The case for safe standing at major football stadia in England & Wales —
A 21st century solution

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Four years before Hillsborough, on 11 May 1985, 56 supporters lost their lives in a fire at Valley Parade, on a day which should have been one of celebration for Bradford City fans as the Bantams captured the old Football League Third Division title.

To those who died in these terrible incidents must be added the anguish of loss for the families and loved ones of the deceased and distress caused to the very many injured.

Yet I believe that the case for safe standing to be introduced at our major grounds needs to be carefully weighed and considered. This report is a reasoned contribution to that debate.

I hope that all who read it and have the best interests of the people’s game at heart will want to engage with its contents. It advocates the introduction of safe standing areas at our major football stadia. This proposal merits the most careful and detailed consideration.

Dr Anne Eyre
Hillsborough survivor

**FOREWORD**

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**FRONT COVER PHOTOGRAPHS**

**Top:** Grange End, Ninian Park, home of Cardiff City FC.

**Middle:** Safe standing area, Weser Stadion, Bremen, home of Werder Bremen FC.

**Bottom:** Fans definitely NOT in a safe standing area watching the Burnley v Liverpool 1914 FA Cup Final held at Crystal Palace.
We are pleased to present this report to you on behalf of the Football Supporters’ Federation, which represents us and over 142,000 of our fellow football supporters throughout England and Wales, following club and national teams at all levels in our two nations.

One of us is currently permitted the choice to sit or stand when watching our team, as AFC Wimbledon currently play in the Ryman League Premier Division. The other is usually not permitted to stand at away games under the current rules as Cardiff City currently play in the Coca-Cola Football League Championship, where standing areas are prohibited by Government regulation.

Because Cardiff City has recently been promoted to this level, we still have standing areas at Ninian Park. Our club wants to include a safe standing area in our new stadium but has been told that this is “not on the agenda” by the Football Licensing Authority.

The stated reason for this prohibition is that standing is less safe than sitting. We believe this proposition is flawed and unsupported by fact. This report explains why. We hope all those concerned with the regulation and management of safety at major football stadia – the Government, Parliament and the National Assembly for Wales, the Football Licensing Authority, local authorities, the Football Association and Football Association of Wales, Premier League, Football League, Football Foundation, police, clubs and their safety officers – will carefully consider this report which advocates permitting safe standing areas.

The time has come for change. Supporters want the choice to sit or stand. Modern technology and design, allied to better training and organisation mean that such choice will now be safe.

Nicole Hammond
AFC Wimbledon supporter
FSF National Council member

Melanie Richards
Cardiff City supporter
FSF Cymru Committee member
1.1 The current regulations on standing at football matches date from the aftermath of the Hillsborough Stadium Disaster on 15 April 1989 when 96 Liverpool supporters lost their lives. The late Lord Justice Taylor was commissioned by the Government to hold a public enquiry into the disaster and its causes.

1.2 It is often forgotten that Lord Justice Taylor published two reports. It was his interim report issued in August 1989 which analysed the day’s events and the lead up to the disaster and summarised the reasons for the disaster as follows (page 55):

265. The immediate cause of the gross overcrowding and hence the disaster was the failure, when gate C was opened, to cut off access to the central pens which were already overfull.

266. They were already overfull because no safe maximum capacities had been laid down, no attempt was made to control entry to individual pens numerically and there was no effective visual monitoring of crowd density.

267. When the influx from gate C entered pen 3, the layout of the barriers there afforded less protection than it should and a barrier collapsed. Again, the lack of vigilant monitoring caused a sluggish reaction and response when the crush occurred. The small size and number of gates to the track retarded rescue efforts. So, in the initial stages, did lack of leadership.

268. The need to open gate C was due to dangerous congestion at the turnstiles. That occurred because, as both Club and police should have realised, the turnstile area could not easily cope with the large numbers demanded of it unless they arrived steadily over a lengthy period. The Operational Order and police tactics on the day failed to provide for controlling a concentrated arrival of large numbers should that occur in a short period. That it might so occur was foreseeable and it did. The presence of an unruly minority who had drunk too much aggravated the problem. So did the Club’s (Sheffield Wednesday FC) confused and inadequate signs and ticketing.

1.3 It is also worth noting that Mr Justice Popplewell, in his enquiry into the Bradford City fire of 1985 said, “The importance of allowing full access to the pitch where this is likely to be used as a place of safety in an emergency should be made plain.” Tragically his recommendation was not heeded.

1.4 Nowhere in his interim report does Lord Taylor ascribe the terrible loss of life, injury and psychological trauma at Hillsborough to the fact that Liverpool fans were standing rather than seated. The common thread of the Hillsborough and Bradford disasters is that supporters were unable to escape with ease onto the field of play. The difference is that those killed in the Bradford fire were all in a seated area of the ground.
The interim report also identifies a catalogue of mismanagement and poor decision-making before the game, particularly:

a) in deciding the match venue and the sector of the ground to be occupied by Liverpool supporters, and

b) the lack of mention in the post-match de-briefing notes of the previous season’s semi-final, also involving Liverpool, of action taken to prevent access to over-crowded standing areas.

Other omissions and errors, particularly in operational decisions and coordination by police and stadium safety authorities as events unfolded, are also noted.

The interim report also notes that a Police recommendation that the certified capacity of 10,100 for the Leppings Lane end be lowered after crushing at the Tottenham Hotspur v Wolverhampton Wanderers FA Cup semi-final in 1981 was not pursued. Work was done to divide the terrace into pens. However, a proposal to increase the number of turnstiles was not pursued and neither were changes made to facilitate separate entrances and facilities such as toilets and refreshment kiosks for each of the pens.

We will not repeat the detailed analysis of design and safety management and improvement failures outlined in the interim report. Suffice to say that it is clear to all who read it that the muddled stadium maintenance and safety inspection regime, allied with a poor, ad hoc, approach to stadium design and event management (which was prevalent throughout the country at the time), paved the way to the tragedy of Hillsborough.

The key point here is that the mere fact that fans were standing was not the cause of the disaster. That said, we recognise, of course, that in his final report, Lord Taylor did recommend as follows:

**All-Seating**

61. 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.

62. It is obvious that sitting for the duration of the match is more comfortable than standing. It is also safer. When a spectator is seated he has his own small piece of territory in which he can feel reasonably secure. He will not be in close physical contact with those around him. He will not be jostled or moved about by swaying or surging. Small or infirm or elderly men and women as well as young children are not buffeted, smothered or unsighted by larger and more robust people as on the terraces. The seated spectator is not subject to pressure of numbers behind or around him during the match. He will not be painfully bent double over a crush barrier. Those monitoring numbers will know exactly how many are there without having to count them in or assess the density by visual impression. There will still, of course, be scope for crowd pressure on stairways whilst entering and especially when leaving, but involuntary and uncontrolled crowd movements occasioned by incidents in the game are effectively eliminated.

We examine the appropriateness of that recommendation in the current context in the rest of this report.

The late Lord Justice could not have envisioned some of the seating areas which would be established as a consequence of his report. To give a few examples:

In Chelsea’s purpose-built West Stand lower tier many fans of not more than average
height and build have found it impossible to sit comfortably without their knees wedged against the seat in front. The seats are also very cramped in terms of width. Similar situations apply at many other grounds, particularly where seats have been bolted on to former terraces such as Luton Town’s Kenilworth Road and Leeds United’s Elland Road. At these grounds in particular, the visiting seating areas are decidedly uncomfortable to the point where it is impossible for tall spectators to sit in the proper position in the seat.

1.13 The Milton End at Portsmouth’s ground Fratton Park is a classic terrace converted to seating. The rake is far too shallow to comfortably view the game whilst seated. It is also open to the elements, as are seated areas at other grounds such as Gillingham’s Priestfield Stadium, completely contrary to Taylor’s recommendations which provided (at paragraph 63 of his final report):

63. ...I also recognise that seating is only regarded as more comfortable than standing if cover is provided. The consensus is that, although standing on an exposed terrace on a wet day is disagreeable, sitting in the rain is worse. So, increased seating does require that cover be provided.

1.14 Lord Justice Taylor also noted that admission prices were one of the factors driving opposition to all-seated grounds. He noted (Para 72) that Rangers FC in Glasgow charged £6 (€8.52) for a seat and £4 (€5.68) for standing (Ibrox Park was not at that stage all seated) which he described as ‘not a prohibitive price or differential’. Adjusted for inflation that would mean a seating price today of approximately £13.50 (€19.17). There are now no ordinary seats available at anywhere near that price at any match in the top two divisions in England and Wales where standing areas are prohibited, and most Premier League prices are at least double that.

1.15 Lord Justice Taylor stated his belief in his final report that fans would come to accept all-seated stadia:

76. It is possible that in the early stages of conversion there may be instances of fans standing on the seats or in front of them because they are used to standing or in order to register a protest, but I am satisfied that in England and Wales as in Scotland and abroad spectators will become accustomed and educated to sitting. The evidence I have received shows that more recently, where seating has been installed, the fans have come to accept and like it.

1.16 It is now clear with the benefit of hindsight that this prediction was wrong. Eleven seasons on from the introduction of all-seated stadia in the top two divisions, significant groups of fans regularly stand at matches. This often causes a range of difficulties which we examine later in the report. It is one reason (amongst many) why it is time to review the continued appropriateness of the regulations introduced as a result of the Taylor report.

1.17 We finish this section by noting that there have been several stadium disasters since Hillsborough, including:

• 11 April 2001, Johannesburg, South Africa: Kaizer Chiefs versus Orlando Pirates, South African Premier League match, 43 dead.
9 May 2001, Accra, Ghana: Ashante Kotoko versus Hearts of Oak, Ghanaian Premier League match, 126 dead (this is the world’s gravest ever stadium incident in terms of loss of life).

1.18 Official enquiries and inquests into the Harare and Accra disasters placed the blame firmly on the police’s indiscriminate use of tear gas for these two tragedies. Both these games took place in all-seated stadia.

1.19 The disaster in South Africa took place at Ellis Park, Johannesburg which is a completely redeveloped, modern all-seater stadium with a capacity of 59,351. It was re-opened in 1982, with further modernisation work performed in 1986. In 1995 it hosted the final of the Rugby Union World Cup. A public commission of enquiry into this tragedy was established under the chairmanship of High Court of South Africa (Gauteng Division) judge Mr. Justice Bernard Makgabo Ngoepe.

1.20 The findings of his final report issued in August 2002, about lack of proper coordination and training of police and stewards are uncannily similar to those of Lord Justice Taylor. To this must be added problems with corrupt over-selling of tickets which led to severe overcrowding in the stadium and its approaches. For the purposes of this report the single most salient fact is that Ellis Park is a modern, completely seated stadium.

1.21 It is also worth observing that recent incidents involving supporters of English club sides in Lens, Rome and Seville, the latter two of which led to supporters being hospitalised, all took place in all-seater stadia. All those requiring hospitalisation following incidents inside the stadia were as a result of wounds caused by blows from police batons. In the case of Seville, the seating was similar in style to that employed at British grounds.

1.22 We must never forget Hillsborough. Our analysis of the facts leads us to believe, however, that the overwhelmingly most important factor in the improved health and safety at football stadia in the top two divisions in England and Wales since the disaster is capital investment in higher quality facilities, improved ground design, better stewarding and policing and closed circuit television (CCTV), none of which are incompatible with small, safe standing areas.
2.1 Lord Justice Taylor’s recommendation that stadia should be all seated was accepted by the Government of the day, who introduced the necessary legislation to enforce it. This was the Football Spectators Act (1989), the scope of which it summarises as follows:

‘An Act to control the admission of spectators at designated football matches in England and Wales by means of a national membership scheme and licences to admit spectators; to provide for the safety of spectators at such matches by means of such licences and the conferment of functions on the licensing authority in relation to safety certificates for grounds at which such matches are played; and to provide for the making by courts and enforcement of orders imposing restrictions on persons convicted of certain offences for the purpose of preventing violence or disorder at or in connection with designated football matches played outside England and Wales.’ (16th November 1989).

2.2 The Act covers three main areas:

- A national membership scheme, under which only spectators permitted to attend designated football matches are authorised spectators. The scheme to be overseen by the Football Membership Authority.

- A licensing system whereby stadia require a licence to admit spectators for designated football matches. The scheme to be overseen by The Football Licensing Authority (FLA).

- A system whereby court orders can be made and enforced against persons convicted of certain offences, imposing restrictions preventing them attending matches played abroad.

