

SGSA Regulatory Activities Consultation

April 2026



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A. Introduction

The purpose of this consultation is to canvas the sector on changes to the regulatory activities of the Sports Grounds Safety Authority (SGSA). The consultation predominantly focuses on the All-Seater Policy Enforcement Approach, which outlines the processes the SGSA will use to enforce the all-seater licence conditions under statutory powers in the [Football Spectators Act 1989](#).

Why is the consultation happening now?

In July 2022, the football sector secured a historic change of policy, with the introduction of licensed standing for grounds subject to the all-seater licence conditions. This has seen engineering solutions being used to address the known safety risks associated with persistent standing in areas designed for seating.

Since this change, persistent standing has reduced significantly in England and Wales due to the commitment of grounds and the sector to address the risks.

But more work is needed. Most football grounds still see fans persistently standing in seated areas. Established, independent research has found that persistent standing leads to involuntary and uncontrolled crowd movements and subsequent related safety risks.

This All-Seater Enforcement Approach document reinforces our sustained efforts to address persistent standing in seated areas, using a measured, proportionate approach that reflects the fact the legislation has been in place for some time.

What does the consultation cover?

Following an internal review, the SGSA is proposing changes to how grounds are assessed on the compliance with the all-seater policy.

The majority of the content remains the same, in particular the ‘initial steps’ and ‘further actions’ grounds are expected to take to demonstrate compliance with the all-seater licence conditions.

The proposed changes are focused on a revised approach for assessing compliance with the all-seater policy. The revisions relate to the internal processes for assessing compliance, adjusting the method based on the experience gathered since 2019/20.

The SGSA is proposing the evaluation of compliance will be based on two overarching components and supporting assessments:

- **Foreseeable risk** – the extent to which safety risks could be reasonably anticipated based on the existing control measures in place.
 - Is there currently identified persistent standing at the ground?
 - Has there been a persistent standing-related incident and/or ‘near miss’ at the ground?
- **Confidence** – the level of assurance that the ground’s arrangements will address the risks and achieve compliance.



- Has the ground already undertaken further action to address persistent standing?
- Does the ground accept that more remains to be done?
- Does the ground have a plan in place with a reasonable timeframe?
- Are there any technical issues related to the construction/layout of the ground?

The methodology for these assessments, along with full detail of what these mean in practice can be found on page 21.

Oversight and Licensing Policy

The Oversight and Licensing Policy outlines how the SGSA will discharge its oversight and licensing powers under the Football Spectators Act 1989.

The Policy has been reviewed and amended to more clearly reflect the SGSA's statutory position in relation to events other than designated football matches.

The change is reflected in a proposed new paragraph 24, under the sub-heading 'Events other than designated football matches', and a consequential amendment at paragraph 16.

The change has been made to more clearly reflect SGSA's statutory remit in relation to oversight of local authority safety certification. It removes any potential ambiguity so that it is clear that for events held at SGSA licensed grounds other than designated football matches (for example concerts or other sporting events), the SGSA does not have regulatory powers.

In practice, local authorities and grounds will be able to continue to ask SGSA Inspectors for advice and guidance. However, this will be limited solely to advice and guidance. A local authority or ground should not take this advice and guidance as a directive from the SGSA.

How can I provide feedback?

The consultation period will run from Thursday 16 April 2026 until 5pm on **Monday 1 June 2026**.

The SGSA will be hosting a special webinar for SGSA licensed grounds and related Safety Advisory Group members, to discuss the proposals outlined in this document.

Responses can be made via the following link <https://www.surveymonkey.com/r/SGSARegulatoryActivitiesConsultation> or by using the response form separately attached.

Information about the consultation can be found on the SGSA website: www.sgsa.org.uk/regulatory-activities-consultation.



B. All-Seater Policy – SGSA Enforcement Approach

Overview

This is a new section added to provide an overview of the Enforcement Approach, the SGSA's regulatory principles and the compliance assessment criteria.

In July 2022, the football sector secured a historic change of policy, with the introduction of licensed standing for grounds subject to the all-seater licence conditions. This has seen engineering solutions being used to address the known safety risks associated with persistent standing in areas designed for seating.

The introduction of seats incorporating barriers or seats with independent barriers has had a positive impact on safety and the fan experience. Most critically, the introduction of this infrastructure drastically reduces the risk of a progressive crowd collapse. Additional benefits have also been identified around fan behaviour and improved crowd management.

The SGSA has taken a deliberate, targeted approach with the roll out of licensed standing and safe standing infrastructure. This has also been reflected in our Persistent Standing Enforcement Approach and related engagement activities. We are confident in the approach being used and the positive impact it has on safety and fan experience.

Since this change, the level of persistent standing and the risks it creates have reduced significantly in England and Wales due to the commitment of grounds and the sector to address the risks.

But more work is needed. Fans persistently standing in seated areas is still a significant occurrence. Established, independent research has found that persistent standing leads to involuntary and uncontrolled crowd movements and subsequent related safety risks.

This All-Seater Enforcement Approach document sets out our objectives and operating model that will be used to drive our ongoing efforts to address persistent standing in seated areas. It outlines the measured, proportionate approach that we will be taking, and reflects the fact the legislation has been in place for several years.

Our message is simple: seats without any safe standing infrastructure are for sitting only. If fans persistently stand in seated areas, whether home or away, the ground has a duty and legal responsibility to address this known safety risk.

Regulatory principles

Since its first publication in July 2019, the All-Seater Enforcement Approach has provided a framework and actions for clubs to address the risks and ensure compliance with the all-seater requirements.

This updated version builds on the previous editions, and seeks to provide greater clarity and transparency on how the SGSA will conduct risk-based evaluations of whether a ground is compliant with the all-seater requirement.



Our regulatory activities are based on the following principles:

- **Evidence-based** – our decisions and actions are grounded in verifiable, documented information and data, drawn from our own inspection and assessment processes other reliable sources.
- **Risk-based** – our regulatory efforts are prioritised according to the likelihood and severity of harm, with activities proportionate to the assessed risk level.
- **Collaborative** – our actions and activities are based on constructive engagement, cooperation and dialogue in order to achieve the desired outcomes.

All-seater compliance assessment

This updated version of the All-Seater Enforcement Approach, based on the experience gathered since 2019/20, seeks to provide greater clarity and transparency with a revised approach to how the SGSA will assess compliance with the all-seater policy. As detailed fully in paragraphs 33-41, the evaluation of compliance will be based on two overarching components and supporting assessments:

- **Foreseeable risk** – the extent to which safety risks related to persistent standing could be reasonably foreseen based on the existing control measures in place. The assessment will be based on the following two factors
 - Is there currently identified persistent standing at the ground?
 - Has there been a persistent standing-related incident and/or ‘near miss’ at the ground?
- **Confidence** – the level of assurance that the ground management’s arrangements will address the risks and achieve compliance in a timely and a robust manner. The assessment will be based on the following four factors:
 - Has the ground already undertaken further action to address persistent standing?
 - Does the ground accept that more remains to be done?
 - Does the ground have a plan in place with a reasonable timeframe?
 - Are there any technical issues related to the construction/layout of the ground?

These evaluations will be based on evidence gathered from a range of sources, including matchday inspections, ground assessments and information from the ground and local authority.

Other changes

Additionally, SGSA has taken the opportunity make some further proposed changes to aid clarity and transparency. The summary of all the changes being considered are detailed at Annex A.

How to use the document

This document builds on the consistent and proportionate approach adopted by SGSA in previous seasons in relation to the enforcement of the all-seater licence conditions under statutory powers in the [Football Spectators Act 1989](#). That approach has helped to facilitate



ongoing constructive engagement with grounds about the spectator safety risks associated with persistent standing in seated areas, and the agreement of voluntary mitigation measures at those grounds identified as higher risk.

The SGSA will work with ground management to address issues, liaising with relevant local authorities, in line with their safety certification responsibilities. Any SGSA enforcement options under the 1989 Act will be tailored to the risk and compliance levels for each ground.

The SGSA will, subject to the nature of risk and compliance issues encountered, adopt a graduated scale of actions, as outlined in this document, to give ground management every opportunity to take all initial steps and appropriate further action to comply with the all-seater licence conditions and/or licensed standing conditions.

It is highly recommended that ground management review this document and use it as a blueprint to address the safety risks associated with persistent standing in seated areas.

QUESTION

1. Does the summary provide a useful overview of the All-Seater Policy Enforcement Approach?

Yes / Somewhat / No / No opinion

Please outline the reason(s) for your response.

2. Do you agree or disagree with the Regulatory Principles outlined?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response.



Introduction

There are minor amendments to the Introduction to clarify the outcomes SGSA wants to achieve through implementation of the enforcement approach.

1. The Sports Grounds Safety Authority (SGSA) is the UK Government's expert body in respect of sports ground safety. The SGSA supports sports grounds, clubs, local authorities and others to create a safe and enjoyable experience for spectators.
2. The Government's current policy in respect of all-seated grounds dates from the start of the 1994/95 season and is enforced by way of conditions set out in the licence issued by the SGSA in respect of premises where designated football matches are played in England and Wales¹ (henceforth "ground(s)").
3. Where grounds are required to be all-seated, the SGSA is instructed by the Secretary of State for Culture, Media and Sport to include all-seater licence conditions restricting the admission of spectators to seated accommodation. Since July 2022 the Secretary of State has allowed SGSA to amend these licence conditions to enable those all-seater grounds which demonstrate compliance with licensed standing criteria to operate licensed standing areas.
4. This document explains:
 - a. SGSA's overall objective of ensuring compliance with the all-seater and licensed standing licence conditions;
 - b. What voluntary steps ground management should take to avoid breach of the all-seater and licensed standing licence conditions, in particular in relation to persistent standing² in seated areas of those grounds subject to the Government's current all-seater policy;
 - c. The enforcement options available to SGSA in relation to the all-seater and licensed standing licence conditions; and
 - d. How SGSA makes decisions to enforce the all-seater and licensed standing licence conditions.
5. This latest document builds on the consistent and proportionate approach adopted by SGSA since the original version of the document was published ahead of the 2019/20 season. That approach has helped to facilitate ongoing, constructive engagement between SGSA and individual grounds about the spectator safety risks associated with persistent standing, and the agreement of voluntary mitigation measures at those grounds identified as higher risk. This updated version seeks to provide greater clarity and transparency with a revised approach to how the SGSA will assess compliance with the all-seater policy.

¹ A designated football match is defined under the [Football Spectators \(Designation of Football Matches in England and Wales\) Order 2000](#) as "any association football match which is played at Wembley Stadium, at the [Principality] Stadium in Cardiff or at a sports ground in England and Wales which is registered with the Football League or the Football Association Premier League as the home ground of a club which is a member of the Football League or the Football Association Premier League at the time the match is played".

² In this document persistent standing is defined as when individuals in seated areas stand for prolonged periods of time other than for short durations during moments of excitement.



6. The document also details how the SGSA will discharge its statutory oversight of local authorities' safety certification responsibilities. It supplements the SGSA's [Oversight and Licensing Policy](#), and should be read in conjunction with that Policy.
7. SGSA believes in firm but fair regulation. When undertaking enforcement activities SGSA is mindful of better regulation principles in the Regulators Code³ and the need for such action to be transparent, proportionate, consistent and targeted where the risks are greatest. Additionally, SGSA's enforcement approach recognises the respective roles and responsibilities of interested parties in relation to the Government's all-seater policy, including individual grounds subject to the policy, relevant local authorities, police services, football governing bodies, and supporters.
8. In implementing this enforcement approach at SGSA licensed grounds, the outcomes SGSA wants to achieve are as follows:
 - a. Ensure arrangements, equipment and procedures at grounds are such as reasonably required to minimise risks to spectator safety;
 - b. Except in licensed standing areas, ensure spectators watch a designated football match from seated accommodation;
 - c. Except in licensed standing areas, stop the incidence of persistent standing from occurring or continuing at designated football matches; and
 - d. Identify and address breaches of all-seater and licensed standing licence conditions and deter future such breaches.
9. As with previous editions, this document will continue to be kept under review to ensure it remains appropriate and fit for purpose and revised as necessary.

COMMENT

There are only minor amendments to the Introduction. However, a comment box is available if you would like to make any comments on the contents of this section.

³ The Regulators' Code came into statutory effect on 6 April 2014 under the [Legislative and Regulatory Reform Act 2006](#) and provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate. For further details see: [Regulators' Code - GOV.UK](#).



SGSA statutory role under the Football Spectators Act 1989

There have been no changes to this section.

10. The SGSA has powers under the [Football Spectators Act 1989](#) (the 1989 Act) to issue licences to admit spectators to grounds which are used for designated football matches in England and Wales. The 1989 Act states the purpose of such licences are “to provide for the safety of spectators...”. It makes it an offence for a club/stadium operator to admit spectators for such matches without a SGSA licence or to contravene any term of a licence. The 1989 Act has a broad reach, which can be summarised as: the proper control of the admission of spectators, including the arrangements to which they are admitted, in the interest of those present during the event, and the proper running of the event.
11. The SGSA’s role when issuing licences includes ensuring that:
 - spectator safety is secured;
 - the ground and any equipment and procedures at the ground are such that only authorised spectators are admitted to designated football matches; and
 - the arrangements, equipment and procedures at the ground are such as reasonably required to prevent offences at designated football matches.

The SGSA has power to impose additional licence terms or conditions where it considers that such action would be appropriate.
12. Offences for breach of a licence condition, or for admitting spectators without a licence, are subject to a defence⁴ that the offence took place without the responsible person’s⁵ consent and that the responsible person took all reasonable precautions and exercised all due diligence to avoid the commission of the offence.
13. The SGSA also has powers under the 1989 Act to oversee local authorities in their regulation (under the [Safety of Sports Grounds Act 1975](#)) of safety at all football grounds that are used for designated football matches in England and Wales (see also paragraph 47).
14. The Government’s all-seater policy does not allow standing accommodation at Wembley Stadium, the Principality Stadium, and the grounds used by clubs who have been in the Premier League or EFL Championship for more than three years in total since the start of the 1994/95 season, with the exception of licensed standing grounds – see paragraph 15 below. The policy is administered and enforced through two conditions in the licences issued by the SGSA (outlined in b. and c. in paragraph 15 below).

⁴ Sections 10(14) or 9(2) of the [Football Spectators Act 1989](#).

⁵ ‘Responsible person’ in this context will normally mean the ground management (which in most cases means the club).



15. Following the Government announcement of 4 July 2022⁶, those grounds currently subject to the all-seater licence conditions outlined above, and who can demonstrate compliance with licensed standing criteria (see **Annex B**), are permitted by the Secretary of State for Culture, Media and Sport to operate licensed standing areas. The licensed standing criteria have been informed by independent evaluation by CFE Research on five ‘early adopter’ grounds in the 2021/22 season, which confirmed the positive impact on safety of licensed standing areas⁷. The first three conditions are consistent with other all-seater grounds (with the first condition a feature of all SGSA licences), while the fourth and fifth conditions are specific conditions governing the operation of licensed standing areas:
- a. The licence holder shall permit any person authorised by the Secretary of State or the Sports Grounds Safety Authority to:
 - (i) enter at any reasonable time the premises to which this licence applies; and
 - (ii) make such inspection of the premises and such enquiries relating to them as he considers necessary for the purposes of Part 1 of the Football Spectators Act 1989.
 - b. Only seated accommodation is to be provided for spectators at a designated football match; and
 - c. Spectators shall only be admitted to watch a designated football match from seated accommodation.
 - d. The licence holder need not comply with conditions b. and c. above in respect of seats incorporating barriers or seats with independent barriers, where SGSA has confirmed in writing for the purpose of this paragraph that:
 - (i) such accommodation meets the standards for the time being set by the SGSA; and
 - (ii) the management of spectators within such accommodation meets the standard required by SGSA to ensure their safety.
 - e. SGSA may at any time, by notice in writing to the licence holder, vary or withdraw any confirmation it has given in respect of accommodation for the purposes of condition d. above.

COMMENT

There are no changes to the ‘SGSA statutory role under the Football Spectators Act 1989’ text. However, a comment box is available if you would like to make any comments on the contents of this section.

⁶ Statutory instrument [SI 2022/78](#) was laid on 4 July 2022, which revoked all existing all-seater orders, and replaced them with a single direction from the Secretary of State to SGSA imposing new requirements as respects to the seating of spectators at designated football matches.

⁷ For further details see SGSA website: [Licensed standing conditions and research](#).



Key roles and responsibilities of other interested parties

There have been no changes to this section.

16. **Ground management**, in most cases the club, is primarily responsible for the safety of spectators, for enforcing the ground regulations and the SGSA licence conditions, and for making 'reasonable adjustments'⁸ to provide suitable accommodation for disabled spectators. A match specific risk assessment for the ground should form the basis of how ground management discharges these responsibilities.
17. Responsibility for the safety certification of grounds at which designated football matches are played rests with **local authorities** discharging their powers under the [Safety of Sports Grounds Act 1975](#) (the 1975 Act). Under the 1975 Act a local authority⁹ is responsible for issuing a general safety certificate for a ground. The local authority needs to be satisfied that the ground management can prevent contravention of the terms and conditions of the certificate (for example through appropriate policies and procedures) to ensure the 'reasonable safety'¹⁰ of all people who attend 'specified activities' at the ground, including designated football matches. The local authority is also the enforcing authority in relation to the [Health and Safety at Work etc. Act 1974](#).
18. Additional background on the roles and responsibilities of all interested parties, including spectators, is at **Annex C**.

