



MANAGEMENT OF PERSISTENT STANDING AT THE CARDIFF CITY STADIUM

Version 1.2
Updated Final Report
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1. INTRODUCTION

- 1.1. This document is an independent report prepared by Professor Steve Frosdick of IWI Associates Ltd following a visit to the Cardiff City Stadium on Friday 11th and Saturday 12th January 2013.
- 1.2. The purpose of the report is to comment on Cardiff City's current and proposed future arrangements for managing persistent standing in the Canton and Ninian Stands at the stadium.
- 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. On 11th January, the author attended a meeting of key stakeholders to discuss these arrangements. The meeting was attended by club officials, a Cardiff City Council officer who is also Chair of the Safety Advisory Group, police representatives, a statutory ambulance service officer and a fan representative.
- 1.5. On 12th January, the author was present to observe the matchday operation for Cardiff City's game against Ipswich Town.
- 1.6. This report is based on discussions at the meeting, the matchday observations and informal conversations with stakeholders. The report is 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.
- 1.7. This is the final report and incorporates comments made after circulation of the draft.

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 Awards.

- 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 current and proposed future 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 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 majority of fans in the Canton Stand wish to stand up to watch the match. The club is therefore looking to facilitate this, providing any attendant safety, security and service risks are being or can be managed. Conversely, the majority of fans in the Ninian Stand wish to sit down. The club is therefore seeking to find an appropriate way of managing the small minority of fans who continue to stand up in this area.

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 Football League’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 have until recently been the main driver for regulatory demands for stadium managers to ‘do something’ about persistent standing and to ‘make the fans sit down’. The fear has been 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. Eleven 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.

4.3. BUMPING AND SCRAPING

- 4.3.1. Regulatory authority demands have also until recently been partly driven by their perception 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. The evidence has however 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.

4.4. 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 than the theoretical risks of injury already discussed. There is therefore an absolute requirement to keep gangways and vomitories clear.

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 also provide compelling reasons to take action about persistent standing.

4.6. DISORDERLY CONDUCT

- 4.6.1. According to the 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. More recent 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.

5. PERSISTENT STANDING IN THE CANTON STAND

5.1. CURRENT ARRANGEMENTS

- 5.1.1. The current arrangements are set out in a generic risk assessment for standing in seating areas of the Cardiff City Stadium. The assessment notes that,

‘There is clear evidence of persistent standing in the top 20 rows of blocks 106 and 107 during every event.

‘The area is occupied by like-minded people who stand in this seated area by preference. There are no issues of customer care, as all purchasers of tickets are aware of this. Any persons who are inconvenienced by this are relocated to other areas of the stadium kept free for that contingency.

‘During an event extra staff are deployed to monitor this area, maintain the lateral (*sic* should be ‘radial’) walkways and to ensure that only supporters who have purchased a ticket for that area are in attendance and that those persons occupy the space in front of their purchased seat.

‘Where offenders are identified, sufficient staff are deployed to allow action to be taken.’

- 5.1.2. In addition, the matchday safety officer is active in dynamic ongoing risk assessment during an event to determine whether these arrangements remain valid.

5.1.3. All stakeholders present at the meeting on 11th January expressed themselves satisfied with these arrangements. The club officials were content that like-minded people were able to enjoy the match in safety and in their preferred way. The police and City Council were content that there were no safety or security risks associated with the persistent standing in this area and the ambulance service representative was content that no injuries were coming to notice. The fan representative was content that fans were able to exercise a choice to stand up to watch the game.

5.1.4. To double-check that the angles of rake in the stand did 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

5.1.5. 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.

5.1.6. 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 above, the seating row depths are 800 mm. These generous dimensions reduce the likelihood of standing fans migrating laterally into the aisles.

5.2. MATCHDAY OBSERVATIONS

5.2.1. The persistent standing in this area was not specifically mentioned in the safety officer's briefing to his chief steward, quadrant managers and other senior staff. It is clearly not regarded as a problem by the stewarding staff.

5.2.2. The persistent standing was however observed to be more widespread than blocks 106 and 107. In fact the area of persistent standing was roughly the same as the area enclosed by the shallow V picked out in white seating across blocks 104 to 108. The fans in this area remained standing throughout the match.

5.2.3. In response to questions, staff confirmed that:

- The persistent standing area broadly corresponded to the shallow V shape across the stand;
- The vast majority of fans in this area were season ticket holders and known to the stewarding staff;
- People who had 'mistakenly' bought an individual matchday ticket for this area and who wished to sit down were offered relocation to a more suitable part of the stand.