2.3 The national membership scheme has never been enforced (with good reason). The system of court banning orders has been introduced and has proved relatively successful.
2.4 The licensing system, overseen by the FLA, has been introduced, and it is this area which relates to standing.

2.5 Sections 8 to 13 of the Act deal with ‘Licences to admit spectators’. Section 8 states that ‘there shall be a body called the “Football Licensing Authority” dealing with the composition of the authority. Section 9 covers the offence of admitting spectators to unlicensed premises. Section 10 covers licences in general.

2.6 Section 11 covers the ‘power of the Secretary of State to require conditions in licences relating to seating’. The full text of this section is as follows:

1. The Secretary of State may, by order, direct the licensing authority to include in any licence to admit spectators to any premises a condition imposing requirements as respect 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.

2. The requirements imposed by a condition in pursuance of this section may relate to the accommodation to be provided at, or the arrangements to be made as respects the spectators admitted to, the premises.

3. A direction may require the licensing authority to include the condition in the licence when granting it or by way of varying the conditions of a licence.

4. Before giving a direction under this section in relation to any premises the Secretary of State shall consult the licensing authority which may, if it thinks fit, make recommendations to him.

5. The licensing authority shall not make any recommendations under subsection 4 above without consulting the local authority in whose area the premises are situated.

6. The power to make an order containing a direction under this section is exercisable by statutory instrument which shall be subject to annulment in pursuance of a resolution of either House of Parliament.

7. In this section ‘local authority’ has the same meaning as in the (1975 c. 52) Safety of Sports Grounds Act 1975.

2.7 Section 12 covers revocation and suspension of licences. Section 13 covers the licensing authority’s powers in relation to safety at football grounds.

2.8 The Football Spectators Act does not therefore, as is commonly believed, state that stadia in the Premier League and Football League Championship should be all seated. It simply says that the Secretary of State may direct the FLA to make conditions regarding seating a condition of granting the licence which is required for each ground. The Act also states that the Secretary of State shall consult with the FLA, which may make recommendations as it thinks fit.

2.9 The all-seater requirement could be relaxed if the Government so wished, without the need for new legislation. The Secretary of State could simply repeal the Regulations.

2.10 The law relating to spectators standing in seated areas is far less clear. As stated earlier in this report, Lord Justice Taylor did not expect that supporters would continue to stand once grounds became all seated and therefore did not make specific recommendations on this issue. The Football Spectators Act does not specifically cover standing in seated areas.

2.11 The FLA have been directed by the Secretary of State for Culture, Media and Sport, to include the following two conditions in the
licences it issues to clubs under The Football Spectators Act 1989:

a) ‘Only seated accommodation shall be provided for spectators at a designated football match’.

b) ‘Spectators shall only be admitted to watch a designated match from seated accommodation’.

2.12 It is therefore a condition of the licences issued to all Premiership and Championship grounds that standing areas cannot be provided, and that spectators can only be admitted to watch from seated accommodation.

2.13 These conditions are however subject to interpretation, and it is debatable as to whether they actually forbid standing in seated areas. This is a grey area of law, which has not been tested in the courts.

2.14 Entry into Premier League and Football League grounds is governed by a club’s ground regulations, which are based on model ground regulations recommended by the Premier and Football Leagues. The following conditions are contained in those regulations:

a) ‘Persistent standing in seated areas whilst play is in progress is strictly forbidden and may result in ejection from the ground’.

b) ‘The club reserves the right to eject from the ground any person failing to comply with any of the ground regulations or whose presence within the ground is, or could reasonably be construed as, constituting a source of danger, nuisance or annoyance to any other person. This could lead to further action by the club including, but not limited to, withdrawal of any season ticket (without reimbursement) and other benefits’.

c) ‘Entry to the ground shall constitute acceptance of the ground regulations’.

2.15 These regulations therefore give the clubs power to eject supporters for persistent standing, and to take other sanctions against them such as withdrawal of season tickets. It should however be noted that these are regulations recommended by the Premier and Football Leagues as a condition of entry into private premises, but they are not law.

2.16 As the supporter liaison officer for Greater Manchester Police puts it, ‘Standing in seated areas is not an offence and as such is not enforced by the Police. The Police only get involved when there is reason to believe that a steward may be at risk in tackling fans who are standing’.

2.17 Notwithstanding this, most football supporters probably believe that persistent standing is contrary to the law, but also believe that the practise is not unsafe, and the law is unnecessary. History has shown that laws which are generally viewed to be unreasonable have proved to be difficult to enforce, and this is clearly proving to be the case with standing at football matches.

2.18 One thing is clear – the all-seater requirement is a matter of regulation rather than statute. The Government Minister has the power to permit safe standing areas without the need for primary legislation. We therefore turn our attention to the arguments about safe standing and better regulation.
3. SAFE STANDING AND BETTER REGULATION

3.1 Nobody wants to see the safety of football supporters put at risk, least of all The Football Supporters’ Federation. After all, it is our members we are talking about. The question is not about whether grounds should have safety regulations proportionate and appropriate to the assessed risk. That is a given. It is about:

• Whether the legal prohibition of small safe standing areas in the top two divisions of English football is necessary to achieve appropriate minimum levels of safety.

• Whether such a prohibition displays an appropriate balance between risk, regulation and individual choice.

• Whether a Government-imposed national regulation which applies exclusively to football displays an illogical and inconsistent approach to risk.

• Whether the national level is the most appropriate to apply regulatory control in this area.

3.2 The Government is already concerned that an inconsistent and illogical relationship between risk and regulation has grown up in this country. The then Prime Minister therefore started an active debate about regulation in a speech to the Institute of Public Policy Research on 26 May 2005 in the following terms:

‘It is what I call a sensible debate about risk in public policy making. In my view, we are in danger of having a wholly disproportionate attitude to the risks we should expect to run as a normal part of life. This is putting pressure on policy-making, not just in Government but in regulatory bodies, on local government, public services, in Europe and across parts of the private sector - to act to eliminate risk in a way that is out of all proportion to the potential damage. The result is a plethora of rules, guidelines, responses to ‘scandals’ of one nature or another that ends up having utterly perverse consequences’.

3.3 The Government wants to look at whether we have too much centrally-imposed
regulation in our lives; whether that regulation achieves its objectives and, even if it does, whether it is the only or the best way of achieving them and whether the balance between risk, regulation and individual choice is right.

3.4 The background to this debate is a view that this balance has shifted inappropriately to the point where the attempt to eliminate all risk has resulted in unreasonable and sometimes illogical restrictions on the choices of individual citizens.

3.5 The Government announced in its 2005 budget the establishment of a Better Regulation Commission (BRC). Its terms of reference are:

To advise the Government on action to:

- Reduce unnecessary regulatory and administrative burdens; and

- Ensure that regulation and its enforcement are proportionate, accountable, consistent, transparent and targeted.

The work of the Commission will include:

- Challenging departments and regulators to ensure that regulation and its enforcement accord with the five Principles of Good Regulation - proportionality, accountability, consistency, transparency and targeting

- Vetting plans from departments and regulators to reduce administrative burdens

- Scrutinising progress by departments and regulators to reduce wider regulatory burdens, including use of alternatives and deregulation

- Investigating specific regulatory and policy issues and making recommendations to Government through published independent reports for Government to respond to within 60 days

- Working with business and other external stakeholders in EU Member States, and the EU institutions, to promote better regulation in Europe.

The scope of the work carried out by the Commission will cover the private sector, public sector, voluntary sector and EU regulatory issues.

3.6 Part of the reason for the establishment of the BRC is that such regulation has often been imposed following high-profile accidents or disasters, or safety scares of varying kinds, but is not subsequently reviewed, sometimes throwing up an inconsistent approach compared with other, greater risks in our everyday lives.

3.7 The BRC’s report ‘Risk, Responsibility and Regulation – Whose Risk Is It Anyway?’ was published in October 2006. Examples examined in detail in the report include the Dangerous Dogs Act, the banning of food additives which have a small health risk attached to them, the establishment of the Adventure Activities Licensing Authority after the Lyme Bay kayaking tragedy, the response to ‘Mad Cow disease’ and the consequences of restrictions placed on railway speeds following the Hatfield Rail Crash. In our view, the response to the Hillsborough disaster fits very appropriately into this framework.

3.8 The Chairman of the BRC, Rick Haythornthwaite, wrote in his foreword to the report about:

‘a growing disquiet about the management of risk in society and what is seen by many as a rising tide of regulation, exacerbated by periodic inappropriate responses to ‘risks of the day’.

3.9 He called upon the Government to redefine the nation’s approach to risk management in a number of ways including:

- Leaving the responsibility for managing
risk with those best placed to manage it and to embark on state regulation only where it represents the optimum solution for managing risk

• Re-examining areas where the state has assumed more responsibility for people's lives than is healthy or desired

• Separating fact from emotion and emphasising the need to balance necessary levels of protection with preserving reasonable levels of risk

3.10 It is the FSF’s contention that the prohibition of safe standing areas imposed at national level in the top two football leagues in England and Wales, introduced in an understandably emotional climate after a disaster but not reviewed since, is a prime example of the kind of inappropriate, unreviewed management of risk which the BRC’s Chairman was referring to.

3.11 The State-imposed prohibition of safe standing in the top two Divisions is an example of regulation at too high a level, rather than leaving the management of safety in football grounds at the level most appropriate to manage it, which is the local level.

3.12 Prior to the establishment of the BRC, the Government had set up the ‘Better Regulation Task Force’ (BRTF), under the Chairmanship of Sir David Arculus, which reported to the Prime Minister in 2005.

3.13 In its report ‘Risk, Responsibility, Regulation: Whose Risk Is It Anyway?’ the BRC recommended that:

In its policies, regulations, announcements, correspondence, targets, performance agreements and actions, the government should:

a) emphasise the importance of resilience, self-reliance, freedom, innovation and a spirit of adventure in today's society;

b) leave the responsibility for managing risk with those best placed to manage it and embark on state regulation only where it represents the optimum solution for managing risk;

c) re-examine areas where the state has assumed more responsibility for people's lives than is healthy or desired; and

d) separate fact from emotion and emphasise the need to balance necessary levels of protection with preserving reasonable levels of risk.

3.14 The Government formally responded to this recommendation as follows:

The Government accepts this recommendation and agrees that the management and handling of risk must be undertaken in a sensible and proportionate way, separating emotion from fact when explaining and managing risks. The Government is taking genuine action to improve regulation, including the extent to which the state assumes responsibility for people's lives and the risks they face, so that the benefits - economic competitiveness, improved job prospects and prosperity and social cohesion - will make the UK a better place to live, work and do business. Regulation brings invaluable benefits – like fair competition, employee welfare and protection of the environment. However, the benefit has to outweigh the cost and burden the regulation imposes. The Government agrees with the Commission that zero risk is unattainable and indeed is in many cases undesirable. We know that people are prepared to tolerate a much higher level of risk where they feel they control how it is managed. So they expect the state to intervene and manage risk on behalf of citizens, the environment, business and others under some circumstances (such as in food safety, aviation and railways) but are prepared to take more personal responsibility for risk when they are driving, for example. Indeed, it is the Government's duty to intervene to protect against unacceptable levels of risk. But it is also
essential that any intervention and regulation is light touch whilst upholding the protection of the interests it seeks to serve. The Government will seek to articulate the acceptable levels of risk in society below which it will not intervene to improve outcomes. Where intervention takes place, the Government will seek to be clear about its purpose; the risk to be managed; the costs, trade-offs and options considered; and how desired outcomes will be achieved, through, for example, explaining the rationale for government intervention in an Impact Assessment. At the same time, the Government will adopt the regulatory approach appropriate to the situation, in line with the Principles of Good Regulation.

3.15 The BRTF identified five Principles of Good Regulation which we examine in the following paragraphs:

1. Proportionality – Regulators should only intervene when necessary. Remedies should be appropriate to the risk posed, and costs identified and minimised.

3.16 Among the criteria proposed to test this principle are that policy solutions must be proportionate to the perceived problem or risk and justify the compliance costs involved; that all options for achieving policy objectives must be considered and that enforcement regimes must be proportionate to the risk posed.

3.17 The FSF does not believe that the all-seater regulations in the top two football divisions in England and Wales meet these tests. As outlined in section 1 of this report, the Hillsborough disaster was not caused by standing per se, as was recognised by Lord Justice Taylor when he stated that standing at a football match is not inherently unsafe. It was caused by an absence of any control on the numbers of spectators who were allowed to enter individual pens from which there was no escape, primarily because of the fences at the front, and by poor crowd management by the police and ground authorities.

