



BRIEFING PAPER

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Standing at football

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Summary

Current position

From August 1994, under the *Football Spectators Act 1989* (as amended), clubs in the English Premier League and Championship have been required to provide all-seated accommodation. This followed Lord Justice Taylor's report (Cm 962, January 1990) into the Hillsborough disaster of April 1989. The report observed:

There is no panacea which will achieve total safety and cure all problems of behaviour and crowd control. But I am satisfied that seating does more to achieve those objectives than any other single measure. (para 61)

(...)

Apart from comfort and safety, seating has distinct advantages in achieving crowd control. It is possible to have disturbances in a seated area and they have occurred, but with the assistance of CCTV the police can immediately zoom in with a camera and pinpoint the seats occupied by the trouble-makers as well as the trouble-makers themselves... (para 64).

The 1989 Act applies in England and Wales.

Calls for change

The [Football Supporters' Association](#) (FSA) is [campaigning](#) for the introduction of safe standing areas.

In 2018, the English Football League and the FSA ran a ["Stand Up For Choice"](#) survey. The majority (94%) of respondents believed they should be able to choose whether to sit or stand at EFL matches.

A 2018 [petition](#) called for safe standing at Premiership and Championship grounds and was signed by over 112,000 people.

In June 2018, during a [debate](#) on the safe standing petition, the then Sports Minister, Tracey Crouch, acknowledged the increasing support for a change to the current policy. She announced that the Department for Digital, Culture, Media and Sport (DCMS) was commissioning an external evidence review to inform any decision on changes to the all-seater requirement. The review was undertaken by CFE Research between November 2018 and January 2019.

Evidence review published (October 2019)

An October 2019 [report](#) set out the findings of the review. According to the report, there was a lack of "robust evidence" on whether a change to current policy would ensure "equivalent or improved spectator safety". There was therefore "significant scope" for further research to build the evidence base.

What now?

The SGSA has commissioned independent [research](#) on the nature and scale of standing at football, the associated safety risks and how to mitigate them. The research is taking place through the 2019/20

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season. [“Emerging findings”](#) were published on 7 February 2020. These found that, among other things:

...installing barriers (or safety bars) has had a positive impact on spectator safety, particularly in mitigating the risk of crowd collapse. Celebrations are more orderly with limited opportunity for forward or backwards movement compared to observations in seated areas. Further, safety staff feel that the introduction of barriers has not encouraged standing where supporters previously sat...

The SGA’s final report will be published in summer 2020.

The Conservative Party [Manifesto](#) for the 2019 General Election included a commitment to “work with fans and clubs towards introducing safe standing”.

On 28 January 2020, the Sports Minister, Nigel Adams, said that the Government was “very keen” to deliver the Manifesto commitment but would have to be “guided by the [SGSA] evidence and be mindful of everyone; the fans, the Hillsborough families”.

1. The current position

The Football Spectators Act 1989

From 1 August 1994, under the *Football Spectators Act 1989* (as amended), all football clubs in the English Premier League and Championship have been required to provide all-seated accommodation. Clubs promoted to the Championship for the first time have up to three years to convert any standing areas to seats. Once converted, grounds must remain all-seated, even if a club is relegated from the Championship.

The 1989 Act set up the Football Licensing Authority (FLA) to operate a licensing system for grounds used for designated football matches¹ and to monitor local authorities' oversight of spectator safety. In November 2011, the FLA's responsibilities passed to the [Sports Grounds Safety Authority](#) (SGSA).²

It is an offence to admit spectators to a designated football match without a licence - issued by the SGSA³ - being in force.⁴ Specific licence conditions are prescribed in secondary legislation, subject to negative procedure, made under section 11 of the 1989 Act.⁵ At present, these require all-seated accommodation at Premier League and Championship grounds.

The 1989 Act only applies in England and Wales.