- There have been no notable issues with disorderly conduct involving fans in this area;
- There was no history of fans obstructing the gangways in this area.



The persistent standing area broadly corresponded to the shallow V shape across the stand.



Stewards occupied the gangways, which were kept suitably clear at all times.

5.3. FUTURE ARRANGEMENTS

5.3.1. At the meeting on 11th January, all stakeholders were satisfied that the current arrangements were safe, longstanding, proven, effective and met the known needs of that group of customers.

5.3.2. There was nothing whatsoever in the matchday observations to dissent from that view.

- 5.3.3. It would be entirely appropriate for the club to revise its operations manual to incorporate the generic risk assessment and to describe the arrangements as the standard operating procedure for this particular part of the Canton Stand. This revised operations manual could then be submitted to Cardiff City Council for scrutiny and incorporation into a schedule to the ground safety certificate.
- 5.3.4. This would represent a waiver both in writing and by action from the contractual requirement to remain seated in this particular part of the stand and it would therefore be unconscionable for fans to be ejected for persistent standing in this area.

6. PERSISTENT STANDING IN THE NINIAN STAND.

6.1. CURRENT ARRANGEMENTS

- 6.1.1. The current arrangements are again set out in a generic risk assessment for standing in seating areas of the Cardiff City Stadium. The assessment notes that,

‘We have identified a small number of spectators who persistently stand at the rear of blocks 117 and 118 close to the away end. Due to the area in which they stand they do not cause issues to any other supporters and there is no evidence of any injury being caused by their actions. During an event staff will be deployed to monitor this area and to continually request this small number of individuals to sit.’

- 6.1.2. Again, the matchday safety officer is active in dynamic ongoing risk assessment during an event to determine whether these arrangements remain valid.
- 6.1.3. The angles of rake in the Ninian Stand are the same as for the Canton Stand and are thus below the maximum 25 degrees permitted for standing areas. There are therefore no inherent safety risks in the physical structure.
- 6.1.4. As the demand for tickets grows, commensurate with the club’s success and possible promotion to the Premier League, additional capacity has been sold in blocks 117 and 118 on an individual match basis. This has recently given rise to letters of complaint from customers whose view has been obstructed by the persistent standing.
- 6.1.5. All parties present at the meeting on 11th January agreed that, although not a safety issue, this was a real customer service issue for the club going forward. The fan representative could not argue against the need for the club to respond to customer complaints given that there was the option for fans to relocate to the Canton Stand.

6.2. MATCHDAY OBSERVATIONS

- 6.2.1. Block 118 formed part of the segregation area for this match. However the persistent standing in block 117 formed a substantial part of the safety officer’s briefing to his chief steward, quadrant managers and other senior staff. Reference was made to three letters of complaint recently received and copies were provided to the relevant quadrant manager. One of the letters was read out in full.

- 6.2.2. The senior briefing emphasised the need to get the fans in block 117 to sit down. To avoid claims that the seats were wet, they were to be dried with a chamois leather before the ground was opened. The tactic for people being difficult was to take them out of the bowl, show them the letters and explain the need to sit down in this area. People were to be warned that they risked their season card being turned off and having to repeat the conversation outside the stadium next time. They also ran the risk of a five game ban and a refusal to renew their season ticket.
- 6.2.3. The briefing was cascaded by the quadrant manager to the stewards working in the quadrant. The briefing referred to the letters of complaint and to the process of showing fans the letters and asking them how they would respond.
- 6.2.4. The briefing acknowledged that most of the fans did sit down when asked, so they would be tackled quickly. Particular focus would be on those standing towards the front of the block. It was emphasised that the club did not want to lose potential new fans who might not come back if they had been unable to see the match comfortably.
- 6.2.5. For good customer service and to avoid claims of having to stand because the seats were wet, stewards were deployed with chamois leathers to ensure the seats were dry.



Stewards were deployed with chamois leathers to ensure the seats were dry.

- 6.2.6. Block 117 is bisected by a gangway leading up and down from a vomitory. It was noted that many of those who persistently stood in block 117 came to their places at the very last moment before kick-off and exited the bowl at half time.
- 6.2.7. At kick-off, the majority of fans in both parts of block 117, north and south of the gangway, were standing in front of their seats. The quadrant manager and another steward immediately deployed with a focus on the north side of the block. On seeing the deployment and hearing the requests to sit, most fans quickly sat down of their own accord. Those who were slower to do so responded positively to the stewards verbal commands. Only about 20 people in the back two rows of block 117 north side remained standing.