COMMENT

There are no changes to the 'Key roles and responsibilities of other interested parties' text. However, a comment box is available if you would like to make any comments on the contents of this section.

⁸ Under the terms of the [Equality Act 2010](#).

⁹ The unitary authority is responsible for issuing safety certificates and for enforcing the [Health and Safety at Work etc Act 1974](#). In two tier authorities, the County Council is responsible for issuing safety certificates, with the District/Borough Council responsible for enforcing the Health and Safety at Work etc Act 1974.

¹⁰ Sections 2(1) and 3(1) of the [Safety of Sports Grounds Act 1975](#).



SGSA's all-seater licensing responsibilities

There is one minor amendment in this section at paragraph 21 to highlight that SGSA Inspectors will take account of the actions of ground management, and the history of any previous licence breaches or offences.

19. The primary purpose of the Government's all-seater policy is to help ensure spectators are kept safe when they watch designated football matches played at home grounds used by clubs in the Premier League or the Championship for at least three years since the 1994/95 season, plus Wembley Stadium and the Principality Stadium.
20. In carrying out the SGSA's statutory functions in relation to the licensing of designated football grounds subject to the all-seater policy, SGSA Inspectors will primarily be concerned with seeking evidence that spectator safety is being managed in accordance with the all-seater licence conditions, and with securing spectator safety, including the safety risks associated with persistent standing in seated areas.
21. SGSA Inspectors will consider evidence supplied by the ground management, whether directly or via the relevant local authority, including, but not limited to:
 - health and safety risk assessment(s) for the ground and associated operations manual;
 - match specific risk assessment(s); and
 - the persistent standing management plan.

SGSA Inspectors will consider the evidence on its merits and make judgments about a number of factors including the actions of ground management in managing persistent standing and, more generally spectator safety. In particular, whether ground management is effectively managing both the nature and scale of persistent standing and the associated risks to spectator safety, when set in the context of the specific ground's infrastructure and the history of previous breaches of the licence and/or offences.

COMMENT

There are only minor amendments to the 'SGSA's all-seater licensing responsibilities' text. However, a comment box is available if you would like to make any comments on the contents of this section.



Urgent and immediate enforcement action

There is one minor amendment to this section, to include a new footnote in paragraph 22b to the relevant section of the Football Spectators Act 1989.

22. Where SGSA Inspectors identify evidence, or have evidence brought to their attention, that represents an immediate and significant risk to spectator safety, they will take urgent action, consulting the relevant local authority as necessary (see also the flow diagram at **Annex D, Figure 1**). The type of urgent action by SGSA Inspectors will vary depending on the precise nature of the immediate and significant safety risk and it should be noted that the below are **not** mutually exclusive:
- a. Informing the relevant local authority, who may then judge that urgent action is needed using that local authority's safety certification powers under the 1975 Act (see also paragraphs 45-46 and **Annex E**), where the immediate and significant safety risk arises from non-compliance with one or more of the terms and conditions of the general safety certificate of the ground; and/or
 - b. Using SGSA's powers under the 1989 Act¹¹ to direct the relevant local authority to include particular terms and conditions in the general safety certificate (see also paragraph 47) in appropriate circumstances. This may include, for example, cases where there is evidence that the basis on which the safety certificate was granted has altered requiring additional measures to secure reasonable safety, or where the SGSA considers that the local authority is not discharging its safety certification responsibilities appropriately; and/or
 - c. Formal enforcement action by the SGSA through the licensing regime under the 1989 Act (see also paragraphs 48-63) where there is an immediate and significant safety risk arising from non-compliance with one or both all-seater conditions. This may include, for example, cases where a ground is openly selling tickets to standing areas despite this being prohibited, or selling tickets to inappropriate seated accommodation, such as where seating is locked up and therefore not available to spectators to watch the match from a seated position.

COMMENT

There is only one minor amendment to the 'Urgent and immediate enforcement action' text. However, a comment box is available if you would like to make any comments on the contents of this section.

¹¹ Section 13(2) of the [Football Spectators Act 1989](#).



'Initial steps' and 'further action' to demonstrate compliance with the all-seater licence conditions

There is one amendment in this section, within paragraph 25 (a).

It has been amended to be clear that the relocation of standing supporters to lower tiers and gradients of less than 25 degrees is only a short-term mitigation, and that risks to spectator safety arising from persistent standing are still present even at lower tiers/rakes.

Additionally, paragraph 23 has been shortened to focus the narrative on steps ground management should take, paragraph 27 has additional narrative about the overall objective of the further action options at paragraph 25, and paragraph 28 has updated narrative to reflect the latest position in relation to the implementation of licensed standing areas.

23. The SGSA will look for evidence that the ground management is visible and active in taking all reasonable precautions and in exercising all due diligence to discourage persistent standing in seated areas and thereby manage spectator safety risks. This evidence may include, but not be limited to, SGSA's matchday inspections observations, and any ground management team matchday observations requested by SGSA (see also paragraph 51). The causes and potential impact of persistent standing in seated areas, including the safety, crowd management, and customer care issues arising from such spectator behaviour, are detailed at **Annex F**.

Initial Steps

24. **Initial steps** to discourage persistent standing and thereby comply with the all-seater licence conditions could include one or more of the below. In taking such initial steps, the SGSA recognises that no single step alone is likely to address the safety risks comprehensively, and that such initial steps need to be kept under regular review as part of driving continuous improvement (see paragraph 24i below). The SGSA further recognises that such initial steps may also manage wider spectator safety risks beyond those associated with persistent standing:
- a. Ground management work with both home and away supporters in the context of their customer charter to identify why they are standing and how best to address this. Ground management use the information received from this spectator engagement to inform their approach to managing persistent standing.
 - b. Ground management produce and keep under review a programme for educating and persuading their home supporters about why they must sit. This covers safety, crowd management and other customer care issues (see **Annex F**) and explains the likely consequences should spectators continue to stand persistently.
 - c. Ground management ensure that season ticket holders and home supporters are clearly advised that it is a condition of entry that they sit and that a deliberate failure to do so is likely to result in the withdrawal of the ticket without compensation and



refusal of entry. Season ticket holders and those receiving their tickets in advance by post, or electronically, should be given this warning in writing.

- d. Ground management may wish to warn away supporters that if they stand in seated areas they risk losing entitlement to tickets. Ground management will need to co-operate with other grounds/clubs, to ensure they treat all spectators equally both in terms of raising awareness of the all-seater condition in the ground regulations, and in the way in which that condition is enforced.
- e. Ground management takes positive action to ensure that all gangways and vomitories are kept clear at all times, along with such measures as may be necessary to prevent uncontrolled migration by spectators standing in seated areas, for example:
 - closely controlling access to certain areas;
 - ticket checks;
 - taking certain rows of seats, or seats near gangways, out of use; and,
 - raising the height of front barriers on raised seating decks (upper tiers) and vomitories.
- f. Ground management uses accessibility audits to understand how best to meet their obligations under the [Equality Act 2010](#) and thereby ensure that disabled spectators are not prevented from seeing the pitch by others standing, even for short periods, in seated areas. Where views are obstructed in this way, the ground management should take the row or rows of seats causing the obstruction out of use.
- g. Ground management, informed by knowledge of the nature and scale of persistent standing at the ground, ensures the Persistent Standing Management Plan for the ground recognises the particular triggers (excitation and thrust) which can lead to a progressive crowd collapse, and details the mitigation to manage such triggers, for example, stopping crowd surfing and/or elaborate goal celebrations by spectators.
- h. Ground management, informed by knowledge of the nature and scale of persistent standing at the ground, ensures that the Crowd Disorder and Anti-Social Behaviour Plan for the ground mitigates the risks of anti-social behaviour, including in persistent standing areas of the ground, for example through ticket checks to ensure appropriate segregation of supporters, and bag/personal searches to stop inappropriate items entering the ground.
- i. Ground management regularly measures the nature and scale of persistent standing at the ground to assess the efficacy of the initial steps already undertaken and to inform further action as part of driving continuous improvement (see paragraph 25 below).

Further Action

25. If a particular ground management can demonstrate that all initial steps have been taken in a robust manner to discourage standing in seated areas and thereby comply with the all-seater licence conditions along the lines detailed in the previous paragraph, the SGSA anticipates the focus of its regulatory activity will be on working with ground management to take **further action** using voluntary measures. This is to ensure ground management manages the safety risks associated with those spectators who are continuing to stand so as to bring the ground back into compliance with the all-seater



licence conditions. In such circumstances, the SGSA will liaise closely with the relevant local authority given the clear relevance of safety certification under the 1975 Act. Appropriate further action by the ground management could include use of one or more of the following options either individually or in combination with each other. However, option a. (spectator relocation) will not on its own provide a sufficient and sustainable solution to addressing risks to spectator safety associated with persistent standing, and should only be considered for use in conjunction with one or more of the other options.

- a. Ground management, informed by feedback from home and away supporters, relocate spectators who persistently stand in upper tiers, and on seating decks with gradients in excess of 25 degrees to lower tiers and seating decks with gradients less than 25 degrees. This will address the known heightened safety risks associated with persistent standing at higher gradients, and should be accomplished using ticket sales, marketing and communications prior to match day. This should help limit persistent standing to certain discrete areas of the ground with lower gradients where the spectator safety risks are lower but still present. In doing so, ground management recognises that safety risks still exist and takes all initial steps to ensure the safety of spectators in such areas and appreciates that such sales and marketing intervention is only a short-term mitigation and does not address sustainably the wishes of supporters who choose to stand.
- b. Ground management, in consultation with the relevant local authority and SGSA Inspector, take steps voluntarily to reduce capacity and density in areas of the ground where persistent standing continues to take place.
- c. If all other mitigation measures have been tried, ground management, in consultation with the relevant local authority and SGSA Inspector and informed by relevant guidance including the sixth edition of the Guide to Safety at Sports Grounds (Green Guide)¹² and Supplementary Guide 01 (SG01): Safe Standing in Seated Areas¹³, install seats incorporating barriers, or seats with independent barriers, in those remaining areas. This is in order to reduce the risk of progressive crowd collapse.
- d. For those grounds that are subject to the all-seater policy on a voluntary basis¹⁴, ground management in consultation with the relevant local authority and SGSA Inspector and informed by relevant guidance including the Green Guide¹⁵, replaces seated areas with other forms of spectator accommodation such as terracing to prescribed standards¹⁶ or seats incorporating barriers/seats with independent barriers.

26. The SGSA will keep under regular review the way in which ground management implements voluntary measures to manage the safety risks for those spectators who are continuing to choose to stand. The SGSA will do so through matchday inspection

¹² The Guide to Safety at Sports, colloquially known as the 'Green Guide' (Sections 12.19-12.25), is the SGSA's guidance on spectator safety at sports grounds.

¹³ For further details see the SGSA website: [SG01: Safe standing in seated areas](#).

¹⁴ Defined as grounds that are used by clubs who have **not** been in the Premier League or the Championship for more than three seasons since the start of the 1994/95 season, but whose ground management has nonetheless chosen to provide seated accommodation only (see also paragraph 12 for which grounds are automatically subject to the Government's all-seater policy).

¹⁵ See Sections 13.1-13.24 of the Green Guide.

¹⁶ For further details see SGSA website: [Terracing](#).



activity, as well as regular dialogue with ground management and the relevant local authority. The SGSA will assess whether the current action being taken by ground management using voluntary measures is sufficient to manage the safety risks associated with persistent standing, and if not, whether further action is required to manage any identified residual risk.

27. In circumstances where safety risks associated with persistent standing continue to be identified at a ground, SGSA expects ground management to take action of the kind outlined at paragraph 25 above. The precise nature of that further action will depend on the specific nature of the residual risks identified and the individual characteristic of the ground in question. SGSA expects, however, the focus of such further action by ground management will be one or more of the three options articulated at paragraphs 25b-c. inclusive, so as to ensure the ground is brought back into compliance with the all-seater licence conditions.
28. The specific further action highlighted in the preceding paragraph has already taken place at a number of SGSA licensed grounds since the then Government announcement of 4 July 2022¹⁷ paving the way for the introduction of licensed standing areas. Further details about the current number of licensed standing grounds are available on the SGSA website here: [Licensed standing - SGSA](#). Case study examples of effective installation of new infrastructure are available from the SGSA website here: [Licensed standing case studies](#), highlighting what can be done to address persistent standing risk in different contexts.
29. In undertaking the further action outlined at paragraphs 25 and 27 above, the SGSA expects to see evidence of ground management undertaking meaningful engagement with their club's home supporters to help inform the nature and scale of any proposed new infrastructure. The SGSA recognises, however, that ultimately the decision about whether to install new infrastructure will be for ground management, driven by a need to address the identified risk to spectator safety and comply with the all-seater licence conditions.
30. Where ground management decides to take further action in the form of the installation of areas of seats incorporating barriers and/or seats with independent barriers, the SGSA anticipates that such infrastructure will be available for both home and away supporters to ensure equality of choice for both sets of supporters. The SGSA accepts, however, that the capacity of home and away areas may differ. Furthermore, whilst such installation of seats incorporating barriers and/or seats incorporating barriers may not result in an immediate application from ground management to operate licensed standing areas, the SGSA does expect such an application within two years of the new infrastructure first coming into use by spectators so that they can realise fully the benefits of such infrastructure in terms of improved spectator safety.
31. In exceptional circumstances where ground management can demonstrate that the demand for standing accommodation is limited to either one of home or away supporters but not both, SGSA will consider waiving the need to provide seats incorporating barriers and/or seats with independent barriers for both sets of supporters. The SGSA will consider each case on its individual merits.

¹⁷ Statutory instrument [SI 2022/78](#) was laid on 4 July 2022, which revoked all existing all-seater orders, and replaced them with a single direction from the Secretary of State to SGSA imposing new requirements as respects to the seating of spectators at designated football matches.



32. Since the 2018/19 season SGSA licensed grounds have had the opportunity to engage with their local Inspector and local authority and then address persistent standing risk. Moreover, the Government's announcement of 4 July 2022 means there is now a well-established option available to those grounds subject to the all-seater policy to apply to operate licensed standing areas. If there is limited or no evidence of further effective action being taken along the lines outlined at paragraphs 25 and 27 in response to residual safety risks arising from persistent standing, SGSA will move to formal enforcement action as outlined at paragraph 48 onwards.

QUESTION

3. Do you agree or disagree with the amendment at paragraph 25a to make clear that the relocation of spectators to tiers of lower gradients is only a short-term mitigation?

Agree / Partially agree / Disagree No opinion

Please outline the reason(s) for your response.

There are three other minor change to the 'initial steps' and 'further action' section (paragraphs 23, 27, and 28). A comment box is available if you would like to make any comments on the contents of this section.



SGSA all-seater risk categorisation

This is an entirely new section, and main purpose of this consultation.

It is recommended you read this section carefully and provide answers to the questions, providing additional rationale and reasoning as required.

33. The SGSA aims to ensure its enforcement response under the 1989 Act is proportionate, appropriate to each situation, and targeted where the risks are greatest. Without prejudice to circumstances in which urgent action is merited (see paragraph 22), SGSA will categorise spectator safety risk and the extent of compliance with the all-seater policy as a necessary pre-cursor to taking formal enforcement action.
34. The assessment of all-seater risk categorisation has two components:
 - a. the nature and scale of persistent standing and the extent to which it poses a **foreseeable risk** to the safety of spectators; and,
 - b. **confidence** in the ground management's ability to address such risk to spectator safety in a timely and robust manner.
35. At the outcome of the assessment process, SGSA will place each SGSA licensed ground into one of five main categories shown immediately below:
 - a. Higher Foreseeable Risk/Lower Confidence
 - b. Higher Foreseeable Risk/Higher Confidence
 - c. Lower Foreseeable Risk/Lower Confidence
 - d. Lower Foreseeable Risk/Higher Confidence
 - e. No persistent standing risk identified
36. SGSA will assess the risk to spectator safety arising from persistent standing on an ongoing basis, using evidence from SGSA matchday inspections, together with other evidence supplied by ground management and/or the relevant local authority.

Persistent Standing and Risk to Spectator Safety

37. For each SGSA licensed ground, SGSA will use the following two factors to assess the **foreseeable risk** to spectator safety arising from persistent standing.
 - a. Is there **currently identified persistent standing** at the ground and thereby a risk to spectator safety?

SGSA assessment will be based principally on the persistent standing risk scores for the ground, as generated following SGSA matchday inspections. The methodology used to calculate these scores is at **Annex G**. Identified persistent standing at a ground will generate a risk score in a range from 1 (lower risk) to 5 (higher risk). SGSA recognises that matchday inspections normally only happen two-three times per season at each ground, so SGSA may judge it appropriate to request additional information about levels of persistent standing from ground management and/or the relevant local authority to help supplement SGSA's own matchday inspection observations.