There are 72 all-seated international, Premier League and Football League grounds in England and Wales.⁶

A safe standing section at League 1 team Shrewsbury Town opened at the start of the 2018/19 season. The section holds over 500 spectators.⁷

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 Millennium 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 [Sports Grounds Safety Authority Act 2011](#), section 1

³ Section 10 of the 1989 Act

⁴ Section 9 of the 1989 Act

⁵ Section 11 of the 1989 Act

⁶ SGSA website, [All seated football stadia](#) [accessed 30 January 2020]

⁷ ["Shrewsbury Town safe-standing: How others are learning from trailblazing Salop"](#), *Shropshire Star*, 29 January 2019

2. Time for change?

Improvements in stadium design and technology, the wishes of some fans to stand, and the success of “safe standing” in European countries, have led to calls for the introduction of standing areas at Premier League and Championship grounds.

Rail seating is one method of implementing safe standing. Several German football clubs use it, including Borussia Dortmund and Wolfsburg. Each ticket holder is designated a seat in the stadium. The design allows for the seat to be locked upright, allowing supporters to stand. Each row has a safety barrier to improve crowd control. For games with all-seater requirements (such as UEFA or FIFA tournaments), the seats can be unlocked and the rail seating becomes a seated section.

A change to the current position would require the Secretary of State to direct the SGSA, through secondary legislation, to allow safe standing in specified areas of grounds.

What do fans think?

Football Supporters’ Association campaign

The [Football Supporters’ Association](#) (FSA) was formed in November 2019 when the Football Supporters’ Federation (FSF) and Supporters Direct merged.⁸ The FSA is campaigning for the introduction of safe standing areas. According to a [“Stand Up For Choice”](#) section of its website, the FSA wants:

- To scrap the existing legislation and ground rules that penalise supporters for standing at football and engender conflict amongst and against fans;
- To replace them with a system that allows individual clubs and their SAGs to work together to develop appropriate stewarding plans based on sound and rigorous dynamic risk assessment;
- To allow the creation of purpose built standing areas. We believe there are a number of alternative technologies that will allow clubs to create such areas, and it is up to clubs individually — in consultation with their supporters — to decide what mix of standing areas, permitted standing in existing seated areas and seated areas is right for them.

The FSA [site](#) gives further detail on its campaign.

“Stand Up For Choice” survey

The English Football League (EFL) and the then FSF ran a [“Stand Up for Choice”](#) survey between 27 April and 10 May 2018.

There were over 33,000 responses. The survey found that 94% of respondents wanted to be able to choose whether to sit or stand at EFL matches. It also found:

⁸ [“The FSF is now the FSA”](#), *FSF News*, 12 November 2019

- Over two-thirds (69%) of responders indicated that they would prefer to stand, compared to less than a quarter (22%) who claimed a preference for seating.
- Standing has also shown to be more popular with younger fans with the highest supporting demographic coming in the 18-34 age groups.
- There is a high demand for the choice to stand across all three divisions, with 94% of Championship supporters and 92% of League One and League Two supporters all in support.
- Nearly half (47%) of all fans said they would attend more games if licensed standing was available.
- There is no material difference between the responses compiled from supporters of the 21 EFL clubs who currently offer standing accommodation compared to supporters of clubs who don't.⁹

The full results are available from the [EFL website](#).

Shaun Harvey, the then EFL Chief Executive, commented:

(...) The safety of all fans attending football matches is the number one priority and we very much understand why the issue of standing at football matches is sensitive and the concerns that the Government may have in terms of changing the legislation.

However, it is the view of the EFL that the current legislation is not appropriate, with some League One and League Two clubs allowed standing areas in their stadiums but others not. When you consider the position in the Championship, it is equally unfair as clubs are required after three years to only offer seated accommodation.

The standard of football on the pitch can have no bearing on whether standing accommodation should be available. If standing is permitted at a football match in League One, then why not a game from the division above if they are designed to the same standards?...¹⁰

Premier League position

In November 2016, Premier League clubs discussed safe standing. In a statement, the League said these were "initial discussions" and that there was "no overall consensus on the matter".¹¹ The BBC reported that Sue Roberts, Secretary of the [Hillsborough Family Support Group](#), had said that introducing standing would be a "backwards step".¹² [The Hillsborough Justice Campaign](#) said that it supported a "full and objective debate".¹³

⁹ ["Stand Up For Choice: Biggest ever fan response shows overwhelming support in standing debate"](#), *EFL news*, 1 June 2018

¹⁰ Ibid

¹¹ ["Premier League statement on safe standing"](#), *Premier League News*, 17 November 2016

¹² ["Safe standing: Premier League clubs to have further talks"](#), *BBC Sport*, 17 November 2016