- 6.2.8. At three minutes after kick-off, the quadrant manager and his colleague turned their attention to the south side of block 117, nearer to the away section. They quickly got everybody sat down and withdrew. At this point, the rear dozen rows stood straight back up again, singing ‘Stand up if you hate Swansea’.
- 6.2.9. Three minutes later, a supervisor, a team leader and two other stewards ascended the gangway and again got everybody sat down. The verbal commands were polite and good humoured, ‘Come on lads. You have to sit down please. We can do this all day if we have to.’ When the steward withdrew, the rear dozen rows again stood straight back up again. This was clear wilful non-compliance with a reasonable request.



CCTV images show the rear twelve rows of persistent standers in block 117 south.

- 6.2.10. The quadrant manager reported he was satisfied with what had been achieved, which was in his view probably the lowest number of people persistently standing there had been all season. There was a need to strike a fine balance. If the fans perceived the stewards were being too heavy, they would all stand up in protest. In fact this had happened at a previous match when the response team had been deployed and the fans had seen this as a ‘challenge’. On a dynamic risk assessment basis, the quadrant manager would rather have a few standing up in the very back rows than the whole block standing in defiance.
- 6.2.11. The quadrant manager also reported that one person had been standing up on his own in the midst of other who were sat down. He refused to sit down and so was taken out onto the concourse. The situation was explained to him and he was given the option of leaving the stadium or relocating to the Canton Stand. He sensibly chose to relocate.
- 6.2.12. The situation remained stable until 18 minutes after kick-off, when the entire south side of block 117 stood up in response to events on the pitch, clapping and singing their support for the team. After two minutes, the supervisor and team leader deployed and again got everybody sat back down. Again, the back six rows stood back up as soon as the two stewards withdrew.
- 6.2.13. At 25 minutes after kick-off, two individuals stood up in the midst of others who were sat down and remained standing. The quadrant manager deployed the team leader, who immediately deployed and got the two individuals to sit down.

6.2.14. The author was satisfied that there was active stewarding in place to deal with the standing and that the decision to leave the back few rows standing up was robust and defensible.

6.2.15. With about 15 minutes of the match remaining, the author returned to observe block 117 from a gantry above and behind the bowl. By this time the majority of the fans on the south side of block 117 were standing, although only the same back two rows as before were standing on the north side of the block.



Towards the end of the match, almost everyone in block 117 south was standing up.

6.2.16. No further intervention from the stewards was observed from this time until the end of the match. This was a little surprising given that there were stewards standing close to the fans on the segregation line and a response team standing in the corner of the Ninian and Grange Stands with nothing to respond to.

6.2.17. It seemed to the author that the stewards had by this point given up trying to get the fans to sit down. Whilst this is understandable, given the non-compliance, the particular emphasis given in the briefings should, in the author's view, have resulted in constant enforcement activity right the way through the event.

6.3. FUTURE ARRANGEMENTS

6.3.1. If the club is promoted to the Premier League, the capacity of the away sector will need to be increased to 2,700 seats. This will be achieved by moving the segregation line north in the Ninian Stand so that block 118 from level with the edge of the disabled section will be in the away sector. The remaining part of block 118 and all of block 117 will still be in the home sector.

6.3.2. Depending on the individual match risk assessments, some, all or none of the home block 118 and block 117 south may be needed to create a sterile area adjacent to the segregation line. This creates a good reason not to sell these blocks to season ticket holders, who would otherwise have to be relocated on a match by match basis.

- 6.3.3. Given the volume of season ticket sales throughout the stadium and the requirement to retain a percentage of tickets for individual match sales, there is a clear argument for setting aside spare capacity in block 118 and the whole of block 117 for this purpose. This would also mean not selling block 117 north to season ticket holders either.
- 6.3.4. The beneficial side effect of not selling these blocks to season ticket holders would be to disperse elsewhere in the stadium those persons who are wilfully and persistently standing. This could be a managed dispersal controlled by the club and providing fans with the option of relocation to the Canton Stand.
- 6.3.5. The club should therefore consider writing to all season ticket holders in block 117 to explain that there are three reasons why they will be unable to renew their season tickets in that block.
- Promotion to the Premier League will require an increase in the capacity of the away sector, which will impact on their block;
 - Depending on individual match risk assessments, some or all of block 117 may be needed to use as a flexible segregation space; and
 - Despite repeated efforts by stewards to preserve an unobstructed view for all fans in this area, there has been repeated and wilful non-compliance with stewards requests to sit down by some persons in this block.
- 6.3.6. Ticket sales for residual capacity in blocks 117 and 118 could then be made on an individual match basis using the club's existing dynamic pricing system.