



MANAGEMENT OF PERSISTENT STANDING AT THE CARDIFF CITY STADIUM

UPDATE REPORT SIX

**Version 1.3
Report
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Prepared By
Dr Steve Frosdick
IWI Associates Ltd
Locks Heath, Southampton SO31 6DG

1. INTRODUCTION

- 1.1. This document is an independent report prepared by Dr Steve Frosdick of IWI Associates Ltd following a visit to the Cardiff City Stadium on Friday 5 April 2018 for the match between Cardiff City and Wolverhampton Wanderers.
- 1.2. This report provides an update on six previous reports (the original report and update reports one, two, three, four and five) and should be read in conjunction with those documents. The six previous reports are available to download from the link at <http://tinyurl.com/n2uo3v9>.
- 1.3. The report is intended to inform the forthcoming annual revision to the stadium operations manual against which the club is issued with a ground safety certificate by Cardiff City Council. The report is also intended to be read by members of the local Safety Advisory Group, fan representatives and any other stakeholders to whom the club chooses to circulate it.
- 1.4. This update report makes further comment on the management of persistent standing. For ease of reference, three sections from the original report have been brought forward to form the first three sections of this report. The content has been reviewed and, where appropriate, revised. This report is therefore structured in five sections:
 - The customer service context;
 - The legalities of standing in football grounds;
 - The risks around standing in seated areas;
 - Persistent standing in the Canton Stand; and
 - Persistent standing in the Ninian Stand.

2. THE CUSTOMER SERVICE CONTEXT

- 2.1. Cardiff City FC has been on what it describes as an ‘incredible journey’ since the ‘wake-up call’ it received in 2001. From a near bankrupt club in an antiquated stadium with management constraints, cultural apathy and infamous supporters, Cardiff City has metamorphosed into an award-winning and customer-friendly business whose fans have a vastly improved reputation.
- 2.2. In 2011, the Family (Grange) Stand was nominated for and won the ‘Best Customer Experience’ award at the Stadium Business Summit in Barcelona. The same year, the club also won ‘Family Football Club of the Year’ at the Football League (now EFL) Awards. The club have been awarded the Family Club award every year since 2011 and in 2018 won the EFL Family Club GOLD Award.
- 2.3. To transform the behaviour of its fans, the club worked closely with distinguished academics over a three year period. A report of the work was published as Stott C; Hoggett J and Pearson G (2011) ‘Keeping the Peace’: Social Identity, Procedural Justice and the Policing of Football Crowds. *British Journal of Criminology* – online 2011 pp 20.

- 2.4. The club's whole ethos is about differentiated customer service – recognising the diversity of its customer base and delivering a range of products and services which seek to meet the legitimate expectations of diverse market segments.
- 2.5. This ethos has been evidenced in a variety of ways, of which just some examples are:
- The very careful migration of customers from the old stadium to the new, ensuring that like-minded people were able to carry on sitting together;
 - Using the Canton Stand to attract the more vociferous supporters, drawing them away from the potential hotspot at the segregation line;
 - The range of activities provided in the Family Stand, ensuring that the match is part of an enjoyable day out;
 - The hosting arrangements for away fans, including an away family area and initiatives such as posters, shirt displays and showing DVDs to welcome the away fans to the stadium;
 - The efforts made to accommodate smokers by providing pass-out facilities during the time the stadium is open;
 - The provision of live music on the Canton concourse before the match; and
 - The voucher exchange scheme to speed up half-time beer sales.
- 2.6. The club has a clear understanding of who its stakeholders are and actively builds relationships with them. Fans are seen as key stakeholders and are actively consulted on all aspects of matchday operations.
- 2.7. The success of this customer service approach is evident from the results achieved in terms of season ticket sales, other revenues, awards won and record low arrest figures.
- 2.8. The club's arrangements for managing persistent standing in the Canton and Ninian Stands have to be seen in the context of this differentiated customer service ethos. Indeed the stakeholder meeting on Friday 11th January 2013 was opened with a presentation by the club on building relationships and the customer service journey to date. The specific question of managing persistent standing was thus located from the outset in a multiple stakeholder customer service context.
- 2.9. In essence, the vast majority of fans in the Canton Stand wish to stand up to watch the match. Since 2013, the club has therefore facilitated this by ensuring that any safety, security and service risks are being properly managed. Most importantly from a customer service point of view, any fans who did not wish to stand in the Canton Stand were helped to relocate to a more advantageous location at the same price.
- 2.10. Conversely, the majority of fans in the Ninian Stand wish to sit down. The club therefore continues to take proportionate action against the tiny minority of fans who continue to stand up in this area.