3.18 It follows that so long as there is control on the numbers of spectators entering each separate area of a ground and there are no fences at the front preventing access to the playing area or other escape route in case of emergency, there is no reason why a standing area cannot be safe, as is illustrated not only by experience in other European countries but also the safety certificates issued to lower league grounds in this country and the situation in other sports.

2. Accountability – Regulators must be able to justify decisions, and be subject to public scrutiny.

3.19 Among the criteria proposed to test this principle are that regulators and enforcers should establish clear standards and criteria against which they can be judged.

3.20 There are no such standards and criteria which have been specified which demonstrate that the imposition of all-seater stadia is the best or the only way of ensuring an acceptable level of safety at a football ground. The only figures cited by the Football Licensing Authority (FLA) are that the number of injuries in grounds which are all-seater is lower than in those which retain a standing area.

3.21 This however is a very long way from proving the point that seated areas are inherently safer than standing areas. In order to establish or disprove a causal link between standing areas and accidents/injuries it would be necessary to have detailed information on the nature, cause and exact location of those accidents and injuries, and undertake a detailed analysis which also included the wide range of other factors which might act as intervening variables. The FLA has not done such an analysis and is not in a position to justify the assertion that small, properly designed safe standing areas are inherently less safe than seated areas.

3.22 Even if such a causal link could be established (which, based on anecdotal
evidence available to us, we doubt), it would not be the end of the debate, which should be set in the context of the Government’s new approaches to risk and regulation, and the role on individual choice in managing risk.

3.23 It is also necessary to recognise two other points. Firstly, in the context of the safe standing debate, the relevant comparison is not between grounds as they are today and as they were pre-Taylor. It is between all-seater stadia and stadia which are of a similar standard but which contain safe standing areas.

3.24 Thus, to take the example of, say, Stoke City, the relevant comparison is not between its new home, the Britannia Stadium, and its former stadium the Victoria Ground, but between the Britannia as it currently is, and as it would be with safe standing area(s); either as part of the original design or if, say, one or more of the three open corners were filled in with a safe standing area.

3.25 Secondly, the building of new stands and stadia, and the conversion of former standing areas to seated areas in the last twelve years have also coincided with a range of other measures and improved practice in the areas of crowd management. This makes it very difficult to make a causal link between any outcomes and just one of these factors, the prohibition of safe standing areas.

3. Consistency – Government rules and standards must be joined up and implemented fairly.

3.26 Among the criteria proposed to test this principle are that regulators should be consistent with each other and enforcement agencies should apply regulations consistently across the country.

3.27 The inconsistent approach to risk and safety can be illustrated by looking at the match-going football experience itself. For example, at many grounds, having been made to sit to watch the match, supporters then walk en masse to the railway station and car/coach parking areas, many walking in the road, weaving through traffic. They stand to queue to enter the railway station and buses/coaches, and again on crowded platforms, where approaching trains pass, often on electrified tracks, with no protective guarding.

3.28 They then board crowded trains, with many people again having to stand. As a caller to BBC Radio 5 Live said, following the recent announcement by a senior railway manager that commuters must expect to stand at peak periods, ‘How come I’m not allowed to stand when watching my football team, but told that I must when I’m commuting, when the football stadium isn’t moving at 70 mph?’

3.29 In many cases, they crowd onto escalators, in stations on the journey to or from the game and even within a few modern grounds, with no safety barriers, and at a far greater risk of a domino effect than in a football ground. There is however no pressure to modify escalator design to incorporate barriers or reduced user density. It is illogical that such an effort is made to stop football supporters standing inside the ground when they encounter far greater risks en route to the match.

3.30 This illogical approach to safety is not confined to football. For example, as a result of a series of accidents in the last five years, which killed a total of less than fifty people, the railway industry has had to spend millions of pounds on safety. The benefit in terms of lives saved has been calculated as fourteen million pounds per life saved, and part of the cost of safety works on the railways has been passed on to rail passengers, with the result that some will now choose to travel by road, and therefore actually face increased dangers.

3.31 Meanwhile the same numbers of people as were killed at Hillsborough die approximately every ten days on British roads. This could be drastically reduced by imposing
say a maximum speed limit of 30 mph on all motorways and roads. But the Government does not do this because it considers that a balance has to be drawn between the benefits in lives saved and the disadvantages of the restrictive measures. Simple measures such as insisting all cars are painted in bright colours, or that motor cyclists wear protective clothing would save lives, yet there is no pressure to do this. It would be resisted by the consumer, yet with football the customers’ opinions are not considered.

3.32 The response to an accident in which many people die at once, or even just a few on public transport, is an inquiry, and huge sums spent on preventing a recurrence. Whilst this is not wrong, if people are killed in ones and twos there is little publicity and far less pressure to improve safety. This inconsistent approach to regulation is one of the factors identified by the BRC.

3.33 An inconsistent approach to standing also applies even within sports grounds. There is no prohibition on safe standing areas for others sports such as Rugby Union, Rugby League, Speedway or horse racing. It doesn’t even apply to other events such as rock/pop concerts which are held at designated all-seater football grounds.

3.34 The FLA has suggested to us that the logical approach to resolving any such discrepancy would be to increase the controls on what is perceived as the less safe event. We do not think that in the context of the Government’s new approach to risk and regulation, which requires the level of risk to be assessed and set against the costs, both financial and otherwise, of the regulation, that this is the right approach. Balances have to be struck in all areas.

4. Transparency – Regulators should be open, and keep regulations simple and user-friendly.

3.35 Among the criteria proposed to test this principle are that policy objectives, including the need for regulation, should be clearly defined and effectively communicated to all interested parties.

3.36 The reason for the introduction of the all-seater requirement was clearly related
to crowd safety following the Hillsborough disaster. However, the Minister for Sport, in replies to supporters seeking a change in the regulations has introduced other matters into the debate, including the assertions that since the introduction of all-seater stadia attendances in the Premier League have risen, the game has widened its appeal to ‘many more groups in society who were previously reluctant to attend matches’ including women and that any return to standing areas would require expensive adjustments to grounds.

3.37 We strongly dispute both the accuracy of some of those assertions and the causal link with all-seater stadia being postulated. In fact, on some of them such as the social inclusiveness of football, we believe that the reverse of what the Minister is suggesting is true. We cover this issue later.

3.38 However, the key point in the context of Government regulation introduced for safety reasons is that this is regulatory creep and as such goes beyond the legitimate remit of the Government Minister charged with responsibility for that regulation.

3.39 Similarly, the FLA has stated that ‘Premiership and Football League grounds are safer, more comfortable and more civilised than they were 10 or 12 years ago’. The statement refers to three concepts, on only one of which, safety, is it appropriate for Government to regulate stadium design and layout.

3.40 It is however worth noting in passing that the concepts of ‘comfortable’ and ‘civilised’ are subjective and ill-defined. It would be extraordinary indeed if the amount of investment in grounds which has taken place had not resulted in improved standards, but that fact does not inform the debate about whether safe standing areas should be permitted as part of that general programme of investment and improvement. Some of those improvements, e.g. to toilet or catering facilities, are totally unrelated to the standing debate, as is any comparison of the quality of the seated areas pre and post investment. Neither is the FLA assertion based on any empirical research of supporter opinion.

3.41 The issue here is whether compulsory seating for every spectator improves the comfort and ‘civilised’ nature of the experience for all those spectators. There are a number of factors on which a significant proportion of spectators say that their comfort and civilised experience has been reduced by this imposition.

3.42 For example, the lack of any freedom to move may reduce the comfort of spectators who are seated adjacent to spectators whose size, language or demeanour they may not like.

3.43 Many spectators also argue that the ability to watch the match in the company of other friends and regulars meeting in the ground, without having to take advance decisions and co-ordinate ticket purchases, is an aspect of ‘civilised’ behaviour.

3.44 As noted earlier in the report, at certain grounds the seating areas are decidedly uncomfortable, either because of their cramped seats or the lack of protection against the weather.

3.45 Another obvious source of discomfort is for those spectators who would rather sit, but who are obliged to stand because other spectators who so prefer are standing in front of them in seated areas. It will no doubt be stated that such spectators should not stand in seated areas but, as we explore elsewhere in the report, the reality is that many do, and will continue to do so, despite the various coercive efforts of football authorities and Local Authorities. As stated earlier, the prediction of Lord Justice Taylor (Para. 76 of his final report) that standing would be a short-term phenomenon as spectators got used to the new arrangements has clearly proved to be very inaccurate.
3.46 The simple reality is that a substantial minority of spectators prefer to stand, and in many cases find it more ‘comfortable’ and ‘civilised’ to do so. The common sense solution to all these difficulties is to give spectators the choice, for the benefit of both those who want to stand, and the (larger) number who want to sit, whilst always maintaining appropriate safety standards.

3.47 But this is all a digression in the context of consideration of the appropriateness of a Government regulation which is supposed to be about safety to this area. These are, or should be, matters for the football industry to debate and determine, in close and meaningful consultation with supporters and their organisations. The very fact that both the Minister and the FLA, which is a regulatory body established for the purpose of enforcing safety regulations, cite such arguments is evidence that in this, as in other areas, Government regulation has crept beyond its intended remit.

5. Targeting – regulation should be focussed on the problem, and minimise side effects.

3.48 Among the criteria proposed to test this principle are that regulations should focus on the problem and that they should be systematically reviewed to test whether they are still necessary and effective. If not they should be modified or eliminated.

3.49 The absurd proposition that the safety of a football ground is a function of the quality of football played within it – which is what the restriction of the application of the legislation to the top two Divisions means– is a classic example of illogical regulation. The fact that clubs are given three years after promotion to those Divisions to remove standing compounds that illogicality. Thus grounds such as Craven Cottage (Fulham), The Bescot Stadium (Walsall), Home Park (Plymouth Argyle) and Ninian Park (Cardiff City) suddenly and allegedly became ‘unsafe’ when their clubs were promoted and could remain so for three years after that.

3.50 The regulation does not focus on the problem, which is the need to ensure that grounds are safe, regardless of the level of football being played within them. It is apparent from reading Lord Justice Taylor’s report on the Hillsborough disaster that his thinking was informed by a justifiable concern about customer care issues and the way fans had been treated by the football industry. It is our contention that the all-seater requirement which he proposed combines two elements which should be kept separate, namely what is necessary to ensure spectator safety and what constitutes a high quality customer experience, about which there will be different views.

3.51 The failure to properly review that legislation in the light of the experience, the technological changes which have occurred since it was introduced and learning from best practice in other countries, is an example of the kind of regulatory creep to which the BRC refers.

3.52 The Better Regulation Task Force also proposed a series of tests of good regulation, including specifications that regulations must:

- Be balanced and avoid knee-jerk reactions
- Balance risks, costs and benefits
- Avoid unintended consequences
- Have broad public support
- Be enforceable
- Be relevant to current conditions

3.53 Let us look at these in the context of the debate about safe standing.

3.54 Whilst we would not claim that the Taylor report, and the all-seated requirement it recommended, were ‘knee jerk’, the proposed imposition by law of all-seated stadia was recommended and introduced in response to a tragedy. The requirement has never been systematically and objectively reviewed. For the reasons outlined above, the FSF believes that the ban on safe standing areas is not necessary to ensure the safety of supporters. It
does not strike a reasonable balance between risks, costs and benefits. The ban has had various unintended consequences, including reducing the enjoyment of many spectators, both those who prefer to stand and those who prefer to sit. There has been a sharp rise in prices, way beyond both the rate of inflation and the level which Lord Justice Taylor regarded as reasonable. The ban does not recognise the element of customer choice which should be present in the football industry.

3.55 The prohibition on standing does not have broad support. Surveys suggest that, even among those prefer to sit, there is a strong majority in favour of giving those who wish to stand the opportunity to do so. The ban is not enforceable without wholly disproportionate and unfair coercive measures. Attempts to enforce the requirement to sit have been identified in independent research as one of the factors which can increase crowd tension and the potential for disorder. The ban is no longer relevant to current conditions. The advances in technology which have occurred since the regulations were introduced permit far better design and management solutions. These advances include design/building technology, electronic entry systems and cards/tickets using RDF and similar technology, and advances in training and event management/crowd psychology.

3.56 In his address to the Institute of Public Policy Research the Prime Minister also said:

‘Science’ is often taken to be a synonym for ‘certainty.’ So, when a scientist admits to uncertainty it can often be taken as an admission that there is probably a problem. In fact, in the scientific world ambiguity, uncertainty, the wisdom that comes with failing and changing your mind, are all essential to progress. Often there is no obvious right or wrong answer. The most likely outcome changes all the time, in response to new evidence.