- b. **Has there been a persistent standing-related incident and/or a ‘near miss’ at the ground in the past?** For example, a progressive crowd collapse, and/or persistent standing-related injuries to spectators. If so, has there been lesson learning from the incident(s), and action taken (as defined in paragraphs 25 and 27) to avoid a repetition?

SGSA will use information from a range of sources, including, but not limited to, SGSA matchday inspections, information requests to ground management and/or relevant local authority, and desk research, to identify whether in the past there has been a progressive crowd collapse at the ground and/or injuries to spectators arising directly from persistent standing. And, whether there has been effective lesson learning by ground management following such incidents.

38. Additionally, SGSA will use the following four factors to assess for each SGSA licensed ground the extent of **confidence** in the relevant ground management team to address any identified persistent standing risk at a ground in a timely and a robust manner.

- a. Has the ground management **previously undertaken any of the further action** outlined at paragraphs 25 and 27 above to start to address robustly the historic observed persistent standing risk at the ground, but more remains to be done?

SGSA will use its own written records to confirm whether ground management has previously undertaken some of the further action to address persistent standing risk as outlined at paragraphs 25 and 27.

- b. **Does ground management accept that more remains to be done** in terms of further action as outlined at paragraphs 25 and 27 to address robustly the current identified persistent standing risk at the ground?

SGSA will use its own written records, most notably exchange of correspondence with the senior decision maker in ground management and lead officials at the relevant local authority, to confirm whether ground management has accepted that more needs to be done at the ground in terms of further action as outlined at paragraphs 25 and 27.

- c. **Does ground management have a detailed and funded plan to undertake further action in a reasonable timeframe** to address the current identified persistent standing risk at the ground?

SGSA will use its own written records, most notably exchange of correspondence with the senior decision maker in ground management and lead officials at the relevant local authority, to judge whether ground management has a detailed and fully funded plan in place to address persistent standing risk at the ground in terms of further action as defined at paragraphs 25 and 27. The written plan will need to demonstrate how the work will be funded and completed:

- i. In a timely manner; and
- ii. In a robust manner, using one or more of the further action options at paragraphs 25 and 27 to mitigate effectively the identified persistent standing risk and to



sustain supply/demand equilibrium, thereby providing sufficient seats with standing infrastructure for the number of fans who choose to stand at the ground.

- d. Are there **technical issues** associated with the construction/layout of the spectator accommodation in the areas where identified persistent standing risk is taking place at the ground which make it disproportionately challenging to be able in a phased manner to install seats incorporating barriers or seats with independent barriers? Will such technical issues delay installation until:
- i. an international break/close season; and/or
 - ii. identified structural/physical issues can be addressed fully, for example through construction of a new stand/ground?

SGSA will use its own written records, and exchange of correspondence with the senior decision maker in ground management and lead officials at the relevant local authority to judge whether there are identifiable technical issues that make it disproportionately challenging for ground management in a phased manner to install seats incorporating barriers or seats with independent barriers infrastructure in the areas of the ground where persistent standing is taking place.

Note – SGSA will NOT consider fixture congestion to be a technical issue within scope of this factor.

39. Additional to the six factors outlined in paragraphs 37 and 38, SGSA Inspectors will also take account of any other information they collect in the course of undertaking SGSA regulatory responsibilities¹⁸, that is relevant to the assessment of the risk of persistent standing-related incidents at the ground and/or SGSA's confidence that ground management will address the risk in a timely and a robust manner. Such information will include, but not be limited to, information gathered through ground assessments and local authority audits¹⁹. For example, information relating to planned ground redevelopment, away fan relocation, short notice ground sharing by two or more clubs, successive promotions resulting in sharp increases in ground attendances and/or frequency of high-risk fixtures.
40. Throughout this risk categorisation process for each SGSA licensed ground, there will be an ongoing dialogue between the SGSA, ground management, and, as appropriate, the relevant local authority.
41. The flow diagrams at **Annex D** (Figures 1-2) illustrate how the SGSA's risk categorisation approach is anticipated to work in practice, with any formal SGSA enforcement action under the 1989 Act targeted where the identified risks are greatest.

¹⁸ Sections 10(8), 13(6) and 13(7) of the [Football Spectators Act 1989](#).

¹⁹ For further details about ground assessment and local authority audits see: <https://sgsa.org.uk/regulatory-support/sgsa-licence/>



QUESTIONS

4. Do you agree or disagree with the proposal to assess all-seater risk categorisation with the two components outlined in paragraph 34?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response.

5. In considering the proposed factors to assess the foreseeable risk to spectator safety arising from persistent standing:

a. Do you agree or disagree with the two factors outline in paragraph 37 a and b?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response.

b. Do you agree or disagree with the proposed evidence-base for the assessments, as outlined in paragraph 37 a and b?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response. In particular, if you disagree, please outline alternative evidence approaches you would like to see used.

6. In considering the proposed factors to assess the confidence in the relevant ground management team:

a. Do you agree or disagree with the four factors outline in paragraph 38 a to d?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response.

b. Do you agree or disagree with the proposed evidence-base for the assessments, as outlined in paragraph 38 a to d?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response. In particular, if you disagree, please outline alternative evidence approaches you would like to see used.

7. Please provide any other comments you have on the all-seater risk categorisation section.



Licensed standing criteria compliance assessment

There have been no changes to this section.

42. For those grounds subject to the all-seater policy and operating licensed standing areas, SGSA Inspectors will periodically assess compliance with the safety management aspects of the licensed standing criteria, using evidence supplied by ground management and/or the relevant local authority, as well as evidence from SGSA matchday inspection activity. They will do so by identifying:
- i. the nature and scale of any non-compliance with the safety management aspects of the licensed standing criteria and associated risk to spectator safety;
 - ii. the likelihood of any identified risk to spectator safety from step i. above actually occurring;
 - iii. the potential impact/consequence if the risk to spectator safety were to materialise; and
 - iv. the nature of any relevant mitigation already in place to manage the risk.
43. The licensed standing criteria compliance assessment outlined above will inform the nature and timing of any remedial action identified by the Inspector to enable the ground to come back into compliance with all the criteria, which the Inspector will then communicate to the ground in writing, copied to the relevant local authority.
44. The licensed standing criteria compliance assessment process outlined above complements the all-seater risk categorisation process (see paragraphs 33-41), with licensed standing grounds subject to both processes. For example, in circumstances where a licensed standing ground is found to be non-compliant with the licensed standing criteria, but is compliant with the all-seater conditions, then any remedial action identified by SGSA will focus on bringing the ground back into compliance with all the licensed standing criteria. By contrast, in circumstances where a ground is compliant with the criteria in terms of operating licensed standing areas, but spectators continue to choose to stand in seated areas of the ground, the all-seater risk categorisation process will inform the SGSA's enforcement approach.

COMMENT

There have been no changes to the 'Licensed standing criteria compliance assessment' text. However, a comment box is available if you would like to make any comments on the contents of this section.



Local authority enforcement of safety certificates under the 1975 Act

There have been no changes to this section.

45. The SGSA categorisation of spectator safety risk and analysis of the extent of compliance with the all-seater licence conditions at a ground may identify issues associated with non-compliance with the terms and conditions of the general safety certificate for the ground. In such circumstances, the SGSA will share safety certificate issues with the relevant local authority. The SGSA anticipates the relevant local authority will judge what action is appropriate, including potential enforcement action under the 1975 Act. Examples of potential local authority enforcement action under the 1975 Act are at **Annex E**.

46. Subject to what enforcement action is taken by the relevant local authority under the 1975 Act to ensure the 'reasonable safety' of all people who attend designated football matches at the ground, the SGSA may judge that enforcement action under the 1989 Act is not necessary. For example, if a local authority directs a ground management, through enforcement of the terms and conditions of the safety certificate, to keep all gangways and vomitories clear, compliance with this will also help deliver compliance with the all-seater licence conditions by encouraging spectators to sit on the seat provided rather than stand in the gangway/vomitory. SGSA reserves the right, however, in appropriate circumstances to take enforcement action under the 1989 Act in parallel with local authority enforcement action under the 1975 Act.

COMMENT

There have been no changes to the 'Local authority enforcement' text. However, a comment box is available if you would like to make any comments on the contents of this section.



SGSA oversight of local authority safety certification responsibilities

There have been no changes to this section.

47. If the SGSA judges that the relevant local authority is failing to take all appropriate enforcement action under the 1975 Act²⁰ to require the ground management to ensure the 'reasonable safety' of all people who attend designated football matches at the ground, the SGSA has the power under the 1989 Act²¹ in an appropriate case to require the relevant local authority to insert conditions in the safety certificate for the ground. In such circumstances, the SGSA's potential enforcement action will be consistent with the examples of potential local authority enforcement action at **Annex E**. The SGSA also has the power under the 1989 Act²² to impose additional terms and conditions in the ground's licence to prevent or minimise the effects of non-compliance with the licence. The SGSA's powers to require the relevant local authority to insert conditions in the safety certificate are subject to the SGSA undertaking a statutory consultation process²³. The SGSA's powers to impose additional terms and conditions in the licence are subject to affording ground management the opportunity to make representations²⁴.

COMMENT

There have been no changes to the 'SGSA oversight of local authority' text. However, a comment box is available if you would like to make any comments on the contents of this section.

²⁰ Section 2(1) of the [Safety of Sports Grounds Act 1975](#).

²¹ Section 13(2) of the [Football Spectators Act 1989](#).

²² Section 10(10) of the [Football Spectators Act 1989](#).

²³ Section 13(3) of the [Football Spectators Act 1989](#).

²⁴ Section 10(11) of the [Football Spectators Act 1989](#).



SGSA enforcement options

There are minor amendments in this section, largely based on the proposed changes to the risk categorisation approach.

In addition, there are proposed amendments at paragraphs 56 to 58 and 67 to reflect that the written warning to ground management will initially be shared in draft form to allow ground management time to make representations against the SGSA enforcement decision before the written warning is formalised and shared with the Secretary of State, the relevant football governing body and the relevant local authority.

All-seater grounds

48. SGSA aims to ensure enforcement action under the 1989 Act is proportionate, appropriate to each situation, and targeted where the risks are greatest. In taking enforcement decisions, SGSA staff will use their professional judgment and discretion, taking account of the risk categorisation process outlined above (see paragraphs 33-41 and **Annex D Figures 1-2**), and all other relevant factors. Paragraphs 64-71 below outline the SGSA's enforcement options specifically in relation to licensed standing areas.
49. Except where immediate and significant safety risks necessitate urgent action (see paragraph 22), SGSA's enforcement approach under the 1989 Act will use an **escalating scale of action** (see also **Annex D Figure 3**) designed to:
- a. give ground management the opportunity to take all initial steps and further action (as defined at paragraphs 24-25) to comply with the all-seater licence conditions before formal enforcement action is taken;
 - b. help ground management to identify appropriate and proportionate further action to manage residual safety risks associated with those spectators who still choose to stand despite ground management taking initial steps and further action (as defined at paragraphs 24-25) to ensure compliance with the all-seater licence conditions (for grounds with licensed standing areas, this includes managing the safety risks associated with spectators continuing to stand in seated areas of ground); and
 - c. keep the relevant local authority informed of developments at every stage given the local authority's related safety certification responsibilities for the ground.
50. The following **enforcement options** are anticipated to be used, tailored to the risk categorisation profile for each ground (see paragraphs 33-41).
51. In the first instance the SGSA will provide ground management, and the relevant local authority, with **advice and guidance** about any additional initial steps and associated timescales for ground management to comply with the all-seater licence conditions. This will cover anything deemed necessary or expedient to ensure spectator safety at the ground in the context of compliance with the all-seater licence conditions, including but not limited to one or more of the initial steps detailed at paragraph 24. It may also include a requirement for the ground management team to supply SGSA with regular



written reports of that team's own matchday observations of the nature and scale of persistent standing at designated football matches hosted by the ground, to supplement SGSA's matchday inspection observations at the ground.

52. Depending on the particular risk categorisation profile for the ground, the SGSA's advice and guidance may also include any further action and associated timescales to manage residual risk associated with spectators who still choose to stand, including but not limited to one or more of the further actions detailed at paragraph 25.
53. Subject to the response of ground management to the advice and guidance, the SGSA will then seek to agree **voluntary measures** to encourage ground management to implement the actions detailed in the SGSA's advice and guidance.
54. If the ground management fails to co-operate and/or take timely action to minimise the incidence of persistent standing in seated areas including but not limited to one or more of the actions at paragraph 25, the SGSA will **advise** the relevant local authority. The SGSA anticipates that the relevant local authority will then determine what action is appropriate, including potential enforcement action under the 1975 Act. However, if the SGSA considers that the local authority is failing to take appropriate action under the 1975 Act, SGSA may **direct** the local authority to insert conditions in the general safety certificate (see paragraph 47).

Enforcement of SGSA licence conditions

55. Irrespective of the steps outlined at paragraph 54, if the SGSA determines that enforcement action is merited, for example, if the SGSA determines spectator safety will not be wholly managed under paragraph 54, the SGSA may use its direct licensing powers under the 1989 Act and as outlined below, in which case the SGSA will inform the local authority that it is minded to take enforcement action against the ground management.
56. If the ground management fails to co-operate and/or take timely action to minimise the incidence of persistent standing, the SGSA will issue a **written warning** to ground management.
57. The written warning will explain clearly the necessary actions and associated timescales for taking reasonable steps to comply with the all-seater licence conditions, and the potential consequences of non-compliance. Potential consequences may include the SGSA using its enforcement powers under the 1989 Act to vary the terms and conditions (including the all-seater conditions) of the licence to admit spectators, or suspend, revoke or not renew all or part of the licence for the ground. The SGSA's judgment as to whether or not enforcement action should be targeted at all or part of the licence will be informed by whether non-compliance with the all-seater licence conditions is associated with part or all of the ground and the nature of the residual risk.
58. A draft of the written warning will be shared with ground management, so they have an opportunity within 21 calendar days to make representations. The final version of the written warning will be copied to the Secretary of State for Culture, Media and Sport and the relevant football governing body. The SGSA will also keep the relevant local authority informed of developments.



59. If the ground management still fails to take the necessary action in a timely and robust manner²⁵, the SGSA will take enforcement action under the 1989 Act either directly or through the variation of the terms and conditions of the licence, including new terms and conditions where appropriate. Such action will be:
- a. **Suspension of part or all of the licence** – the SGSA is more likely to use this approach if it is confident that ground management will take all initial steps and appropriate further action to comply with the all-seater conditions in a reasonable timeframe and a robust manner; or
 - b. **Revocation** – the SGSA is more likely to use this approach if it cannot foresee that ground management will take all initial steps and appropriate further action to comply with the all-seater conditions in a reasonable timeframe and/or a robust manner during the course of a season; or
 - c. **Non-renewal of all or part of the licence** – the SGSA is more likely to use this approach on receipt of an application to renew a licence if it does not consider that ground management has taken all initial steps and appropriate further action to comply with the all-seater conditions in a reasonable timeframe and/or a robust manner ahead of a new season
60. Unless there is an urgent issue which poses a serious and immediate risk justifying immediate suspension²⁶ of the licence (see paragraph 22), all of the above actions will be commenced by a written notice to ground management detailing the proposed action and giving them the opportunity to make representations. In respect of suspension, revocation or the imposition of varied/new terms and conditions this will require a response within 21 days from date of service²⁷; in respect of non-renewal this will require a response within 28 days from the date of service²⁸. The SGSA will take these representations into account in making its decision which it will communicate to ground management after the relevant period has elapsed.
61. The SGSA recognises the outcome of any enforcement action as described above for non-compliance with the all-seater licence conditions is likely to be that ground management, when hosting designated football matches at their ground, will not be allowed to permit spectators to part or all of the ground. This will be an unwelcome outcome for all concerned, including spectators. With that in mind, the SGSA will seek to proceed by means of advice, persuasion and agreement, with use of statutory powers a last resort, except in circumstances where the SGSA considers urgent action (paragraph 22) and/or enforcement (paragraph 62) is merited.
62. Nevertheless, the SGSA will take formal enforcement action if all other approaches have been exhausted and it considers based on the available evidence that the risk of spectator injury is unacceptably high and/or the ground management is failing to co-operate or act promptly to comply with the terms and conditions (including the all-seater licence conditions) of the licence to admit spectators.

²⁵ For definitions of reasonable timeframe and robust manner see paragraph 38c.

²⁶ Section 12(5) of the [Football Spectators Act 1989](#).

²⁷ Section 12(4) and section 10(11) of the [Football Spectators Act 1989](#).

²⁸ Section 10(3) of the [Football Spectators Act 1989](#).



63. If the SGSA considers that the risk gap created by non-compliance with licence conditions is extreme (i.e. there is a high residual risk, the risk is likely to materialise, and the consequences are likely to be severe), or where there is a wilful breach of the law (such as admitting spectators to unlicensed grounds) and all reasonable steps were not taken by ground management, it will consider taking immediate enforcement action²⁹, which may include, as a last resort, taking a prosecution for breach of the ground's all-seater licence conditions³⁰.