- 2.11. The update reports, of which this is the sixth since 2013, have continued to provide independent scrutiny of these arrangements. Those reports have been forwarded to the local Safety Advisory Group for the purposes of accountability.

3. THE LEGALITIES OF STANDING IN FOOTBALL GROUNDS

- 3.1. The law on standing in football grounds is derived from section 11 of the Football Spectators Act 1989. This provides that,

The Secretary of State may, by order, direct the licensing authority to include in any licence to admit spectators to any specified premises a condition imposing requirements as respects the seating of spectators at designated football matches at the premises; and it shall be the duty of the authority to comply with the direction.

- 3.2. This requirement currently applies only to grounds in the top two divisions of Welsh and English football. It therefore applies to the Cardiff City Stadium, which must, by law, be an all-seated ground.

- 3.3. Many supporters in all-seated grounds choose to stand in front of their seats for prolonged periods, even throughout the entire match. This is not illegal. Although clubs are legally obliged to provide seats and there is thus a clear expectation that fans will use them, nevertheless the supporters are not legally bound to sit down.

- 3.4. This point was confirmed in a letter sent by the Department for Culture, Media and Sport to the Football Supporters Federation in 2008. The latter stated,

At no point has it been argued that the individual spectator commits a criminal offence by standing in a seated area.

- 3.5. Standing in seated areas, is, however, contrary to ground regulations. Regulation 13 of the EFL's model set of ground regulations states,

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.

- 3.6. The ground regulations form a contract between the supporter and the club. By standing in contravention of Regulation 13, the supporter is in breach of that contract. This is a civil matter and it is up to the club to decide how to deal with it.

- 3.7. This regulation is included in the Ground Regulations displayed at the entrances to the Cardiff City Stadium. It therefore forms part of the contract which the fan accepts with the club on purchasing a ticket and entering the stadium. As with all contracts, the club may choose to waive a provision either in writing or through its actions. It is therefore open to the club by its actions to waive the requirement to sit down in the Canton Stand.

4. THE RISKS AROUND STANDING IN SEATED AREAS

4.1. RISKS TO SAFETY, SECURITY AND SERVICE

4.1.1. Standing in seated areas carries with it various reasonably perceivable risks to safety, security and customer service. These are:

- Progressive crowd collapse;
- Bumping and scraping;
- Blocked gangways;
- Obstructed viewing; and
- Disorderly conduct.

4.2. PROGRESSIVE CROWD COLLAPSE

4.2.1. Concerns about 'it' being inherently unsafe were until 2013 the main driver for regulatory demands for stadium managers to 'do something' about persistent standing and to 'make the fans sit down'. The fear was that someone standing up during normal play could fall over the back of the seat in front of them and trigger a progressive crowd collapse, resulting in crushing injuries or even death.

4.2.2. But is such standing inherently unsafe? How real is the risk of a crowd collapse? The answers to these questions are not as straightforward as the authorities might wish. It all depends on when the standing takes place. It also depends on the angle of rake in the seating deck.

4.2.3. A (then) Football Licensing Authority (FLA) report in 2002 referred to the risks and found that,

The risk of such falls and the likelihood of a cascading effect increase along with the gradient of the seating deck. The majority of upper tiers and many single and lower tiers have gradients above the 25° that the Guide to Safety at Sports Grounds (the Green Guide) considers safe for any standing accommodation, even where this is equipped with crush barriers to the highest standard. Indeed many seating decks, particularly on upper tiers, have gradients close to the recommended safety maximum for seating of 34°. Standing in a seated area with such a gradient must by definition be treated as unsafe.

