people present) that can safely exit from the sports ground, or section within it, under emergency conditions to a place of safety within a set time. The determination of that set time is based on an assessment of the levels of fire risk present throughout the exit route.

Similar to the exit capacity outlined above, the calculation for exiting under emergency conditions should take into account whether it is a flat or stepped route, along with the consideration of any parts of the exit route where narrowing of widths are found.

**e. Final capacity**

Having calculated each of the above figures, the final capacity of the sports ground, or section of it, will be determined by whichever is the *lowest* figure of the above four factors.

It is recommended that, whatever the style of safety certificate, the management of the sports ground should take responsibility for assessing the (P) and (S) factors and calculating the safe capacity and not leave this to the local authority. These should take account of all the recommendations in the Green Guide, not merely those with which the sports ground already complies. The (S) factor and, to a lesser extent, the (P) factor will reflect the Operations Manual and its underlying risk assessments or, in a prescriptive style certificate, the conditions included by the local authority.

Whoever is calculating the safe capacity should set a single (P) factor and a single (S) factor for each separate area of the sports ground. It should then use whichever is lower to determine the safe capacity of that area. It should neither multiply the (P) and (S) factors by each other nor adopt the average. Both these approaches would distort the final figure.

If the local authority is satisfied that the proposed (P) and (S) factors are reasonable and that the ground management's methodology and calculations are correct, it may accept the recommended safe capacity and promulgate it in the safety certificate. If it is not satisfied or if the ground management has not calculated the capacity itself, the local authority may set what it considers to be the safe capacity.

## **4.8 Red-line boundary**

The safety certificate should include the geographical extent (site plans) of the safety certificate conditions, often referred to as the red-line boundary plan. This boundary shows where the certificate or terms and conditions apply.



The certificate holder cannot be held responsible for circumstances outside their control, for example areas in Zone Ex, as discussed in the next section. Certificate conditions should only cover areas under direct control of the management of the sports ground.

The red-line boundary defining the extent of the Safety Certificate should include:

- a.** the viewing area;
- b.** concourse and associated spaces within the sports ground; and
- c.** could include external areas such as points of entry and car parking.

The permitted capacity of a regulated stand could be reduced because of circumstances in other areas of the sports ground that are not themselves covered by the safety certificate. Any Operations Manual should cover such areas whether or not they fall within the ambit of the safety certificate.

## 4.9 External factors

Zone Ex is the external zone which lies immediately beyond the outer perimeter of the sports ground, consisting of a network of routes or areas, often leading to transport hubs, and whose management is considered key to the safe and secure arrival and departure of spectators.

A certificate holder cannot be held responsible for circumstances outside their control, for example hazards presented by local industrial premises or restricted access for emergency vehicles because of congestion on the public highway, even if these could adversely affect the safety at the sports ground. The 1975 and 1987 Acts and the safety certificate do not cover safety beyond the boundary described within the certificate.

Although in most locations the routes or areas that make up Zone Ex fall outside the legal jurisdiction of the ground management, it is nevertheless incumbent upon them to ensure that all safety, security and service arrangements within that zone are integrated, co-ordinated and agreed by all key stakeholders prior to the event

The ground's Operations Manual should include any measures that its management can take to ensure reasonable safety at the ground when affected by such external factors. This should be in the form of a Zone Ex Co-ordination Plan, details of which are included in SG03: Event Safety Management. In brief, this should include:

- a.** Site plans and maps showing the agreed geographical boundaries of Zone Ex and the locations of key routes, gathering points, buildings and facilities within the zone.
- b.** The stakeholders actively engaged in Zone Ex and any agreed protocols regarding which individual(s) or stakeholder(s) will lead the event day Zone Ex co-ordination.
- c.** Details of personnel within Zone Ex, such as stewards, security personnel, or emergency services.
- d.** Resources within Zone Ex, such as CCTV, security measures and access points.
- e.** How communications will be co-ordinated within Zone Ex.



The local authority should take account both of external factors and of the proposed mitigating measures in any Operations Manual when agreeing the permitted capacity.

This is extremely important as it is fundamental to the safety of spectators that the areas external to a sports ground must also be able to accommodate the movement of the determined safe capacity of the stadium both in arrival, circulation and exiting at the end of an event both under normal and emergency conditions.

Whilst a sportsground cannot be subject to a condition to install measures on land that it does not own or control, any external factors which impact upon the safe arrival, movement and departure of the calculated safe capacity must be reflected in a corresponding reduction in that calculated safe capacity unless appropriate mitigating measures are put in place.

A Safety Advisory Group sub-group focused on Zone Ex can be a useful approach to bringing stakeholders together. This is detailed in [section 7.9](#).

## 4.10 Specified events

It was not the intention of the 1975 Act that all events held in any part of a designated sports grounds to which the public are admitted are required to be specified in a sports ground safety certificate. Section 2(1) of the 1975 Act provides that:

“A safety certificate shall contain such terms and conditions as the local authority consider necessary or expedient to secure the reasonable safety at the sports ground when it is in use for the specified activity or activities ...”

The 1975 Act does not define what can be included as a specified activity. However, section 12(1)(b) provides that it is an offence if:

“when a general safety certificate is in operation in respect of a sports ground spectators are admitted to a sports ground on an occasion when it is used for an activity to which neither the general safety certificate nor a special safety certificate relates”

A “spectator” is defined in section 17 as “any person occupying accommodation provided for spectators at a sports ground”.

Based on sections 12(1)(b) and 17, if persons are using the terracing or seating accommodation to view an activity at the sports ground, that activity should be specified in either the general safety certificate or a special safety certificate.

For example, a firework display which is to be viewed by spectators from the stands or a religious festival where an altar/stage is erected on the pitch and those attending sit in the stands would need to be included as specified activities as those admitted to the sports grounds would fall within the definition of a spectator as they are “occupying accommodation provided for spectators at a sports ground”.

Accommodation is not defined in the 1975 Act. However, the ordinary meaning of “accommodation” within the context of the Act suggests a contained, organised viewing area. Therefore, it might not always be the case that a safety certificate will only be required for those events for which people occupy existing standing terraces or seating decks to view the activity.



For example, if the existing standing terraces or seating decks are not used to view the activity, but instead another part of the sports ground is modified, for example by the installation of temporary structures, from which spectators will view the event, it should be considered a specified activity which will need to be covered by a safety certificate.

#### 4.11 **Deviations from guidance**

If there are safety management controls or physical attributes of the ground that do not follow the guidance in the Green Guide, we call this a deviation from the guide.

Section 1.8 of the Green Guide states it may be possible for both new and existing sports grounds to deviate from specific guidelines without detracting from the grounds overall safety, security and service provision. A deviation is acceptable if it provides the equivalent or a higher standard to that outlined in the Green Guide.

An example of this could be in a corner of a ground there may be more than 28 seats in a row which is the limit put in the Green Guide. However, if the ground management carries out a risk assessment to demonstrate the extra seats do not negatively impact the egress time from the viewing accommodation to a place of safety, the local authority could accept the deviation.

Where deviations occur, they should be recorded and kept with the safety certificate or included in an appendix. This provides an audit trail in the case of personnel change at the local authority and/or the sports ground. Where this has not previously been demonstrated, agreed and recorded, the local authority will normally need to scrutinise the particular risk assessments. If it is then satisfied, it should record the nature of the deviation and the reasons why it regards the alternative approach as acceptable.

