

Sport without spectators

Key safety considerations for football grounds

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Introduction

1. This guidance offers advice and direction to certifying authorities in their discharge of powers under the Safety of Sports Grounds Act 1975 and Fire Safety and Safety of Places of Sport Act 1987 in respect of any proposal to play designated football matches¹ with no spectators during the current COVID-19 pandemic restrictions.

Definitions

2. For the purpose of this guidance “no spectators” is intended to mean the playing of designated football matches without admission of the general public. It would however be anticipated that those admitted to the sports ground may include:
 - Playing squads.
 - Teams management and back room staff.
 - Match referees and assistants.
 - Essential employees and contractors of the sports ground, for example safety management and facilities management teams, ground staff and catering.
 - Employees of blue light services but only where deemed to be essential to the safe running of the match.
 - Accredited media staff, including TV, radio, press and photographers.
 - Public bodies with relevant legislative powers to enter the sports ground for the purposes of ensuring compliance with sports grounds and health and safety legislation, and current Governmental and sport governing bodies legislation and guidance in relation to COVID-19, including the local authority and the Sports Grounds Safety Authority (SGSA).
 - Representatives of the competition organiser, competition venue operator and elite sport organisations charged with responsibilities for ensuring venue and participant compliance with Government and sport governing bodies protocols in relation to COVID-19.
3. Those to be admitted should be issued with official accreditation specific to permitted access areas and limited to individual matches.
4. For the purpose of this guidance ‘certifying authority’ means the local authority responsible for issuing a General Safety Certificate under the Safety of Sports Grounds Act 1975 or the Fire Safety and Safety of Places of Sport Act 1987. Where the term ‘local authority’ is used instead this refers to the local government body responsible for enforcing the function being described, and in some areas of England this may not be the same organisation as the certifying authority.

General Safety Certificate

5. It is anticipated that any “no spectators” matches will be held within designated sports grounds as defined under the Safety of Sports Grounds Act 1975. A General Safety Certificate will therefore be in scope, which will, notwithstanding that the match will not be viewed by spectators, still contain requirements over all areas for which ground management has direct or indirect control. This could encompass offices or players’

¹ A designated 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”.



facilities within a stand, media facilities, club or leisure facilities, satellite buildings and access and egress to and from car parks.

6. A key consideration is whether the terms and conditions contained within the certificate are scalable or otherwise able to be amended to reflect the lower numbers of people within the stadium in line with the “no spectators” requirement. This would be particularly in the areas of staffing levels for stewards and medical teams, originally set in the certificate on the assumption of allowing entry to viewing spectators.
7. The numbers of those accredited from paragraph 2 above should be determined together with their expected viewing positions to enable amendment of the General Safety Certificate and any supporting Operations Manual and to assist in the development of a match specific Event Management Plan.
8. Consequently, the General Safety Certificate, whether prescriptive or risk-based, will require amendment to reflect the differing conditions of use of the sports ground as well as additional condition(s) to place a requirement upon the certificate holder to comply with Government and sport governing bodies protocols in relation to COVID-19 bio-security.
9. Under the Football Spectators Act 1989² the SGSA is able to direct certifying authorities to include conditions within a safety certificate. However, the SGSA anticipates that all certifying authorities with powers over those sports grounds selected to host “no spectator” matches will voluntarily insert a COVID-19 relative condition into General Safety Certificates.
10. SGSA proposes the following standard condition for insertion within both prescriptive and risk-based certificates:
“The holder shall ensure that, whilst provisions of the Health Protection (Coronavirus, Restrictions) (England) Regulations 2020 (as amended) or, as the case may be, the Health Protection (Coronavirus Restrictions) (Wales) Regulations 2020 (as amended)³ are in force, the procedures for the phased return of live sport, as set out in Appendix X of this safety certificate [prescriptive SC] or Section Y of the Operations Manual [risk-based SC], are followed.”
11. Consideration should be given where appropriate to the widening of invitations to Safety Advisory Groups beyond the normal membership to include participation from specialist areas of expertise where it is felt that added value could be achieved or where regulatory overlap exists.
12. It should be noted that as a result of the changes necessary to both prescriptive and risk-based styles of General Safety Certificate the requirements of regulation 5(5) of the Safety of Sports Grounds Regulations 1987 should be followed in relation to advertising the change.

Safety and security considerations

13. As stated within the *Guide to Safety at Sports Grounds (Green Guide)*, responsibility for all people in a sports ground during an event lies with the ground management.

² Section 13(2) of the Football Spectators Act 1989

³ S.I. 2020/350 and W.S.I 2020/353 (W.80)