4.2.4. In the same year, WS Atkins prepared a report for Trafford Borough Council. This looked at persistent standing in Manchester United's Old Trafford stadium. The report concluded that the most dangerous time for fans to be standing was at moments of excitement, such as when a goal is scored. The next most dangerous time was on egress when fans were leaving the stadium. The least dangerous time was passive standing during normal play.

4.2.5. 16 years later, the evidence still supports this assessment. The two most serious known accidents involving fans in seated accommodation in Wales and England both occurred in 2011 at times of high excitement. Both involved away fans falling from height after goals were scored in matches at Scunthorpe United versus Leicester City and Millwall versus Cardiff City. In the case of the Cardiff fan, the fall was from a barrier at the front of a radial gangway and not directly from the seating area.

- 4.2.6. It follows from the above that persistent standing in seated stands with angles of rake below 26° is NOT inherently unsafe and does not pose a risk of progressive crowd collapse. It is in fact less dangerous than standing at times of high excitement and then standing during egress, both of which are permitted.
- 4.2.7. To double-check that the angles of rake in the Canton Stand do not pose an inherent safety risk, the riser heights and tread depths were measured and the angles of rake calculated using a spreadsheet available from the Sports Grounds Safety Authority. The stand is parabolic (i.e. the angle of rake gradually increases) and so the measurements were taken in three places. The results were as follows:

Row	Seating row depth	Row riser height	Tan	Angle
B	800 mm	240 mm	0.30	16.70
O	800 mm	290 mm	0.36	19.93
HH	800 mm	340 mm	0.43	23.03

- 4.2.8. The angles of rake are thus below the maximum 25 degrees permitted for standing areas. There are therefore no inherent safety risks in the physical structure of the Canton Stand.

4.3. BUMPING AND SCRAPING

- 4.3.1. Regulatory authority demands have also been partly driven by perceptions of the risk of minor injury to fans lower limbs from bumping and scraping against the back of the seat in front of them.
- 4.3.2. In 2013, the evidence caused the regulatory authorities to back down on this claim. The Football League Persistent Standing Summary 2012/13 (up to 31 December 2012) shows that 878 games were played, watched by 7,714,527 people, of whom 464,877 (6.0%) had persistently stood. The response rate for the survey was 95%. It is recognised that there may have been some under-reporting of minor injuries by both the fans themselves and by clubs, however the number of reported injuries from such standing was zero – none at all.
- 4.3.3. More recently, with the rise of social media reporting, the observed persistent standing at ground around the country and the more public debate about standing in football grounds, there have been regular reports of fans suffering minor injuries from bumping and scraping, particularly during goal celebrations, when of course it is expected that fans will stand up. It is therefore important to note that no such incidents whatsoever have been reported in the Canton Stand. As with the risk of progressive crowd collapse, this can be attributed to the low angles of rake and the generous seating row depths in the Canton Stand.

4.4. BLOCKED GANGWAYS

- 4.4.1. Fans who are persistently standing take up more room than fans who are sitting down (typically 550 mm rather than 460 mm per person, according to the 2002 FLA report). Since only 24 standing persons can therefore ‘fit’ easily into a row of 28 seats, there is therefore a risk of lateral migration into the gangways and vomitories.

- 4.4.2. Blocked gangways and vomitories pose a safety risk because they inhibit both routine and emergency access by medical services, stewards and police.
- 4.4.3. They also pose a service risk as they make it more difficult for fans to move in and out to use the concourse facilities.
- 4.4.4. Blocked gangways and vomitories pose real safety and service risks which are far more compelling for the Canton Stand than the risks of injury already discussed. There is therefore an absolute requirement to keep gangways and vomitories clear.
- 4.4.5. For newly constructed stands, the *Guide to Safety at Sports Grounds* specifies a minimum seat width of 460 mm and a minimum seating row depth of 700 mm. According to the seating plan produced by Sebel Furniture Ltd (a copy of which is held by the club), the majority of seats in the Cardiff City Stadium are 480 to 500 mm in width. As shown in the table at paragraph 4.2.7 above, the seating row depths are 800 mm. These generous dimensions reduce the likelihood of standing fans migrating laterally into the aisles. The stewarding arrangements then ensure that the risk does not materialise.
- 4.4.6. As was reported in update report number five, for international matches where the occupants of the Canton Stand are different from league and cup matches, the club additionally manages this risk by taking off-sale the end two seats of each row.