**The SGSA has produced a template form to record deviations from the Green Guide.**

#### 4.12 **Demountable structures**

If a demountable stand of any size is erected at a designated sports ground, the ground management will need to undertake the necessary risk assessments as to its use and management and incorporate the outcome into any Operations Manual. For its part, the local authority will need to declare its safe capacity.

The position is less clear cut where a demountable covered stand with accommodation for 500 or more spectators is erected at a non-designated sports ground and is proposed as a temporary construction. Section 26 (11) of the 1987 Act defines a stand at such a sports ground as “an artificial structure (not merely temporary) which provides accommodation for spectators and is wholly or partly covered by a roof”. Home Office Circular 96/1988 explains that, by use of the phrase “not merely temporary”, the definition excludes temporary stands from certification.

The term “temporary” has not been further defined. It does not automatically cover all demountable structures. Some may remain in place for many years. A stand erected for one or more specific events should clearly be regarded as temporary. However, it would be difficult to argue this in relation to a stand that is to be used for a whole season of the sport in question. The local authority will need to assess every case having regard to its individual circumstances. In this context, it may be relevant to consider the Building Regulations definition of a temporary building. Where a demountable stand is not deemed to be a regulated stand, the local authority may still issue a prohibition notice under section 10 of the 1975 Act. This procedure is described in **section 8.4**.





Chapter 14 of the Green Guide offers guidance on the safety, design and management of demountable structures. **Annex D of the Green Guide provides a checklist of technical information** required for the approval of demountable structures by the appropriate authorities. Further detailed advice may be found in the fourth edition of **Temporary Demountable Structures: Guidance on Procurement, Design and Use**, published by the Institution of Structural Engineers.

Temporary demountable structures not used as spectator accommodation, such as television gantries, lighting towers, information boards or advertising hoardings may nevertheless affect the safety of people at the event. They should be covered in the Operations Manual (or, where there is no such manual, in the terms and conditions of the safety certificate), with particular attention being paid to their stability and fire safety.

# 5.0 Administrative processes

## 5.1 Local authorities policies and procedures

Local authorities will find it helpful to draw up written policies and procedures identifying the specific responsibilities of particular individuals or groups of staff involved in sports ground safety certification.

Setting out the policies and procedures a local authority will follow in discharging its responsibilities under the 1975 and 1987 Acts not only demonstrates that the authority takes ownership and understands the key issues involved, but also provides the authority with the opportunity to set out its objectives and the roles of individual staff in their delivery. It provides for greater consistency and efficiency when staff or organisational changes result in responsibility for sports ground safety being taken on by new staff, as well as ensuring that those delivering the service are aware of the performance standards.

The authority should therefore have written policies and procedures in place which clearly set out:

- how it will consider an application for, and the issue of, a safety certificate and special safety certificate;
- how it will monitor if the terms and conditions of the safety certificate are being adhered to and
- what action it will take if they are not.

Each procedure will be unique to an individual local authority, reflecting its structure but also incorporating best practice. The procedures should provide a systematic specification of all the routine work involved in the safety of sports grounds process in a documented format. The documents should be available to any member of staff at any time to assist them in ensuring the required standards are being met. It is recommended that these should also be available to the public to ensure they have a full understanding of what can be expected from the local authority.

The following general principles will apply and should be included in any policies and procedures produced by the local authority:

- a. All policies and procedures should contain a date of issue along with the author's name and the name of the individual or body that has approved it.
- b. They should be reviewed regularly and contain the date of last review.
- c. When published on the local authority's website it is advisable to include contact details, such as a postal address, telephone number and email address of the relevant department.



To support local authorities, the SGSA has developed a number of templates and checklists, noted throughout this guidance. These are all freely available for local authorities.

## 5.2 Rights of appeal

The 1975 and 1987 Acts provide a right of appeal to the magistrates' court for:

- a. any person against a determination by the local authority that he or she is not qualified to hold a safety certificate;
- b. any interested party against the inclusion of anything in, or omission of anything from, a safety certificate or the refusal of the local authority to amend or replace it (An 'interested party' is defined in section 5.5 of the 1975 Act);
- c. the applicant against the refusal of the local authority to issue a special safety certificate;
- d. any person, upon whom the local authority has served a notice that it has determined that a particular stand is a designated stand, against that determination; and/or
- e. any aggrieved person against a prohibition notice or an amendment to a prohibition notice (An 'aggrieved person' is defined in section 10A(7) of the 1975 Act). Further detail on prohibition notices are outlined at **section 8.4**.

Appeals must be lodged within 28 days if they relate to a general safety certificate and within seven days if they relate to a special safety certificate. If the appeal is against an amendment to the safety certificate, the original terms and conditions remain in force until the appeal has been determined. By contrast, any restrictions imposed under a prohibition notice remain in force unless or until amended or annulled by the court.

There is no statutory right of appeal against a condition that the SGSA has required a local authority to include in a safety certificate under section 13(2) of the 1989 Act.

## 5.3 Fees

The 1987 and 1988 Regulations empower the local authority to determine the fee to be paid in respect of an application for the issue, amendment, replacement or transfer of a safety certificate, or the cancellation of a certificate for a regulated stand. This fee shall not exceed an amount commensurate with the work actually and reasonably done by, or on behalf of, a local authority in respect of the application.

Local authorities can charge the reasonable costs incurred up to and including the cost of issuing the safety certificate as the regulations reflect only the administrative process and not oversight (such as during performance inspections, annual inspections, meetings, and so on) to ensure compliance.

It will be for the local authority to determine whether and, if so, how much of the work that it undertakes to determine whether to accept an Operations Manual (or any amendments) is chargeable. It should be noted that the local authority may only charge for amending the safety certificate in response to an application from the proposed or existing certificate holder.



## 5.4 Notices by the local authority

The safety certificate is a public document to which any person applying for it, or affected by it, should have access.

Both the 1987 and 1988 Regulations require the local authority to notify every interested party, as defined in the Regulations, in writing of its decision to issue, amend or replace, or refuse to amend or replace, a safety certificate. In the case of a refusal, the local authority must give its reasons.

This notice must specify that a copy of the safety certificate and any application is available for inspection at a specified time and place.

The local authority must also publish a similar notice in a local newspaper. Despite the advent of digital communications, this notice must continue to be published in a printed format. Accordingly, as the law stands, the notice must be published in the local paper to be effective. Local authorities can publish the notice on their website, but it must be in addition to publishing the notice in the local paper rather than as an alternative.

## 5.5 Safety certificate review, amendment and replacement

Section 4 of the 1975 Act and section 29 of the 1987 Act provide that the local authority may either amend or replace the safety certificate in any case in which this appears appropriate. It may do this either on its own initiative or in response to an application from the certificate holder. The SGSA has developed a [template policy for the issue and review of the general safety certificate](#) which can be used to outline the local authority's procedures.

### a. Review

As noted previously, there is no provision in the 1975 Act for a general safety certificate to be issued for a finite period. The same is true for a regulated stand certificate under the 1987 Act. It must be assumed, therefore, that such a certificate should run indefinitely, unless or until it is revoked, replaced or surrendered. However, as a matter of good practice it should be regularly reviewed by the local authority to ensure that the contents remain up to date and applicable to current conditions at the ground.

Ideally, the safety certificate and where required the Operations Manual should be reviewed annually. Where the sports ground is used on a seasonal basis, this review should take place in sufficient time for any necessary remedial work to be completed during the close season. At those sports grounds where events are held throughout the year, the local authority and certificate holder should liaise about the most sensible time for the annual review.