‘This is a major challenge both to politicians and the media. The structure of political combat tends to invite certainty, or at least a show of certainty, when that idiom is entirely inappropriate for discussing fine-grained risks and the balance of probability. There are trade-offs, dilemmas, balances between costs and benefits in every decision. Unless we find a viable way of discussing these risks a mature national conversation on important policy questions like GM science will be impossible.

‘So, for example, one piece of research into a supposed link between autism and the MMR single jab, starts a scare that, despite the vast weight of evidence to the contrary, makes people believe a method of vaccination used the world over, is unsafe. The result is an increase in risk to our children’s health under the very guise of limiting that risk.

‘And before we all just complain about the regulators, the public servants or indeed the Government, let us just pause for a moment in sympathy. A civil servant or regulator who fails to regulate a risk that materialises will be castigated. How many are rewarded when they refuse to regulate and take the risk?

‘Bodies set up to guard the public interest have one-way pressures. It is in their interest never to be accused of having missed a problem. So, it is a one-sided bet. They will always err on the side of caution.

‘It seems to be part of the DNA of regulatory bodies that they acquire their own interests and begin to grow. Max Weber famously noted the tendency of bureaucracies to tidiness…

Sometimes, we need to pause for a moment and think whether we will not do more damage with a hasty response than was done by the problem itself. We cannot respond to every accident by trying to guarantee ever more tiny margins of safety. We cannot eliminate risk. We have to live with it, manage it.’

3.57 The FSF believes that the Prime Minister’s comments are highly pertinent to the debate about safe standing and the approach to it
adopted by the regulatory body responsible for this area, the Football Licensing Authority.

3.58 In summary, the Government-imposed requirement for all-seater stadia does not comply with the five principles of good regulation or pass any of the six tests of good regulation suggested by the Better Regulation Task Force. They are, to use a phrase favoured by the current Home Secretary, ‘Not fit for purpose.’

3.59 Sadly, Lord Justice Taylor is no longer with us. We believe that if he were, as an intelligent and far-sighted man, he would have recognised the force of many of our arguments and the case for amending the regulations which were introduced on his recommendation.

3.60 One final note on the principle of regulation. The FSF’s call for more regulation in some other areas of football might strike some as inconsistent with the thrust of this report. The two are in no way inconsistent. We believe statutory oversight and direction introduced to oversee our game should be applied using the same principles of good regulation set down by the BRTF and the BRC.
4.1 Since the advent of all seated stadia, it has proved very difficult for clubs to force people to stay seated. A sizeable minority of fans at many clubs have continued to stand up in seated areas for part or all of the game. Whilst letters to supporters, public address announcements, stewards and police can ask people to sit, this often has very limited effect. The numbers who stand varies according to the club and the fixture - from a handful to virtually a whole stand or sector.

4.2 The FLA and some local authorities are using various methods to try to prevent persistent standing, including reductions in capacity, particularly for away supporters, and threats of withdrawing licences. Many individuals have been ejected from grounds for standing, and some even banned. This is causing increasing conflict between supporters, their clubs and the authorities. It is particularly illogical that home clubs suffer capacity reductions and consequent loss of revenue because of the actions of visiting supporters.

4.3 Ejections can have a negative public order effect, with more supporters angrily standing in a gesture of defiance. At many clubs stewards attempt to get people to sit, but as soon as a few rows have done so, a chant of ‘stand up if you love, or hate xyz’ is started, and the whole process has to begin again.

4.4 Reduction in allocations for travelling supporters results in away fans buying tickets for the home area of grounds, with resulting lack of segregation and potential for disorder. Even where clubs have had away allocations cut (e.g. Cardiff City, Manchester United, Leeds United, West Ham United, Newcastle United), those travelling have continued to stand at almost every game. This is hardly surprising because those who have obtained a ticket for the game have, by definition, not suffered any sanction. The attempt by local authority licensing officers to ‘punish’ visiting supporters who persistently stand in this way is another example of a counter-productive and short-sighted policy.
4.5 It appears that clubs will continue to have to allocate resources to this issue. They may lose income from reduced capacities. They will alienate some of their most loyal fans. Other supporters are prevented from being able to see the game by supporters standing in front of them. There are also many examples of disorder occurring within grounds, due to confrontation with police and stewards over standing. A number of our members have complained that they believe teenage supporters are singled out by stewards, while the older supporters are ignored. Others have complained about being forced to sit on wet seats, contrary to the regulations and guidance. The FSF also has many documented instances of discriminatory treatment between home and away fans. Broadly, if enough fans stand up, home or away, at most grounds and insist on standing, then they will not be required to sit. If only a small group is standing they will be victimised, even in cases where they are offending nobody by blocking their view of the game.

4.6 The FLA set as one of its objectives to ‘secure elimination of large-scale persistent standing by home supporters and a reduction in standing by visitors during the 2003/04 season’. Its annual review for 2004 stated ‘standing by home supporters was reduced but not eliminated’. However no mention was made of any success or otherwise in reducing standing by visitors. Even after a further two season’s effort the FLA has patently failed to meet its 2003/04 target to eliminate large-scale standing of home supporters, and there has been little sign of a reduction in standing by away fans.

4.7 Despite the lack of progress in stopping persistent standing in seated areas, when asked in July 2005 what measures the FLA intended to use to prevent this in the coming season, the FLA Chief Executive John De Quoit’s reply gave nothing to suggest greater success saying ‘We shall therefore continue to address the issue of persistent standing in seated areas in partnership with the football authorities, clubs, local authorities and other agencies in line with our stated approach.’ It is clear that many within the organisations that the FLA lists do not support the policy, but it appears that everyone has to ‘toe the party line’ and that any attempt to debate the standing issue is quickly quashed.

4.8 In short, the current approach is not working. It has failed to stop persistent standing, which has customer care implications. It has failed to deal with safety concerns, either by stopping persistent standing, or by containing it to the most suitable areas. It is causing increasing problems of conflict between supporters and stewards. It has a financial impact on clubs. It is driving supporters away from football.

4.9 The FSF notes with approval the Early Day Motion in the House of Commons proposed by Mike Hancock MP calling for the Government to engage in dialogue with all football stakeholders including supporters about permitting safe standing areas at major football stadia. As this report goes to press the EDM has been signed by 142 MPs of all political parties. The Leader of the Official Opposition has also promised an early review of the regulations involving supporters when and if he comes to office. Yet the Government continues to play a ‘dead bat’ to the issue, to use an analogy from another sport.

4.10 The FSF also notes that the Football Foundation (FF) commissioned a report called ‘Football and Its Communities’, published in May 2006. This report recommended that the Government ‘consider reviewing the all-seater requirement for the top two divisions to allow convertible safe-standing areas in stadia at all levels of the game.’
5.1 Commercial property consultants Drivers Jonas (DJ) whose current and former clients include, amongst many others, Liverpool, Middlesbrough, Exeter City, Reading, Southampton, Sunderland and Swansea City Football Clubs, commissioned the Football Fans’ Census (FFC) in 2005 to survey opinion amongst football fans on a range of stadia issues. The FFC also undertook a separate survey working with the group Stand Up Sit Down (SUSD) at the end of 2006.

5.2 The full findings of the latter survey, which is based on responses from 2,046 football supporters between 11 December 2006 and 6 January 2007, can be found at appendix A of this report. Amongst the highlights was a 92% ‘yes’ response to the question, ‘Should fans be given the freedom to choose whether they stand (in ‘safe-standing’ areas) or sit inside football grounds?’ Only 7% answered ‘no’ with 1% answering ‘don’t know’.

5.3 These results show beyond doubt that a majority of fans, including those who prefer to sit, back the introduction of safe standing. Anybody who attends games in the top two divisions in this country cannot fail to notice the number of fans who stand. Clearly, with the benefit of hindsight, Lord Justice Taylor was...
The case for safe standing at major football stadia in England & Wales — a 21st century solution

wrong about all fans coming to prefer seating to standing.

5.4 The FLA produced a paper in August 2002, entitled ‘Standing in Seated Areas at Football Grounds’. This states five examples of why spectators may stand persistently, as follows:

- They stand because inadequate sightlines obstruct their view or the seats are uncomfortable
- They cannot see because other spectators are standing
- They see supporters of the other team standing
- They positively prefer to stand
- They are demonstrating their opposition to the policies of the club or the Government

5.5 The FSF agrees that all these are valid examples of why supporters stand, but some are far more important than others.

5.6 Further reasons are to demonstrate mass solidarity, standing in response to chants such as ‘Stand up if you love City’, ‘Stand up if you’re top of the league’ etc, or simply because the view from a standing position is better than that when seated. Fans of Football League clubs where standing still exists often prefer to stand up because it is far cheaper than the seats.

5.7 By far the greatest of these reasons is however supporters’ positive preference to stand. The FLA however does not expand on this, and one probably has to be a committed football supporter to understand the reasons. Football is a fast and passionate sport, and many supporters find that watching from a sitting position reduces their enjoyment of the game. They wish to sing and chant as part of a communal act to show support for their team. Whether at football, or at a choral or rock concert, or even in church, temple, synagogue or mosque, sitting is not conducive to loud or passionate singing. The atmosphere this creates is a very important part of the football experience for many supporters. It is appreciated even by those who do not wish to join in.

5.8 Fans know that by their vocal support they can raise their team’s performance and many players and managers attribute a good performance to the level of vocal support. Since stadia became all seated the atmosphere at many grounds has considerably reduced. This is partly a result of people being forced to sit, and partly because those of like mind who used to congregate in areas of terraces to sing, are now spread around the ground. It is interesting that Manchester City, for example, have announced the establishment of a ‘singing area’ at the City of Manchester Stadium from next season. It is not clear how much the Club expects its supporters to sing whilst remaining seated. The FSF is aware of similar initiatives at Arsenal, Chelsea and Manchester United.

5.9 To many people, football is not about watching a performance. The game is a major part of their lives, and matches a passionate experience that they feel a part of. By standing, supporters feel more involved and closer to the players. When seated they feel more like observers than participants.

5.10 Supporters have stood at football ever since the leagues became organised over a hundred years ago, and for many it is the natural way to watch the sport. Across the world fans of all ages and of both sexes still stand to support their teams. It is a part of football culture and, as has been shown in recent years, will be extremely difficult to educate away.

5.11 In reply to letters, the Government has made conflicting statements with regard to personal choice and safety. With regard to protective clothing for motorcyclists the Department for Transport said:
THE FOOTBALL SUPPORTERS’ FEDERATION

5.12 With regard to standing at football the Minister for Sport said:

‘The issue here is one of safety versus choice. While offering spectators a choice is desirable, ensuring their safety is essential and this must be our priority.’

5.13 This difference in approach is particularly ironic given that the evidence for reduction in injuries through wearing protective motorcycle clothing is far stronger than that for making football fans sit down.

5.14 Those who advocate the introduction of safe standing are often portrayed as nostalgic for some mythical time in the past when football was somehow ‘better’ or ‘more authentic’. This is, frankly, nonsense. No football fan in this country needs any lectures about how the game was run. The neglect of spectator safety, comfort and opinion in Britain was historically endemic. That is why fans, some of whom were our members, were killed or injured (setting aside those injuries caused or provoked by hooligans). The FSF does not advocate a return to the old-style terraces which existed at all too many grounds prior to the post Hillsborough Taylor reforms. Many were indeed dangerous and lacked the most basic safety, toilet and refreshment facilities.

5.15 What we do believe is that football is a cultural and sporting entity (as the Canadian social commentator Marshall McLuhan once shrewdly observed ‘Culture is what people do.’). In the absence of compelling and grave safety reasons, ‘customers’ should be allowed the choice as to how they watch the game. Currently, because the authorities are unable to curb the natural inclination of many supporters to stand, others behind them lose the freedom to choose, as they have to stand in order to see. Providing separate standing areas would allow choice for all. It would be a ‘win-win’ situation.

5.16 The dissatisfaction of some Manchester United supporters had become so extreme that they formed their own breakaway club called FC United of Manchester (FCUM) in 2005/6. Whilst the formation of FCUM has been controversial (some Manchester United supporters accusing FCUM followers of ‘desertion’) the breakaway is an example of the disaffection and alienation bubbling under the surface at many clubs, particularly the bigger ones. One of the many issues driving the formation of FCUM is the lack of choice to sit or stand at Old Trafford.