Licensed standing areas

64. The SGSA's approach to enforcement action in relation to licensed standing grounds will continue to follow the same approach as outlined above in respect of compliance with the all-seater licence conditions for the seated areas of those grounds.
65. In relation to compliance with the licensed standing conditions for operating licensed standing areas, SGSA enforcement action under the 1989 Act will be proportionate and based on the licensed standing criteria compliance assessment outlined at paragraphs 42-44.
66. In circumstances where there is evidence at a licensed standing ground of non-compliance with one or more of the published licensed standing criteria, the SGSA will inform ground management of the steps SGSA considers are required to bring the licensed standing area back into compliance. However, if ground management fails to co-operate and/or take timely action to bring the licensed standing area back into compliance with all the criteria, the SGSA will adopt a **sliding scale of action** (see **Annex D, Figure 4**). Initially, the SGSA will **advise the relevant local authority** that it is minded to move towards enforcement action under the 1989 Act for non-compliance with the licensed standing conditions.
67. If ground management fails to co-operate and/or take timely action to bring the licensed standing area into compliance with all the licensed standing criteria, the SGSA will issue a **written warning** to ground management indicating that if they fail to take the necessary action, the SGSA will commence enforcement action under the 1989 Act for non-compliance with the ground's licence. A draft of the written warning will be shared with ground management, so they have an opportunity within 21 calendar days to make representations. The final version of the written warning will be sent to ground management, copied to the Secretary of State for Culture, Media and Sport and the relevant football governing body. The SGSA will also keep the relevant local authority informed of developments. The written warning will include:
- The measure(s) that the SGSA considers are required to bring the licensed standing area back into compliance with the licensed standing criteria;
 - the timescales within which ground management must put in place the required measures; and
 - notice that the licensed standing conditions may be withdrawn if the required measures are not put in place within the relevant timescales.

²⁹ Relevant offences for admission of spectators without a licence and for breach of licence conditions are created by s9(1) and s10(13) respectively of the [Football Spectators Act 1989](#).

³⁰ Paragraph 1, Schedule 1 of the [Sports Grounds Safety Authority Act 2011](#).



68. If, following the receipt of the written warning described above, ground management at a licensed standing ground fails to take the required action set out in the warning, the SGSA will consider taking **enforcement action** under the 1989 Act. Depending on the individual circumstances, the SGSA may remove the licensed standing conditions (thereby prohibiting the continued operation a licensed standing area) and/or make other variations to the terms and conditions of the licence, for example, taking a specific part of the ground out of use.
69. Unless there is an urgent issue which poses a serious and immediate risk justifying immediate suspension³¹ of the licence (see paragraph 22), the enforcement action outlined in the preceding paragraph will be commenced by a written notice to ground management detailing the proposed action and giving them the opportunity to make representations. Given the action will involve the imposition of varied/new terms and conditions this will require a response within 21 days from service³². The SGSA will take these representations into account in making its final decision, which it will communicate to ground management after the relevant period has elapsed.
70. As with the all-seater enforcement approach, the SGSA recognises that enforcement action as outlined in the preceding paragraph will be disruptive and unwelcome by ground management and spectators. It will therefore only be taken as a last resort if the SGSA determines that other approaches have been exhausted and/or that ground management is failing to co-operate or act promptly to comply with the licensed standing conditions.
71. If the SGSA considers there is a wilful breach of any of the licensed standing criteria, it reserves the option to take such immediate enforcement action under the 1989 Act as it sees fit, which may include, as a last resort, taking a prosecution for breach of the ground's licence conditions³³.

QUESTION

8. Do you agree or disagree with the proposed amendment to share a written warning with ground management in draft, to allow for representations to be made, as outlined in paragraphs 56 to 58 and 67?

Agree / Partially agree / Disagree No opinion

Please outline the reason(s) for your response.

A comment box is available if you would like to make any other comments on the contents of this section.

³¹ Section 12(5) of the [Football Spectators Act 1989](#).

³² Section 12(4) and section 10(11) of the [Football Spectators Act 1989](#).

³³ Section 10(13) respectively of the [Football Spectators Act 1989](#) and Paragraph 1 Schedule 1 of the [Sports Grounds Safety Authority Act 2011](#).



Different types of spectator accommodation

There have been no changes to this section.

72. The SGSA further appreciates that, without prejudice to the risk categorisation and associated enforcement approach above, a ground management whose ground is subject to the Government's all-seater policy may choose to take advantage of different types of seated spectator accommodation, such as seats incorporating barriers, or seats with independent barriers, to invest in new spectator accommodation even if the existing ground infrastructure and crowd management arrangements are able to support the effective management of the identified spectator safety risks. If a ground management chooses to adopt such an approach, the SGSA will consider such proposals on their individual merits and in accordance with existing established guidance, most notably the Green Guide, and SGSA guidance on spectator accommodation changes³⁴. Additionally, in such circumstances the SGSA will remind the ground management about the Government's all-seater policy, where specified grounds hosting designated football matches are expected to comply with the existing all-seater licence conditions (see paragraph 14).
73. The SGSA also recognises that ground management at licensed standing grounds may determine once they start operating licensed standing areas that the size and location of such areas needs to change to reflect the high demand from spectators for such areas. In those circumstances, the SGSA will consider each proposal from ground management on its individual merits and in accordance with existing established guidance, most notably the Green Guide and SG01: Safe standing in seated areas). In doing so, the SGSA will remind ground management about the ongoing requirement to comply with the licensed standing criteria (see Annex B).

Review

There have been no changes to this section.

74. The SGSA's enforcement approach will be kept under review and adapted as necessary as new technologies are developed in terms of the provision of spectator accommodation, and as new evidence is gathered about the characteristics and effective management of safety risks associated with persistent standing in seated areas.
75. The approach will also be kept under review to ensure it remains appropriate and fit for purpose, for example to reflect: the emergence of any new safety risks arising from changes in crowd behaviour, especially at moments of excitement, for example, new ways of celebrating when goals are scored.

³⁴ For further details see SGSA website: [Spectator Accommodation Changes](#).



Impact assessment

There have been no changes to this section.

76. This document outlines the SGSA's current approach to enforcement of the existing all-seater licence conditions under statutory powers in the Football Spectators Act 1989. Consequently, the SGSA considers the document to be a Non-Qualifying Regulatory Provision for the purposes of Business Impact Target Reporting³⁵ under the Enterprise Act 2016. Business impact is centred principally on relevant ground management and relevant local authorities familiarising themselves with the new document, which is based substantively on the corresponding document published in summer 2019 ahead of the 2019/20 football season.

COMMENT

There have been no changes to these sections. However, a comment box is available if you would like to make any comments on the contents of this section.

³⁵ For further details see Gov.uk website: [Business Impact Target Reporting](#).



Annexes

A new Annex A summarises the main proposed changes in this version of the document.

There are consequential amendments to the flow diagrams in Annex D as a result of the amendments already outlined within the document.

A new Annex G has been added, which outlines SGSA's methodology for calculating a persistent standing risk score for each SGSA licensed ground.

COMMENT

The Annexes are provided for context, background and to outline internal processes and procedures.

A comment box is available if you would like to make any comments on the contents of the annexes.



Annex A: Overview of Changes

Most of the document narrative is unchanged from the previous version of July 2023. However, the following changes have been made:

- **New Overview and Revised Introduction** – reflecting the current position in relation to licensed standing implementation as at July 2026 and signalling the changes made to the document in the July 2026 version. New paragraphs 4 and 8 help clarify the outcomes SGSA wants to achieve through implementation of the enforcement approach.
- **General** – the removal/amendment of references to specific seasons so that the document remains current beyond one season until such time as an updated version is published.
- **Paragraph 21** – additional text highlighting that SGSA Inspectors will take account of the actions of ground management, and the history of any previous licence breaches or offences.
- **Paragraph 22** – minor amendment with a new footnote in sub-paragraph b. that references the relevant section of the Football Spectators Act 1989.
- **Paragraph 23** – shortened to focus the narrative on steps ground management should take to avoid a breach of licence conditions.
- **Paragraph 25** – amended to be clear that the relocation of standing supporters to lower tiers and gradients of less than 25 degrees is only a short-term mitigation, and that risks to spectator safety arising from persistent standing are still present even at lower tiers/rakes. Additional narrative here (and in paragraph 27) highlighting the overall objective of the further action options taken by ground management is to remove as far as reasonably practical all safety risks associated with persistent standing. Additionally, some minor amendments to avoid unnecessary repetition and to ensure consistent terminology.
- **Paragraph 26** – reference to risk categorisation deleted to avoid any potential confusion with the risk categorisation process outlined at paragraphs 33-41.
- **Paragraph 27** – removal of sub-paragraphs to avoid repetition with the further action options at revised paragraph 25. Additional narrative about the overall objective of the further action options at paragraph 25.
- **Paragraph 28** – updated narrative to reflect the latest position in relation to the implementation of licensed standing areas up to July 2026.
- **Paragraph 31** – minor amendment to clarify the paragraph is about circumstances involving home supporters or away supporters but not both.
- **Paragraphs 33-41** – SGSA's refined approach to all-seater risk categorisation based on six factors. The first two factors help SGSA assess the nature and scale of persistent standing and the extent to which it poses a foreseeable risk to the safety of spectators. The other four factors help determine SGSA's confidence in ground management's ability to address persistent standing risk at a ground in a timely and a robust manner.



- **Paragraphs 48, 50, 52 and 57** – minor consequential amendments to reflect the revised approach to risk categorisation in paragraphs 33-41.
- **Paragraphs 56-58, and 67** – amendments to reflect that the written warning to ground management will initially be shared in draft form to allow ground management time to make representations against the SGSA enforcement decision before the written warning is formalised and shared with the Secretary of State, the relevant football governing body and the relevant local authority.
- **Paragraphs 63 and 71** – amendments to each of these paragraphs and the associated footnotes to make explicit reference to the potential, as a last resort, for prosecution under the terms of the Sports Grounds Safety Authority Act 2011.
- **Annex D, Figures 1-4** – consequential amendments to each of the flow diagrams to reflect the changes at paragraphs 33-41.
- **Annex G** – new annex outlining SGSA’s methodology for calculating a persistent standing risk score for each SGSA licensed ground (see also paragraph 37).



Annex B: Licensed standing in seated areas criteria

Grounds can apply to the Sports Grounds Safety Authority (SGSA) to offer licensed standing where the necessary infrastructure and crowd management arrangements, outlined below, are in place.

To become licensed standing ground, management teams must:

- Demonstrate how they have addressed the criteria set out below.
- Obtain approval from the Sports Grounds Safety Authority (SGSA) to operate licensed standing in seated areas and receive a licence with the necessary conditions.

Application criteria

Grounds applying to become a licensed standing ground must demonstrate how they meet the following criteria, which cover four categories:

- A. Compliance with guidance (point 1)
- B. Infrastructure (points 2-8)
- C. Safety management procedures (points 9-13)
- D. Safety Advisory Group (SAG) engagement (points 14-16)

A. Compliance with guidance

1. Any infrastructure must comply with the appropriate SGSA guidance.

Compliance with the relevant sections of the current (sixth) edition of the *Guide to Safety at Sports Grounds (Green Guide)*, with particular reference to Chapter 12 – *Seated Accommodation*, and Chapter 2 of the current (second) edition of *Supplementary Guidance 01: Safe Standing in Seated areas (SG01)*, in terms of:

- a. the design and installation of the proposed area(s) including testing/sign off of new seats with barriers/independent barriers by a competent person³⁶; and
- b. the safety management procedures put in place in advance of spectators being admitted to the area(s) in question, including the provision of suitably qualified/trained stewards.

B. Infrastructure

2. Licensed standing areas must be made available to both home *and* visiting supporters.

In achieving this, visiting supporters should *also* be offered seated accommodation within the provision.

³⁶ To validate the design and quality of installation, the ground is required to carry out proof of load testing to a minimum of 5% of the installation to ensure that required loadings can be achieved.

Additional testing will be required in cases where more than one type of fixing has been used and where fixings are into different types of substrate.

The minimum figure of 5% is without prejudice to any additional testing requirements of the local authority in relation to the General Safety Certificate.



The ground management must be able to demonstrate active engagement with supporters, which has helped inform decision making on the size and location of those licensed standing areas. The final decision will be based on a range of factors, most notably the nature and scale of spectator safety risk associated with persistent standing in conventional seated accommodation and the associated SGSA Persistent Standing Enforcement Approach.

Note that it is recognised that the capacity of licensed standing areas, whether for home or visiting supporters, may vary according to the event and the likely demand, and that allocations will require continual review.

3. Each seat/space must be allocated to *only one* spectator.

4. It should not be possible for any of the seats in the proposed areas to be locked in either the 'up' or the 'down' position.

5. Each seat and seat row must be clearly identifiable.

For the legibility of both spectators and stewards, each individual seat and seat row must be clearly, neatly and accurately identified. Where tip-up seats are in place, the seat numbers must be clearly visible both when the seat is in the 'up' position and the 'down' position and fixed so as to make removal difficult.

6. A CCTV system must be in place and offer full coverage of the licensed standing areas.

The installation must be in accordance with the requirements outlined in the sixth edition of the *Green Guide* (see Section 16.20 – CCTV provision).

7. There must be no negative impact on viewing standards for other spectators.

The ground management must be able to show that the provision of licensed standing will have no negative impact upon the viewing standards, comfort or amenity levels of seated spectators in adjoining areas.

8. There must be no negative impact for disabled spectators.

The ground management must be able to show that the provision of licensed standing will have no negative impact upon the viewing standards, comfort or amenity levels of disabled spectators, either in the area in question or adjoining areas, and that the ground is continuing to meet its responsibilities under the Equality Act 2010.

C. Safety management procedures

9. Ticket buyers must be informed in advance.



Purchasers of tickets for licensed standing areas must be informed at the point of sale, and on the ticket itself, that spectators in the area in question will be standing during the activity (see Section SG01 2.4.c.ii of SG01).

All clubs should develop a ticket sales strategy that accommodates home and visiting spectators who do not wish to or cannot, stand, including ambulant disabled people and families with small children. Close co-operation with the visiting club will be required when selling the visiting clubs ticket allocation.

10. A Code of Conduct must be introduced.

A *Code of Conduct*, enforced by ground management, to maintain high standards of spectator behaviour in the proposed areas must be provided to all ticket holders. This must reflect the entry conditions outlined in the *Supplementary Guidance* (see Section 2.4.c of SG01). An example of such a *Code of Conduct*, which can be tailored for local circumstances, is at Appendix A.

11. Briefing and training must be in place for staff and stewards.

Procedures must be in place, including the training and briefing of staff and stewards, to ensure that only relevant ticket holders are admitted to the areas in question.

12. Safety management procedures must be in place to monitor and manage the behaviour of spectators in licensed standing areas.

13. Management must demonstrate compliance with the SGSA's Persistent Standing Enforcement Approach in the ground's conventional seated areas.

D. Safety Advisory Group (SAG) engagement

14. There must be meaningful consultation with the SAG.

Ground management must be able to demonstrate that there has been meaningful consultation with the core members of the relevant SAG as defined in its terms of reference, about the plans for licensed standing areas, together with evidence of support for those plans by the relevant certifying authority.

Additionally, ground management must show they have reviewed any information sharing agreement with the local police informed by their plans for licensed standing areas.

15. SAG consultation must be recorded and inform the proposed approach.

Ground management must demonstrate that SAG consultation has informed the proposed approach both in terms of the physical infrastructure and crowd management arrangements for those areas, including evidence that any existing and effective management of the segregation line between home and visiting supporters will not be compromised.



Note that in circumstances where such SAG consultation results in objections to the proposals for licensed standing areas from one or more of the core SAG members, the ground management must show evidence that the certifying authority has recorded formally:

- a. details about each of the objections, including the evidence base and who tabled each of them; and,
- b. the certifying authority's accompanying rationale for rejecting each of those objections when giving its support to the proposed safe standing areas.

16. There must be continued engagement with the SAG.

Ground management must demonstrate that there are arrangements in place for regular dialogue with the core members of the relevant SAG about the operation of licensed standing areas to provide a suitable forum where partners, including the local police, can take an evidence-based approach to the ongoing effective management of the proposed areas.

Version 1.2 (5 October 2022)

Annex B, Appendix A

Code of Conduct for licensed standing areas

Background

It has long been established that, simply by entering a sports ground, all spectators commit themselves to adhere to a number of ground regulations. Equally it is acknowledged that few spectators are familiar with those regulations, other than in the broadest terms. For this reason, it is recommended that all spectators who purchase or are allocated tickets for licensed standing areas are provided in advance with a copy of a *Fan Code of Conduct*. This should include both home and away supporters.