The safety certificate should also be reviewed following an incident or a near miss, as outlined in [\*\*section 5.6\*\*](#).

### b. Amendment

The local authority may need to amend a safety certificate to reflect changes at the sports ground. Planned changes may include those to the physical structure, safety management or the personnel identified in the safety certificate. While these may eventually lead to changes in capacity, an interim capacity calculation may be required while any construction work is carried out or new systems are



tested. Hence, section 8 of the 1975 Act and section 32 of the 1987 Act require the certificate holder to notify the local authority of any proposed alterations or extensions that are likely to affect safety at the ground.

In the same vein, the ground management should be required to notify the local authority of any proposed changes in the Operations Manual. These may occur at any time because the manual is a dynamic document. As notification of changes to the Operations Manual is not, of itself, a legislative requirement, the local authority will need to ensure that it appears as a condition in the safety certificate.

In some cases, the local authority may consider it necessary to recalculate the permitted capacity of part or all of the sports ground, either following an incident or because of deterioration in its structure, maintenance or management. This is most easily achieved by decreasing either the (P) or (S) factor as appropriate. Such decisions should be taken in accordance with laid down procedures and be formally recorded.

### **c. Replacement**

Replacing safety certificates can normally only be justified where the change of circumstances or the number and scale of the amendments makes this the most practical option. This would most commonly occur when a club moves to a new ground. In such cases, it would be sensible for the club and the local authority to move to a risk-based certificate if they have not already done so.

## **5.6 Review after an incident**

The local authority should formally review the general safety certificate as soon as reasonably practicable after any incident in which safety at the ground may have been put at risk or where doubts have been cast on the condition or management of the sports ground. Such a review should encompass both the wording of the safety certificate and the permitted ground capacity.

A risk-based certificate should include a condition requiring the holder to examine the Operations Manual following any incidents. It is also good practice for such a commitment to be included within the Operations Manual.

A “near miss” should always be treated as an incident for these purposes. A near miss is an event that, while not causing harm, has the potential to cause injury or ill health. It is not intended to apply to very minor incidents, but rather those that have the potential to be very serious. This will always be a matter of judgement rather than something that can be tightly defined in advance.

The local authority should always convene a meeting of the SAG as soon as possible after any significant incident or “near miss” at a sports ground in order to ascertain whether there were any breaches of the safety certificate and whether the Operations Manual and / or safety certificate should be amended.

This review should not be limited to the circumstances of the incident. It should identify and analyse any underlying safety weaknesses that need to be addressed. These weaknesses and the local authority’s response should be recorded in writing.

In addition to a review after an incident, the safety certificate and where required the Operations Manual should be reviewed annually. Where the sports ground is used on a seasonal basis, this review should take place in sufficient time for any necessary remedial work to be completed during the close season. At those



sports grounds where events are held throughout the year, the local authority and certificate holder should liaise about the most sensible time for the annual review.

## 5.7 Business continuity and resilience planning

The **Civil Contingencies Act 2004** requires local authorities to maintain plans to ensure that they can continue to exercise their functions in the event of an emergency so far as is reasonably practicable. This should include the safety at sports grounds function.

Business continuity management is a process that helps mitigate risks to the smooth running of an organisation or delivery of a service, ensuring continuity of critical functions in the event of a disruption, and effective recovery afterwards. It is about identifying those parts of service delivery that the organisation cannot afford to lose.

A local authority must be able to demonstrate that:

- a. business continuity plans are documented and regularly reviewed and tested to ensure resilience;
- b. plans are regularly reviewed by senior management, with an emphasis on continual improvement;
- c. staff resilience planning is in place to ensure continuity of the function; and
- d. staff are aware of what will be required of them to ensure continuity and have the necessary training and experience to undertake the roles they could be expected to perform.

**Further guidance on business continuity planning, including details of recognised standards can be found via Gov.uk.**

There are also recognised standards of practice which are available on the **Business Continuity Institute website**.

Planning and exercising for emergency situations minimises the impact of potential disruption. It also aids in the prompt resumption of service. In order to be successful, business continuity management must be regarded as an integral part of an organisation's normal ongoing management processes. And in doing so, it safeguards the interests of the key stakeholders and the reputation of the organisation. **Annex B of SG03: Event Safety Management outlines details of effective exercise planning.**

In addition, the local authority should have specific resilience plans for loss of key staff, for example through sickness, secondment, resignation, redundancy or retirement. Any resilience plan covering the safety certification function should include:

- who is responsible for the plan;
- identification of key roles and how they will be covered;
- clear job descriptions;
- details of the SAG chair and deputy/deputies; and
- competency and training requirements.

# 6.0 Monitoring

## 6.1 The need for monitoring

The achievement of reasonable safety at a sports ground is a continuous process that does not end with the production of an Operations Manual and / or the issuance of the safety certificate. The local authority must monitor the holder's compliance with the certificate's terms and conditions.

Under section 10b of the 1975 Act, it is the duty of the local authority to enforce the provisions of the Act and of the Regulations made under it and, for that purpose, to arrange for the periodic inspection of the designated sports grounds within its area. Section 34 of the 1987 Act imposes a broadly similar duty regarding sports grounds containing regulated stands. Further statutory guidance is given in Home Office Circulars 72/1987 and 97/1988.

The duty in section 34 of the 1987 Act applies to the whole sports ground. It is left to each local authority to determine, in light of its local knowledge, the extent of the inspection. This includes not only the general condition of the sports ground but also whether any events were scheduled which might attract unusually large numbers of spectators. This has proved particularly relevant when football clubs from divisions below the Football League have been drawn at home in the latter stages of the various Football Association cup competitions.

### a. Risk-based certificate monitoring

A risk-based certificate will include a condition or conditions requiring the holder to comply with the policies, plans and procedures set out in the Operations Manual. The monitoring by the local authority must include examining the extent of such compliance. However, while the safety certificate should require the holder to comply with the Operations Manual, it would be neither reasonable nor practicable for the local authority to monitor every detail of its content at all times. The ground management must be allowed to perform its functions and exercise its responsibilities without unnecessary restrictions being imposed. It will be necessary to identify and strike a balance between close oversight of the key issues that have a significant impact on safety at the ground and a more hands-off approach to those that can reasonably be left for the most part to the ground management.

**[The SGSA has developed a checklist for auditing the compliance of an Operations Manual \(available on its website\).](#)**

Any failure by the holder to follow the procedures set out in the Operations Manual should be dealt with by the local authority in the same way as it would have dealt with a holder not complying with the terms and conditions of a prescriptive style certificate. Advice on enforcement action is set out in **section 8 - Enforcement**.



**b. Prescriptive certificate monitoring**

The monitoring should examine compliance with the terms and conditions laid out in the certificate.

The **SGSA has developed a Monitoring and Inspection Policy template** (available via its website), which local authorities can modify for their individual needs and outline the procedures they will follow.

In essence, there are two main forms of monitoring carried out by the local authority:

- i. Annual inspection; and
- ii. During performance inspections (DPIs).

## 6.2 Annual inspection

The annual inspection of the sports ground by the local authority is not intended to duplicate work that should be undertaken by or on behalf of the certificate holder. Instead, it is designed to check that the certificate holder is complying with the provisions of the Operations Manual or the safety certificate conditions for properly maintaining the sports ground and its fittings and, ideally, for noting and agreeing remedial action on problems already identified by the certificate holder.

