

Local authority audit

Local Authority: City of Wolverhampton

Meeting with: Emma Caddick and Alison Stephens

SGSA Inspector: M Girvan



Local authority audit record

Ground	Molineux Stadium	Club associated with ground	Wolverhampton Wanderers
Date audit carried out	16 September 2021	Date audit due	
Reason audit late (if applicable)			
Date report sent to LA	12 November 2021		
Type of Safety Certificate	Risk-based	Date Safety Certificate Issued	30 July 2021

Local authority audit summary

The City of Wolverhampton issues a safety certificate to one designated ground, Wolverhampton Wanderers and three regulated stand certificates to Monmore Green greyhound racing, Dunstall Park horse racing and Aldersley athletic stadium. The audit covers the processes in respect of the designated ground however the processes are replicated for the other sports grounds.

Have the recommendations from the previous audit been completed?

Yes

Capacity, capability and culture at the local authority

There is a good safety culture within the local authority, the officers involved in the safety of sports grounds function are competent and have a high level of capability though additional resources would be beneficial.

SAG performance and governance.

The SGSA inspectors consider the performance by the local authority to ensure an effective SAG is at a high level supported by a commitment to the process.

Are the monitoring arrangements satisfactory?

Yes

Confidence in the local authority to perform its role.

The SGSA Inspector has confidence in local authority is able to discharge its statutory duty in respect of its safety at sports grounds function

Comment on the impact of COVID-19 on Local Authorities in carrying out its safety at sports grounds function.

Covid 19 certainly made it more difficult with limited resources for the local authority to prioritise the safety of sports grounds function during pandemic period nevertheless the local authority did ensure standards were maintained and the safety certificate updated accordingly.



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Audit Score		
Section	Agreed Score	With multiplier
1 Compliance with actions from previous audit (Multiplier- 1)	4	4
2 Safe Capacity (Multiplier- 4)	5	20
3 SAG Governance and Performance (Multiplier- 3)	5	15
4 Safety Certification (Multiplier- 3)	5	15
5 Monitoring (Multiplier- 3)	5	15
6 Enforcement (Multiplier- 1)	5	5
7 Training and Expertise (Multiplier- 2)	5	10
8 Business Continuity and Resilience Arrangements (Multiplier- 1)	5	5
9 Confidence in LA discharge of duties & Safety Culture (Multiplier-2)	4	8
TOTAL	43	97
Risk Rating (High Risk 0-65, Medium Risk 66-89, Low Risk 90+)	Low Risk	

Recommended actions from audit		Responsible person	Review date	Completed date
1	Consider additional resources to support the lead officer	E Caddick	March 2022	

Section 1: Compliance with recommendations from the previous audit

All recommended actions	Yes/No	Date comp
Develop a dispute resolution process to record the actions taken by each stakeholder and the timeframes required.	Yes	March 2020
An additional officer will be required to provide support and resilience for the safety at sports grounds team within the authority. Any new staff engaged by the certifying authority acting as an officer		



within the Safety at Sports Grounds team must be given opportunity to develop their knowledge skills and experience.		
Inspector's score		4
Evidence to support score		
<p>The dispute resolution process has been incorporated within the operations manual prepared by the club which has been reviewed and agreed by the local authority. Furthermore reference to the process is detailed in the terms of reference for the SAG.</p> <p>The local authority are committed to resourcing additional staff to support the safety of sports grounds function within the local authority.</p>		

Guidance notes for evidence	
0	No progress has been made with any previous recommended actions.
1	No action has been made with any previous recommended actions. Good reasons have been provided as to why actions have not been progressed and a plan has been identified as to how actions will be completed.
2	Made progress on some recommended actions but some priority actions have not been started.
3	Made good progress on priority recommendations, but not fully completed them.
4	Made good progress on all of the recommended actions, but not fully completed them. Good reasons have been provided as to why not all recommendations have been fully completed.
5	Completed all recommended actions.

