

**EXEMPTION FOR IN-HOUSE FOOTBALL STEWARDS  
FROM LICENSING UNDER  
THE PRIVATE SECURITY INDUSTRY ACT 2001  
FRAMEWORK  
SEPTEMBER 2005**



## **EXEMPTION FOR IN-HOUSE FOOTBALL STEWARDS FROM LICENSING UNDER THE PRIVATE SECURITY INDUSTRY ACT 2001**

### Summary

1. Ministers have agreed to exempt in-house football club stewards from licensing by the Security Industry Authority (“SIA”) under the Private Security Industry Act 2001 on the grounds that suitable alternative arrangements, equivalent for all practical purposes so far as the protection of the public is concerned, either are or shortly will be in place.
  
2. Ministers recognise that football is already generally effectively regulated. Accordingly, the exemption will be based around the existing safety systems, but with the addition of the following three key criteria. To qualify for an exemption, in-house stewards should:
  - be trained to a nationally accredited standard and that this training should, inter alia, cover conflict management;
  
  - be subject to suitable vetting by the CRB; and
  
  - be suitably regulated and monitored.
  
3. This paper demonstrates how the necessary suitable alternative arrangements to enable stewards to satisfy these criteria either are, or shortly will be, in place.

### Scope of the exemption

4. For the purposes of the exemption, having regard to the definition of “licensable conduct” in the 2001 Act, the football authorities and the FLA have identified that the following stewards are within the scope of the PSIA when they are working in licensed areas:
  - stewards searching spectators on their entry to the ground;

- stewards specifically tasked with intervening against and ejecting spectators who are in breach of ground regulations; and
  - the supervisors of these two previous groups; and,
  - in a non-frontline capacity, safety officers and chief stewards.
5. Generic job descriptions for these stewards are attached at **Annex A**. It is estimated that they will cover some 20% – 25% of the in-house stewards, roughly 3,000 in all.
6. By the same token, the following are **not** within the scope of the PSIA:
- stewards who are not tasked with any of the functions listed above; and
  - stewards directly employed by more than one club or those brought and paid by the visiting club (unless they are performing a licensable function).
7. Under the 2001 Act as it stands, contract stewards who search, intervene and eject (i.e. who perform licensable functions) in licensed areas **will** require a door supervisor's licence from the SIA and are expected to apply to the SIA for their licenses as soon as possible. From 20 March 2006, with the advent of licensing for manned guards, those who work in non-licensed areas will also require an SIA licence. Moreover, the exemption **will not** apply to in-house personnel performing licensable activities on non-event days, for example as door supervisors at a licensed bar in the stand.

### Training

8. There are currently two steward training qualifications accredited by the Qualifications and Curriculum Authority at Level 2:
- the National Vocational Qualification in Spectator Control awarded by City and Guilds; and

- the Certificate in Event and Matchday Stewarding (“CEMS”), replacing the Football Stewarding Qualification, awarded by 1<sup>st</sup>4Sport (formerly the National Coaching Foundation).
9. Both qualifications include training on conflict management, though at present only the CEMS includes a practical section on physical restraint. However, the FLA is participating in a formal review of the NVQ (launched at the end of June) which will, inter alia, identify how this additional element can best be incorporated. The revised NVQs at levels 2, 3 and 4 will be ready by March 2006.
  10. In March 2005, the football authorities issued the revised (third edition) steward training package to clubs. This includes the new module on conflict management. Some clubs have already started training their stewards in line with this new module. The majority began using the revised package at the start of the current season. (Training could not be conducted during the closed season when neither the stewards nor the club staff were around).
  11. All stewards will be formally trained in conflict management. Those responsible for searching, intervention and ejection will also take the additional section on restraints. This can only be done in small groups with appropriately qualified trainers, so will take a little time to complete. It is hoped that all exempted stewards will be fully trained in conflict management, including the hands-on element, by the end of the football season. (It should be borne in mind that these stewards will, by definition, be among the more experienced, who will already be fully trained in all the other elements.)
  12. The FLA has participated actively in the development of both steward training qualifications and the training package. It is satisfied that these equip stewards for the tasks that they have to perform. It has also mapped the CEMS against the training required for door supervisors. The CEMS is both more extensive (70 hours as opposed to 28 hours) and more relevant to the role of a steward. There is very little in the door supervisors’ training that could count towards the CEMS.

13. The football authorities are committed to setting up a national database of in-house stewards at football grounds later this season. This will enable them to monitor the stewards' training and assessment.

#### Vetting

14. The Football Association ("FA") already has a Criminal Records Bureau ("CRB") Unit which undertakes criminal record checks for child protection purposes for all personnel involved in coaching or working with young persons, and for referees. This Unit is an Open Umbrella Body registered with the CRB.