The certificate holder should be responsible for appointing suitably qualified persons to undertake the structural appraisals and the other inspections or tests prescribed in the Operations Manual. The local authority should check that the required inspections have taken place and that the persons concerned were duly qualified. Unless the authority has doubts about the independence, competence or approach of these persons, the submission of a certificate that the structure or fitting meets the appropriate requirements should normally suffice. Nevertheless, the local authority remains free to carry out sample testing if it considers this to be necessary. **Further guidance on annual inspections versus structural appraisals is available on the SGSA website.**

The Home Office Circulars 72/1987 and 97/1988 prescribe in considerable detail what is to be examined by or on behalf of the local authority as part of the annual inspection. In summary, this should encompass:

- a. the certificates covering structural, dynamic performance and electrical tests;
- b. the records maintained by the management of the sports ground, in particular, of attendances, accidents, maintenance, equipment tests, steward training and contingency plans;
- c. the condition of the sports ground and its fixtures and fittings; and
- d. the lighting, public address, fire warning and entry control equipment.

Many local authorities consider the advantages of a team approach to the annual inspection. This might involve the officers who represent the police, fire, ambulance and building authorities on the SAG. These visits can be carried out jointly as a team or on separate occasions for each officer to look at their discipline and provide feedback to the SAG chair.

**The SGSA has developed an annex detailing further information and checklist for local authorities to consider during the annual inspection.**





Local authorities should be mindful of the **Regulators' Code** when making on-site visits and providing tailored advice available to businesses. In other words, they should provide ground management with advice and assistance to improve its compliance.

### 6.3 During performance inspection (DPI)

The annual inspection of the sports ground constitutes one element of the monitoring by the local authority. It is equally important to have regard to the safety management – the (S) factor – when determining its safe capacity. The local authority should therefore also monitor both the certificate holder's general compliance with the Operations Manual or safety certificate conditions and such matters as:

- a. the safety culture of the ground management;
- b. the training, assessment, qualification and competence of the safety officer;
- c. the training, assessment, qualification and competence of the stewards and other safety personnel; and
- d. whether there are effective systems for identifying and tackling problems.

The scrutiny of records may indicate whether tasks have been performed; it may also give an impression of good or poor management. However, it cannot adequately convey whether the sports ground is being operated safely. The local authority can only monitor this effectively if it periodically observes the performance of the management immediately before, during, and after the event – in other words, conducting a during performance inspection (DPI). Such inspections can also help inform the local authority's assessment of how much oversight of the ground's performance is required.

When inspecting the sports ground during an event, the local authority should be sensitive to the operational responsibilities of its management. Any requests for access, in particular to the ground's control room, must be reasonable and should not distract safety personnel from the performance of their duties.

The local authority should record items examined on an inspection checklist, which can be used as an aide-memoire and attached to the officer's reports. **The SGSA has developed a DPI checklist template that can be adopted.**

The officer's report should be sent to the certificate holder and the safety officer of the ground, along with a copy to the SGSA inspector (for grounds subject to SGSA licensing). All inspections should be discussed at the following SAG meeting.

Where breaches in the terms and conditions of safety certificates are noted, these should be brought to the attention of the certificate holder and safety officer immediately and followed up by formal letters of confirmation. This is outlined further in **section 8 – Enforcement**.

### 6.4 Frequency of inspections

The 1975 Act states that the local authority should "arrange for the periodical inspection of designated sports grounds". Periodical is defined as "at least once every twelve months". For regulated stands with accommodation for over 2,000



spectators, the 97/1988 Circular lays down a minimum of one inspection in the calendar year following the issuance of the last safety certificate and once in every calendar year thereafter. In all other cases, the minimum is once in every two calendar years.

There is nothing to preclude the local authority from inspecting the sports ground more frequently. The number of inspections reasonably required will vary from venue to venue.

At most designated sports grounds, it will normally be sufficient for the local authority to inspect the structures and fittings once a year while the sports ground is empty. It might be sensible to conduct this inspection at different times each year, so that the sports ground can be observed under a variety of conditions. Further inspections are likely to be necessary only in the event of significant structural modifications.

However, the sports ground management's performance during events will need to be checked more frequently by DPIs, as outlined in [section 6.3](#). Without regular checks there is a risk of potentially hazardous situations developing unchallenged. The same considerations apply to the local authority's checks of the records of attendances, accidents, maintenance, steward training and contingency plans, though some of these could be carried out on non-event days.

The most sensible way for the local authority to identify how many inspections it might reasonably undertake during the year would be for it to require each venue to undertake an annual self-assessment as part of its review of its risk assessments and recommended capacities. The local authority should take this into account, along with any other relevant factors, in particular the management's compliance with the Operations Manual or safety certificate conditions. Improvements in safety management may lead to a reduction in the number of inspections.

In only the most exceptional cases would it be necessary for the local authority to be present at every event staged at the sports ground. Nevertheless, the local authority needs to be alerted quickly to anything that may affect safety so that it may take any necessary action as soon as practicable. It should also invite feedback from other sources, in particular, from the other agencies represented on the SAG who may attend events in the course of their normal duties. This should be seen as an adjunct to, not a substitute for, inspection by the local authority.

## 6.5 Inspection personnel

It is for the local authority to determine how best to undertake inspections. It must be satisfied that the inspecting officers are competent for that purpose. There is no legal requirement for inspections to be undertaken by staff from a particular professional discipline. As noted in [section 6.2](#), the local authority should consider the potential advantages of a team approach, particularly for the annual inspection.

The inspecting personnel may need to respond immediately if they become aware of a serious safety hazard. The local authority should therefore identify and formally record what enforcement powers it has delegated and to whom. Moreover, under section 11 of the 1975 Act or section 35 of the 1987 Act, any personnel who may need to exercise a right of entry to a sports ground must be formally authorised by the local authority. This too should be properly recorded in the minutes of the relevant committee.



## 6.6 **Records of inspections**

The local authority should maintain detailed records of all inspections as part of its audit trail. It may wish to consider sending a copy to the certificate holder, if only to ensure that there is no confusion about any need for immediate remedial action.

Written checklists are a useful tool when conducting inspections. The templates provided by the SGSA should be modified by local authorities to meet their requirements. They could, for instance, include references to other matters, such as environmental health, for which they may be responsible under other legislation. Moreover, it may not be practicable for a local authority to inspect every element of a very large ground on a single event day. Staff using the checklists should be encouraged to comment as fully as necessary on each item and not merely to tick entries on a form. This is particularly important where there are any deviations or problems since these will need to be noted in writing and investigated.

Where breaches of the terms and conditions of the safety certificate or non-compliance with the Operations Manual are noted, these should be brought to the immediate attention of the safety officer.

# 7.0 Safety Advisory Groups

## 7.1 Purpose of Safety Advisory Groups (SAGs)

Lord Justice Taylor's Reports into the Hillsborough Stadium Disaster in 1989 recommended that local authorities establish an advisory group, now generally known as a Safety Advisory Group (SAG), to provide specialist advice to the local authority so that it may effectively discharge its functions under the 1975 and/or 1987 Acts.

SAGs are an essential way of ensuring good liaison between stakeholders. They provide vital forums within which the local authority and other agencies may develop a joined-up approach to safety, while each exercising its own responsibilities. Without an effective SAG, a sports ground can end up being pulled in different directions by statutory agencies with varying priorities.