Section 2: Safe capacity

Document	Yes/No	Date on doc
Capacity calculations using Green Guide methodology	YES	
(P) and (S) Factor assessment using indicative questions	YES	
Inspector's score		5
Evidence to support score		
<p>The capacity calculations are included within the club's operations manual that is assessed annually by the local authority. The capacity calculations for the ground have been revised due to the additional capacity created by the revised seat configurations in the Jack Harris/South Stand and the loss of the demountable stand in the south west corner.</p>		



The club submits an annual P and S factor assessment to the local authority that is reviewed. This year the club has recruited a new full time deputy safety officer, this is reflected in the S factor assessment

The lead officers with responsibility for the safety of sports grounds function within the authority are able to use colleagues from other disciplines to assist in the review process.

Guidance notes for evidence

1	No evidence or knowledge as to how the current capacity was calculated. Local authority not conversant with how to calculate capacities or the use of (P) and (S) Factors. (P) and (S) Factors not applied to capacity calculations.
2	Some knowledge of capacities calculations using the entry, holding and exit figures. Evidence of capacity calculations produced but does not follow Green Guide methodology. No recognition of the relevance of (P) and (S) Factors or reduction of capacity applied even though defects have been identified.
3	Good understanding of the relevant parts of the capacity calculations but calculations are not accurately applied to conditions at the ground. Evidence that the relevant indicative questions have been used in identifying the (P) and (S) Factors, but there is no record how the factors have been applied. No evidence of review process.
4	Clear evidence and experience of calculating capacities in accordance with Green Guide methodology. Clear evidence that the (P) and (S) Factors have been used in calculating the capacity and are in line with indicative questions and Green Guide methodology has been recorded.
5	Clear and concise capacity calculations including all people have been recorded and are regularly reviewed by experienced local authority staff. Evidence that the (P) and (S) Factors have been validated and reviewed by a competent member of staff. Documented evidence of any contraventions which may affect the (P) and/or (S) Factors together with details of the action taken. Detailed procedures in place which process map the actions to be taken by the local authority and that these procedures are regularly reviewed by senior management. A clear audit trail for the whole process.

Section 3: Safety Advisory Group (SAG) governance and performance

Document	Yes/No	Date of Doc
SAG terms of Reference including wider definition and dispute resolution process	YES	
SAG agenda	YES	
SAG minutes	YES	
SAG action log	YES	



Inspector's score	5
Evidence to support score	
<p>The terms of reference for the SAG are reviewed annually as specified in the council's Managing Safety Policy.</p> <p>An agenda and set of minutes are produced for each SAG, the local authority provides a clerk service to the ASAG to ensure the administration processes are effective and efficient.</p> <p>All actions are followed up at subsequent meetings</p> <p>There is good engagement from stakeholder agencies though the fire service and ambulance service have had challenges with providing support to the SAG process. The stakeholders are actively consulted through the safety advisory group on matters within the operations manual or conditions in the safety certificate recent examples include the security plan and medical plan.</p> <p>The safety advisory group process was used to good effect when considering the counter terrorism hostile vehicle mitigation measures that were to be deployed to protect the stadium and spectators, it was a good example of collaborative working between key stakeholders and partners.</p> <p>Where necessary and appropriate are discussed in closed session.</p> <p>The governance procedures for the SAG process are very effective.</p>	

Guidance notes for evidence	
1	A SAG has not been formally established. SAG meetings are not held or are very infrequent appropriate to the risks. Lack of interest in process.
2	No terms of reference have been produced. Lack of audit trails. Meetings are held but many core members of the group are not regular attendees or send deputies who are not empowered to make decisions on their behalf. Low levels of interest.
3	Terms of reference established. Agendas for meetings. No real compliance with the identified roles and responsibilities. Lack of clarity in identifying issues in minutes or on action notes. Although meetings are held, with regular attendees, the ability of the group to influence the performance of the club is diminished by not identifying actions that need to be taken. Ineffective leadership of the group by the Chair.
4	SAG meetings are regularly held appropriate to the risks. Request agenda items before meetings. Timely minutes reflect the identification of required actions that need to be taken, records the findings but does not ensure that actions are followed through to completion. Effective leadership by the Chair and effective participation from members of the group. Written SAG terms of reference which are reviewed at least annually or if any changes in circumstances have been identified