¹³ Quoted in ["Safe-standing initiative given a lift by Premier League mood swing"](#), *Guardian*, 16 November 2016

In April 2018, the Premier League said that safe standing was “complex and nuanced and clearly requires more research”.¹⁴

West Brom’s application for safe standing

In April 2018, it was reported that the Government had blocked an application by West Bromwich Albion, then in the Premier League, to install “rail seating” at the Hawthorns.¹⁵

During a June 2018 [debate](#), Tracey Crouch, the then Sports Minister, explained the DCMS’ decision:

(...) I recognise the increasing support for the Government to change the all-seater policy in the top two tiers of English football, and the interesting innovations in spectator accommodation in recent years... Those developments led the then premier league club West Bromwich Albion to make the request to the Sports Ground Safety Authority to run a rail seating pilot. The request to install rail seating made it clear that the intention was to create a permanent area within the ground where supporters would be freely permitted to stand. That would have been in breach of the licence conditions imposed on all clubs in the top two divisions under the powers set out in the Football Spectators Act 1989, the current legislative framework.

Ministers make decisions based on the evidence put in front of them within the legal framework permitted. Contrary to media reports, I did not receive a recommendation from the SGSA to approve the application. The club’s request would have required an immediate change in the law as it stands. As the application was for permission to start this coming season, colleagues will appreciate that the processes required would have taken more than the few months that Albion wanted them completed in. However, more significantly, the current legislative framework means that I cannot allow for any pilots. There is no wriggle room. It is either the status quo or changing the legislation.¹⁶

Petition in 2018 calling for safe standing

A 2018 [petition](#) called for safe standing at Premiership and Championship grounds:

Allow Premier League and Championship football clubs to introduce safe standing

Safe Standing offers a much safer alternative to fans who wish to stand, rather than sit at football matches. After the highly successful introduction to rail seating at Celtic Park, as well as numerous Bundesliga clubs, many football fans feel that laws preventing standing areas should be relaxed.

Some football clubs that already have successfully installed rail seating are: Celtic, Werder Bremen, Hamburg SV, VfL Wolfsburg, Hannover 96 and the famous “yellow wall” at Borussia Dortmund.

In conclusion, there is a clear demand for safe standing with 92% of respondents saying fans should be given the choice to stand in

¹⁴ Quoted in [“Premier League clubs want more evidence on safe standing”](#), *BBC Sport*, 18 April 2018

¹⁵ [“West Brom’s plans to introduce safe-standing section blocked by government”](#), *Independent*, 9 April 2018

¹⁶ [HC Deb 25 June 2018 c273WH](#)

safe standing areas, in a poll by the Football Fans Census, and it would only promote English football further by improving the overall matchday experience.

The petition closed on 8 June 2018. It was signed by over 112,000 people.

Government response

In its [response](#), the DCMS said that it would need “strong evidence” to change the current position:

(...) The Government’s current policy is that all-seater stadia are the best means to ensure the safety and security of fans at designated football matches in England and Wales. However the time is now right for us to reexamine that policy in light of the technological changes in stadium and seating design as well as the representations from both clubs and supporters on this issue.

(...)

Given the success of all seater stadiums, the safety reasons for introducing the policy, and the enhancements that seated spectators have enjoyed, the Government would need strong evidence and rationale to change that policy.

The Government is aware of the calls from a wide range of interest groups including some football clubs and supporters’ groups to introduce standing areas for spectators at football matches in the top two divisions of English football.

We will continue to listen to supporters’ groups and other stakeholders who would like to see the reintroduction of standing at football in the top two tiers. The introduction of rail seating at Celtic Park and more recently at Shrewsbury Town FC informs the debate about the future of spectator accommodation at football matches. It is important that we have this debate and that it is informed by the evidence...

The petition was [debated](#) in the House of Commons on 25 June 2018. Tracey Crouch, the then Sports Minister, acknowledged the increasing support for a change to current policy but said that any change needed to be evidence based. She therefore announced that the DCMS was commissioning an evidence review:

(...) The one thing we need to do is to collect and analyse the evidence that exists and ensure that all views on this issue can be heard and considered before we make any decision on changes to the all-seater policy...We need proper evidence and solutions about how risks associated with standing would be addressed and what systems might be needed to achieve this. The first step is to gather that data and to conduct further research if necessary.