The SAG is an advisory body. It does not make decisions nor issue enforcement actions. Rather, it exists to assist a local authority in discharging its legal responsibilities.

In this guidance we refer to SAGs which are established to advise the local authority on their responsibilities under the 1975 and/or 1987 Acts, but many local authorities have also established SAGs to consider events which are not held in sports grounds with a General Safety Certificate. Whilst much of the guidance below can be seen as general good practice which could apply to a SAG established to consider any type of event, it should not be seen as wholly applicable to events held outside of sports grounds, as these are not subject to the same regulatory regime. (The [Emergency Planning College](#) has also produced a Good Practice Guide to Working in Safety Advisory Groups which provides further detailed information.)

## 7.2 SAG management and procedures

As the SAG fulfils an important oversight role for the local authority it should be properly constituted with effective procedures.

### a. Terms of reference

The terms of reference should encompass all matters falling within the purview of the local authority on stadium safety and should be reviewed regularly. They should also set out details including, but not limited to:

- i. the aim and objectives of the group;
- ii. role and responsibilities of the chair and any deputy, including how the group's work is reported to the relevant committee or cabinet member of the local authority;



- iii. core membership, along with an overview of the responsibilities of each member;
- iv. additional invited representatives;
- v. frequency of meetings;
- vi. means of addressing any conflict of interest; and
- vii. other process/procedure items, such as administration responsibilities, data protection or any SAG sub-groups.

**b. Procedures**

The local authority should provide the necessary level of secretarial and administrative support to the SAG and should lay down procedures for ensuring that it runs smoothly. The meeting should have a formal agenda with all members invited to submit agenda items, accompanied, where applicable, by written reports.

The local authority should also consider developing policies and procedures for SAG members to abide by, including, but not limited to:

- i. observing or being alerted to a safety weakness either during an inspection of a sports ground or when they are present in the course of their normal duties;
- ii. a near miss at a ground;
- iii. dispute resolution procedure, to outline the process for resolving issues that could arise between members; and
- iv. information sharing and confidentiality policy to avoid any confusion or difficulties over issues such as freedom of information and data protection.

**c. Chair**

It is strongly recommended that the SAG chair be an officer of the local authority responsible for issuing the safety certificate. This person should have sufficient seniority to be able to make decisions on behalf of their organisation and to liaise with the sports ground and stakeholders at all levels, but also be able to dedicate sufficient time to the role.

Whilst the SAG chair does not need to be an expert in safety at sports grounds, it is important that they are well-informed about the wider issues affecting the ground in question, as well as the specific challenges that are faced at a local level, and the liaison required to ensure that stakeholders are fully engaged with the group.

The overall duty of the SAG chair is to ensure that all partners work together towards the common goal of safety at a sports ground. It is the chair's responsibility to ensure the SAG meeting runs effectively, and that members of the group are engaged. In doing so, the chair must set the appropriate tone for the meeting, by ensuring appropriate questions are asked and actions recorded, but without becoming excessively formal or bureaucratic. Critically, the chair must be mindful of differing priorities for stakeholders and mediate if they can see things heading towards a difference of opinion.



**d. Resilience**

The local authority should ensure there are effective resilience and continuity plans in place to ensure that, when a member of the SAG retires or moves to a new post, a successor has already been identified and is ready to take the work forward without any delay. This applies particularly to the SAG chair or lead officer roles on whom the local authority may heavily depend. This is outlined further in **section 5.7**.

**e. Reports into the Council**

The SAG management may also produce regular written reports for the members' committee to which it is accountable. These should normally include the results of any monitoring visits by members of the SAG and details of any exercises by the certificate holder to test the sports ground's contingency plans.

## 7.3

### Membership

The SAG brings together stakeholders with responsibility for issues relating to safety at a sports ground. As it is an advisory group, there is no legislation determining the membership of the group. However, the membership should sufficiently include all agencies and other stakeholders impacted or with oversight of the sports ground for which the SAG covers. Where this membership becomes too unwieldy, the SAG chair may consider introducing sub-groups, to focus on a particular issue, such as Zone Ex. This is discussed further at **section 7.9**.

All representatives attending the SAG should be suitably senior, as they should be able to speak with knowledge and authority and be empowered to take operational decisions on behalf of their organisations, except where these raise new policy issues.

In his final report into the Hillsborough Disaster, Lord Justice Taylor outlined the appropriate membership of the SAG. In this, he stated: "representatives of the club and of a recognised supporters' organisation should be consulted, since they may have relevant suggestions or criticisms to make, but they should not be full members of the team". As such, the membership of a SAG should be made up of 'core' members and invited representatives.

#### Core members

**a. Local authority**

As stated in **section 7.2**, it is for the local authority to determine which officer shall chair the SAG.

SAG chairs may also wish to invite local authority staff from other departments, including those responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005, Health and Safety at Work etc. Act 1974 and Licensing Act 2003.

This may include, but not limited to, representatives from the following departments:

- i. Building control;
- ii. Highways;



- iii. Environmental health; and
- iv. Emergency planning.

In addition, some disciplines could be invited for specific issues, for example any local events co-ordinator.

**b. Police**

The 1975 Act states that the local authority has a duty to consult with the police in relation to the safety certificate. Therefore, the police should be a formal member of the SAG.

**c. Fire representatives**

Similar to the police above, the 1975 Act gives the local authority a duty to consult with the fire service on the safety certificate. Therefore, they should be a formal member of the SAG.

**d. Medical representatives**

Whilst the ambulance service is not a statutory consultee of the safety certificate, it is an important member of the SAG and should be invited to attend. Depending on the venue, there may be a requirement for more detailed discussions on medical issues, so a sub-group may need to be established – see **section 7.9** below.

**Invited representatives**

**e. Sports ground being discussed**

As a matter of principle, the safety certificate holder should be invited to all meetings of the SAG unless there is an explicit reason for excluding them on a particular occasion.

However, a sports ground is an invited representative, and not a core member in order for safety functions to be discussed in private if needed, for example in the case of any enforcement action.

Operational matters and any resultant recommendations regarding the safety certificate should be done with the sports ground as part of the discussions, in order to secure an informed debate. This should also ensure that they are aware of the issues underlying the local authority's requirements.

Alongside the safety certificate holder, the ground's safety officer should be invited. There may be benefit in extending the invitation to representatives of other functions within the club, such as health & safety or safeguarding, depending on the individual circumstances at the ground, and the matters which are on the agenda. In addition, it may also be useful to invite a representative of the club's medical provider, and sometimes their stewarding or security provider.

**f. Supporters group**

The Taylor Report into the Hillsborough Disaster recommended that the SAG should consult with representatives "of a recognised supporters' organisation on a regular basis". Many achieve this by inviting a representative of supporters to be a member of the SAG. This is strongly encouraged.



There can be difficulties in establishing the appropriate representation, particularly for grounds where there are multiple supporter groups. In addition, there may be issues around confidentiality when certain items (such as counter terrorism) are discussed. This can be overcome with procedures for such circumstances outlined in the terms of reference.

Local authorities are encouraged to consult representatives of a recognised supporters' group where possible or have arrangements in place that ensure supporter's views are represented.

**g. Sports Grounds Safety Authority (SGSA)**

The SGSA is not a formal member of a SAG. However, SGSA Inspectors can attend meetings in respect of those football grounds which fall within its regulatory oversight. SGSA Inspectors are there as independent advisers who are present at the invitation of the local authority.