5	Constituted SAG which is aware of its responsibilities, meet with appropriate regularity with attendance of all relevant organisations of enough seniority to take decisions. Written terms of reference and procedures in place including a documented dispute resolution process. All documents including terms of reference, agenda, policies and procedures reviewed in line with wider definition of safety. Appropriate secretarial support provided, timely and accurate agendas, papers and minutes produced. Arrangements in place for confidentiality of meetings and documents, where necessary. A clear audit trail is maintained of any recommendations or decisions made to the local authority and the outcome.
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Section 4: Safety certification

Document	Yes/No	Date of Doc
Safety certification policies and procedures	YES	
Safety Certificate that includes consideration of all people and red line drawing	YES	
Operations manual (controlled copy or access to)	YES	
Any proof of Safety Certificate review e.g. SAG minutes, annual inspection etc	YES	
Record of deviations to Green Guide	YES	
Special Safety Certificate	YES	
Inspector's score		5
Evidence to support score		
<p>The strategic document for the local authority with regards to public safety events is the Managing Safety Policy, this overarching document outlines the policies and procedures to be implemented by the local authority officers in respect of the monitoring and enforcement activities. The policy document covers the activities for the local authority that are issued with a safety certificate</p> <p>The risk-based safety certificate that is supported by comprehensive operations manual certificate holder and reviewed on an annual basis references all people at sports ground and furthermore includes a plan that demonstrates the extent of the safety certificate.</p> <p>The local authority has access to the operations manual that is located on the shared drive.</p> <p>The lead officers update the safety certificate in response to changing circumstances for example the issues relating to the temporary demountable structures in the south-west corner and guidance including guidance issued by SGSA. This was particularly notable during the Covid 19 pandemic period where the safety certificate was changed to reflect the relevant regulations.</p> <p>The audit trail for the review of the safety certificate is evidenced through minutes of the safety advisory group together with the annual report.</p>		



The schedule of deviations to the Green Guide is maintained, there have been no recent additions.

The local authority has defined processes for issuing special safety certificates.

The road closure and HVM scheme is detailed within the operations manual.

The local authority has confirmed with the Company Secretary the correct name of the certificate holder, this is identified as Wolverhampton Wanderers 1996 Limited.

Elected members of the local authority are sighted on the safety certification process through the licensing committee.

Recent revisions are detailed below:

June 2020 Introduction of Coronavirus condition

May 2021 Limited return of spectators

July 2021 Removal of Coronavirus condition. Inclusion of Steward Training requirement Inclusion of capacity calc if social distancing reintroduced

Guidance notes for evidence

1	Although a safety certificate is in force the conditions, or the procedures in any operations manual required under the Safety Certificate, are out of date in respect of current circumstances. For example policies on Pyrotechnics or Drones.
2	The certificate conditions, and operations manual where one is required under the Safety Certificate, has/have been reviewed on an ad hoc basis, but no amendments have been issued where changes have been identified. Changes have been made to event day procedures without reference to the local authority or SAG.
3	The certificate conditions, and operations manual where one is required under the Safety Certificate, are the subject of an annual review but any amendments are not immediately made, or changes recorded.
4	Annual review of certificate conditions, and operations manual where one is required under the Safety Certificate, with amendments issued immediately to ensure that the certificate is up to date. Clear terms and conditions reflect the circumstances at the ground. Written amendments are made immediately after any changes at the ground or to the club's safety management systems. Public notices are issued advising of any changes to the Safety Certificate.
5	The certificate wording updated in line with the wider understanding and additional conditions considered e.g. event safety policy, infectious disease clause (Covid-19), crowd disorder and anti-social behaviour, and counter terrorism plan. Certificate states time of its operation and a plan of certified condition area is attached. Updated list of deviations to the Green Guide. All SAG members involved in



the ongoing dynamic review of the safety certificate. Where an operations manual is in place the local authority is kept aware of any proposed changes and maintain a controlled accurate copy. Clear audit trails are maintained including any contraventions together with details of the action taken. There are detailed policies and procedures in place which process map the actions to be taken by the local authority and that these policies and procedures are regularly reviewed by senior management. For example agreed policies on Pyrotechnics or Drones.