Management considerations

When preparing a *Fan Code of Conduct* for licensed standing areas, ground management should take the following into consideration:

- a. The Code should be tailored to the specific characteristics of the ground, the nature of the match being staged and to the provisions of any national and/or local guidance in force at the time (for example, in relation to COVID-19).
- b. The Code should be written in concise, plain language.
- c. If being communicated in digital form – as is strongly recommended – a check box should ideally be included for ticket buyers to confirm that they have read the Code, before leaving the page.
- d. Printed copies of the Code should be posted in prominent locations within the spectator accommodation.
- e. Where appropriate, the wording of the Code should be shared in advance with representatives of supporters' groups.
- f. More prominent and specific spectator messages should be displayed in prominent positions where applicable eg 'no climbing on seats or barriers'.



An example *Fan Code of Conduct* for licensed safe standing areas is available below.

Example Fan Code of Conduct in licensed safe standing areas

This safe standing area has been introduced to help keep you safe while watching the match.

This *Code of Conduct* does not replace any other ground rules. Failure to comply with these may lead to you being removed from the ground and banned from future matches, and/or the ground losing the right to maintain safe standing areas.

1. Be respectful towards staff, stewards, and other fans at all times.
2. Have your ticket available at all times for any necessary secondary ticket checks.
3. Behave appropriately in the stand – anti-social behaviour will not be tolerated. That includes no climbing on the seats or rails.
4. Don't stand on the rails or seat. This safe standing area is here to keep you and other fans safe.
5. Unless needing to use facilities, don't move around in the safe standing area – your ticket is for your space only.
6. Don't stand in the gangways or on the steps to watch the match – these are for accessing and leaving your seat only.

Thank you for your support and co-operation.



Annex C: Additional background – roles and responsibilities of all interested parties

1. **Premier League and English Football League ground regulations** adopted by all Premier and Football League clubs include as a condition of entry to the ground that spectators may not stand in seated areas while play is in progress:
 - “12. All persons entering the Ground may only occupy the seat allocated to them by their ticket and must not move from any one part of the Ground to another without the express permission or instruction of any steward, officer of the Club and/or any police officer.”
 - “13. Nobody may stand in any seating area whilst play is in progress. Persistent standing in seated areas whilst play is in progress is strictly forbidden and may result in ejection from the Ground.”
2. **Ground management (in most places the club)** is primarily responsible for:
 - the safety of spectators
 - customer care
 - making ‘reasonable adjustments’³⁷ to club policies, procedures, and the physical environment, to provide suitable accommodation for disabled spectators
 - enforcing the ground regulations, including the conditions relating to seated areas detailed above
 - the safety of employees/workers (under the Health and Safety at Work etc Act 1974)

For every match clubs should produce a specific risk assessment. Where that risk assessment identifies that spectators may stand persistently it is for management to produce a plan for addressing the issue that reflects the nature and scale of persistent standing at the ground and the specific ground’s infrastructure characteristics. The plan should first identify and initiate all reasonable steps to get spectators to sit down in accordance with the all-seater licence conditions (including publicising the all-seater requirements from the ground regulations on ticketing) and then seek to manage safety risks arising from those spectators who still choose to stand.

3. While responsibility for the safety of all people present in a ground lies at all times with ground management, at certain sports grounds and for certain events the presence of the **Police** may be required, or requested, to maintain public order and prevent the commission of offences. If there is to be a police presence in or at the sports ground, management should consult with police in advance and draw up a Statement of Intent. This sets out the division of responsibilities and functions and makes clear who will assume responsibility in particular circumstances. Ground management should not, however, rely on the presence of police officers to overcome inadequacies in the safety management operation at a ground.
4. Primary responsibility for certifying ground capacities and imposing terms and conditions on safety matters rests with **local authorities** in the context of their safety certification role at sports grounds. Ground management are responsible for the safety of spectators as well as their employees. If the **local authority** considers ‘reasonable safety at the ground’ is being compromised they have the statutory responsibility to take appropriate enforcement action under the provisions of the Safety of Sports Grounds Act 1975.
5. The **Sports Grounds Safety Authority (SGSA)** is the UK Government’s expert body of sports ground safety. The SGSA’s core statutory functions are set out in the Football

³⁷ Under the terms of the [Equality Act 2010](#).



Spectators Act 1989 and the Sports Grounds Safety Authority Act 2011. These include an important statutory responsibility to regulate local authorities in their oversight of safety at the 92 football clubs in the Premier League and the English Football League, and at Wembley and the Principality Stadium. The SGSA also issues licences to those 94 stadia through which the Government's all-seater policy is implemented and enforced.

6. The causes and potential impact of persistent standing in seated areas, including the safety, crowd management, and customer care issues arising from such spectator behaviour, are detailed at [Annex E](#).
7. **The football governing bodies (Football Association, Premier League and English Football League)** are responsible for drawing up and enforcing the rules and regulations of football, including those relating to ticketing and the number of places to be provided for visiting supporters. This offers opportunities for encouraging good behaviour and discouraging supporters who misbehave, for instance by allowing clubs to reassign accommodation. However, the scope for such action is limited. While the football governing bodies can impose certain penalties, it might be difficult to relate these to the specific problem of standing spectators. The football governing bodies are also in a position to co-ordinate initiatives by and on behalf of the clubs. These can include communicating with supporters directly and through publicity programmes and encouraging clubs to take a consistent approach to supporters who persist in standing.
8. **Spectators, whether home or away supporters**, are expected under Section 8 of the Health and Safety at Work etc. Act 1974 not to "intentionally or recklessly interfere with or misuse anything provided in the interests of health, safety, or welfare in pursuance of the relevant statutory provisions." In the context of a football ground at which designated football matches are played, this means spectators are expected not to misuse or otherwise interfere with the infrastructure provided for their safety. They are also expected, as a condition of their admittance, to comply with the ground regulations, and are at risk of being ejected if they fail to do so.



Annex D: SGSA enforcement approach flow diagrams

Figure 1: All-seater policy: SGSA enforcement approach – overview

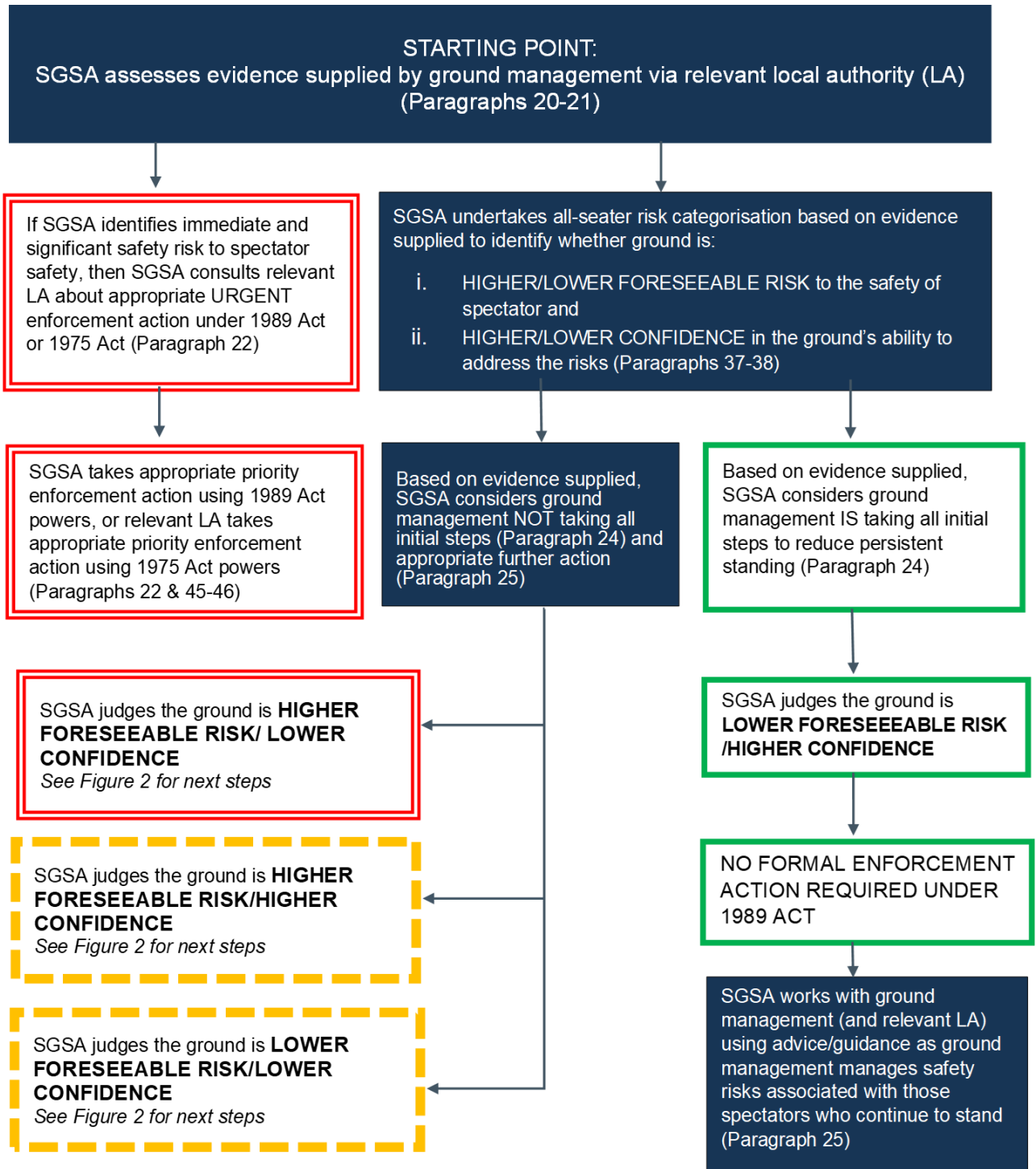




Figure 2: All-seater policy: SGSA enforcement approach – detail

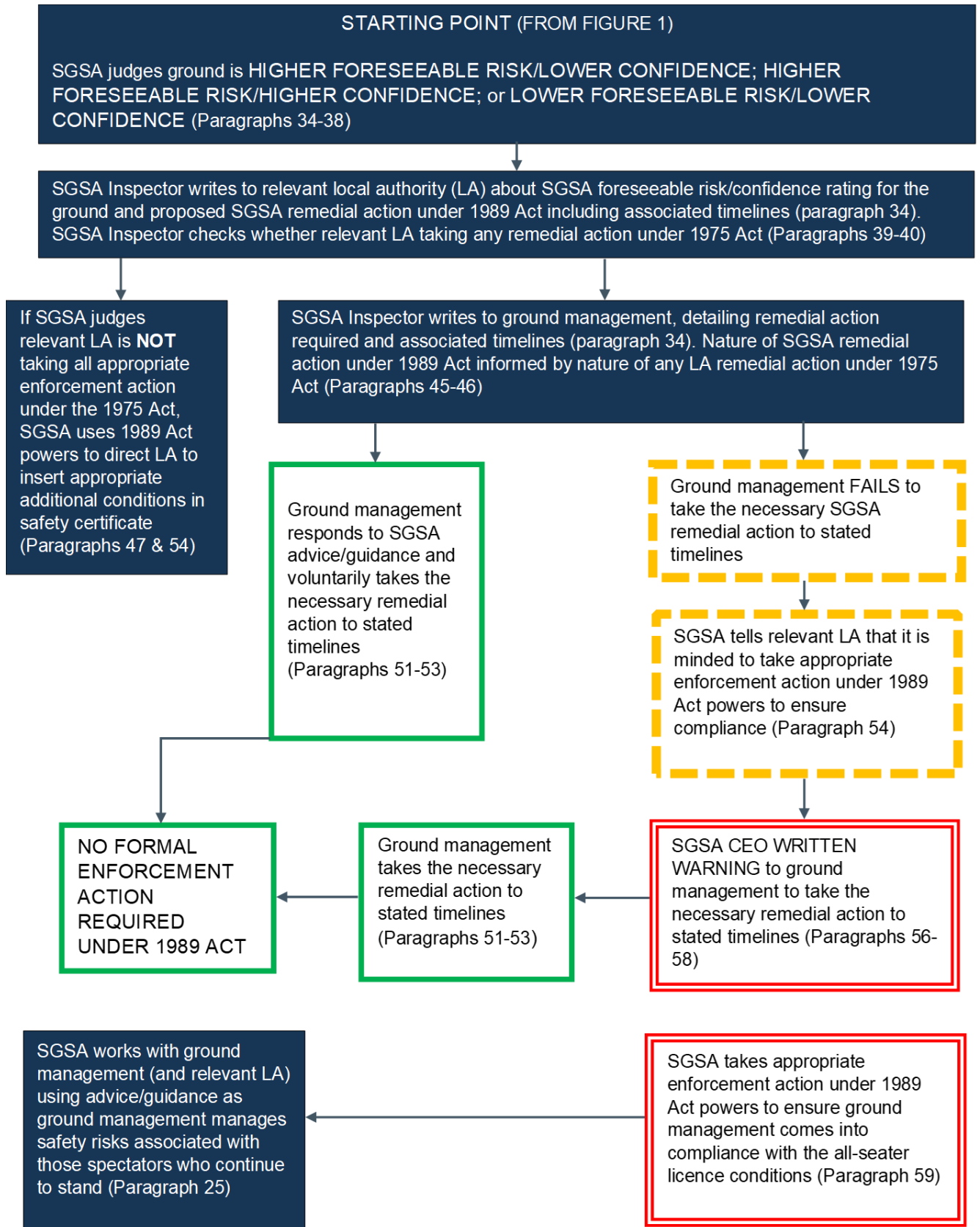




Figure 3: All-seater policy: SGSA enforcement approach – sliding scale of enforcement options where evidence suggests ongoing non-compliance with all-seater conditions (under 1989 Act powers unless otherwise stated)

SGSA works with ground management (and relevant local authority) to give ground management every opportunity to come into compliance prior to formal enforcement action being taken (Paragraphs 52 & 54)