**h. Others**

It will be for the SAG chair to invite any other representative or group which may be relevant. These may be permanent members of the group, or invited for a specific period of time.

## **7.4 Safety Advisory Group agenda and papers**

To support the effective management of the SAG, the secretariat should circulate the agenda, relevant papers and minutes of the previous meeting sufficiently in advance.

Whilst the meeting should not be overly formal, there should be sufficient structure in place to ensure that the appropriate issues are considered by the group.

**a. Agenda**

There should always be a written agenda, issued in advance, and minutes should be taken, by someone who is not the chair.

An agenda should be developed ahead of the meeting. This may include standing items including, but not limited to:

- i. ground updates, such as events, alterations, installations, development work, etc;
- ii. stewarding;
- iii. medical arrangements;
- iv. incidents;
- v. changes to the Operations Manual;
- vi. inspection reports;
- vii. new or revised guidance;
- viii. security arrangements;
- ix. safety certificate; and
- x. Zone Ex.





In addition, there may be set items for each organisation represented at the meeting to give an update or raise any current issues or questions.

**b. Confidential items**

Where confidential matters are to be discussed (commonly referred to as Part B of the SAG), particularly in relation to counter terrorism activities, arrangements should be made for the issues to be discussed in a separate meeting, or part of the meeting, of the SAG where only those needing to be engaged are present. Separate confidential minutes might also be required for that part of the meeting to prevent issues arising in relation to the unwitting release of sensitive material.

The precise membership of this smaller SAG meeting will be dictated by local requirements and protocols in relation to information sharing agreements. It is important that the privacy of counter terrorism documents is preserved and that the attendance at discussions is restricted to those who need to be present. The handling and sharing of all documents relating to police counter terrorism advice and the ground counter terrorism plans should be in accordance with a suitable and agreed security marking scheme, for instance the **Government Security Classification Scheme**.

The process for dealing with counter terrorism matters confidentially could also be used to deal with other sensitive matters. It is for the local authority to determine membership of other such meetings.

## 7.5 Minutes of the Safety Advisory Group

The production of accurate and timely minutes of SAG meetings provides a vital audit trail and ensures that key discussions are recorded and actions reviewed.

In addition, it is good practice to maintain an action log separate to the minutes, which allows each individual action to be followed through to completion and progress updates to be added.

Accurate minute taking is particularly important when new sports grounds are under construction or existing ones are undergoing a major redevelopment. In such cases, the situation may change on an almost daily basis. The local authority, advised by the SAG, may need to reach decisions at very short notice, often during a visit to the site. Unless all these decisions are recorded at the time and the minutes are agreed as soon as possible thereafter, they risk giving rise to debate and possible recriminations at a later date.

It is also essential to record why the ground management has proposed, the SAG has supported, and / or the local authority has accepted any deviations from the recommendations of the Green Guide when setting the capacity of the sports ground. The onus will be on the local authority to demonstrate that it has acted reasonably. (**Section 4.11** outlines further information on deviations from the Green Guide.)

Similarly, the minutes should record the reasons for any amendments to the terms and conditions in the safety certificate. In the absence of such information, the local authority could be vulnerable to an appeal by the certificate holder. Such minutes do not themselves constitute the amendment to the safety certificate. The local authority must formally issue a written amendment.



SAG minutes, along with any papers presented at the meeting, would be subject to a Freedom of Information (Fol) request. The [\*\*Information Commissioner's Office\*\*](#) provides full details on the responsibilities of public bodies in relation to Fol.

## 7.6 **Audit trail and record keeping**

SAG meeting minutes constitute an important part of the audit trail for the local authority. It should ensure there are procedures in place for:

- a. the annual inspection of the sports ground and the annual review of the safety certificate have been completed;
- b. any identified safety weaknesses in the ground and / or the contents or implementation of any Operations Manual have been analysed and addressed;
- c. any incidents involving an actual or potential threat to the safety of people at the ground have been debriefed and the lessons learned have been implemented;
- d. any recommendations of the SAG have been properly reported to the local authority;
- e. the decisions of the local authority have been properly communicated to all interested parties;
- f. these recommendations and decisions have been followed up and fully implemented; and
- g. this action has been reported back to the SAG and subsequently to the local authority.

The records and information held should comply with the local authority's retention policy.

The SGSA reviews the audit procedures in place as part of its local authority audit assessments.

## 7.7 **Frequency of meetings**

The local authority should always convene a meeting of the SAG as soon as possible after any significant incident or "near miss" at a sports ground in order to ascertain whether there were any breaches of the safety certificate and whether the Operations Manual and / or safety certificate should be amended.

Such cases apart, the number of SAG meetings in any year will largely depend upon the particular circumstances of the sports ground concerned. Good practice shows that a local authority is likely to require a minimum of two meetings of the SAG per year to perform effectively, even if the sports ground has an up-to-date Operations Manual and safety certificate, and the ground is well managed with no significant problems.

By contrast, experience has shown that, during the planning and building stages of a major sports ground redevelopment, the SAG will need to meet much more frequently, perhaps monthly, to deal with the many issues raised by the contractors, architects and the certificate holder.



The local authority should balance the need to retain a sufficient overview against its desire to avoid overburdening a certificate holder who is acting responsibly. In the majority of cases, three or four meetings per year would seem reasonable. It is helpful for all agencies involved to schedule the meetings well in advance, perhaps doing so at the start of the season or calendar year.

## 7.8 Combined Safety Advisory Groups

The local authority would normally maintain a separate SAG for each sports ground with a safety certificate in its area. However, where the membership of these SAGs would substantially overlap, the local authority may decide that one SAG may cover several sports grounds.

There are cases of sports grounds that cut across local authority boundaries, and the authorities concerned have set up a single SAG. The local authority should formally record these arrangements in the terms of reference.

## 7.9 Safety Advisory Groups sub-groups

In certain circumstances, it may be advisable to form additional sub-groups to discuss specific topics. This will enable certain issues to be discussed in full and with an expanded range of stakeholders that do not necessarily need to form part of the overarching SAG.

These should be effectively chaired by a representative of the main SAG. There should be appropriate terms of reference which set out the purpose, role and membership of the group and procedures to ensure that points of discussion are able to be noted by the main SAG. Sub-groups are not decision-making bodies. However, they should be constituted to allow for recommendations to be made through the main SAG to the local authority for decision.

The requirement of the sub-group will be a decision for the main SAG. Topics which could be referred to a sub-group include medical provision and Zone Ex, which could also encompass traffic management and transport plans.

### a. Medical Advisory Group

A Medical Advisory Group (MAG) could be set up to oversee medical and first aid provision at a sports ground and to report into the SAG. The group could cover topics including logistical and clinical issues, medical and ambulance provision, liaison with the emergency services, training and annual reviews, and any other issues that may be relevant locally, or in relation to specific sports or events. The membership could include the ground's medical co-ordinator, event doctor(s), the Safety Officer, medical and first aid providers and the local NHS Ambulance Service.

### b. Zone Ex Group

By its very nature, Zone Ex is likely to include numerous stakeholders who may not be relevant for the main SAG. Therefore, a Zone Ex sub-group could be beneficial to develop a multi-agency approach with all stakeholders to co-ordinate the management of Zone Ex on an event day (see [section 4.9](#) for detail on Zone Ex). This is particularly true with large venues with complex land ownership adjacent to the venue.