14. Although this Sport Without Spectators guidance has a focus on bio-security risks arising from COVID-19, attention is still needed to identify and mitigate other safety and security risks which are more commonly found within sports grounds.
15. Management should therefore conduct detailed risk assessments for any proposed “no spectators” event and develop new, or amend existing plans, to reflect the differing risks arising and append to the sports grounds Operational Manual.
16. This guidance recognises not just the wider understanding of safety to all people within the sports ground during the event, but also a wider understanding of safety to include risks arising from COVID-19.
17. The list of headings below highlights some but not all areas of the Operations Manual where review and amendment of normal activity planning and delivery may be needed. The list is not exhaustive, recognising that review and amendment of each Operations Manual will be a matter for ground management, in consultation with the relevant certifying authority:
 - Event Safety Policy
 - Health and Safety at Work Policy
 - Risk register and any risk assessments arising
 - Event Management Plan
 - Stewarding Plan
 - Counter Terrorism Plan
 - Co-ordination plans for Zone Ex
 - Fire Safety Plan and Risk Assessments
 - Communications Plan
 - Medical Plan
 - Outside broadcast facilities within ground or secure external compound/perimeter
18. The local authority should receive evidence that checks on structures, installations and components at the sports ground and all relevant maintenance and safety checks of plant/life safety systems and stored and drinking water have been undertaken during the closedown period. Additionally, local authorities should check that the required inspections and tests pre-event/event day/during event are undertaken and suitably qualified staff are in attendance during the event.
19. Signage should be clear inside of the sports ground showing those areas which are open for movement, and those which are closed and therefore out of bounds.
20. Alternative means of escape should be identified to ensure the safety of those inside the sports ground in the event that egress cannot be achieved through normal routes. All doors on these emergency escape routes should be staffed by stewards to help facilitate and direct the movement to places of safety.
21. Communications and control should be maintained at all times that the sports ground is open to ensure the safety and security of all people inside. This can best be done by utilising the existing match control point. Event management should review the planning, operation and delivery of the following
 - Communications plan – lines and means of communications
 - Control point – organisations required in attendance
 - Radio communications/PA/CCTV



- Fire detection and alarm systems – match day operation to be utilised with fire stewards in numbers appropriate to the identified risk.

22. In cases where fixtures to be played without spectators are identified as potentially presenting a risk of crowds gathering outside stadia and/or may lead to other public order issues, it is recommended that Safety Advisory Groups are used as the vehicle to co-ordinate discussion to assess risks based on the latest local intelligence and identify suitable mitigations. Local police forces will advise on the current intelligence picture and be in receipt of national guidance from the UK Football Policing Unit.
23. Such mitigations may include for example club communications with fans, broadcasting or streaming games, or alteration to kick-off times.
24. If the outcome of discussions is that the risks cannot be mitigated, consideration should be given by all parties to moving the match to a neutral venue.

Medical and first aid provision

25. The hosting of “no spectators” matches should not place an unreasonable burden upon local ambulance or voluntary services.
26. It is likely that substantial reduction could be made in provision of medical team resource for matches played under the “no spectators” format. There would, however, still be a need for a minimum level of provision for those required to be in attendance.
27. The level of medical provision as required under the General Safety Certificate would be in addition to any provision arising from the requirements of Government and sport governing bodies protocols.
28. Risks arising from the event including all workplace risks should be fully considered and evaluated before setting out in a revised Medical Plan to be agreed and supported by local resources.
29. It is unlikely that trigger points as set out in the *Green Guide* would be reached, but the Guide should still be used as a source of reference and good practice.

COVID-19

30. The measures contained within [Stage 3](#) of the Government’s five stage framework for the return to full elite sporting competition build upon measures contained within Stages 1 and 2 which must also be followed together with any specific advice/protocols published by the sports governing bodies.
31. Stage 3 guidance advises on the resumption of domestic competition (no spectators) for teams and individual sports and sets out responsibilities applicable to a competition organiser, competition venue operators and elite sport organisations/individuals with the requirement for all to work collectively.
32. Stage 3 guidance promotes the need for the three groups identified above to develop risk assessment and mitigation plans to address the points contained within the guidance.



Health and safety at work

33. The move to Stage 3 and domestic competition will introduce requirements on Venue Operators contained within the Health and Safety at Work etc. Act 1974 (sections 2 and 3) to reduce workplace health and safety risks, including those associated with potential COVID-19 exposure, 'so far as is reasonably practicable' for all those admitted inside the sports ground as listed at paragraph 2 above. Responsibility will be to both employees and people other than employees who may be affected by the way an undertaking by the duty holder is conducted.
34. Government guidance on working safely during COVID-19, which has been informed by input from the Health and Safety Executive (HSE) and Public Health England, will be relevant here (see: [Working safely during COVID-19](#)). The Health and Safety (Enforcing Authority) Regulations 1998 allocate enforcement of health and safety law at sports grounds primarily to local authorities.
35. Despite the demanding circumstances, compliance with occupational health and safety requirements remains with duty holders (for example employers including TV contractors) and they must still meet their responsibilities in the context of the current public health risk. However, it is essential that all employers co-operate with the Venue Operator to co-ordinate the safety measures they need to take with those of other employers concerned.
36. When following Public Health England guidelines there may be occasions when a conflict with workplace risk assessments/method statements and working practices arises; for example, activity where for safety two or more people are required and therefore could not meet advised social distancing measures. In cases such as this, mitigation measures must be considered, developed and put into place to ensure observance of both legislation and current good practice.

Media provision

37. On the assumption that the matches are likely to be covered by television broadcast, it is essential that the sports grounds event management team considers as part of its match day planning any additional or alternative proposals put forward by broadcasters which differ from previously agreed, tried and tested arrangements. This may include for example additional advertising signage or new signage locations.
38. Normal pre-event planning and inspection should be carried out including for all television broadcast compound areas.

References

- Elite sport – return to domestic competition guidance: <https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-phased-return-of-sport-and-recreation/elite-sport-return-to-domestic-competition-guidance>
- Working safely during COVID-19: <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19>