15. The FA and its agent have indicated that they are willing and able (and have the necessary resources) to undertake CRB checks for all stewards requiring an exemption from licensing by the SIA, in line with their existing procedures. These are summarised in **Annex B**. All criminal records checks for football stewards will be carried out through this one body. A common system will ensure consistency and avoid duplication where stewards work for more than one club. Club safety officers will also be required to undertake the CRB check, but will not be required to undertake the training.

16. The FLA and the football authorities are willing to accept the list of offences and criteria drawn up by the SIA in the first instance in order to ensure the swift implementation of the CRB checks. They may wish to review this list in the light of experience. Any changes to the criteria following a review, and any changes to the scheme as a whole, will need to be subject to agreement by Ministers.

17. However, no checks can be undertaken until Home Office ministers have made the necessary Exceptions Order to permit full disclosure for this category of person. Work is underway to arrange this, and the date that the Order is expected to come into force is January 2006. It is recommended that football stewards begin their training as soon as possible, but it will not be possible for the CRB checks to take place until after this Order has come into force. In the meantime, ACPO has written to all police forces to ask them not to prosecute any football clubs or stewards until this time.

## Regulation and oversight

18. Designated sports grounds with a capacity of over 10,000 (over 5,000 in the case of grounds in the Premier or Football Leagues) require a safety certificate from the local authority under the Safety of Sports Grounds Act 1975 (“the 1975 Act”). All other sports grounds with a covered stand with a seated or standing capacity of 500 or more require a certificate under the Fire Safety and Safety of Places of Sport Act 1987 (“the 1987 Act”). The certificate covers all matches and spectator events at the ground.
  
19. The FLA oversees this at grounds hosting designated football matches (currently Premiership, Football League and international matches). This oversight could be extended by Order to lower divisions, though this would have to be properly justified in terms of the FLA’s wider role of safety oversight and the licensing of spectator accommodation under the Football Spectators Act 1989.
  
20. In practice, with the possible exception of the Football Conference national division (which is actively seeking an extension of the FLA role), clubs in the football pyramid are unlikely to be within the scope of the 2001 Act. Licensed areas are normally restricted to discrete bars or club houses. Moreover, these clubs do not normally employ stewards to undertake “security” functions. Therefore in practice there is no need to make an Order extending the FLA’s oversight to lower divisions. But, where licensable activity is undertaken, licenses should be sought from the SIA.
  
21. It is a standard condition of a safety certificate at grounds overseen by the FLA that all stewards must be trained to a recognised national standard (ie either the NVQ or the new CEMS). The local authority is expected to check the steward training records. The FLA audits the performance of local authorities. Over the coming year it will pay particular attention to these records.
  
22. If a club’s safety management is inadequate or if it breaches the conditions of a safety certificate, the local authority may take one or more of the following measures:

- a reduction in the permitted capacity of part or all of the ground;
- in urgent cases, the issue of a prohibition notice which may reduce the capacity or close part or all of the ground; or
- legal action (either a formal caution or a prosecution).

23. The existing system and procedures will be sufficient to ensure the adequate oversight of the steward training following the accreditation of the CEMS and the addition of the extra module to the steward training package.

24. The existing system and procedures will also be extended to cover the monitoring and enforcement of CRB checks, provided that it could be demonstrated that additional requirements in the safety certificate were necessary in order to ensure the reasonable safety of spectators and were being imposed for that purpose.

25. If this could not be demonstrated, it would be necessary to rely on a voluntary agreement, to be policed by the football authorities in co-operation with the FLA. This would not prevent Ministers requiring the possession of a CRB check as a condition for an exemption. In either event, the impact upon the workload of the local authorities and the FLA will be minimal. There will merely be a small increase in the number of records to be checked.

26. The FLA already provides a detailed annual review of its performance to DCMS. This will in future include the FLA's assessment of the integrity and efficacy of the exemption, and be copied to Home Office Ministers also.

#### Right of Appeal

27. The FA will set up an internal appeals system by January 2006, along the lines of the Review Panel described in Annex B, to hear the appeals of people who are deemed not to be suitable to be a football steward following their CRB check.

### Scope of the exemption

28. The Regulations granting the exemption will define its scope in simple, clear and unambiguous terms. The relevant circumstances to be prescribed in the Regulations will be where:

- the ground is covered by a safety certificate issued by the local authority under either the 1975 Act or the 1987 Act;
- this certificate requires the stewards to be trained to a recognised national standard;
- stewards undertaking “licensable conduct” under the 2001 Act have (once the system is fully operational) undergone CRB checks; and
- there are appropriate monitoring systems in place.