4.5. OBSTRUCTED VIEWING

- 4.5.1. As well as blocking access to concourse facilities, persistently standing fans pose other customer service problems. Children, fans who find it difficult to stand for long periods and those who simply do not wish to stand are all forced to do so in order to have a view.
- 4.5.2. Depending on the location of their space, disabled patrons may also have their view obstructed.
- 4.5.3. These customer service risks provide compelling reasons to take action about persistent standing. The club has done this by making sure there is no persistent standing in any other home areas than the Canton Stand.

4.6. DISORDERLY CONDUCT

- 4.6.1. According to a 2002 FLA report,

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 tackle offensive conduct such as racist chanting or obscene language. Even where this does not lead to misbehaviour, standing spectators may not be in the mood to comply with reasonable requests (in particular to keep the gangways and exits clear) that may be for their own safety.

- 4.6.2. Other thinking suggests that it is the type of person which is relevant to questions of conduct rather than whether they are standing up or sitting down. Speaking at an event at the Houses of Parliament on 11 December 2012, West Midlands Police match commander, Superintendent Steve Graham, told the audience,

If you put a decent person on a terrace, they're a decent person. If you put someone with criminal intent in a seated area, they're someone with criminal intent who may misbehave. To say that just because you put someone in a standing area, they will misbehave, is fundamentally wrong.

The person who threw the coin at Rio Ferdinand threw it from a seated area. The person who jumped on the ground at Hillsborough and assaulted the goalkeeper did so from a seated area. It wasn't the fact they were in terraces that made them behave like that. They behaved like that because they're criminals.

- 4.6.3. Following Superintendent Graham's argument, the risk of disorderly conduct in football grounds is not causally linked to whether the offender is standing up or sitting down. In this context, it is important to note that there have been no incidents of disorderly conduct in the Canton Stand since the new management arrangements were introduced in 2013.

5. MANAGING THE CANTON STAND

5.1. INTRODUCTION

- 5.1.1. The club again reported that there had been no safety, security or service issues whatsoever since the last update report in November 2015. Cardiff City fans in the Canton Stand had continued to stand throughout each game, albeit the crowd densities had been lower given the reduced attendances over the seasons 2015/16 and 2016/17.
- 5.1.2. Attendances had increased due to the club's success in the current season 2017/18, however the Stand was not entirely sold out to season ticket holders. As a result, the club had decided to sell tickets for the Canton Stand to known persons on a match by match basis. These tickets were mainly for the front of Stand below the vomitories. The club reported that the area in which the persistent standing took place had expanded a little beyond the wave shape marked out in white seats between gangways 104 and 107. This had presented no risks or management issues given that the Stand was sold only to ticket holders whose identities were known to the club and who had continued to behave appropriately throughout the season.
- 5.1.3. The club reported that there had been attempts by some fans to migrate backwards towards the rear centre of the Stand. This had been countered by changing the deployments of the Safestyle agency stewards. Instead of being spread down the gangways, the three stewards in each of gangways 104 to 107 were deployed to the last six rows, where they were instructed to check the tickets of everyone wishing to ascend to those rows. Other Safestyle agency stewards were deployed to the vomitories with instructions to carry out a ticket check on fans wishing to enter the Stand.

- 5.1.4. For the Canton Stand, the match briefing notes emphasised that *the main issue is ensuring that only spectators with tickets for this area are allowed into the seating areas. We must keep the radial gangways clear. Please note that if a customer cannot produce a valid ticket for that area they should be ejected from the ground.* These points were observed to be reinforced at the management briefing.



The stewarding deployments had been revised to prevent migration towards the rear of the Stand.