5.17 One FSF member who has attended three FCUM games as a neutral said of his visits, ‘I’d encourage every fan in the country to get along to an FC United game if they can. It’s a real eye-opener. Just how an afternoon out at a professional football match should be. I’ve never heard three thousand fans make so much noise. The passion and wit of the FC United supporters is really something very special. The club board, elected by the fans, is working flat out to encourage a new generation of young supporters.

‘The Government believes that the clothes motorcyclists wear continue to remain a matter of personal choice and there are currently no plans to make protective clothing compulsory’.

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into the ground. It has worked very hard to ensure that the stewarding of fans is sensitive and appropriate. Tickets only cost £7 (€9.94) for adults and £2 (€2.84) for concessions. You won’t find a better value day out anywhere in the country. The whole sense of the ground on match days is one of empowerment, passion and fun.'

5.18 A medium term objective of the FCUM members and board is to develop its own stadium. Commenting on this, FCUM general manager Andy Walsh says, ‘Many of our supporters prefer to stand and this is an issue that the club is keen to pursue. We’d want safe standing areas as part of any new ground we build.’ The anecdotal evidence of FCUM is supported by recent research conducted by Professor Mike Weed of Canterbury Christ Church University. Professor Weed’s research was not directly related to the issue of standing at football stadia. It was connected with the growth of the culture of watching the game live on television in pubs and bars.

5.19 Professor Weed’s research did examine however some of the ‘push’ factors behind the growth of live pub football that has become so popular in recent years. In his research Professor Weed flags up what has been referred to as the ‘sanitisation’ of the Premier League football as a result of the changes brought about by the 1990 Taylor Report on the safety of sports stadia. This identified football clubs as having prime responsibility for the safety and comfort of spectators, and included the conversion of all first and second division all-seater grounds to stadia by 1994.’

5.20 Professor Weed highlights the argument that the move to all-seater stadia may have destroyed the traditional atmosphere of football. He explains, ‘The Football Act incorporates a wide-ranging definition of disorder, and this widespread definition can cause the criminalising of those elements of football support such as chanting and singing, which are a significant element of the football experience. Therefore it would appear that the ‘spectre of football hooliganism’ alongside the introduction of all-seater stadia has created an atmosphere inside football grounds that makes the pub a more attractive place in which to watch football.’

5.21 Professor Weed’s research also analyses the nature of sport spectating. He says: ‘The concept of a shared communal experience is at the crux of understanding the attraction of the pub as a sport spectator venue and perhaps of understanding the nature of the sport spectating experience itself. Underpinning the desire for such shared experiences is the ‘place-making quality’ of people as sports spectators. With regards to a pub, a social space is transformed into a sporting place. There is a need for people to come together to be with others in moments of intense co-present fellow feeling, the moment is shared collectively by all present, and the joy or despondency at the outcome is a shared communal moment.’

5.22 In the following sections, we examine some of the arguments which have been put forward against the provision of safe standing, namely safety; disorder; customer care; technical issues and social inclusion.
6. SAFETY AND RISK

6.1 In Section 3 of this report, we looked at the inconsistencies in relation to the approach to safety and risk in the context of debates about the approach to regulation. The Minister of Sport has stated that he requires evidence that standing areas can be safe. Whilst, of course, we want to ensure appropriate standards of safety for our members, we suggest that this is to put the onus of proof the wrong way round. Nothing is ever totally safe. The only way to eliminate all safety risks from football would be to ban the professional game completely. In that sense, nobody could ever ‘prove’ that standing areas are ‘safe’. It is for the Government to demonstrate that a regulation preventing standing areas is an appropriate, proportionate and consistent way of approaching the question of safety in football grounds.

6.2 The FLA has published statistics for the number of injuries occurring at football matches. These show an average of one injury per 27,432 spectators. Most of these injuries were minor: cuts caused by slipping or scalds from hot drinks, for example. That season only 127 cases required hospital treatment. Whilst the FSF would not wish to become complacent, this injury rate is very low, particularly considering that over 65% of those treated were either ill, or had pre-existing injuries sustained outside the ground.

6.3 The injury rate is slightly higher (1 in 20,528) for grounds with terracing, than all seated grounds (1 in 28,501). The FLA and DCMS frequently use these figures as justification for all seating, but there is no evidence that these injuries are due to standing. It appears that there are no statistics related to the rate of injuries in standing areas compared to seating. These would be the only relevant figures in assessing the case for prohibiting standing areas, and even then would need to be subject to the kind of detailed multivariate statistical analysis we referred to in Section 3 of this report. Indeed in its report the FLA says that fewer resources devoted to safety at lower division clubs is a likely factor, and of course the physical standard of grounds is by and large much lower.

6.4 This is because in assessing factors such as safety, injury statistics and crowd behaviour, it should be noted that the building of new stands and stadia, and the conversion of former standing areas to seated areas, has coincided with a range of other measures, and that the improvements that have occurred cannot be linked to the move away from standing areas.

6.5 The FLA’s report states, ‘As a generality, it would be preferable for standing in seated areas to be addressed primarily through the
education, persuasion and positive management of spectators. However, such measures alone may not achieve the desired results. To the extent that they prove insufficient, they will require to be backed up by action to reduce capacities. It is important that supporters are engaged in the process where possible and that they understand why the proposed action is both necessary and ultimately for their benefit. A heavy-handed approach that was perceived to penalise the innocent could be counterproductive and might exacerbate the situation.

6.6 However, in practice there has been little in the way of education of supporters as to why they should not stand, other than that this is a ground regulation. This point has been made to some football clubs, who have agreed, but said that they consider that such education is the job of the FLA and not individual clubs. The video shown at many Premier League grounds with large screens is treated with much derision, when commented upon at all. Many supporters disagree with the safety reasons that the authorities give to back up their claims that standing is dangerous. The fact that they have stood without incident or accident for years merely convinces them that some of the arguments against standing are bordering on absurd.

6.7 The generally inconsistent and illogical approach to safety issues relating to standing in seated areas does nothing to increase the confidence of supporters in the approach of the authorities to the banning of safe standing areas.

6.8 Whilst the authorities will not permit supporters to stand during play, on occasions, such as for singing the national anthem or for moments of respect, they are actually asked to stand. Before and after major matches and after goals are scored, PA announcers often play music which has the effect of encouraging supporters to stand and even dance, yet they are told that standing during the game is unsafe.

6.9 It is accepted that supporters can stand at moments of excitement, such as goals, and of course to enter and leave the ground, but standing passively throughout the game is not permitted. The final Taylor report (para 63) recognised with some characteristic judicial gravity and understatement, ‘It is true that at moments of excitement seated spectators do, and may be expected to, rise from their seats’. The authorities accept that spectators will stand at moments of excitement, but will not tolerate persistent standing. However, the limits of ‘moments of excitement’ are unclear.

6.10 The report on safety at Old Trafford commissioned by Trafford Borough Council, and undertaken by the independent consultants WS Atkins, examined the safety of supporters standing in seated areas at different times. It concluded, not surprisingly, that the most dangerous time is at moments of excitement, such as when a goal is scored. The next most dangerous time is when fans are leaving the stadium, and the least dangerous time is passive standing during normal play. However, it is only during the latter that attempts are made to force supporters to sit down.

6.11 Consideration of the safety case for permitting dedicated standing areas should begin with the current situation. The relevant comparison is not between grounds as they are today and as they were pre-Taylor. It is between all-seater stadia and stadia which are of a similar standard, but which contain a limited amount of designated standing accommodation such as those in stadia in Germany.

6.12 The degree of risk from the type of designated standing areas proposed by the FSF is minimal, and in many cases less than those resulting from the current situation of uncontrolled standing in seated areas. Lord Taylor accepted that ‘Total Safety’ is not achievable except with an empty stadium.
7.1. Even though the reasons for the introduction of the current regulations were overwhelmingly to do with safety, not disorder, recently the ‘goalposts have been moved’ by some authorities and commentators, and new reasons have been postulated, including the threat of increased disorder, if safe standing is introduced.

7.2. The first point to make here is that this is a different issue, and that if prohibition of standing is put forward on these grounds, then it should be subject to detailed scrutiny and debate based on up to date evidence.

7.3. The FLA suggests that allowing supporters to stand may lead to increased crowd trouble, but no evidence appears to have been presented to support this. There is also no evidence that disorder is any more likely at grounds in Football Leagues One and Two which still have standing areas.

7.4. If there is evidence then it should be presented. Any disorder would almost certainly occur at a time of controversy or excitement, when supporters would already be expected to be standing. A ground regulation banning standing is hardly likely to stop anyone who is sufficiently agitated as to cause trouble, from getting out of their seat.

7.5. Others have argued that the imposition of all-seater stadia has contributed to football crowds being far more peaceable than in the past in a country and society which is generally much more violent. It is said that the introduction of standing areas would lead to a return to old-style terrace aggression and warfare.

7.6. We do not dispute the sincerity of those who hold this view. However we believe that the use of modern CCTV technology and the long-standing policy of segregating home and
away fans would deter any would-be troublemakers from committing criminal offences within safe standing areas. At worst they would be no more likely to commit such offences than currently. A change in the culture of football supporters started prior to all seater stadia, and regardless of whether supporters sit or stand (in seated areas or terraces), incidents within grounds are now rare. It is simply not the case that those who stand are hooligans looking to cause trouble. They are just normal supporters of all ages and both sexes, many of whom are season ticket holders, who prefer to watch football while standing.

7.7 Furthermore, the provision of separate standing areas for home and away supporters could ensure that fans using them were well separated in the ground (most likely at opposite ends). If it is believed that these are the supporters most likely to cause difficulty, then even in its own terms, this is an argument for the introduction of standing areas.

7.8 It was said in the final Taylor report and has been repeated since that it is much easier to catch offenders in seated areas than in standing areas. We do not agree with this. Whilst sale for any price by any person other than the issuing club of match tickets may be prohibited under anti ticket touting legislation, any football supporter will tell you that fans sell ‘spares’ to other fans all the time.

7.9 Likewise, season ticket holders often allow their tickets to be used by fellow fans (almost always other fans of the same club or ‘neutrals’ amongst family and close friends). This is known by club administrators and a blind eye is turned where this causes no problems. Another wide-spread practice is ‘renting out’ season tickets to others where the holder temporarily cannot attend games. At clubs with long season ticket waiting lists literally thousands of season tickets can be in regular use by persons other than the registered holder. There is therefore no guarantee that the person to whom a ticket has been issued for a particular seat will actually be the person occupying that place in the ground.

7.10 The FSF also notes the views of many police officers that it is often more difficult to reach and, if necessary, arrest offenders in seated areas than in standing areas. For this reason, arrests/ejections are often delayed until half or full-time in all but the most pressing cases. Those who wish to cause disturbances around football matches are, unfortunately, stupid. Any experienced police officer will say that it is the certainty of successful detection and prosecution that is the most important factor in deterring crime. This has been achieved in our stadia and would remain the case if safe standing areas were to be introduced.

7.11 An important factor in this context is that permitting standing in designated areas would reduce a major area of conflict between supporters and stewards, and in doing so improve the relationship between them and make it easier for the latter to deal with any unacceptable conduct. It would also prevent conflict between supporters who wish to sit, and those who may stand blocking their view.

7.12 Dr Cliff Stott of the Department of Psychology at Liverpool University, who has done much work on the psychology of football crowds, has stated that where stewards have attempted to force fans to remain seated during games it has increased the determination of fans to remain standing
and has dramatically increased the tension between fans and stewards, often resulting in a more hostile situation developing than had existed before action was being taken.

7.13 The German experience suggests that where those fans who wish to stand are given the right to do so, those in seated areas remain seated. Such a situation here would greatly reduce conflict between fans and stewards. The ‘peer pressure’ to remain seated would be that much greater where fans could say, ‘If you want to stand, get a ticket in the standing area.’

7.14 The FLA states that a seated crowd is easier to manage, and that this is harder if spectators are standing. However there appears to be no evidence from the lower divisions that suggests supporters standing are not managed perfectly adequately and that this would not be the case for small standing areas in the top divisions. There appears in some parts to be an assumption that all football supporters must be denied freedom or closely monitored, in order to prevent disorder. The reality is that hooliganism within grounds (both all seated and with standing areas) has greatly decreased, and the control that some wish to exert over individual supporters is out of all proportion to the possible risk of disorder.

7.15 There is also the point that it is not reasonable to impose excessive controls on the large majority of ordinary innocent supporters, just to deal with occasional incidents of disorder from a small minority.