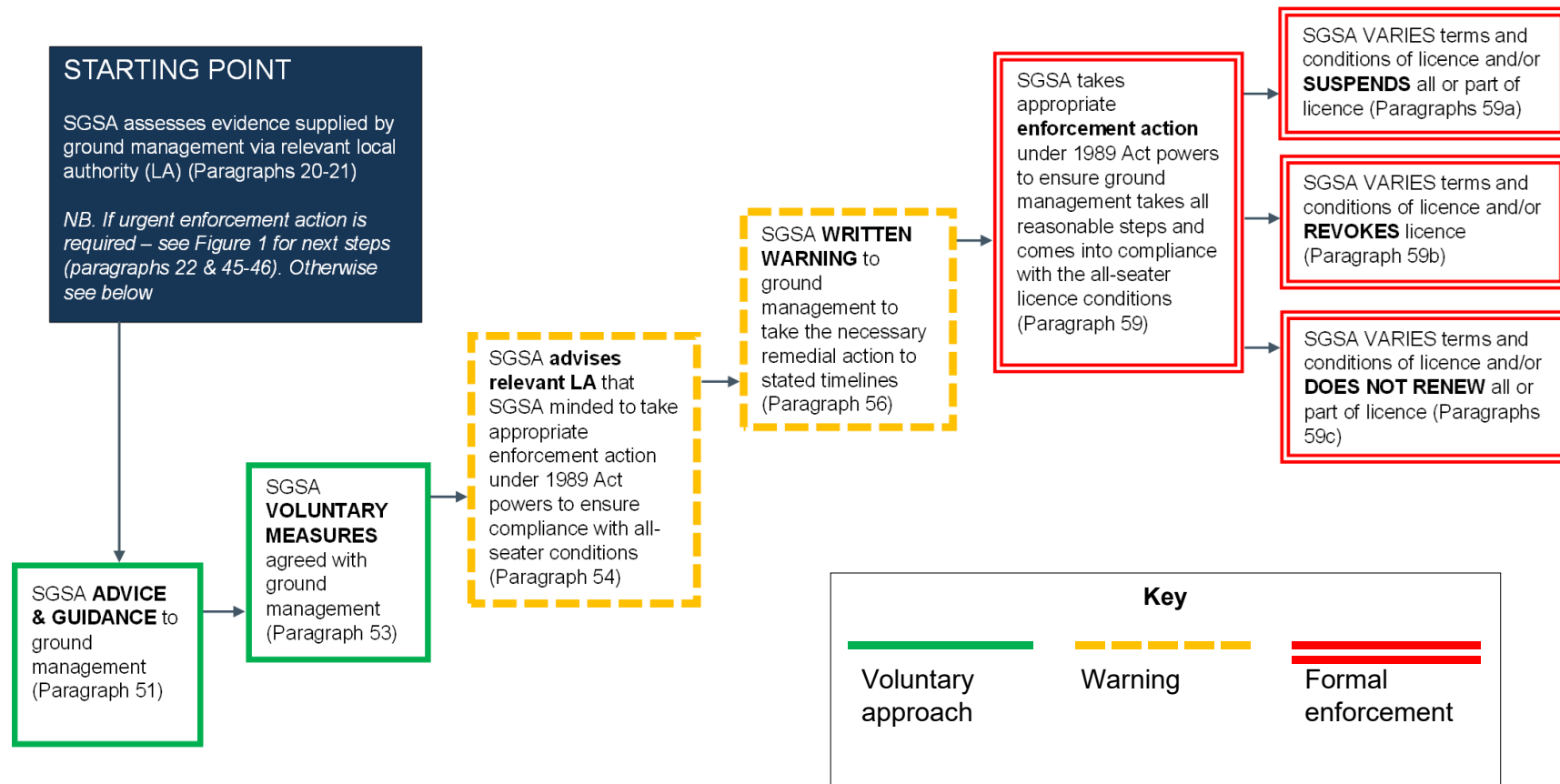
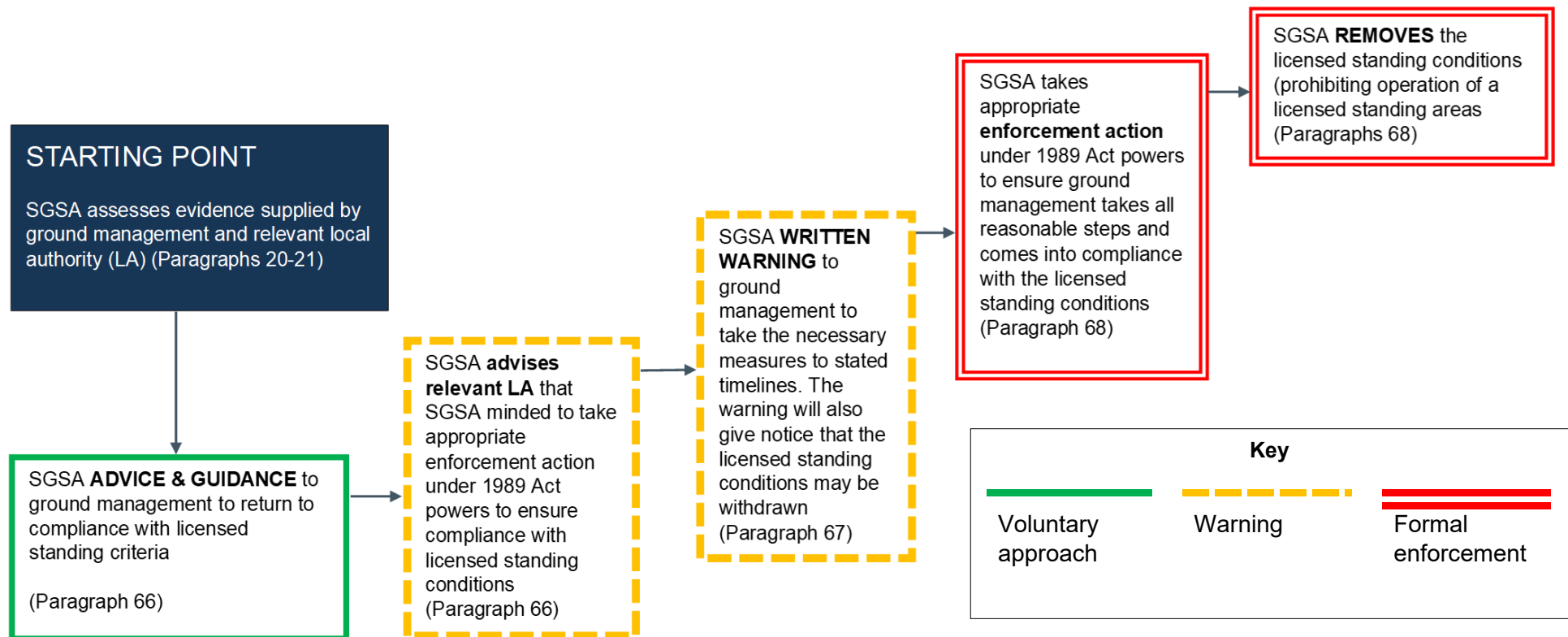




Figure 4: Licensed standing areas: SGSA enforcement approach - sliding scale of enforcement options where evidence suggests ongoing non-compliance with all-seater conditions (under 1989 Act powers unless otherwise stated)

SGSA works with ground management (and relevant local authority) to give ground management every opportunity to come into compliance prior to formal enforcement action being taken (Paragraphs 42-44)





Annex E: Potential enforcement action by local authorities under the Safety of Sports Grounds Act 1975

Where local authorities are not satisfied that any management plans provide for the reasonable safety of spectators, they can consider limiting capacity to an appropriate level. Instances where action may be required by local authorities include:

- a. If the gradient of the seating deck is above 25 degrees, persistent standing could be regarded as unsafe by definition (on the basis that the Green Guide does not allow standing in areas with rakes exceeding that). The local authority may require any such seating deck area where spectators are standing to be taken out of use on safety grounds. Additionally, persistent standing on seating decks with gradients below 25 degrees may also be unsafe. The local authority will consider each case on its individual merits and take action appropriately.
- b. If the front barrier of an elevated seating deck is not to crush barrier height and strength, persistent standing presents increased safety risks. The local authority may require the ground management to take at least the front row, and preferably the front two rows, out of use on safety grounds.
- c. Where significant numbers of spectators are standing, the local authority may reduce the holding capacity of the area concerned by allocating each spectator a width of 550mm, rather than the 460mm of the typical seating configuration, to prevent them spilling out into gangways. Ground management and supporters should be aware that this alone would result in one in every six seats in the area concerned being taken out of use.
- d. In addition, if the ground management is failing to manage the crowd, the local authority may reduce the (S) factor³⁸ for the area concerned to whatever level is necessary to ensure the reasonable safety of spectators. Where the area concerned is occupied by visiting supporters, the reduction could apply to all matches or to those that have been identified as likely to present a particular risk.
- e. As an alternative to the previous option, the local authority could also require the closure of particular rows (radial or lateral) or could limit the use of certain areas to particular groups of spectators (for instance, home supporters or disabled spectators)³⁹. The progressive closure of rows from the front would effectively deal with the main transgressors and warn those behind that they may also lose their places for subsequent matches if they do not sit down.
- f. If the ground management fails to take measures to educate and persuade supporters that they must sit down, with a consequent impact on safety, the local authority may reduce the (S) factor and therefore the ground capacity.

³⁸ In order to calculate the holding capacity of a sports ground, each part of the ground's viewing accommodation should be assessed according to the quality of the safety management in that area. This assessment is known as the (S) factor. Further information on the (S) factor can be found in Section 2.4 of the sixth edition of the Green Guide.

³⁹ Closure of particular rows may contain seats for disabled spectators, such as identified easy access and amenity seats. In such circumstances, the seats for disabled spectators should remain operational, subject to being adequately stewarded.



- g. If the rake is so shallow that it positively encourages spectators to stand, the local authority may reduce the (P) factor⁴⁰ accordingly. In appropriate cases, the SGSA could consider whether to impose a licence condition limiting the use of such areas.

It is extremely important that local authorities act reasonably and follow due process if seeking to adopt any of the measures above. It is particularly important to be able to demonstrate a proportionate and transparent approach if taking action which could result in reduced capacities.

⁴⁰ In order to calculate the holding capacity of a sports ground, each part of the ground's viewing accommodation should be assessed according to its physical condition. This assessment is known as the (P) factor. Further information on the (P) factor can be found in Section 2.4 of the sixth edition of the Green Guide.



Annex F: Causes and potential impact of standing in seated areas

It is recognised that spectators may stand persistently for different reasons, some involuntary, some deliberate, for example:

- a. they stand because inadequate sightlines obstruct their view or the seats are uncomfortable;
- b. they cannot see because other spectators are standing;
- c. they see supporters of the other team standing;
- d. they prefer to stand; or
- e. they are demonstrating their visible/vocal support for their team

Seated areas do not contain any of the design and safety features found on terraces designed to accommodate standing spectators. Standing in seated areas may raise issues in respect of one or more of the following: safety, crowd management and customer care.

Safety

Spectators standing in seated areas may create a number of hazards both for themselves and for those around them, for example:

- a. Spectators standing in these circumstances are not protected by any crush barriers. Instead they have a seat back in front of their legs. In the event of an incident, there would be nothing to prevent them from falling forwards onto the heads and upper bodies of the spectators in front. The falling spectators could themselves incur lower limb injuries from the seats. The risk is exacerbated if spectators stand on the seats themselves.
- b. The risk associated with such falls, and the likelihood of a cascading effect, increase along with the gradient of viewing accommodation. The Green Guide considers areas of conventional terracing with gradients in excess of 25 degrees to be potentially hazardous and as such should be avoided. This fact is supported by recent research carried out by CFE Research. However Green Guide compliant seating accommodation, including seats incorporating barriers or seats with independent barriers, is permitted to a maximum gradient of 35 degrees.
- c. A further significant safety hazard arises if spectators stand on an upper or elevated tier. The front barrier or parapet in front of the seated spectators will normally be at a height of 800mm, rising to 1100mm at the foot of each gangway. These barrier heights assume seated spectators. The Green Guide recommends that 800mm is sufficiently high to protect spectators entering and leaving but may not prevent a standing spectator from toppling over the barrier and into the crowd below. Raising the barrier would in many cases create a restricted view and might even encourage spectators to stand. An alternative, which has been adopted at some grounds, is to increase the height incorporating the use of transparent materials e.g. toughened glass. Another ground has sought to reduce the risk by installing a horizontal barrier extending outwards from the parapet wall.



- d. A seated area built to the minimum dimensions recommended by the Green Guide can accommodate 31 seated spectators per 10m² although it is accepted that this number may be slightly higher in older stadia conforming to previous guidance. If spectators have migrated and are not occupying their allocated positions, the density is likely to be higher still. It could even come close to the maximum of 47 persons per 10m² permitted in a standing area that is fully equipped with crush barriers.
- e. Moreover, spectators standing side by side will, if they can, tend to occupy a greater lateral space (typically 550mm per person) than those who remain seated (typically 460mm). If the stand is full, standing spectators are likely to spill out into the gangways and vomitories, which become blocked. This not only impedes the safe circulation and exit of spectators; it also makes it difficult for stewards and first aid staff to undertake their safety duties. Keeping gangways clear is a fundamental safety requirement.
- f. Spectators standing in radial gangways are, moreover, the most prone to falling, both during moments of excitement and when others are pushing their way through. The SGSA is aware of incidents where spectators were injured by other spectators falling down the gangways in which they were standing. It should be remembered that gangways are unlikely to have handrails and may have a significant number of risers permitted in one consecutive flight.
- g. Spectators purchase a seat in the reasonable expectation that they will be able to see the match. If those in front are standing, smaller spectators, in particular children, may be unable to see unless they stand on the seat. This constitutes a significant safety hazard.

Crowd management

Standing in seated areas can have a number of potentially serious consequences, for example:

- a. It is important for ground management and stewards to be able to secure the co-operation of spectators on a match day. While there is no automatic correlation between standing in seated areas and misbehaviour, there is evidence that some groups of standing spectators regularly adopt a hostile attitude to stewards and to the authorities generally. This can make it harder to identify individual offenders.
- b. Even where this does not lead to misbehaviour, standing spectators may not comply with requests (in particular, to keep the gangways and exits clear – see above) that may be for their own safety.
- c. Standing spectators are less static, less identifiable as individuals, and less likely to make eye contact with stewards than seated spectators. Consequently, standing spectators present additional challenges when stewards seek to give instructions to them.



Customer care issues

These are primarily matters of concern for football ground management and the football authorities, who recognise that standing in seated areas can have an impact on the customer experience and customer care, for example:

- a. Once the spectators at the front of a seating deck stand, those behind them have no alternative but to do likewise, whether they wish to or not. Those who are unable to stand for prolonged periods, or who prefer not to are likely to suffer a significant loss of enjoyment. They cannot remedy this themselves.
- b. Spectators who do not wish to stand may feel threatened and intimidated by those who do. The SGSA is aware of spectators being assaulted when they asked those standing to sit down.
- c. Over the past 20 years, there have been significant increases in the number of women, children and older people attending matches. If they are prevented from seeing or enjoying matches in popular areas, they may choose to stop coming rather than move to other areas, and hence may be lost to the game, and reduce the diversity of spectators to the game which has grown in recent years.
- d. Disabled spectators, including but not only wheelchair users, cannot satisfactorily be accommodated among, or in many cases behind, standing spectators. If spectators stand in seated areas, they may prevent ground management from making 'reasonable adjustments' to club policies, procedures and the physical environment to provide suitable accommodation in all parts of the ground for disabled spectators in accordance with the Equality Act 2010.



Annex G: Persistent Standing Risk Scoring Methodology

The diagram below summarises the persistent standing risk criteria and mitigation used as part of SGSA Matchday Inspections to generate persistent standing risk scores for every ground in England and Wales subject to SGSA licensing.

Four Risk Criteria (weighting %) (each scored from 1 (lower risk) to 5 (higher risk))

1. Number of distinct and separate areas of persistent standing (10%)
2. Numbers of spectators who persistently stand (60%)
3. Tiers and Gradients in areas where persistent standing occurs (20%)
4. Nature of crowd behaviour in areas where persistent standing occurs (10%)

Pre-mitigation score:

Risk scores, derived from each of the four risk criteria shown above are added together

Mitigations limited to:

- a) Seats Incorporating Barriers/Seats with Independent Barriers and
- b) Higher barriers on front walls of upper tiers

Proportion of seats where persistent standing (PS) observed and where a physical environment mitigation is present	Mitigation a) – reduction to PS risk score	Mitigation b) – reduction to PS risk score
90% or above	80%	10%
60%-89%	60%	5%
31%-59%	40%	5%
11%-30%	20%	0%
10% or below, or not present	0%	0%

Post-mitigation score:

Mitigations a) and b) from the table above are added together and then applied to the Total Pre-mitigation score



C. Oversight and Licensing Policy

The Oversight and Licensing Policy outlines how the SGSA will discharge its oversight and licensing powers under the Football Spectators Act 1989.

Following the receipt of legal advice, the Policy has been reviewed and amended to more clearly reflect the SGSA's statutory position in relation to events other than designated football matches.

The change is reflected in a proposed new paragraph 24, under the sub-heading 'Events other than designated football matches'.

What does the change mean?

The change has been made to more clearly reflect SGSA's legal, statutory remit in relation to oversight of local authority safety certification. It removes any potential ambiguity so that it is clear that for events held at SGSA licensed grounds other than designated football matches (for example concerts or other sporting events), the SGSA does not have regulatory powers.

In practice, local authorities and grounds will be able to continue to ask SGSA Inspectors for advice. However, this will be limited solely to advice and guidance. A local authority or ground should not take this advice as a directive from the SGSA.



Oversight and Licensing Policy

August 2017 (revised March 2019⁴¹, March 2022⁴², July 2022⁴³ and July 2026⁴⁴)

About this document

This document sets out the Sports Grounds Safety Authority's (SGSA's) policy on how it will discharge its oversight and licensing powers under the Football Spectators Act 1989.

Regulatory role

1. Under the provisions of the Football Spectators Act 1989 (1989 Act) the SGSA has two regulatory responsibilities:
 - i. To keep under review the discharge by local authorities of their functions under the Safety of Sports Grounds Act 1975 (1975 Act) in relation to grounds at which designated football matches are played (section 13 of the 1989 Act).
 - ii. To issue licences to admit spectators to any premises for the purpose of watching any designated football match played at those premises (sections 10-12 of the 1989 Act).

Designated football matches are defined as those matches played at the home grounds of clubs in the Premier and English Football Leagues, Wembley and the Principality Stadium⁴⁵.

2. This policy sets out the SGSA's regulatory objectives and how it will discharge its statutory responsibilities under the 1989 Act.

Regulatory objectives

3. The SGSA's principal purpose is to ensure sports grounds are safe for everyone.
4. The SGSA will use its regulatory powers in a risk-based and proportionate way to ensure reasonable safety is maintained at the home grounds of clubs in the Premier League and English Football League, Wembley and the Principality Stadium. Flow diagrams at Annex A summarise how SGSA will use its regulatory powers, which is outlined in more detail below.
5. Safety is a broad term which means that people present at a sports ground are protected against dangers of physical harm or injury arising from being present. In today's changing world, such dangers could arise from a range of factors including sports ground structures, safety management arrangements, terrorism, crowd disorder and other anti-social behaviour by individuals or groups which may cause physical harm or injury. Safety at a sports ground is not limited to the safety of spectators; it includes the safety of all people present at the ground. This will include measures to ensure the protection of groups such as club employees, stewards, agency staff,

⁴¹ March 2019 version reflects the publication of the sixth edition of the Guide to Safety at Sports Grounds (Green Guide).

⁴² March 2022 version reflects the introduction of licensed standing areas from 1 January 2022.

⁴³ July 2022 version reflects the ongoing operation of licensed standing areas beyond the 2021/22 season – see paragraph 38.

⁴⁴ July 2026 version includes an amendment to paragraph 16 and a new paragraph 24 that clarify SGSA's approach to Local Authority oversight under Section 13 of the Football Spectators Act 1989.

⁴⁵ For full statutory definition see: [Football Spectators \(Designation of Football Matches in England and Wales\) Order 2000](#).



medical staff, players and officials during an event. However, it does not extend to any risks inherent from participation in the sporting or competitive activity.