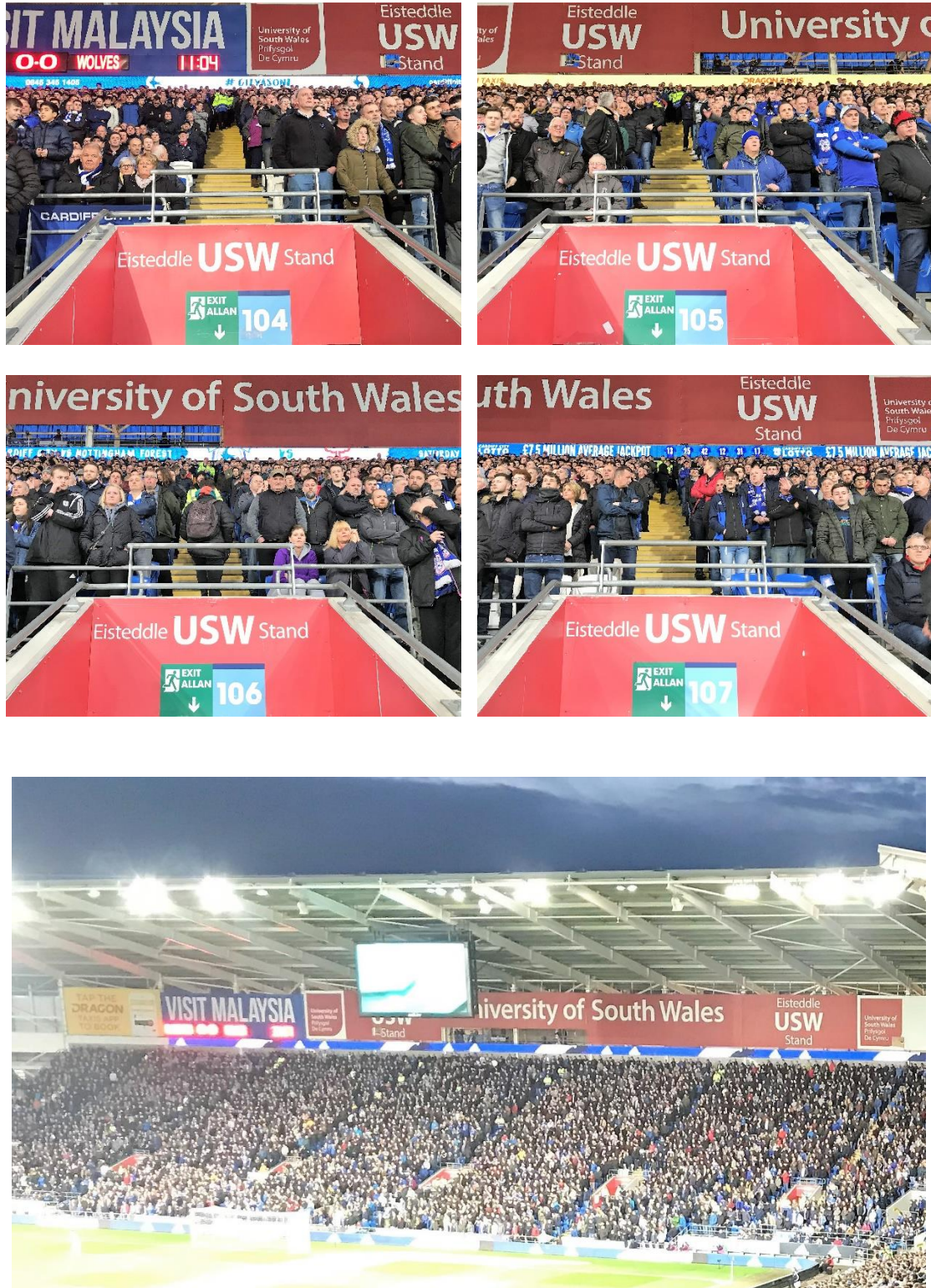
5.2. MATCHDAY OBSERVATIONS FOR THE CANTON STAND

- 5.2.1. Direct observations were kept from the gantry behind the Canton Stand from 30 minutes before kick-off until ten minutes after kick-off. Observations were then carried out for ten minutes from the vomitories of gangways 104 to 107. Thereafter observations were continued from level four of the Ninian Stand until five minutes before the end of the match.
- 5.2.2. The stewards were observed to be on post in accordance with the planned deployments from before the stadium opened to admit spectators.
- 5.2.3. The stewards were observed to be vigilant in checking the tickets of spectators seeking to access the rear six rows of the Stand. As a result, there was no apparent overcrowding at the rear of the Stand and the observer was satisfied that the briefing instructions had been fully complied with.