Section 5: Monitoring

Document	Yes/No	Date of Doc
Procedures for inspection and monitoring	YES	
Record of during performance inspections (DPIs) (provide all dates of DPIs completed during current season)	YES	
Record of annual inspection	YES	
Proof of feedback/actions as a result of inspections	YES	
Risk assessment for frequency and selecting of DPIs	YES	
Focus checks on monitoring visits such as steward training records, matchday records etc	YES	
Proof of monitoring persistent standing	YES	
Any reviews, tests and exercises the local authority has undertaken/observed to validate the emergency preparedness of the ground, including each ground's Contingency Plans (including Evacuation Plans) and integration with the Major Incident Plan (latter written by the emergency services)	YES	
Inspector's score		5
Evidence to support score		
<p>There are clear prescribed procedures for the inspection and monitoring of the conditions of the safety certificate detailed within the strategic policy document.</p> <p>The local authority has identified the need to undertake four DPI's during each season there will be two in 2021 and a further two 2022. The next planned DPIs will be 1 November 2021 and 4 December 2021.</p> <p>Matches selected for a during performance inspection are selected based upon a risk assessment process considering a range of factors including kick-off time, opposition, position within the league and significance of the fixture.</p>		



The annual inspection process was undertaken in 2021 however the 2020 annual inspection process was deferred due to the Covid 19 pandemic. The local authority considered the staging of fixtures behind closed doors to warrant a lighter touch in regulation during this period.

Feedback as a result of all inspections undertaken by the local authority. The inspecting officers undertaking monitoring visits do focus on specific items per inspection.

The local authority continued to monitor the behaviours of the supporters within the areas fitted with seats incorporating barriers albeit these areas are not formally licensed by SGSA as standing accommodation. At the time of the audit the local authority was aware of the early adopter criteria.

The local authority is satisfied with and been assured by other stakeholders the club's contingency plans have been satisfactorily developed and tested through consultation and exercise.

Guidance notes for evidence

1	The local authority does not undertake any form of monitoring of compliance with the safety certificate.
2	No risk assessments undertaken to inform frequency of inspections. Inspections limited to single statutory visit. No prescribed forms for inspections and no record of results conveyed back to the club or retained on file.
3	Risk assessed match DPI's are undertaken but no planned annual inspection, covering all aspects of sports ground safety. Forms are used to record results with some feedback conveyed to the club. Engagement in the club's emergency preparedness but reviews/exercises not carried out.
4	A programme of risk assessed DPI's are planned and an annual inspection undertaken, with issues being identified, fed back to the club and followed up to completion. A procedure in place which process maps the actions to be taken by the local authority and that this is regularly reviewed. Engagement in the club's emergency preparedness with reviews/exercises carried out.
5	DPIs are determined by risk assessment which takes into account; required frequency, safety management culture, and ground management's compliance with the safety certificate. An annual inspection carried out by competent persons. Comprehensive reports using updated documents including wider understanding considerations. Outcome of inspections communicated to the club and other members of the SAG, followed up to completion. Records maintained of any contraventions together with details action taken. Regularly reviewed procedure in place which process maps the actions to be taken by the local authority. The DPI includes persistent standing information. Engagement in the club's emergency preparedness with reviews/exercises carried out and proactive involvement in the wider major incident plan written by the emergency services.