### Conclusion

29. In summary:

- The two stewarding qualifications are both academically accredited at Level 2 both contain sections on conflict management. Training in accordance with the expanded training package began at the start of this season.
- The Football Association will be ready to extend CRB checks to stewards performing functions caught by the 2001 Act from when the relevant Order is made, probably in January 2006.
- The existing system of safety certification will enable the FLA to monitor the operation of the exemption, and this monitoring is capable of being extended to cover the CRB check if the appropriate conditions are fulfilled.

30. Ministers are satisfied that suitable alternative arrangements either are or shortly will be in place and have granted the exemption.

Football Licensing Authority / SIA / Home Office / DCMS  
6<sup>th</sup> September 2005

## Annex A

### **Job Description – Search Stewards**

#### **Responsible to the Safety Officer**

##### Areas of work:

All parts of the stadium, inside and outside. Including licensed and unlicensed areas, corporate areas, concourses, vomitories and gangways, trackside, and at turnstiles.

Role: Searching the public

CRB checking needed: Yes

Search stewards are expected to be involved in dealing with incidents within and outside the stadium, including the licensed areas of the stadium.

This team of stewards will be a specialist teams to deal with conflict, disorder and breaches of the ground regulations including searching and ejecting spectators, and will have had additional training in conflict management over and above that given to other stewards.

##### Duties include:

- To attend pre event planning and briefing sessions.
- To ensure that the requirements of the safety certificate and ground regulations are met at all times
- To be responsible for the safety and comfort of spectators within a designated area at all times.
- To carry out all instructions given by Safety Officer, through a supervisor.
- Liaise with supervisors and other specialist stewards before, during, and after each event.
- Assist in the identification of spectators who are banned from the ground or who do not possess tickets at all ticket matches or who are in possession of forged tickets.
- Assist in dealing with of breaches of ground regulations.
- Carry out ejections for breaches of ground regulations.
- Prevent entry to the stadium of those spectators without a valid ticket, those that are banned from the stadium, those in breach of ground regulations and / or those in breach of specific legislation.

- Selectively search spectators in accordance with club policies and the ground regulations in order to prevent those items prohibited under the ground regulations being brought into the stadium.
- Ensure that gangways and exit / evacuation routes are kept clear.
- Assist in the diversion of spectators to other parts of the ground including the closing of turnstiles when the capacity for any area is about to be reached.
- Identify and investigate any incident or occurrence among spectators, reporting their findings to a supervisor, and acting in accordance with instructions from a supervisor, the Chief Steward or the Safety Officer.
- Know the location of and be able to operate effectively the fire-fighting equipment at the ground.
- Know the location of the first aid room and any first aid equipment kept elsewhere in the Stadium.
- Be fully conversant with any methods or signals used to alert staff that an emergency has arisen.
- Be capable of recognising potential fire hazards and suspect packages, reporting such findings immediately to a supervisor, the Chief Steward or the Safety Officer.
- Comply promptly with any instruction given in an emergency by the Safety Officer, area supervisor or a police officer.
- Remain at allocated post as instructed unless authorised or ordered to do otherwise by the supervisor, area supervisor, the Safety Officer or a police officer.
- Report to the area supervisor or Safety Officer any damage or defect which is likely to pose a threat to spectator safety e.g. a damaged seat or barrier.
- Assist as required in the evacuation of the ground.

## **Job Description – Response Stewards**

### **Responsible to the Safety Officer**

#### Areas of work:

All parts of the stadium, inside and outside. Including licensed and unlicensed areas, corporate areas, concourses, vomitories and gangways, trackside, and at turnstiles.

Role: Responding to and dealing with incidents.

CRB checking needed: Yes

Response stewards are expected to be involved in dealing with incidents within and outside the stadium, including the licensed areas of the stadium.

This team of stewards will be a specialist teams to deal with conflict, disorder and breaches of the ground regulations including searching and ejecting spectators, and will have had additional training in conflict management over and above that given to other stewards.

#### Duties include:

- To attend pre event planning and briefing sessions.
- To ensure that the requirements of the safety certificate and ground regulations are met at all times
- To be responsible for the safety and comfort of spectators within a designated area at all times.
- To carry out all instructions given by Safety Officer, through a supervisor.
- Liaise with supervisors and other specialist stewards before, during, and after each event.
- Assist in the identification of spectators who are banned from the ground or who do not possess tickets at all ticket matches or who are in possession of forged tickets.
- Assist in dealing with of breaches of ground regulations.
- Carry out ejections for breaches of ground regulations.
- Prevent entry to the stadium of those spectators without a valid ticket, those that are banned from the stadium, those in breach of ground regulations and / or those in breach of specific legislation.