Membership for this group may include, but not be limited to:

- i. the local authority;
- ii. the police;
- iii. the local highways authority;
- iv. the land owner(s);
- v. local and regional transport operators;
- vi. local car park operators;
- vii. agencies supplying staff and/or stewards deployed in Zone Ex;
- viii. local disability access officers;
- ix. local residents and community groups;
- x. local pubs, bars and restaurants; and
- xi. local shops and businesses.

# 8.0 Enforcement

## 8.1 Enforcement options

The local authority may need to respond quickly to any incident that puts people at risk or any safety weakness identified by or to its inspecting personnel. This is particularly important if the terms and conditions of the safety certificate appear to have been contravened and / or if the ground management is failing to comply with its own Operations Manual. The local authority should ensure that it has the necessary powers, policies and procedures in place to enable it to take any appropriate action in a timely manner.

In this context, the risk-based safety certification provides local authorities with the same enforcement powers as a prescriptive certificate.

The response of the local authority must be proportionate to both the urgency and the seriousness of the case. It may choose between the following enforcement options:

- a. a reduction in the permitted capacity of all or part of the sports ground (see [section 8.2](#));
- b. the issuance of a prohibition notice (see [section 8.4](#)); or
- c. in the event of a breach of the safety certificate conditions, a warning, simple caution or prosecution (see [section 8.7](#)).

## 8.2 Reduction in the capacity of a sports ground

If an incident suggests that the management of a sports ground is performing poorly, the local authority should review the (S) factor and hence the capacity of the sports ground or a particular section of the ground. The same applies if there has been no incident but the sports ground management's overall performance during an event appears deficient and / or it does not appear to be fully in control. Similarly, if the local authority's inspecting personnel identify any deficiencies in the fabric, equipment, records or management systems, that the authority has not already taken into account when accepting or calculating the permitted capacity, it should review either the (P) or (S) factor as appropriate. Guidance on this can be found in Chapter 2 of the Green Guide.

Any new capacity should be properly calculated having regard to the change in circumstances. The local authority should follow the same procedures as during the routine annual review of the safety certificate. It should invite the ground management to submit its proposed revised (P) or (S) factor, while reserving the right to overrule this if appropriate. Wherever possible, the two parties should also agree a programme of remedial measures or improvements. Once these have been



implemented, the local authority should consider restoring the original capacity. There is a clear onus on the local authority to act reasonably and in accordance with due process, not least because the certificate holder has a right of appeal against any reduction in capacity.

### 8.3 **Appeal against a reduction in capacity**

Appeals against a reduction in capacity imposed by way of an amendment to a safety certificate or against a prohibition notice are to be submitted to a Magistrates Court within 21 days.

Where an appeal is made against an amendment to a safety certificate, the amendment cannot take effect until the appeal is heard.

### 8.4 **Prohibition notices**

Unlike the other provisions of the 1975 and 1987 Acts, the power to issue a prohibition notice applies to all sports grounds, as defined in section 17 of the 1975 Act, including those that are neither designated nor contain a regulated stand.

Section 10 of the 1975 Act empowers the local authority to issue a prohibition notice for all or part of any sports ground if it considers that the admission of spectators involves a risk to them that is so serious that, until steps have been taken to reduce it to a reasonable level, admission of spectators ought to be prohibited or restricted. The prohibition may be general or may apply to a particular event.

A prohibition notice is a measure of last resort. Therefore, it should only be used where an amendment of the safety certificate is not considered an effective way of dealing with the risk(s). In practice, it is likely to be required only if the problem is urgent or the certificate holder or management of the sports ground appears unable or unwilling to rectify the situation before the next event.

A prohibition notice must specify:

- a.** the nature of the risk to spectators; and
- b.** the number of spectators that may be admitted to the sports ground.

The notice may also include the steps that need to be taken to reduce the risk to a reasonable level.

If the local authority considers and states in the notice that the risk to spectators is or may be imminent, the notice takes effect as soon as it is served. In all other cases, it comes into force at the end of the period specified in the notice. The local authority may amend or withdraw the notice at any time.

Under the Environment and Safety Information Act 1988, the local authority is required to keep a register of any prohibition notices that it has issued.

Local authorities need to ensure that any requirement in a prohibition notice is clear and specific. A general statement that the certificate holder shall comply with the Operations Manual to the satisfaction of the local authority would be inappropriate because it would leave the requirements unclear and at the whim of the local authority. By contrast, it would be acceptable to require the certificate holder to comply with the Operations Manual or to specify ways in which this should be achieved.



The [Department of National Heritage Circular of 16 November 1995](#) outlines the powers and responsibilities under section 10 of the Safety of Sports Grounds Act 1975, which allows local authorities to issue prohibition notices for sports grounds if they are of the opinion that spectators are likely to be at serious risk of injury.

## 8.5 Procedures for issuing prohibition notices

The local authority needs to ensure that it can, if necessary, issue a prohibition notice at very short notice and without reference to senior officers or to members. In accordance with its standing orders, the local authority should formally identify the officers who may serve any prohibition notices on its behalf, the extent of their delegated powers, and the circumstances in which they may be used. The officers concerned are likely to be those who already conduct inspections on event days.

The system of prohibition notices depends upon the local authority having effective administrative machinery in place. In particular, there is unlikely to be time to locate the required form and prepare a prohibition notice after the problem has arisen. The necessary documentation should be drawn up in advance on a contingency basis. It may be advisable for the authorised personnel to carry a blank pro forma that can be filled in and signed on the spot. [A template prohibition notice for local authorities to modify and use is available from the SGSA website.](#)

The local authority must send copies of any prohibition notice to the chief officer of police and, where it is not itself that authority, the fire authority or the building authority. It should be aware that no prohibition notice may include any directions, compliance with which would require the provision of police, unless the chief officer of police has consented to their inclusion. Only the chief officer of police may determine the extent of that provision.

## 8.6 Appeals against a prohibition notice

An aggrieved person may appeal to the magistrates' court against a prohibition notice within 21 days of the serving of the notice. However, the bringing of an appeal does not suspend the operation of the notice or any amendment to it. If the prohibition notice is to apply to a single event, the local authority should, wherever possible, serve it well in advance so that any aggrieved person has a reasonable opportunity to exercise this right of appeal.

Any restrictions imposed under a prohibition notice remain in force unless or until amended or annulled by the court.

## 8.7 Penalties for contravention of the safety certificate

It is an offence for any responsible person, not merely the certificate holder, to contravene the terms and conditions of a safety certificate or a prohibition notice. These offences, along with the defence of absence of consent and due diligence, are listed in section 12 of the 1975 Act and section 36 of the 1987 Act.

Where it appears to the local authority that an offence, however minor or technical, may have been committed, it should consider its response, having regard to the facts and merits of the case and taking care to apply the normal rules of evidence.



**a. Warning**

In very minor cases, particularly if the certificate holder has immediately taken action to prevent any repetition, the local authority may determine that no further action is warranted, though it may wish to warn those responsible regarding their future conduct.

**b. Simple caution**

In more serious cases, for example where people have been put at risk but the offence appears to be an isolated oversight, the local authority might wish to administer a simple caution (previously referred to as a formal caution).

A simple caution should only be issued for offences where there is no imminent risk or where the offence is readily admitted and immediate action has removed that risk. A caution can be used to:

- deal quickly and simply with less serious offenders;
- to divert the management from unnecessary appearance in court; and
- to reduce the chances of their re-offending.

A record of that caution is required to be kept by the local authority.