Today I can announce that we will commission an external analysis of evidence relating to the all-seater policy...As well as looking at what evidence already exists and assessing its reliability, that work will look to identify any important gaps in data, including injury data, and recommend the best ways of filling them.

The premier league has already shared some of its injury data with me, collated in the SGSA format from its clubs. What is clear is that not enough information is collected to determine the circumstances, severity or outcome of injuries...it is clear that the

data needs further probing, and that is what I am announcing today...¹⁷

The evidence review was undertaken by CFE Research between November 2018 and January 2019.

3. Evidence review published (October 2019)

An October 2019 [report](#) set out the findings of the evidence review. The report concluded that there was a lack of “robust evidence” on whether a change to current policy would ensure “equivalent or improved spectator safety”. There was therefore “significant scope” for further research to build the evidence base.¹⁸

The executive summary set out the review’s findings in the following areas.

Safety risks and management of standing in all-seater stadia

The review found that persistent standing in seated areas happens at the majority of football grounds but the extent varies by match, club, stand, and within a game:

...There is a lack of sector consistency around what is meant by “persistent standing”. Assessments at two individual clubs concur that standing in seated areas is most dangerous during moments of excitement, followed by when leaving the stadium – both of which are permitted under the all-seater policy and therefore a risk that is unrelated to persistent standing.

Current evidence included in this review cannot fully assess the safety risk of persistent standing. Risk modelling suggests that there is a low risk of progressive crowd collapse as a result of standing during normal play, but that this risk increases depending on other factors (e.g. rake, crowd instability) and is considered to be higher at times of excitement. Since the all-seater policy has been introduced there have been no major football stadium disasters or reports of significant incidents of spectator injury.

Data on injuries sustained by supporters inside football stadia does not evidence a link with standing in seating areas. Of 1,550 injuries recorded by Premier League clubs during the 2017/18 season, none were attributed to persistent standing and 84% were reported as having no link whatsoever to standing. However, data is not currently collected in a way that can fully investigate any causal relationship between persistent standing and injuries.

Persistent standing is associated with other hazards, such as standing on seats, blocking gangways, overcrowding, and disputes. Measures to prevent persistent standing have had limited success; football clubs typically focus on keeping aisles and gangways clear to enhance spectator safety. One club has adopted a managed standing area, with an independently endorsed approach to risk management. However, this approach

¹⁷ [HC Deb 25 June 2018 cc273-4WH](#)

¹⁸ Jo Welford et al, [Standing at Football A Rapid Evidence Assessment](#), CFE Research, October 2019, pp5-6

relies on particular stadium characteristics and so may not be replicable elsewhere.

UK clubs which have implemented dual purpose/standing areas demonstrate clearly articulated risk assessments and operational plans for these areas comparable with seated areas. The impact this may have had on safety has not been evidenced.¹⁹

Developments in football spectating and safety since the introduction of the all-seater policy

The review said that it was difficult to isolate the impact of changes in stadium design on improved spectator safety:

Significant developments in stadium design are widely acknowledged to have improved spectator safety, as have comprehensive crowd management approaches, but it is very difficult to isolate the impact of individual changes on safety.

A number of options for standing in all-seater stadia have been implemented in UK clubs, including rail seating (Celtic FC, Shrewsbury Town FC), 2020/Grandstand seating (Wycombe Wanderers FC) and OxRails (Oxford United FC). Tottenham Hotspur FC have installed areas of "stadium seating with an integrated bar" in their new stadium. All of the above still allow for spectators to be seated. This review found no research that examines whether this modern infrastructure is more or less safe than current accommodation.²⁰

The wider impact of the all-seater policy

The review found there was no indication of a causal relationship between the all-seater policy and football attracting a more affluent and diverse crowd:

....Indeed there have been significant wider contextual changes related to fandom and the consumption of sport since the Taylor Report. It is difficult to predict whether managed standing areas would have an impact on crowd diversity.

There is a high level of fan support for the introduction of standing areas in all-seater stadia, and the choice to sit or stand in principle. A smaller proportion express that they themselves would actually like to stand, and there is emerging evidence that very few fans currently only sit, or only stand for the duration of a match. A small minority of respondents to fan surveys are opposed to standing areas.