The stewards were vigilant in checking the tickets of spectators seeking to access the rear six rows.

- 5.2.4. Gangways 104 to 107 were observed to be kept clear. Vomitory stewards and the Quadrant Manager were observed to be diligent in deploying up the gangways to keep them clear of standing spectators.



Stewards were observed to be diligent in keeping the gangways clear throughout the match.

5.3. CONCLUSIONS IN RESPECT OF THE CANTON STAND

- 5.3.1. As previously reported, the Canton Stand works very well as it is. There was nothing arising from the match day observations to suggest any change was needed to the club's approach to managing persistent standing in the Canton Stand.
- 5.3.2. Given the contemporary debate about 'safe standing', and whether clubs in the Premier League and the English Football League Championship should be permitted to install rail seating of the type used in Germany and, more recently, at Celtic Park in Scotland, it is important to differentiate between what the club are doing in the Canton Stand and such 'safe standing'.
- 5.3.3. The club refer to their own approach in the Canton Stand as 'standing safely', i.e. the spectators are permitted to stand because **the particular environment** of the stand enables them do so safely.
- 5.3.4. This practice now needs to be considered in the context the draft Sports Grounds Safety Authority guidance in the forthcoming Sixth Edition of the Guide to Safety at Sports Grounds. Section 12.1 of that draft guidance states,

It is emphasised that the provision of seats is not, in itself, a guarantee of safe conditions for spectators. Good design and safety management are essential, and are of particular importance in areas of seated accommodation where spectators persistently stand up to watch the event. In such locations, management will need to consider how to discourage spectators from standing, or, where prevailing legislation and competition rules allow, whether to install additional barriers, or seats incorporating barriers, designed to mitigate the risks from persistent standing.

- 5.3.5. **After review in the light of the above, the club's risk assessments in respect of persistent standing in the Canton Stand are unchanged. Good design of the Stand and good safety management are clearly in place. The low angles of rake (16.70 to 23.03 degrees), seat widths (480 to 500 mm) and seating row depths (800 mm), combined with the ticket sales policies and stewarding practices, have already proved sufficient to mitigate the risks. Experience shows that there are no incidents. The club does not therefore see any need to install either additional barriers or seats incorporating barriers at this time.**
- 5.3.6. The club's approach was commended in a letter from the Chief Executive Officer of the EFL to the Minister of Sport on 26 February 2018, in which he called for three things: amendment of the all-seater policy so that it did not apply below the Premier League; clubs to be permitted to install rail seating; and
- Mandate the SGSA to agree an approach for managing persistent standing in other seated areas, in line with the approach being successfully implemented at Cardiff City.*
- 5.3.7. This endorsement does not mean that the club's approach is directly transferable to all other grounds. Each case must be considered on its merits on the basis of the risk assessments, the physical infrastructure and the safety management.