7.16 At this report was being finalised, Leeds United fans invaded the pitch at the end of their home game against Ipswich Town. Elland Road is an all-seated stadium. This is a further example that disorder is not related to whether a stadium is all-seater or has safe standing areas.
8. CUSTOMER CARE

8.1 Many people within the game, including many club safety officers, believe that the biggest issue regarding standing in seated areas is customer care, not safety. The FLA paper quotes examples where standing in seated areas has a negative impact on customer care:

- Spectators behind those who stand have no choice but to do likewise, even if they would prefer to sit.
- Spectators who do not wish to stand may feel threatened by those who do.
- If women and children are prevented from enjoying matches in popular areas, they may choose to stop coming rather than move to other areas.
- Spectators in wheelchairs cannot satisfactorily be accommodated behind standing spectators.

8.2 It is entirely reasonable for a spectator to expect that they will be able to see the game whilst sitting in the seat that they have paid for and not have their view blocked by others standing in front. Supporters of small stature, children, and those who for whatever reason are unable to stand for long periods should not have their enjoyment spoiled by others standing. Many supporters, particularly those with children, have had matches spoiled by being unable to see due to persistent standing, and some have stopped watching their teams.

8.3 All the customer care issues listed by the FLA relate to problems where some supporters wish to stand, and others do not. Clearly this does cause problems, and they can be resolved by separating those who wish to stand and those who do not. Customer care would therefore be best provided by allowing supporters a choice as to how they watch football.
8.4 To some extent this has already occurred informally, as the areas where supporters stand are well known to regular supporters, so those wishing to avoid them can simply purchase tickets elsewhere. In some cases, clubs give this unofficial advice to supporters.

8.5 The FLA’s comment with regard to women and children is a sexist stereotype which has caused offence to some female supporters. Many women prefer to stand at football, and conversely some men prefer to sit while others wish to stand. It is not a matter of gender, but the ability and desire to stand.

8.6 It is true that spectators in wheelchairs cannot usually be satisfactorily accommodated behind standing supporters. This is, however, because too many designated areas for wheelchair users are not designed to give a view of the playing area over fans who are standing up in their seats. It is worth pointing out that making fans in seated areas sit down does not solve the problem for fans that use wheelchairs behind them, if their view is obstructed when supporters in front of them stand at moments of excitement. This merely condemns the wheelchair reliant supporter to seeing all the game except the most crucial passages of play. A wheelchair user on the FSF national council has said that a good litmus test of whether an area for wheelchair users is adequate is ‘Where a ground is staging an international match or cup final, I can see the Monarch when all stand for the national anthem.’ Indeed the requirement for wheelchair users’ areas to maintain their sightlines of the pitch when fellow supporters in front of them stand is written into both domestic and European guidelines. This requirement is not, unfortunately, always observed.

8.7 With a viewing platform giving a clear sight of the pitch over standing fans, the needs of disabled fans can be met perfectly within a standing area. In any case, there would be no need to put the disability area behind a safe standing area, which will only form a small proportion of the total spectator accommodation.

8.8 Permitting designated standing areas would have many customer care benefits, something that any industry or service should take very seriously.
9.1 The FLA has stated that areas designed for seated spectators would not allow standing spectators a clear view of the pitch without major structural changes to the profile of the viewing area. However, even if true, this is irrelevant to the debate about Government regulation. It should be a matter for the football industry, not the FLA to decide on the affordability and feasibility of any required structural changes within stadia. If clubs are willing to cover the costs of changes or incorporate such designs into new developments then the FLA must provide the safety standards required and clubs and stadium designers must adhere to such standards.

9.2 The FLA in the report of its visit of 23/24 February 2001 to view the ‘Kombi’ convertible seating/safe standing system employed at the AOL Arena in Hamburg found that:

1. The combination of ‘Kombi’ seats and removable barriers is an ingenious and well-engineered system that overcomes most of the disadvantages, in particular inadequate seats and restricted views while seated, of the standing/seating conversions installed at other German football grounds.

2. This system could, with certain modifications, comply with the safety standards required in England and Wales.

9.3 The FSF does not advocate this particular solution over the alternatives employed at other German stadia. We merely note that the FLA, so apparently implacably opposed to standing, has recognised that at least one of the systems employed in Germany is transferable and safe.

Kombi seating at the Weser Stadion, Bremen.
10. SOCIAL INCLUSION

10.1 The Minister for Sport has argued that the introduction of all-seater stadia has increased the range of people watching football, particularly women and families. It is also argued by some (including the president of the Football Safety Officers' Association [FSOA] in a recent radio interview) that the introduction of safe standing would tend to exclude women, younger fans and disabled supporters from attending.

10.2 We find it more than a little ironic that all-seater stadia should be supported on these grounds, given the increased prices which have accompanied the move to all-seater stadia and are pricing many groups of society on low incomes out of football, particularly the young.

10.3 It is also ironic that a Government regulation introduced for another purpose should be justified on these grounds. The FSF is not opposed to the idea that Government should interest itself in the need for greater social inclusion at football matches. We argued that case before the Football Task Force chaired by the Rt Hon David Mellor MP. We were disappointed at the Government's relatively weak response to the Football Task Force's recommendations, as a result of which it established the Independent Football Commission with very limited terms of reference. If the Government is serious about its concern in this area, it should address issues such as ticket pricing and redistribution of wealth within the game.

10.4 However, the simple answer to this point made by the Minister and the President of the FSOA is that nobody is suggesting that anyone be made to stand. Our estimates of demand suggest that a reasonable level of safe standing would probably be about fifteen to twenty percent of capacity at the top levels of the game. Any advantages which have resulted from the provision of improved quality seating would remain, with the added advantage that spectators who do not wish to sit would

Many women and younger supporters have always preferred to stand. This picture shows Everton fans at Goodison Park in the early 1950s.
no longer be forced to watch the game from a seated area, with all the management problems which that has caused. This should increase its attractiveness to those who wish to sit, of whatever gender, ethnicity or social group. Safe standing areas will increase choice, diversity and social inclusion, the reverse of the effect advanced by some opponents of safe standing.

10.5 The FSF also believes that some who oppose the introduction of safe standing areas do so for motives that have nothing to do with spectator comfort and safety. There is a perception amongst some that those who prefer to stand rather than sit are undesirable in that they have less money to spend and/or are more prone to anti-social behaviour than those who prefer to sit. They hide their desire to keep these ‘elements’ out of our football grounds behind the safety argument. This is dishonest and completely counter to football’s unique position as ‘the people’s game’, drawing as it does on the support of all social classes and backgrounds.

10.6 The right for fans to attend games irrespective of social class, disability, gender, race, religion, sexual orientation or age is central to the policies and ethos of the FSF. Fan groups were formed to oppose racism in football grounds long before such campaigns were official policy and organisations such as Kick It Out (KIO) were formed. The FSF adopted a resolution calling for action on homophobic abuse and chanting at its 2006 Fans’ Parliament and has a member of its National Council with specific responsibility for the issues particularly affecting disabled supporters.

10.7 The FSF has many women members supporting Premier League and Football League Championship clubs who would prefer to stand if given the choice. Two of them co-wrote the introduction to this report. One wrote the foreword. Of the three, one of them currently holds a standing season ticket at Ninian Park and will lose her right to stand soon unless the regulations preventing standing are not repealed. The following table shows the percentage of women and younger supporters amongst season ticket holders on the Grange Road standing area at Ninian Park.

<table>
<thead>
<tr>
<th>DESCRIPTION</th>
<th>NUMBER</th>
<th>% OF TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of season tickets</td>
<td>1,650</td>
<td></td>
</tr>
<tr>
<td>Adult women season ticket holders</td>
<td>750</td>
<td>45.45%</td>
</tr>
<tr>
<td>Under 16 season ticket holders</td>
<td>580</td>
<td>35.15%</td>
</tr>
</tbody>
</table>

10.8 The licensed capacity of the Grange Road end is 2,100. Season ticket holders therefore represent 78.57% of the total maximum attendance in this section. The experience of Germany’s new generation of safe standing areas also shows that standing areas are no barrier to the young or women supporters. Just the opposite in fact. The more options available, the more inclusive the football experience becomes. We now turn to the German experience.
The Deutsche Fussball Bund (DFB), or German Football Federation, the equivalent of the Football Association (FA) in England or Football Association of Wales (FAW), reviewed its policy on permitting standing in the light of the Heysel and Hillsborough disasters.

Its report of March 1993 accepted that incidents of violence had occurred in standing areas and ‘gave serious consideration to methods for solving the problem’. In the words of the report:

‘Sections of terracing were made smaller by the introduction of segregating elements between sectors and pens, existing escape routes were enlarged and new ones created, and surveillance equipment was installed.’

The DFB considered the conversion of standing areas to all-seater and reached the following conclusion:

In the recent period, many people with an interest in football have been asking the DFB to lend their support to the concept of standing areas of a particular size for home and away fans in our stadia: in total no more than twenty percent [of the ground capacity], with variable capacities for home and away fans. After carefully considering all the relevant issues and the DFB’s own concept and holding numerous meetings with representatives of clubs and councils, senior police officers and stewards, representatives of supporters’ clubs and fan projects, and sociologists and educationalists, we have come to the conclusion that a certain number of standing places should be retained for the following reasons:
1. Safety inside grounds is already guaranteed for the most part by a variety of structural and organisational measures.

2. Violent incidents in standing areas can mainly be attributed to the particular idiosyncrasies and the composition of the spectators there rather than the physical configuration of these areas. The majority of these spectators will not behave any differently in an all-seater stadium.

3. In the long run, abolishing standing areas would make it considerably more difficult, if not impossible, for socially disadvantaged football supporters to attend their team’s matches. Football, being a people’s sport, should not banish the socially disadvantaged from its stadia, and it should not place its social function in doubt itself.

4. For several years now, self-regulating processes have been in evidence amongst fans in standing areas. These processes seldom render it necessary for the police or stewards to intervene.

5. The climatic conditions in northern, eastern and western Europe are different from those in southern Europe; spectators are much less willing to use uncovered seating when it is raining or snowing than they are to stand in wintry weather conditions. For economic reasons it will not be possible in many countries to furnish grounds with roofed accommodation in the foreseeable future.

6. Football is culture. It involves not only the spirit of fair play but also the solidarity inspired by a sense of community. For young people, fan culture is an important factor in the development of their personality on the path to gaining independence in an increasingly complex society. From the socio-pedagogic point of view, it is essential that areas where young people can interact are maintained and safeguarded. These include standing areas in football grounds.

7. The young fans on the terraces embody the vibrant world of football. It is here where the atmosphere that attracts millions of people all over the world to our sport is created. It is here where the fans that are the first to cheer their team on and the last to whistle are to be found. Young people live with the emphasis on the physical. They seek and require direct (and physical) contact with their like-minded peers. The terrace is their own miniature world, a place where people from all sections of society meet. Those who do away with standing areas take away a part of these people’s lives.

8. In the unanimous opinion of many experts the rigorous removal of all standing areas will lead to many ‘adventure-seeking’ young people joining the hooligan scene, with the consequence that the violent clashes outside grounds will continue to increase in both number and brutality. The success of our varied efforts to contribute to a positive change of consciousness in the long term by improving the way in which we look after
fans will be placed in serious doubt by this unjustified (from the fans’ point of view) intervention in their world.

9. We are now witnessing more and more cases of spectators ignoring seats, which were installed at great expense, and simply standing on them. This is a very dangerous practice, especially in view of the steepness of the terracing often encountered in the bigger grounds.

Based on the above considerations the DFB has concluded that for its domestic competitions standing areas for both home and away fans may be retained in the grounds used by professional clubs in the capacity recommended by the DFB Safety Committee in each particular case. The DFB will continue to pursue and lend its support to this aim.

11.4 A new generation of stadia has emerged in Germany, either on completely new sites, such as the Veltins Arena in Gelsenkirchen, home of Schalke 04 (who currently lead the Bundesliga) or completely redeveloped stadia on existing sites such as Signal Iduna Park, home of Borussia Dortmund or the AOL Arena, home of Hamburger SV.

11.5 An FSF national council member recently travelled out to Germany to watch three games. His full report is included as appendix B to the main report.

11.6 He surveyed in detail the arrangements made for safe standing at each of three stadia:

- Veltins Arena, Gelsenkirchen
- Signal Iduna Park, Dortmund
- Weser Stadion, Bremen

11.7 The Veltins Arena has an area of 14,000 standing spaces for home fans and 2,000 for visiting supporters. It hosted the 2004 UEFA Champions League Final and matches in both the group and knock-out phases of the 2006 World Cup. Signal Iduna Park has 25,000 safe standing spaces for home fans and 2,500 similar for visiting supporters. It hosted matches in the last World Cup also. The Weser Stadion having a total capacity of only 43,000 has smaller safe standing areas for both home and away fans.