Disorder in football stadia is a complex issue which occurs in both seating and standing areas, and cannot be attributed to any one factor. Data suggests that arrests and disorder do not occur any more frequently at grounds with licensed standing than those that are all-seater. Some suggest that a standing crowd is more difficult to manage, but we are aware of no research to indicate whether permitting standing areas in all-seater stadia might impact fan behaviour.²¹

¹⁹ Ibid, pp4-5

²⁰ Ibid, p5

²¹ Ibid, p5

4. What now?

The SGSA has commissioned independent research on the nature and scale of standing at football, associated safety risks and how to mitigate them. The research will take place over the 2019/20 season. The results will be published in summer 2020. The [SGSA website](#) explains:

(...)

The research follows on from the review into evidence relating to the all-seater policy commissioned by the Department for Digital, Culture, Media and Sport (DCMS). The review commissioned by DCMS identified a lack of evidence on standing at football grounds. This latest analysis of evidence commissioned by SGSA examines the existing data and research relating to:

- football matches taking place at all tiers of competition under the all-seater policy and other UK and International jurisdictions;
- persistent standing contrary to current policy, and associated safety and injury risk;
- the evolution in stadium design, seating technology and modern crowd management approaches, in particular the introduction of rail seating and other new seating products such as seats with independent barriers; and
- the permanent application of the policy once a stadium is brought in scope.²²

[“Emerging findings”](#) were published on 7 February 2020:

(...) There is no ‘one size fits all’ approach to the safe management of standing. Strategies to assure the safety of supporters are nuanced to take account of the physical features of the stadium, the behaviour and culture of supporters who occupy those areas, and the match context.

Research so far suggests that, overall, installing barriers (or safety bars) has had a positive impact on spectator safety, particularly in mitigating the risk of crowd collapse. Celebrations are more orderly with limited opportunity for forward or backwards movement compared to observations in seated areas. Further, safety staff feel that the introduction of barriers has not encouraged standing where supporters previously sat.

Other positive impacts include orderly egress, a reduction in the number of supporters leaning on/over perimeter fencing and a decline in conflict that is triggered by persistent standing. However, the risk of injury caused by climbing on infrastructure remains as supporters can climb on unlocked seats, seat backs and barriers. These areas should be monitored closely to identify and manage this behaviour. Areas with barriers can also be popular with supporters and require specific management strategies to control access and migration.

Incorporating wheelchair platforms into areas with barriers allows disabled ticket holders to be part of this experience. This is important for the development of progressive and inclusive approaches that encourage and enable a diverse range of supporters to engage with football.

²² SGSA website, [Research](#) [accessed 30 January 2020]

Away areas remain a challenge to manage for some matches. Persistent standing in away areas is extensive and migration within stands is more prevalent than in home areas. The installation of barriers as a strategy to enhance the safety of fans should not therefore focus solely on home areas, and management strategies specifically for away supporters are required.

Enforcing the all seater policy has been a source of conflict between fans who persistently stand and fans who wish to sit, as well as between fans and stewards, resulting in safety risks. The introduction of barriers appears to have reduced the potential for conflict, and the associated risks. Fans who buy tickets in these areas generally understand and accept that those around them will stand. Ticketing strategies to ensure that supporters are in the right area of the stadium for their standing preferences are crucial and require considerable thought and ongoing management.²³

The SGA's final report will be published in summer 2020.

The Conservative Party [Manifesto for the 2019 General Election](#) included a commitment to "work with fans and clubs towards introducing safe standing".²⁴

On 28 January 2020, the Sports Minister, Nigel Adams, said that the Government was "very keen" to deliver the Manifesto commitment but would have to be "guided by the [SGSA] evidence and be mindful of everyone; the fans, the Hillsborough families".²⁵

²³ SGSA, [The safe management of standing at football: Emerging findings](#), February 2020

²⁴ Conservative Party, [Get Brexit Done Unleash Britain's Potential](#), November 2019, p26

²⁵ ["Safe standing in top two tiers of English football could move closer with Government review this week"](#), *Daily Mail*, 28 January 2020; See also [PO 5492](#) [on safe standing areas], answered 23 January 2020

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