6. Responsibility for safety at a ground where designated matches are played rests with ground management. This is regulated by the safety certificate issued by a local authority under the 1975 Act.
7. In overseeing how local authorities discharge their functions and in taking licensing decisions, the SGSA will seek to satisfy itself that appropriate provision is being made to secure reasonable safety at a ground. The SGSA believes that true safety comes when those who are responsible understand and believe in it for themselves. It cannot be imposed or achieved through external regulation alone.
8. The SGSA will therefore work in partnership and seek to ensure the provision of reasonable safety at sports grounds at which designated football matches are played through education, guidance and persuasion. If such an approach fails and the SGSA is concerned that reasonable safety is being compromised by the actions or inactions of others, the SGSA will use its regulatory powers to ensure reasonable safety is maintained.
9. The SGSA reserves the right, however, to take urgent action using its direct regulatory powers if a significant safety issue occurs in or around a SGSA licensed ground that merits such an approach (see paragraphs 25-29).
10. The SGSA's regulatory powers to insert a condition in a safety certificate issued by a local authority to any ground at which designated football matches are played (section 13 of the 1989 Act) and to issue licences to admit spectators (section 10 of the 1989 Act) are complementary and are not mutually exclusive. The SGSA is able to use both powers to regulate safety if it considers it appropriate to do so. The SGSA's licensing powers are particularly wide and, in addition to enforcing the Government's all-seater policy (see paragraph 34), can extend to other issues relating to the admission of spectators and the arrangements to which they are admitted, including facilities for disabled people.
11. Any condition inserted into a licence would only apply when the ground is being used for a designated football match, while a condition in a safety certificate would apply more widely to any activities specified in the certificate.
12. In line with the Hampton principles⁴⁶, the SGSA will take a risk-based approach to all its regulatory activity, ensuring that the focus of attention is on those sports grounds where the actions or inactions of the ground management or the local authority threaten to compromise the reasonable safety of those at the ground.

Relationship with other agencies and regulatory bodies

13. The SGSA recognises the scope of its responsibilities extends into areas where other agencies are involved and other regulatory regimes exist; for example the safety of those working at a sports ground will also be covered by the Health and Safety at Work legislation. In such circumstances of regulatory overlap, the overriding principle should always be that the more specific legislation shall have primacy. In such cases the SGSA will seek to reach agreement with the other regulatory body with a view to ensuring that there is no duplication of regulatory control.

⁴⁶ *Reducing Administrative Burdens: Effective Inspection and Enforcement*, Philip Hampton, March 2005, included within the Regulators' Code: <https://www.gov.uk/government/publications/regulators-code>



14. Where an issue within the SGSA's remit is being appropriately addressed by another specialist agency the SGSA would not normally seek to take regulatory action.

Oversight of local authorities

15. Under the provisions of the 1975 Act where a sports ground has been designated by the Secretary of State for Digital, Culture, Media and Sport as requiring a safety certificate, the local authority is required to issue a certificate containing such terms and conditions as it considers necessary or expedient to secure reasonable safety at the sports ground when it is in use for any activity specified in the safety certificate, to monitor compliance with that certificate and where necessary take any appropriate enforcement action.
16. Under the provisions of section 13 of the Football Spectators Act 1989 (1989 Act) the SGSA has a statutory responsibility to keep under review the discharge by local authorities of their functions under the 1975 Act in relation to sports grounds at which designated football matches are played. The SGSA in discharging that responsibility may examine the safety certificate as a whole, to the extent that matters contained within it relate to or materially affect the safety of spectators at designated football matches. The SGSA will provide detailed advice and guidance on all aspects of safety certification and, at appropriate intervals, examine whether the local authority's policies, decisions and actions on the following matters are reasonable:
 - the issue, revision and amendment of the safety certificate
 - the terms and conditions of the safety certificate, especially the prescribed capacity
 - the certificate holder's compliance with the terms and conditions of the safety certificate.
17. The SGSA needs to be satisfied that terms and conditions in safety certificates, or the content of accompanying operations manuals, are sufficient to ensure the reasonable safety at the ground. These terms and conditions should be consistent with the particular circumstances at the ground concerned. The SGSA shall seek to encourage and persuade all local authorities to issue risk-based safety certificates.
18. The SGSA will not merely concern itself with the contents of safety certificates but also with the procedures adopted by the local authorities for determining the contents, for monitoring and for enforcing compliance. It will promote consistency and good practice. The process of local authority oversight is outlined below and in a flow diagram in Annex A, Figure 1.
19. The SGSA will not intervene formally where it considers terms and conditions to be excessively stringent provided that these do not put the safety of those at the ground at risk. Action by the SGSA is not a substitute for ground management's statutory right to appeal to the courts.
20. The SGSA will carry out its statutory review function by:
 - attendance at Safety Advisory Groups, meetings with the local authority and with such other parties that it may consider appropriate
 - monitoring the contents of the safety certificate, the records required to be kept under the terms and conditions of the safety certificate, and such other documents as it may consider relevant



- a regular cycle of audits of local authorities' safety certification procedures, with the baseline exercise conducted in the 2021/22 season informing a subsequent risk-based approach on the frequency of such audits⁴⁷
 - proactive monitoring of compliance with the requirements and conditions of the safety certificate by way of matchday inspections to the sports grounds concerned.
21. Day to day contact with individual local authorities will be handled by SGSA inspectors. Contact will normally be with the officer with delegated responsibility for safety certification who may or may not be the Chair of the Safety Advisory Group. If issues cannot be resolved at this level, they will be escalated to the SGSA's Head of Inspectorate.
 22. If the SGSA is unable to persuade the local authority to take the appropriate action and, as a consequence, it is felt that reasonable safety is being compromised the SGSA shall exercise the power provided by section 13(2) of the 1989 Act to issue a notice to the local authority to add a relevant condition to the safety certificate, in accordance with the statutory consultation requirements⁴⁸. Any such notice will be issued by the SGSA Chief Executive and the local authority's enforcement of the condition monitored by the SGSA inspector.
 23. Should a local authority fail to satisfactorily enforce any condition inserted into a safety certificate under the provisions of section 13(2) of the 1989 Act, the SGSA shall consider, subject to the consultation required under section 10(11) of the 1989 Act, whether to insert a condition⁴⁹ into the licence issued in respect of the ground. Compliance with any such condition shall be monitored by the SGSA inspector and any non-compliance dealt with as a breach of a licence.

Events other than designated football matches

24. Additional to discharging statutory responsibilities for the oversight of Local Authorities as outlined at paragraphs 15-23, SGSA may also engage as appropriate with ground management, the relevant local authority, and the relevant Safety Advisory Group, in circumstances where a SGSA licensed ground is hosting an event other than a designated football match. Such SGSA engagement, however, will be limited solely to the provision of advice and guidance. Ground management will be responsible for safety at the ground for the event (see paragraph 6), and the relevant local authority will be responsible for issuing the safety certificate with appropriate terms and conditions to secure reasonable safety at the sports ground for the event (see paragraph 15).

Responding to a significant safety issue

25. Without prejudice to the stated approach outlined above as to how the SGSA will discharge its oversight powers under the 1989 Act, the SGSA may take direct action using its regulatory powers under sections 10-13 of the 1989 Act if a significant safety issue occurs in or around a SGSA licensed ground. A significant safety issue is defined here as any event at a SGSA licensed ground that:
 - a. represents a significant risk to spectator safety, and

⁴⁷ High-risk local authorities will be audited more frequently than medium and lower risk authorities. Medium and lower risk authorities will be audited more frequently if SGSA is made aware of new information since the previous audit to merit such increased frequency.

⁴⁸ Section 13(3) of the 1989 Act.

⁴⁹ Section 10(10) of the 1989 Act.



- b. in the judgment of the SGSA, requires urgent remedial action to be undertaken before spectators can safely be re-admitted.
26. In such circumstances, the SGSA will (as outlined in Annex A, Figure 3):
 - a. write to the relevant licence holder in ground management, copied to the local authority, seeking a detailed report of the incident, including the likely causes of the incident and remedial action being taken to prevent a recurrence;
 - b. work with the local authority and other partners to determine whether urgent amendments are required to the ground's safety certificate and/or the way in which all relevant partners coordinate the management of Zone Ex (see the Guide to Safety at Sports Grounds (Green Guide) sixth edition Section 6.10);
 - c. notify the SGSA Board in writing and if appropriate convene a meeting of the Board at the earliest opportunity to inform the Board of the situation;
 - d. determine whether direct regulatory action by the SGSA is necessary and, if so, what form of regulatory action is necessary in the circumstances, having regard to the facts of the individual case; and,
 - e. assess whether a significant safety issue at a particular SGSA licensed ground has strategic implications for other SGSA licensed grounds and, if so, take action accordingly (see also paragraph 30).
27. If the SGSA determines that direct regulatory action by the SGSA is necessary it may, depending on the seriousness of the case, use its statutory powers to take one or more of the following courses of action:
 - a. direct the relevant local authority to insert a condition in the safety certificate for the ground⁵⁰;
 - b. change or insert additional licence conditions in the SGSA licence for the ground⁵¹; and/or
 - c. in serious cases where the SGSA determines that the remedial action proposed by the licence holder will not address the relevant safety risks, including where the licence holder fails to cooperate with the SGSA's investigation (see paragraph 26 a and b), the SGSA may suspend the ground's licence with immediate effect⁵².
28. In determining the timings of the steps outlined at paragraphs 26-27 above, the SGSA will take into account the seriousness of the safety issue, the timing of the next designated football match scheduled to be hosted by the ground, and the statutory notice periods required under the 1989 Act.⁵³
29. For further information on the statutory notice periods required by the 1989 Act, please see paragraphs 52-53.

⁵⁰ Section 13(2) of the 1989 Act.

⁵¹ Section 10(10) of the 1989 Act.

⁵² Section 12(1) of the 1989 Act. Please note that in urgent cases the SGSA has the power to suspend a licence without carrying out a prior consultation – see section 12(5) of the 1989 Act and paragraph 54 of this policy.

⁵³ Section 13(3) (powers to direct a local authority to insert a safety certificate condition) and section 10(11) (powers to vary the SGSA licence) of the 1989 Act.



National safety issues

30. The SGSA recognises that there may be national safety issues which call for a consistent approach across all grounds at which designated football matches take place. In such cases, once it has first sought to educate and persuade, including discussing the issue with local authorities, the SGSA shall consider whether the nature of the issue is such that it should consult and then issue a notice⁵⁴ to all local authorities requiring an appropriate condition to be inserted into a safety certificate or the management of the issue to be included within an operations manual. The local authority's enforcement of such conditions shall be monitored by the SGSA inspector. Should the local authority fail to satisfactorily enforce the condition the SGSA shall consider, subject to the consultation required under section 10(11) of the 1989 Act, whether to use powers under section 10(10) of the 1989 Act to insert the condition into the SGSA licence issued to the ground.

Licensing

31. Under the provisions of section 10 of the 1989 Act, the SGSA issues an annual licence on 1 August each year with a licensing period that runs to 31 July the following year, to allow spectators to be admitted to a ground at which a designated football match is to take place in England and Wales. The process involved is set out below, and in Annex A, Figure 2.
32. As set out above under "Regulatory objectives", SGSA's licensing powers can be used to regulate safety and can also extend to other issues relating to the admission of spectators and the arrangements to which they are admitted.
33. A key purpose of the licence issued to those grounds concerns the risks attached to standing by spectators. The SGSA's approach is to ensure that:
 - a. the Government's policy in respect of all-seater stadiums is enforced at those grounds to which the policy applies (see paragraphs 34-37);
 - b. those grounds subject to the all-seater policy who wish to operate licensed standing areas meet SGSA's licensed standing criteria, including Supplementary Guidance 01: Safe Standing in Seated Areas (SG01) (second edition) standards, for such areas⁵⁵ (see paragraph 38); and,
 - c. at any other ground, any conventional terraced standing accommodation is of the specified standard (see paragraphs 39-42).

All-seater grounds

34. The requirement for football grounds in the top two divisions of English football to have all-seater stadia has been in place since 1994. It is recognised that it would be unreasonable to expect a club that is promoted to the Championship for the first time to immediately replace any existing terracing with seating. However, they are expected to do so before they commence their fourth season in either the Championship or Premier League.
35. Once a club has been in the Championship or the Premier League for three seasons (cumulative), the Secretary of State for Digital, Culture, Media and Sport will consider instructing the SGSA to include conditions into the licence issued to the ground in

⁵⁴ Section 13(2) (issuing notice) and 13(3) (associated consultation) of the 1989 Act.

⁵⁵ The licensed standing criteria and Supplementary Guidance 01 (SG01) – Safe standing in seated areas can be accessed here: [SGSA licensed standing](#).



respect of the seating of spectators, but before doing so the Secretary of State is required to consult the SGSA.

36. Where the SGSA wishes to make recommendations to the Secretary of State, and in particular where it is aware a club will be seeking an extension to the deadline, the SGSA is required, under the provisions of 11(5) of the 1989 Act, to consult with the local authority in whose area the ground is situated. Although there is no similar statutory requirement for the SGSA to consult with the licence holder, the SGSA will do so before making any recommendations to the Secretary of State. Further details on how it will consult in such circumstances are at Annex B.
37. Once the consultation is complete, unless the Secretary of State agrees to any extension or other variance, the SGSA will be directed by the Secretary of State to include conditions into the licence of any club that has spent three years or more in the top two divisions of English football since the 1994/95 season. These conditions are a matter for the Secretary of State but currently provide that:
 - Only seated accommodation shall be provided for spectators at a designated football match.
 - Spectators shall only be admitted to watch a designated football match from seated accommodation.

Licensing Standing Areas

38. Initially, SGSA licensed grounds with licensed standing areas were limited to five 'early adopter' grounds subject to the all-seater requirement which successfully applied in autumn 2021 to join an 'early adopter' programme of grounds to operate such areas from 1 January 2022 to the end of the 2021/22 football season. An independent evaluation of the programme informed subsequent SGSA advice to the Secretary of State in June 2022 recommending licensed standing areas continue beyond the 2021/22 football season. On 4 July 2022 the Government accepted this SGSA advice and allowed the ongoing operation of licensed standing areas, subject to SGSA licensed grounds demonstrating compliance with SG01 and associated licensed standing criteria⁵⁶.

Standing accommodation at the prescribed standards

39. Clubs not subject to the all-seater requirement will be permitted to continue using conventional terraced standing accommodation provided it is of the specified standard in respect of the layout, strength and positioning of barriers. In considering whether to licence the use of each individual terrace the SGSA will have regard to the following criteria:
 - i. whether the layout:
 - comprises continuous crush barriers between radial gangways, as outlined in paragraph 11.9 and illustrated in Figure 19 of the sixth edition of the Guide to Safety at Sports Grounds (Green Guide); and
 - is such that all spectators are within 12 metres of a gangway or exit as measured along a line of unobstructed travel from the viewing position (see paragraph 13.5.b of the sixth edition of the Green Guide).
 - ii. whether the spacing, strength and construction of all the crush barriers conform to paragraph 11.2 and Figure 14 of the sixth edition of the Green Guide.

⁵⁶ For further details about licensed standing, including the associated criteria and Supplementary Guidance 01 (SG01) – Safe Standing in seated areas, see: [SGSA Licensed Standing](#)



- iii. whether the height and positioning of all the crush barriers accord with paragraph 11.11 and Figure 20 of the sixth edition of the Green Guide.
40. It should be assumed that level standing areas or non-stepped sloping areas will not form part of the viewing accommodation that will be licensed for spectator use.
41. Any club entering the English Football League for the first time will have three seasons to bring any terracing up to the specified standard. Any applications from such clubs to extend the three-year deadline will be considered against the criteria set out in paragraphs 39-40 above. The SGSA recognises that there may be a small number of existing terraces at clubs entering the English Football League for the first time which consist of non-continuous crush barriers, but which were built strictly in accordance with the edition of the Green Guide in place at the time of building and now comply fully with paragraph 11.10 of the sixth edition of the Green Guide. The SGSA will consider sympathetically applications to license any terraces that fully satisfy these criteria.
42. Where a club in the Premier League or the Championship faces a deadline for meeting the all-seater requirement, or a club in Leagues 1 or 2 for bringing its terraces up to the prescribed standard, the SGSA will, when considering any licence application during the three-year deadline, seek to satisfy itself that the licence holder has achievable plans for meeting the deadline.

Non-safety issues

43. Licences issued by the SGSA can encompass issues wider than the Government's all-seater policy and ensuring any permitted standing accommodation is of the specified standard. The SGSA's licensing powers can be used to regulate safety and can also extend to other non-safety issues relating to the admission of spectators and the arrangements to which they are admitted. If an issue which cannot be addressed through a safety certificate is brought to the SGSA's attention and it is persuaded that the licence would be the most effective way of addressing it, consideration shall be given to including appropriate conditions within the licence.
44. The SGSA's current policy is not to take the facilities provided for disabled people into consideration when issuing licences. Instead, the SGSA will seek to work in partnership with the Equality and Human Rights Commission (EHRC), other relevant stakeholders and with clubs, and encourage good practice in this area by providing advice and guidance.