11.8 It was difficult for the FSF to obtain injury statistics as these simply aren’t kept. Germany has never experienced the sort of repeated football stadium disasters that we have in this country. In a country famous for its record-keeping this speaks volumes.

11.9 The FSF was told by Herr Volker Fuerderer, safety manager of the Veltins Arena that, ‘In the nearly six years of the existence of the Veltins Arena I would go as far as to say that there is not a single incident or injury that was caused that we would explain with the existence of standing terraces’.

11.10 All of the safe standing areas in the stadia visited by the FSF use differing techniques which permit their conversion into seated areas for use at games played under UEFA and FIFA regulations which currently do not permit tickets for standing areas to be sold.

11.11 As part of the visit the FSF spoke to many fans as well as stadium officials and police. The recurring theme, particularly amongst fans, many of them young women, was that they chose to stand because it was fun. The domination by aggressive young men which some in this country believe would accompany the introduction of safe standing here simply does not occur in Germany. Indeed the pricing structure is similar to that reported by Lord Justice Taylor in his final report when
referring to Rangers FC at the re-built (but then still including standing areas) Ibrox Park.

11.12 At the Veltins Arena standing tickets cost €9 (£6.34) for adults and €6 (£4.22) for concessions. Season tickets (which include all domestic league and cup and European games) cost €153 (£107.75) and €102 (£71.83) respectively. The cheapest seats cost €15 (£10.56) with a season ticket costing €255 (£179.58).

11.13 At Signal Iduna Park, standing tickets cost €11.80 (£8.31) for adults and €7.70 (£5.42) for concessions. The cheapest seats are €23 (£16.20). Safe standing season tickets are €148 (£104.22) and €91 (£64.08) for concessions. At the Weser Stadion, Werder Bremen operates a price banding system depending on the perceived popularity of the game. The prices are €10/11/13 (£6.99/7.75/9.15) and €7/8/9 (£4.93/£5.63/6.34) for concessions. Season tickets are priced at €130 (£91.55) and a stunning €65 (£45.77) for children under 16 years of age. Other concessions pay €85 (£59.86). The cheapest seats at the Weser Stadion are priced at €20/25/35 (£14.08/17.61/24.65).

11.14 These prices must of course be set against generally much lower admission prices in Germany (despite salary levels and a general cost of living which are similar to Britain, taking into account the current favourable exchange rate of Sterling against the Euro). The price ratio between the cheapest standing place and the cheapest seat is interesting though – 1:1.6 at the Veltins Arena, 1:1.94 at Signal Iduna Park and 1:2 at the Weser Stadion.

11.15 The capacity of the Veltins Arena in its Bundesliga configuration is 61,482. For matches under UEFA or FIFA regulations this reduces to 53,951. The total capacity of the standing areas is 16,307. When in seated configuration this reduces to 8,600. This is a ratio of 1:1.9 between seating and safe standing.
12.1 We will not dwell long on this area as this report is primarily aimed at decision-makers in the United Kingdom and its constituent nations. Briefly, competitive international club and national team tournament matches played under the regulations of both bodies require matches to be played either in all-seated stadia or, where a stadium includes standing area(s), for tickets not to be sold in such (a) sector(s) of the ground.

12.2 A Republic of Ireland international recently observed that the atmosphere at the Lansdowne Road stadium (now closed for re-building) in Dublin for friendly internationals was always much better as the standing areas could be opened to fans (there being no prohibition in Irish law on standing at major football matches and UEFA/FIFA regulations not applying to such games). In European Championship and World Cup qualifying games the terraces had to be closed or temporary seating placed on them.

12.3 During the closure of Lansdowne Road for re-development, both the Football Association of Ireland (FAI) and the Irish Rugby Football Union (IRFU) have an agreement with the Gaelic Athletic Association (GAA) to use its Croke Park stadium in Dublin for their home games. The two home Six Nations Championship games against France and England already played there have seen the ground full to its 82,300 capacity, including 12,800 standing spectators on the famous Hill 16 terrace which was completely re-built to modern standards during 2003-2005. This area will have to be closed for the forthcoming European Championship qualifying games, the first of which is due to take place against Wales as this report is being completed. The demand for tickets has been so great, despite Croke Park having more than twice the number of permanent seats than Lansdowne Road (69,500 compared to 33,000), that the FAI is considering placing around 6,000 temporary seats on Hill 16.

12.4 Any football fan following his/her club or the English or Welsh national teams elsewhere in the world for matches under UEFA or FIFA regulations will tell you that, whilst the games may have to be played in all-seated grounds, or the standing areas closed for these matches, huge sections of both home and visiting supporters actually stand. These are usually those behind the goals. The FSF believes that both UEFA and FIFA needs to re-examine and amend their regulations in this respect to permit standing areas to be used for games under their auspices where such areas meet strictly enforced rules for design, maintenance and management/stewarding. Such rules should be developed and enforced in consultation with supporter representatives, as well as local stadium, safety and football authorities and police/security agencies.

12.5 Aside from being popular with supporters in most countries, this would mean fans could stand in properly designed and stewarded safe standing areas, rather than in seated areas with all the attendant customer care issues. It would also remove the need, driven by differing competition rules, for all safe standing areas to be convertible to seating. This would still be an option for those clubs/national associations who wished to develop their stadia this way for reasons other than differing rules and jurisdictions.
13. SUMMARY AND RECOMMENDATIONS/PROPOSALS

13.1 The FSF believes that the time has come for reform in this area. The introduction of safe standing areas would:

- Be extremely popular with supporters, both those who prefer to (or who must, by reason of health and/or disability) sit and those who prefer to stand
- Provide choice and promote social inclusion in our national game
- Substantially assist in the relationship between supporters and stewards by removing an area of potential conflict between them
- Be safe

13.2 The FSF believes that the case for safe standing areas to be permitted is overwhelming on the grounds of:

- Choice
- Equity
- Proportionate and appropriate regulation
- Social inclusion

13.3 Point 6 of the FSF’s Fans’ Blueprint for Football (the full text of which can be found at Appendix C of this report), approved at its 2003 Fans’ Parliament, provided:

‘The Government to permit safe standing areas at stadia where clubs and their supporters so wish.’

13.4 The FSF believes that the time is ripe for this policy to become a reality.

13.5 The FSF makes the following recommendations and proposals:

1. That as part of the DCMS Regulation Simplification Plan now required following the Government’s acceptance of most of the recommendations of the BRC, or otherwise, the Government should repeal the regulations requiring leading football stadia in England and Wales to be all-seated, replacing these regulations with new regulations and guidance clearly setting out standards under which a safe standing area may be licensed.

2. That the Government direct the FLA to prepare suitable regulations and guidance under which clubs, working with their supporters, may introduce safe standing areas at grounds in England and Wales hosting matches in the Premier League and Football League Championship, as part of the process of repealing the current regulations prohibiting standing.

3. That UEFA and FIFA alter their competition rules to permit standing areas where constructed, maintained and managed under clear rules and guidelines developed in consultation with all stakeholders (except where this may be currently prohibited by national legislation).
13.6 The Prime Minister Tony Blair, speaking in an interview with The Independent on Sunday newspaper as the then Leader of the Official Opposition on 22 January 1995, said:

‘I was never convinced, regarding the smaller clubs in particular, that the removal of all standing was necessary and I was pleased when this was relaxed following representations by MPs, fans and clubs. While safety must always be the ultimate criterion, there is no reason to ignore technological improvements made since Taylor reported, which might allow for safe standing.’

13.7 This view is consistent with his views on better regulation subsequently expressed as Prime Minister.

13.8 The FSF believes that the introduction of safe standing areas at top football stadia in England and Wales will:

- Be safe for spectators
- Be supported by most football supporters, including those who prefer to sit
- Promote social inclusion
- Provide choice

13.9 The time for reform is overdue. The time for action is now.

Dr. Malcolm Clarke FRSA
FSF Chairman
APPENDIX A - FOOTBALL FANS’ CENSUS - SAFE STANDING SURVEY

Safe Standing Results Summary
Results produced by The Football Fans’ Census
12 January 2007

About The Survey
The national survey of 2,046 football fans was conducted by the Football Fans’ Census on behalf of ‘Safe Standing’ between 11 December 2006 and 6 January 2007. The survey was conducted online and supporters of 159 teams were represented including all clubs in the Premiership and Football League. 46% of respondents were season ticket holders.

About The Football Fans’ Census
The Football Fans’ Census is a football research organisation. It has over 100,000 registered member/users.

Tables of Findings
Source ‘Safe Standing Survey’ by the Football Fans’ Census. Sample size 2,046 football fans.

Q1. Should fans be given the freedom to choose whether they stand (in ‘safe-standing’ areas) or sit inside football grounds?
Yes 92%
No 7%
Don’t know 1%

Q2. Should ‘safe-standing’ areas be allowed in grounds?
Yes - it should be mandatory 27%
Yes - the option should be allowed 65%
No - ‘safe-standing’ shouldn’t be allowed 7%
Don’t know 1%

Q3. If clubs went ahead with it, what percentage of a ground’s capacity should be allocated a ‘safe-standing’ area?
Over 35% 23%
21-35% 36%
11-20% 24%
10% or less 11%
Don’t know 6%

Q4. Who should have the power to decide whether or not grounds should include ‘safe-standing’ areas?
Government/Depart of Culture, Media and Sport 9%
Local authorities - councils and police 20%
Individual clubs 52%
Supporters 17%
Don’t know 2%

Q5. If there was a ‘safe-standing’ area in your ground how often would you buy a standing ticket IF going to a match?
All the time 40%
More often than not 23%
Occasionally 17%
Never 17%
Don’t know 3%

Q6. How would the introduction of ‘safe-standing’ affect your match attendance?
I’d go to a lot more matches 18%
I’d go to a few more matches 13%
Wouldn’t affect my attendance 65%
I’d go to a few less matches 1%
I’d go to many less matches 1%
Don’t know 2%

Q7. If designated standing areas were available would you generally prefer to use a standing or sitting area?
Standing 69%
Sitting 31%

Q8. What effect would the introduction of ‘safe-standing’ have on crowd trouble and hooliganism?
Would improve the situation a lot 4%
Would improve the situation slightly 7%
Wouldn’t make any difference 69%
Would make the situation slightly worse 10%
Would make the situation a lot worse 4%
Don’t know 6%
Q9. What effect would the introduction of ‘safe-standing’ have on spectator safety?
- Would improve safety a lot: 6%
- Would improve safety slightly: 18%
- Wouldn’t make any difference: 54%
- Would make it slightly more unsafe: 14%
- Would make it significantly more unsafe: 4%
- Don’t know: 4%

Q10. What effect would the introduction of ‘safe-standing’ have on your view during the match?
- Would improve it a lot: 17%
- Would improve it slightly: 19%
- Wouldn’t make any difference: 43%
- Would make it slightly worse: 13%
- Would make it significantly worse: 4%
- Don’t know: 4%

Q11. Do you think the introduction of ‘safe standing’ areas would improve the atmosphere at football?
- Yes - significantly: 72%
- Yes - somewhat: 20%
- No - it wouldn’t make any difference: 8%

Q12. Overall, what effect would the introduction of ‘safe-standing’ have on your match-day experience?
- Would make it a lot more enjoyable: 52%
- Would make it slightly more enjoyable: 26%
- Wouldn’t make any difference: 17%
- Would make it less enjoyable: 2%
- Would make it significantly less enjoyable: 2%
- Don’t know: 1%

Q13. Regardless of your preference to stand or sit, do you think that there should be designated standing areas at all grounds, to allow choice for all supporters and overcome the current problem of supporters standing in seated areas, blocking the view of those behind who may wish to sit?
- Yes: 90%
- No: 10%

Q14. Do you think there can ever be such a thing as ‘safe standing’?
- Yes: 79%
- No - but I would like there to be standing areas anyway: 13%
- No - and I would not like there to be standing areas at football: 6%
- Don’t know: 2%

Q15. Would you be more or less likely to vote for a politician in Local Elections who supported the reintroduction of some form of standing at football?
- Much more likely: 29%
- More likely: 24%
- Would make no difference: 43%
- Less likely: 2%
- Much less likely: 2%

Q16. Would you be more or less likely to vote for a politician in National Elections who supported the reintroduction of some form of standing at football?
- Much more likely: 25%
- More likely: 25%
- Would make no difference: 46%
- Less likely: 2%
- Much less likely: 2%
1. For supporting information with the report, I visited Germany as an FSF representative attending three Bundesliga games (equivalent of the Premier League in England & Wales):

2. In addition to attending the matches I spoke to a large number of supporters, stadium managers and safety officers and local authorities. My visit included the following games:

   • Schalke 04 v Hamburger SV, Veltins Arena, Gelsenkirchen, Friday 2nd March 2007
   • Werder Bremen v VfB Bochum, Weser Stadion, Bremen, Saturday 3rd March 2007
   • Borussia Dortmund v Energie Cottbus, Signal Iduna Park, Dortmund, Sunday 4th March 2007

3. A number of issues were studied at each:

   • The design of the ground’s safe standing area
   • Persistent standing in seated areas / facilities for disabled fans
   • Crowd dynamics in the standing areas
   • Accident / injury statistics

Standing Area Design

4. Each of the three stadiums had a different approach to the standing area.

5. At the Veltins Arena (formerly the Arena Auf Schalke) in Gelsenkirchen, home of Schalke 04, there is a standing area at the Nordkurve (North Curve), a lower level behind one of the goals, for fourteen thousand fans. There is a smaller standing section for two thousand away fans at the other end of the stadium. This area has staggered barriers placed on every fourth step. For European / international matches, the barriers are removed and seating installed in its place.