- Immediately respond as directed by a supervisor, the Chief Steward or the Safety Officer to incidents where spectators are climbing fences and other structures or standing on seats, and deal with such incidents as required.
- Ensure that gangways and exit / evacuation routes are kept clear.
- Assist in the diversion of spectators to other parts of the ground including the closing of turnstiles when the capacity for any area is about to be reached.
- Identify and investigate any incident or occurrence among spectators, reporting their findings to a supervisor.
- Know the location of and be able to operate effectively the fire-fighting equipment at the ground.
- Know the location of the first aid room and any first aid equipment kept elsewhere in the stadium.
- Be fully conversant with any methods or signals used to alert staff that an emergency has arisen.
- Be capable of recognising potential fire hazards and suspect packages, reporting such findings immediately to a supervisor, the Chief Steward or the Safety Officer.
- Comply promptly with any instruction given in an emergency by the Safety Officer, area supervisor or a police officer.
- Remain at allocated post as instructed unless authorised or ordered to do otherwise by the supervisor, area supervisor, the Safety Officer or a police officer.
- Report to the area supervisor or Safety Officer any damage or defect which is likely to pose a threat to spectator safety, e.g. a damaged seat or barrier.
- Assist as required in the evacuation of the ground.

## **Job Description – Supervisor**

### **Responsible to the Safety Officer**

Areas of work: All parts of the stadium, inside and outside.

CRB checking needed: Yes – for supervisors of search and response teams

Supervisors are expected to be involved in dealing with and managing incidents within and outside the stadium, including the licensed areas of the stadium.

They will manage a team of stewards, including specialist teams to deal with searching and ejecting spectators.

#### Duties include:

- To attend pre event planning and briefing sessions.
- To control and co ordinate stewarding and safety in specific stands on a match day.
- To ensure that the requirements of the safety certificate and ground regulations are met at all times
- To be responsible for the safety and comfort of spectators within a designated area at all times
- To be responsible for the training and development of stewards and supervisors in designated areas.
- To ensure all safety checks are carried out, and report back to the control room
- To monitor and manage all staff in designated area before, during and after the event.
- To attend pre-match, and post-match briefings and compile a concise report for Safety Officer
- To carry out all instructions given by Safety Officer, or through the Safety Officer.
- Liaise with other Supervisors before, during, and after each event.
- Allocate stewards for specified roles and responsibilities
- To brief all stewards in your designated area and de brief them after the event
- To collect and report any information from the event back to the Safety Officer

- To ensure all stewards are aware of the date and time of the next event.
- Assist in the identification of spectators who are banned from the ground or who do not possess tickets at all ticket matches or who are in possession of forged tickets.
- Assist in the prevention of breaches of ground regulations.
- Manage ejections for breaches of ground regulations.
- Prevent entry to the stadium of those spectators without a valid ticket, those that are banned from the stadium, those in breach of ground regulations and / or those in breach of specific legislation.
- Manage teams of safety stewards and of specialist stewards.

## Annex B

### CRB checks for football club stewards

The Football Association already has a CRB Unit which carries out CRB checks for child protection purposes for all personnel involved in coaching or working with young persons, and for referees. The FA CRB Unit is an Open Umbrella Body registered with the CRB. The FA CRB Unit function is performed by The Media Group on an agency basis.

There is an application form covering four A4 pages. Applicants have to supply all addresses over the last five years (there must not be any gaps) and three forms of identification. Clubs will need to get stewards requiring a CRB check to complete an application form and provide the required ID for submission to the FA CRB Unit.

Clubs will have to pay upfront the £34 standard Home Office charge, plus a £10 administration fee to the FA CRB Unit. The FA CRB Unit cannot process any application without prepayment.

The FA CRB Unit will then contact the CRB for a disclosure of any criminal offences recorded against the individual concerned. The FA CRB Unit will receive a list of any criminal offences, **plus** any additional information held on this person. The individual will be provided with the list of offences, but not any additional information. The FA CRB Unit cannot disclose the actual information received to the football club concerned; it will make a **recruitment decision** based on the information received.

Each club will get a letter from the FA CRB Unit giving the recruitment decision. This will be YES or NO, depending upon whether the disclosure contains any serious or significant issues. There will also be a third category, where the information in the disclosure may need to be reviewed by a Panel, subsequently resulting in a YES or NO recruitment decision. The FA will therefore need to set up a review panel. This Panel will also have the responsibility to hear any appeals that are made by applicants regarding the vetting decisions made about them.

Disclosures take a minimum of four weeks; usually they take around six weeks; but they can take up to four months. Different police forces take different lengths of time to respond.