Licensing process

45. When considering the renewal of a licence the SGSA will wish to be satisfied that further licence conditions are unnecessary. When submitting its licence application, the applicant may be required to provide information in respect of the safety of the ground, including its safety management systems and procedures, or any other issue which the SGSA considers relevant to its licensing decision. Where such information is to be requested licence applicants will be given a minimum of two months' notice of what will be required to be submitted with the licence application.
46. In addition to the information requested of clubs already subject to the SGSA's licensing requirements, any club seeking promotion to League 2 of the English Football League will be asked to supply the following additional information/documentation:
 - a copy of the ground's safety certificate or any regulated stand safety certificates,



- a copy of the capacity calculations for the ground and each individual section of the ground, together with an assessment of the (P) and (S) factors⁵⁷,
- a copy of either the operations manual or event day management plan.

Prior to the SGSA considering any licence application from a club seeking promotion an SGSA inspector will visit the ground on a match day to validate the capacity calculation and whether the physical conditions at the ground and the ground's safety management would support the (P) and (S) factors if the club secured promotion.

47. On receipt of each licence application, the relevant SGSA inspector will prepare a written report for the SGSA Chief Executive taking into account the information submitted in the licence and the inspector's knowledge of the ground as a result of the SGSA's oversight activity. In doing so the inspector will have regard to the specific matters outlined in section 10(12)(c) of the 1989 Act. The written report will be cleared by the SGSA Head of Inspectorate and the SGSA Chief Executive, and will include a licensing recommendation, along with the following:
 - a. Ground overview, including structures and installations
 - b. Club overview, including governance and safety leadership
 - c. Safety management team
 - d. Persistent standing/fan disorder
 - e. Competence of local authority
 - f. Risk assessment and summary.
48. The SGSA will act proportionately when considering licence applications, as outlined above and in a flow diagram in Annex A, Figure 2. The reasonable safety of those at the ground will be treated as an overriding consideration. The SGSA Chief Executive will prepare an overview report informed by individual inspector written reports (see paragraph 47), for the Board's information. Once the process is complete and based on the SGSA's Chief Executive's decision, , unless there are issues of concern (see paragraph 49 onwards), the licence will be issued.

Compliance and enforcement

49. Where there are issues of concern identified from the documents supplied by the applicant which impact on the reasonable safety at the ground, the SGSA inspector will liaise with the applicant and local authority to agree how the issues should be addressed before making a licensing recommendation. The SGSA will take a similar approach in the first instance if issues which impact on the reasonable safety at the ground arise during a licensing period after a licence has been issued.
50. If the issues cannot be resolved by education and persuasion the SGSA will consider issuing a notice⁵⁸ requiring appropriate conditions to be inserted into the safety certificate. Only if that fails to achieve the required improvement would the SGSA consider addressing the issue by acting using its licensing powers under Sections 10-12 of the 1989 Act. This could involve inserting additional licence conditions (see paragraphs 51-52) or, if the circumstances merit it, revoking, suspending or declining

⁵⁷ An explanation of (P) and (S) factors is provided in section 2,4 of the Green Guide.

⁵⁸ Section 13(2) of the 1989 Act, and following consultation as required by section 13(5) of the 1989 Act.



to issue a licence (see paragraphs 53-54). The process is also outlined in a flow diagram at Annex A, Figure 2.

51. Any decision to insert a new licence condition⁵⁹, whether safety or non-safety related, will only be taken after the statutory consultation required under section 10(11) of the 1989 Act which provides that SGSA shall not vary the terms or conditions of a licence without:
 - i. notifying the licence holder in writing of the proposed alterations or additions;
 - ii. giving the licence holder an opportunity to make representations about them within the period of 21 days beginning with the service of the notice; and
 - iii. taking any representations so made into account in making the decision.
52. A decision as to whether to insert a new licence condition will be made within 21 days of the end of consultation with the licence holder. The SGSA will provide full reasons for any decision to insert a condition.
53. In considering whether to revoke, suspend or decline to issue a licence⁶⁰, the SGSA will have regard, alongside any other relevant circumstances, to the matters outlined in section 10(12)(c)⁶¹ of the 1989 Act. The SGSA will also endeavour to consult the licence holder, the local authority and the Secretary of State before reaching a decision, taking into account the statutory consultation required under section 12(4)⁶² of the 1989 Act which provides that the SGSA shall not revoke or suspend a licence without:
 - i. notifying the licence holder in writing of the proposed revocation/suspension and the reasons for it;
 - ii. giving the licence holder an opportunity to make representations within the period of 21 days beginning with the service of the notice; and
 - iii. taking any representations so made into account in making the decision.

Urgent risk to spectator safety

54. The SGSA may determine, however, that the nature of outstanding remedial action represents an urgent risk to spectator safety. In such circumstances the SGSA may suspend the licence with immediate effect and, in parallel, notify the licence holder, the local authority, and the Secretary of State as soon as practicable of the grounds for such immediate suspension⁶³. The licence holder may apply to the SGSA for the licence suspension to be lifted at any time. In doing so, the licence holder must demonstrate to the SGSA's satisfaction that the risk to spectator safety that led to the suspension has been resolved or adequately mitigated.

⁵⁹ Section 10(10) of the 1989 Act.

⁶⁰ Section 12 of the 1989 Act.

⁶¹ This includes, but is not limited to, whether the equipment provided, procedures used and other arrangements in force at the premises are such as are reasonably required to prevent the commission or minimise the effects of offences at designated football matches.

⁶² The consultation period prescribed under s12(4) of the 1989 Act is subject to s12(5), which enables the SGSA to suspend a licence without observing the requirements of s12(4) if it is satisfied that the urgency of the case requires such a course of action – please see paragraph 54.

⁶³ Section 12(5) of the 1989 Act.



QUESTION

9. Do you agree or disagree with the proposed addition of paragraph 24, and the consequential amendment at paragraph 16, to clarify the SGSA's responsibilities under the Football Spectators Act 1989?

Agree / Partially agree / Disagree / No opinion

Please outline the reason(s) for your response.

10. Please provide any other comments you have on Oversight and Licensing Policy.



Annex A – Flow diagrams

Figure 1: Oversight of local authorities

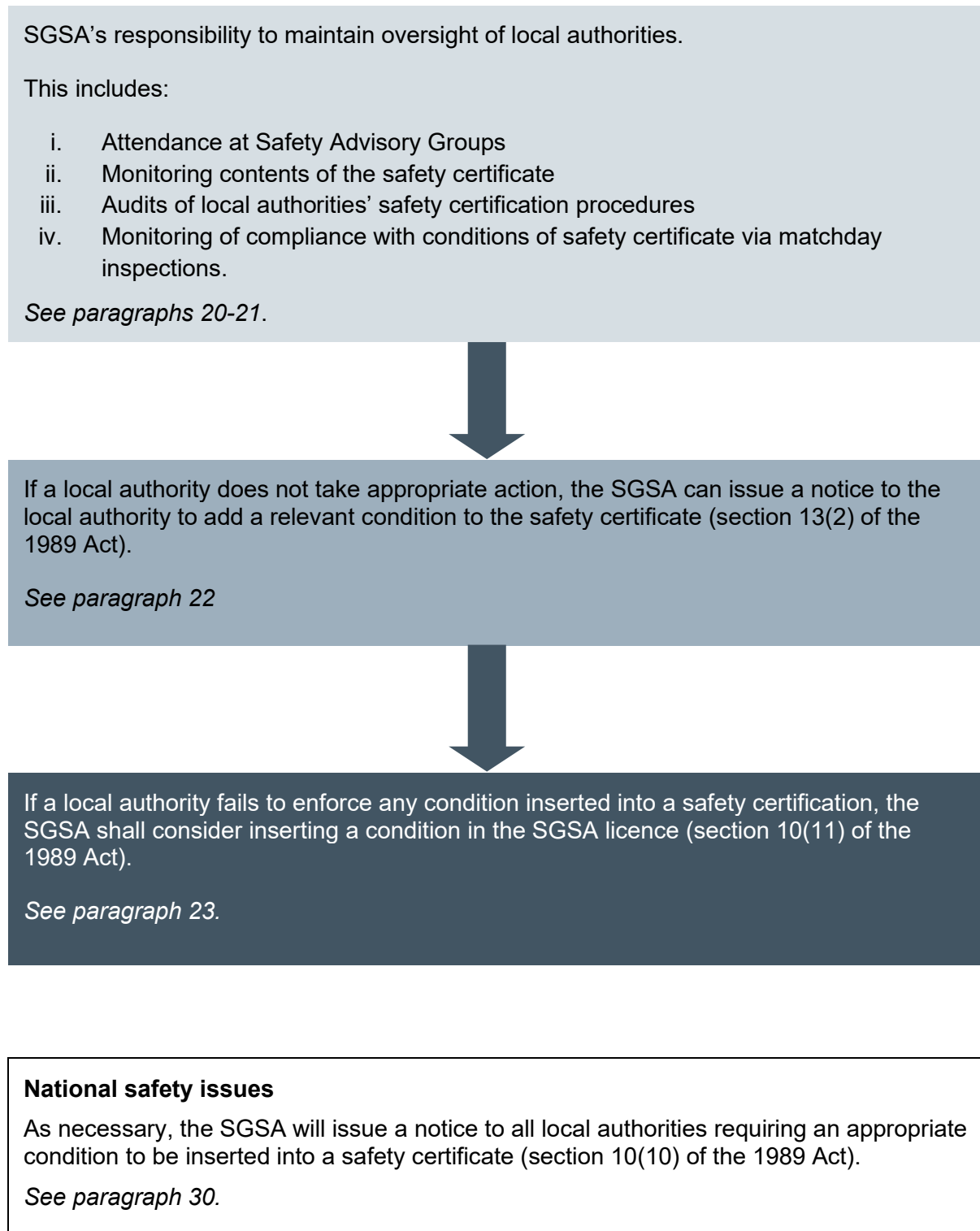




Figure 2: Licensing

The SGSA licence is issued annually for the period from 1 August to 31 July. This licence allows spectators to be admitted to a designated football match.

All-seater licence

- Applicable for clubs in Premier League or Championship for three seasons (cumulative) since 1994/95.
- Licence includes conditions that only seated accommodation shall be provided.

See paragraphs 34-37.

Licensed standing licence

- Applicable to grounds that meet SGSA's licensed standing criteria
- Allows standing in seated accommodation in limited areas, with appropriate infrastructure.
- All-seater licence conditions apply elsewhere in ground.

See paragraph 38.

Terracing licence

- Applicable to clubs not subject to all-seater requirements.
- Terraced standing accommodation must meet prescribed standards within the Green Guide.

See paragraphs 39-42.

Licence application submitted, with information including safety management systems and procedures.

Where new/additional information is needed, the SGSA will give a minimum of two months' notice of what will be required. See paragraphs 45-46.

Written report prepared for the SGSA Chief Executive by SGSA Inspector, including licensing recommendation, taking into account the information submitted in the licence application and the inspector's knowledge of the ground, based on oversight activity. See paragraph 47.

SGSA Chief Executive overview report on all licence applications considered at Board meeting for their information. Except where any compliance concerns are raised, licence granted. See paragraph 48.

Compliance and enforcement – issues identified

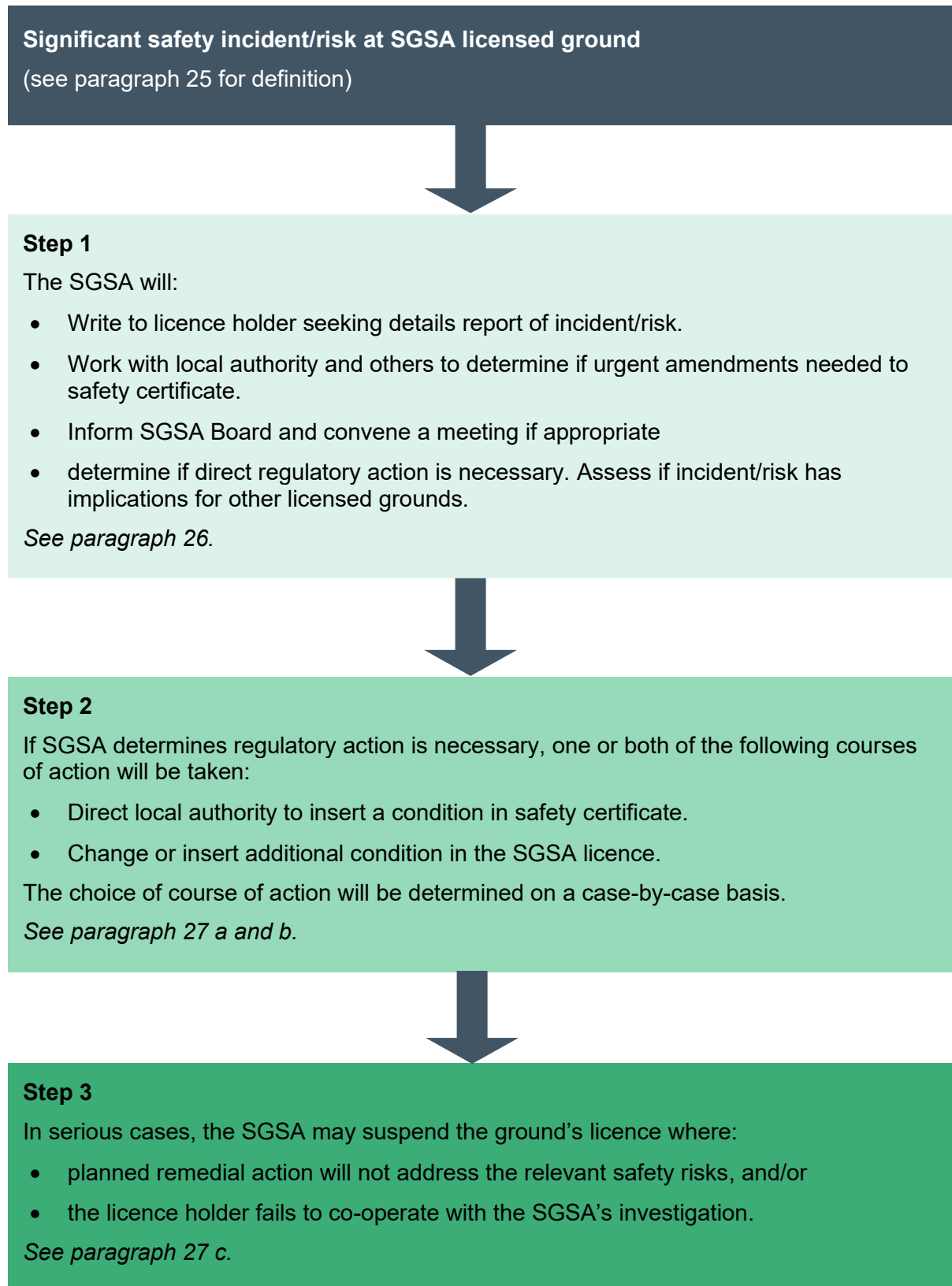
The overriding consideration in compliance and enforcement decision making is the reasonable safety of those at the ground.

- Step 1 – SGSA inspector to liaise with ground and local authority to agree how issues should be addressed, before making licensing recommendation.
- Step 2 – If issue cannot be resolved, SGSA will consider issuing a notice requiring a condition in the safety certificate.
- Step 3 – Should a condition in the safety certificate not deliver the necessary improvement in spectator safety, the SGSA will consider inserting an additional licence condition in its licence.
- Any new licence condition can only take place after consultation with the licence holder.
- Step 4 – Once previous steps exhausted, the SGSA will consider revoking, suspending or declining to issue a licence.

See paragraphs 49-53.



Figure 3: Responding to a significant safety risk





Annex B – SGSA consultation about requests for an extension to the all-seater deadline

(see also paragraphs 34-37)

1. In considering any case made by a licence holder and/or local authority for an extension to the deadline for meeting the all-seater requirement, the SGSA shall seek to be fair both to the licence holder who is seeking the extension and to other licence holders who have previously met the all-seater requirement within the specified deadline.
2. The SGSA would expect to support extensions only in the most exceptional circumstances. The SGSA shall not seek to lay down criteria because every case shall be judged strictly on its merits but by way of illustration, the SGSA would expect any licence holder seeking an extension to demonstrate to its satisfaction that:
 - its circumstances were wholly exceptional (i.e. not shared by other clubs)
 - the reasons for delay could not reasonably have been foreseen
 - the delay could not be attributed to the actions or inaction of the club.
3. Should a licence holder be seeking an extension because a club is in the process of moving to a new ground and wishes to avoid expenditure on its existing ground, the SGSA will not normally consider supporting a relaxation of the deadline until it has clear evidence that this would be for a strictly limited period and that the club concerned could realistically complete its relocation within a reasonable and definite timescale. In considering such cases the questions to which the SGSA will require clear answers are likely to include:
 - has the club received detailed planning permission?
 - has the site been acquired?
 - has the design of the ground and related facilities been finalised and approved by all relevant authorities?
 - has the necessary financial package been secured?
 - has the contract to build the ground been let?
 - has work started on site or has a start date been settled?
 - has a firm date for completion been fixed and are there safeguards against delay?
 - has the disposal of the existing site been agreed?