6. At the Weser Stadion in Bremen, there is standing on the East Curve for fans and a smaller area for away fans. Here, every row of two steps has a barrier running the length of the area, with pull down seats attached to them. For domestic games, the seats are locked and are simply unlocked when needed for UEFA/FIFA games, with the capacity of the area being reduced by fifty percent. As can clearly be seen from the pictures in the main report, the barrier is set at around waist height even for the average sized youth.

7. Borussia Dortmund’s ground, Signal Iduna Park houses the biggest standing area in Europe. The Sudtribune (South Stand) has a capacity of twenty-five thousand - bigger than the whole capacities of three Premier League grounds (Portsmouth, Fulham and Watford). There is also a two thousand five hundred capacity standing area for the away fans. The huge area is split into two sections - the lower part taking up two thirds of the space and the higher part being one third. The lower part is a similar design to the Veltins Arena - staggered barriers every four steps. The higher part is steeper than the lower part and therefore there is a barrier on every two steps similar to the Weser Stadion design, though again, the barrier is around the waist height of the average fan. Tickets are checked at the entrance to both the lower and higher levels to ensure the capacities of neither section are breeched. Fans cannot gain access from one level to the other.

Persistent Standing in Seated Areas

8. One feature of all three games I attended was that there was no persistent standing by fans in the seated areas.

9. I can confidently state that there was very little standing up in seated areas at all - with the exception of brief moments at Bremen and the Energie Cottbus fans at Dortmund after they had scored.
Those fans at Bremen were in one corner of a stand running the length of the pitch and they stood up momentarily during the game when the ball was at the other end of the stand they were in to ensure they could see. Once the play had moved elsewhere they immediately sat down.

The Energie Cottbus fans stood up for a few minutes after their team had scored two goals in quick succession. Ironically their seats (only two rows of 60 seats in each row) were situated directly in front of the standing area so had no direct impact on those fans behind them! There was no effort made by stewards to make the Cottbus fans sit down, they simply did so themselves after a few minutes of celebrating.

What was clear is that there was no form of persistent standing in seated areas as seen every week in stadiums throughout England & Wales. There was also an absence of conflict between sets of fans who wish to stand and those seeking to sit, nor between fans and stewards which has the potential to create trouble rather than prevent it.

Fans with disabilities not requiring a wheelchair, (and older fans) were situated in areas integrated with fans in the seated area. Again, their view was not impeded by able bodied fans standing up in front of them for long periods of time as is the case in England & Wales.

By segregating those fans who wish to stand from those who wish to sit, everybody is accommodated as they wish and content - fans and stewards alike, helping to create a good atmosphere all round rather than one of increased tension.

In many ways this was the most interesting aspect of the three games I watched. It was very evident how the relationship and interaction between the clubs and fans has developed, was valued and appreciated by both sides and how this contributed to the atmosphere in each stadium - not just in the standing areas but in the seated areas too.

Each club granted stadium passes to fan groups who then collected flags, banners and drums that were stored within the ground. These were then placed at the front of the standing areas before fans were admitted to the ground.

The areas immediately around the flags and banners were taped off and only members of the fan groups were admitted into that zone. One fan from each club was able to stand on a platform slightly elevated from the rest of the fans. With the use of a microphone/Tannoy system, they led the crowd throughout the game with songs spreading from the fan group members to all sections of the standing areas - sometimes into the seating areas, though as mentioned previously, this did not lead to fans standing up in seated areas whilst joining in
- with the exception of a Mexican Wave at the Weser Stadion!

19. What was evident in the standing areas was their extremely popular with fans of all ages and sexes. The front of each area, this was generally populated by younger fans, both male and female, and the age level tended to increase the further back it went. Some of the fans were as young as ten (if not younger). Notable too was the mix of the sexes at the game.

20. As soon as the turnstiles opened, each standing area filled up very quickly. Fans wanted to be in the best place as possible. With forty-five minutes to kick off at the Veltins Arena game, the other three sides of the stadium were practically empty whereas the Nordkurve and the visiting fans standing section were almost full.

21. At the Weser Stadion, the Ostkurve is split into two parts, divided by the player’s tunnel. The fan club members and generally younger fans occupied the section to the right of the tunnel, with the other side generally being used by those fans wishing to stand up but away from the excitement of the fan club members as well as being used by fans with younger children.

22. At kick off, the fan group members of each home team were now on the pitch performing a synchronised flag waving routine to greet their team. The match announcer read out the first names of the home players and the whole crowd responded by shouting back his surname. A similar exchange of words occurred when the home team scored. Generally, any message over the public address system addressing the crowd collectively starts with the words ‘Meiner Fussball Fruenden’ (‘My football friends’).

23. What was even more striking was at the end of each game, the home team players made the particular effort to go right up to standing area to acknowledge the support given by the fan club members in creating the atmosphere on the day and cheering on the team. In the Weser Stadion, all the Werder Bremen players linked hands in front of the end and bowed down, then raising their hands high, repeating the exercise several times in unison with the fans. They then broke off and spent a few minutes walking at the front of the stand, shaking fans’ hands. (Compare this to the ‘walk to the halfway line, raise your hands in the direction of each stand whilst turning and and clapping four times’ that fans in England and Wales receive at the end of each game.) By now, the seated fans had departed the stadium, yet the standing area was still practically full.

24. I close this section with a quote from one Schalke 04 fan at the Veltins Arena; a young girl aged no more than thirteen. Whilst listening to a question directed to another fan, she cut in and said ‘standing is fun’! I thought she hit the target beautifully. I recalled how much the ‘fun factor’ has disappeared from the vocabulary of match-going fans in England and Wales.

**Accident & Injury Statistics**

25. One objective of the visit was to collate statistics relating to accidents and injuries at German grounds in order to determine if there is any causal link to standing and injuries or accidents.

26. This was the response I received from Borussia Dortmund; ‘We thank you for your interest in Borussia Dortmund. We are afraid to have to tell you that we don’t keep statistics about accidents within the stadium’.

27. I was told by Herr Volker Fuerderer, Safety Officer at the Veltins Arena: ‘In the nearly six years of the existence of the Veltins Arena I would go as far as to say that there is not a single incident or injury that was caused we would explain with the existence of standing terraces.’

28. Different conclusions can be taken from these statements. It must be noted that Germany has never suffered a major stadium
disaster in its history however. Germany is also a nation famed for its meticulous record-keeping and the quality of its public safety services. I believe that such statistics are not kept as nobody has ever seen the need for them. The accident/injury rate is so low throughout stadia there as to make the keeping of such records irrelevant. That is not to dismiss health and safety issues, far from it. However, I am positive that if there were accidents / injuries taking place on a regular basis, then the clubs, central and local governments and the DFB German Football Federation) would be investigating such incidents thoroughly.

29 In a recent edition of the UK magazine ‘When Saturday Comes’, Professor Gunter Pilz from the Institute of Sports Science at Hanover University stated, ‘There is no evidence that all-seat stadiums are intrinsically safer than those with standing areas’. In the same article he refers to UEFA regulations requiring stadia to be all seated for matches in its competitions as ‘absolute nonsense’.

30 I spoke to medical staff at the Veltins Arena and the Weser Stadion. They confirmed that, of the few fans being treated during games, injuries requiring treatment were not related to fans standing. Neither were they related to fans being seated. Medical staff at the Weser Stadion commented that injuries receiving treatment tended to be alcohol related, for cardiac arrest or due to breathing difficulties.

CONCLUSION

31 The visit to Germany was very fruitful. What occurs week in week out in safe standing areas in the Bundesliga rebuts the arguments presented against standing in England and Wales being permitted.

32 Evidence gathered shows:

• It is safe to stand up. There is no increase in the number of injuries or accidents in standing areas compared to seated areas.

• Safe standing areas do not increase disorder amongst fans

• Safe standing areas do not socially exclude female fans or younger fans, nor do they discourage them from attending games.

• Introducing standing in England & Wales would be a progressive step.

• Safe standing areas offer fans on low incomes - particularly younger fans and students who are currently financially excluded - the opportunity to attend games.

• Average attendances in Germany in the Bundesliga are the highest of any of Europe’s elite leagues.

• Safe standing areas are instrumental in creating a vibrant atmosphere at games - again sadly missing at many stadia in England & Wales, particularly the newer “identikit” ones.

• Safe standing areas here would remove the current tension that exists between fans who wish to stand up in seated areas and those who wish to remain seated - or fans with physical disabilities that are unable to stand up. It would also improve the sometimes hostile relationship between fans and stewards where stewards are asking fans to be seated during games.

• It would help foster a better relationship between clubs and supporters. Many fans feel alienated and far removed from the players and team they support. By creating unique standing areas within stadiums, a greater rapport with the team from those fans seeking to create an atmosphere will ultimately develop.

Phil Gatenby
FSF National Council
1. The creation of one unified governing body governing all levels of football in England to replace the current multiplicity of leagues and associations.

2. The introduction of revenue sharing between all professional clubs where one quarter of all league TV and gate revenue (including executive boxes) is pooled and divided equally.

3. Minimum standards of governance, administration and financial control for all clubs to be enforced by the governing body as a condition of membership and league entry, including a ‘fit and proper’ person test for all persons owning or directing a football club.

4. An annual club licensing system to be introduced over a five year period. A condition of licensing to include a ban on unfunded revenue deficits.

5. The creation by statute of a special legal status giving appropriate forms of ‘not-for-profit’ status for sporting clubs.

6. The Government to permit safe standing areas at stadia where clubs and their supporters so wish.

7. An end to constant fixture changes to suit television or policing.

8. Prior consultation with supporters on broadcasting contracts to ensure a fair deal for the match-going fan and an end to TV ‘overkill’.

9. An end to bans on away fans and an increase in away ticket allocations.

10. A comprehensive review of the structure of all domestic league and cup competitions and the structure of the season involving supporters at every stage.

11. Consultation with supporters on the structure of all European and international club and national team competitions and how they relate to domestic competitions.

12. The development of clear rules in consultation with supporters to prevent any recurrence of the FA appeals tribunal decision to permit the former Wimbledon FC move to Milton Keynes.

13. The development of clear, legally enforceable rules to prevent clubs selling their grounds without the explicit prior agreement of their supporters and other another ground being provided in the same town.

14. Involvement of supporters in initiatives to combat racism on the field and in the stands.

15. An end to discriminatory treatment of away supporters in terms of ticket prices and allocations in both domestic and international competitions and club levels.

16. The development of a regular TV free midweek evening with no live broadcast Premiership, Football League or Champions’ League games for midweek fixtures to encourage live attendance.

17. An end to the constant above-inflation increase in ticket prices, particularly for lower priced tickets.

18. Discount ticket prices for younger and retired supporters with national standards on age criteria.

19. The development of disabled supporters’ facilities at all levels of the game, including minimum standards

20. Involvement of supporters in all policing and stewarding policies affecting them.

APPENDIX C – FANS’ BLUEPRINT FOR FOOTBALL – FOOTBALL SUPPORTERS’ FEDERATION
21. Encouragement and adequate funding of supporter organisation and involvement in the game at all levels.

22. The introduction of statutory independent regulation of the game.


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Schalke 04 fans in the home safe standing area, Veltins Arena, Gelsenkirchen. The banner says ‘What you don’t achieve alone, we’ll achieve together’.