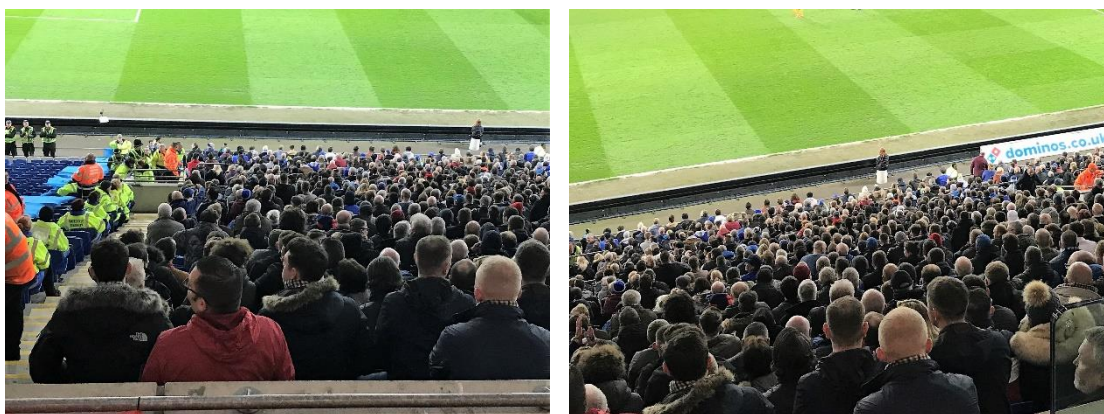
6. MANAGING THE NINIAN STAND

6.1. INTRODUCTION

- 6.1.1. The club reported that the segregation area would comprise the seats either side of gangway 118, with netting and stewards deployed on the segregation lines.
- 6.1.2. The club also reported that 200 seats around gangways 116 and 117 had been taken off sale so as to reduce the crowd density in those areas.
- 6.1.3. The club also reported that, with one exception, there had been no persistent standing in the Ninian Stand since the last update report in November 2015. The exception had been the FA Cup tie versus Manchester City on 28 January 2018, when there had been issues with persistent standing requiring the attention of the stewards around gangways 116, 117 and 118.
- 6.1.4. For the Ninian Stand, the match briefing notes emphasised that *no persistent standing is to be strictly enforced*. This point was reinforced at the management briefing.
- 6.1.5. To support this policy at this match, the club had developed an operating procedure whereby, if a spectator was seen to be persistently standing and not responding to advice from the stewards, the spectator's seat number would be noted and communicated to the Control Room. The spectator's identity would be verified using CCTV and the club season ticket database and a text message would be sent to their mobile phone giving advice about the implications of their persistent standing for their season ticket renewal. This was an innovative approach.

6.2. MATCHDAY OBSERVATIONS OF THE NINIAN STAND

- 6.2.1. Direct observations were carried out from level four of the Ninian Stand from 20 minutes after kick-off until five minutes before the end of the match.



In the Ninian Stand, there was no persistent standing whatsoever throughout the first half.

- 6.2.2. Although spectators around gangways 116 and 117 – and indeed throughout the Stand – understandably stood up at times of high excitement, they soon sat down again once the moment had passed. There was no persistent standing whatsoever throughout the first half, although a small number of individuals at the very rear were sometimes perching on the upright seats rather than sitting on them.

- 6.2.3. After the start of the second half, five individuals in the second to back row remained standing. They were soon approached by the Quadrant Manager and stewards and asked to sit down. Four did so but one remained standing and was dismissive of the stewards.
- 6.2.4. This individual was asked to come out into the gangway. The Quadrant Manager's intention was to ask him to come down to the concourse for a word of advice and then allow him to return to his seat. The individual was again dismissive and moved further into the seating row, away from the gangway. This was unacceptable behaviour and the decision was taken to eject him.
- 6.2.5. Response stewards attended. The individual was then taken from the stand and ejected from the stadium. His identity was verified and the decision was taken that any season ticket renewal by him would have to be in another part of the ground.
- 6.2.6. The ejection had a salutary effect on other spectators and no further persistent standing was observed for the remainder of the match.
- 6.2.7. There were however two second half incidents which provoked standing by the home fans around gangway 117. In one case, an alleged racist remark from the away section was overheard by home fans. The home fans were aggrieved and a good number of them stood for several minutes, voicing their disapproval. One fan was taking photographs of the alleged offender and another was pointing him out to the stewards.



One individual was rightly ejected for being dismissive of the stewards advice to sit down.



An alleged racist comment by an away fan provoked standing by the home fans around 117.

- 6.2.8. In the other incident, an orange smoke device was thrown from the away sector onto the pitch. In line with the new pan-European best practice guidance recently adopted by the club, fire stewards wearing personal protective equipment attended the vicinity, kept a safe distance, left the device to burn out and then removed it using long handled tongs. This was a textbook response.
- 6.2.9. The home fans were aggrieved by the throwing of the smoke device onto the pitch and again a good number of them stood for several minutes, voicing their disapproval.



The throwing of an orange smoke onto the pitch provoked standing by the fans around 117.



Three orange smokes were fired in the away sector and one was recovered not fired.

6.2.10. The observer considered that, in both cases, the standing by home fans was an understandable reaction to a provocation by away fans and did not amount to 'persistent standing'.

6.3. CONCLUSIONS IN RESPECT OF THE NINIAN STAND

6.3.1. With the exception of five persons just after half time, there was no persistent standing in the Ninian Stand. The one person who was twice dismissive of the stewards asking him to sit down was rightly ejected from the stadium.