If the offender commits a further offence, the caution may influence the decision to take a prosecution.

**c. Prosecution**

In the event of persistent or flagrant breaches of a safety certificate, or those which have seriously prejudiced spectator safety, the local authority could consider bringing a prosecution under the 1975 or 1987 Act.

The decision to prosecute is very significant and must be related to risk. In general, it should be reserved for those who:

- blatantly disregard the law; and/or
- refuse to implement basic legal requirements and who put the public at risk.

Factors that should be considered when deciding to prosecute include, but are not limited to:

- the previous history of the defendant/organisation;
- availability, co-operation and reliability of witnesses;
- the willingness of persons involved to put matters right;
- the probable public benefit and importance of the case;
- whether other action, such as prohibition notices would be more effective; and/or
- any explanation offered by the defendant.

Before deciding to proceed with a prosecution, local authority officers must be satisfied that there is relevant, admissible, substantial and reliable evidence that the offence has been committed by the defendant and that there is a realistic prospect of conviction.





Whilst the primary purpose of this guidance is to provide advice to local authorities on the certification of sports grounds under the 1975 and 1987 Acts, local authorities should be mindful that action under other regulatory processes may be more appropriate in some circumstances.

The Health and Safety at Work Act 1974, the Licensing Act 2003 and the Regulatory Reform (Fire Safety) Order 2005 all provide routes by which a local authority can address safety. Procedures should be in place to gain the assistance of other departments or authorities where such action is appropriate.

## 8.8 Consistency and procedures

In line with both the [Enforcement Concordat](#) and the [Regulators' Code](#), all local authorities should promote consistency and accountability when taking enforcement action.

An enforcement policy and procedure should clearly set out how the local authority aims to ensure that enforcement is fairly applied. This can be evidenced by the following principles:

- a. proportionate in applying sports ground law and ensuring compliance;
- b. consistency of approach;
- c. targeted enforcement action;
- d. transparency about how the local authority operates and what those regulated may expect; and
- e. accountability for the local authority's actions.

**[A template enforcement policy is available from the SGSA.](#)**

## 8.9 Conflict of interest

Where a local authority is the owner or part owner of a sports ground for which it is also the enforcing authority there may be a potential for an actual or a perceived conflict of interest. In such cases, enforcement policies should include a clear statement of the local authority's approach to premises in which it may have an interest, such that it will:

- apply its enforcement policy and practice in the same way that it does for all other premises and duty holders; and
- have arrangements in place to identify and resolve potential conflicts of interest.

It is also important that a local authority has plans and contingencies in place for dealing with those exceptional circumstances where a conflict of interest has come to light after an incident has occurred.

In addition, the local authority should identify whether any potential conflicts of interest are introduced or removed when governance arrangements change.



# References and links

The below outlines useful links to documents referred to throughout this guidance.

## Legislation

Safety of Sports Grounds Act 1975 (the 1975 Act): <https://www.legislation.gov.uk/ukpga/1975/52>

Fire Safety and Safety of Places of Sport Act 1987 (the 1987 Act): <https://www.legislation.gov.uk/ukpga/1987/27>

Football Spectators Act 1989: <https://www.legislation.gov.uk/ukpga/1989/37/contents>

Health and Safety at Work etc. Act 1974: <https://www.legislation.gov.uk/ukpga/1974/37>

Regulatory Reform (Fire Safety) Order 2005: <https://www.legislation.gov.uk/uksi/2005/1541/contents>

Sporting Events (Control of Alcohol etc.) Act 1985: <https://www.legislation.gov.uk/ukpga/1985/57/contents>

Private Security Industry Act 2001: <https://www.legislation.gov.uk/ukpga/2001/12/contents>

Sports Grounds Safety Authority Act 2011: <https://www.legislation.gov.uk/ukpga/2011/6/contents/enacted>

Licensing Act 2003: <https://www.legislation.gov.uk/ukpga/2003/17/contents>

Building Safety Act 2022: <https://www.legislation.gov.uk/ukpga/2022/30/contents>

## Historic circulars

There are a wide-ranging set of Government department (in particular the Home Office) circulars which provide detail on the interpretation and application of primary legislation. They are useful, but often overlooked, pieces of guidance for enforcing authorities.

The [SGSA website contains copies of each of the circulars](#):

As an overview, the purpose of each Circular is as follows:

**Department of National Heritage Circular 16 November 1995** – purpose to remind local authorities about the powers and responsibilities under the 1975 Act to issue prohibition notices.

**Home Office Circular 97/1988** – outlines the frequency and scope of the inspections of the regulated stands. It also reminds local authorities that section 34 of the Act applies to the whole of a sports ground which contains a regulated stand but that the extent of the inspection of any un-certificated parts of the ground should be determined by the local authority.

**Home Office Circular 96/1988** – outlines the implementation of the regulated stands certification process.

**Home Office Circular 19/1988** – outlines the implementation of Part 4: indoor sports licences of the Fire Safety and Safety of Places of Sport Act 1987.



- Home Office Circular 72/1987** – Outlines the scope of inspections of designated sports grounds.
- Home Office Circular 71/1987** – relates to the implementation of Part 2 of the Fire Safety and Safety of Places of Sport Act 1987, including how these provisions impact the 1975 Act.
- Home Office Circular 7/1986** – provides a reminder of the powers, duties and functions of local authorities under the 1975 Act, linking it to the Local Government Act 1985, outlines the requirement to consult fire authorities on a safety certificate application and defines a sports ground and a stadium.
- Home Office Circular 5/1986** – outlines the findings of the Report into the Bradford fire disaster, and the new safety measures introduced in line with the Report’s recommendations, including the extension of the definition of designated grounds to include rugby union, rugby league and cricket.
- Home Office Circular 54/1985** – outlines the recommendations arising from the interim report following the Bradford fire disaster including the requirements to consult the police on a safety certificate application and the inclusion of first-aid facilities in the safety certificate.
- Home Office Circular 187/1976**– advises on the procedure for dealing with special safety certificate applications.
- Home Office Circular 130/1976** – outlines the procedure to follow regarding applications for general safety certificates.
- Home Office Circular 150/1975** – outlines the implementation of the Safety of Sports Grounds Act 1975, with specific reference to the findings of the Inquiry into Crowd Safety at Sports Grounds following the Ibrox Disaster in 1971.

## SGSA guidance and documents

Guide to Safety at Sports Grounds (Green Guide): <https://sgsa.org.uk/green-guide/>

Supplementary Guidance 03 Event Safety Management: <https://sgsa.org.uk/document/sg03-event-safety-management/>

Alternative Uses of Sports Grounds: <https://sgsa.org.uk/document/alternative-uses-of-sports-grounds/>

SGSA website: [www.sgsa.org.uk](http://www.sgsa.org.uk)

### Templates available on the SGSA website:

- General safety certificate application form
- Regulated stand certificate application form
- Model risk-based safety certificate
- Variation / deviation from the Guide to Safety at Sports Grounds (Green Guide) template
- Issue and review of safety certificate policy template
- Monitoring and Inspection Policy template
- During performance inspection (DPI) checklist template



- Enforcement Policy
- Prohibition notice template
- Operations Manual audit template
- Annual inspection checklist

## **Other useful documents**

**Emergency Planning College:**

**[Good Practice Guide to Working in Safety Advisory Groups: Part 1](#)**

**[Part 2: Supporting appendices](#)**

**[Part 3: Examples of safety advisory group practices](#)**



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