Section 6: Enforcement

Document	Yes/No	Date of Doc
Enforcement policy covering the suite of available options	YES	
Enforcement procedures for staff to follow	YES	
Prepared notices	YES	
List of authorised officers/deputies	YES	
Delegated authority for serving notices	YES	
Procedure for reporting to relevant local authority committee if required	YES	
Inspector's score		5
Evidence to support score		
<p>There are clear prescribed policies and procedures the technical officers undertake and follow in considering the appropriateness of any enforcement in accordance with the local authority policy.</p> <p>The inspecting officers have access to preprepared enforcement notices.</p> <p>There is a list of authorised officers to undertake enforcement action. The delegated authority process is subject to an annual review and confirmed to all staff undertaking enforcement action. Recently job description to ensure officers roles and responsibilities reflect the duties undertaken.</p> <p>The relevant Cabinet committee within the local authority is advised and informed of enforcement action undertaken by the inspecting officers in accordance with the local authority policy.</p> <p>The SGSA Inspector is satisfied the local authority is continuing to perform at level 5 in this criteria</p>		
Guidance notes for evidence		
1	No enforcement policy and enforcement processes developed. No local authority staff guidance issued, or training given. No willingness to enforce relevant sports ground safety standards.	
2	Local authority staff lack experience in their role. Unsure of policies to follow through poor communication. Poor documentation. Lack of process to issue prohibitions.	



3	Policy and process on enforcement is widely understood. Local authority staff not fully trained or supported in their roles. Documentation is not in accordance with regulators code.
4	Safety at sports grounds policy and process communicated to local authority staff. Local authority staff are experienced and confident to carry out enforcement. Documentation, including audit trails in place but has scope for improvement. Enforcement options include informal warning, prohibition notices, reductions in capacities, formal caution, prosecution.
5	Local authority has an enforcement policy with enforcement procedures in place which process map the actions to be taken by the local authority. These procedures are regularly reviewed by senior management and there is access to legal advice. Enforcement options include informal warning, prohibition notices, reductions in capacities, formal caution, prosecution. All enforcement documentation has been updated in line with the wider understanding advice produced by the SGSA and has been reported/endorsed by the relevant council committee if so required. Staff have the necessary experience and training to implement the policy. Documented evidence of any contraventions are recorded with a clear audit trail.

Section 7: Training and expertise

Document	Yes/No	Date of Doc
Training policy/procedure	YES	
Staff training records including any qualifications and CPD	YES	
Management structure in place to support safety at sports ground function	YES	
Job/role descriptions including safety at sports ground function	YES	
Staff have ability to easily access expertise from other departments/external bodies/organisations when required	YES	
Inspector's score		5
Evidence to support score		
<p>The local authority has a policy that enables all staff to attend training in order to improve their skills and performance, attendance of formal or informal training is encouraged.</p> <p>CPD records are maintained particularly by those officers with membership of professional bodies. Officers with the safety at sports grounds function have attended a number of training opportunities provided by SGSA including safety certification and Covid capacity calculations in compliance with the SGSA supplementary guidance SG 02.</p> <p>There is a management structure within the directorate that supports the safety at sports grounds function and ensures continuity.</p>		



The technical officers with responsibility for sports ground safety certification have access to additional internal support and resources as may be required.

Guidance notes for evidence

1	Local authority staff lack experience/formal training/knowledge.
2	Local authority staff have received training, but lack of relevant experience does not give them confidence to act with authority. Therefore, they are unable to make effective judgements.
3	Identified that local authority staff are inexperienced with only limited training. Resources are allocated, including time, to ensure that more guidance and support given to local authority staff. Some records are maintained of individuals' development, training and experience.
4	Local authority staff who have several years' experience in the role and have received appropriate training. They receive a good support to undertake roles. Regularly monitored by way of performance and quality of reports. Satisfactory records are maintained of individuals' development, training, and experience. Commitment from local authority to support person to do role and provide continued professional development.
5	Staff have the correct competence, experience and the necessary practical and theoretical knowledge to undertake their roles and responsibilities. Procedures are in place to ensure that staff operate within the limits of their competence. Staff can access appropriately qualified specialists when dealing with highly technical issues. Good records are maintained of individuals' development, training, and experience. Commitment from local authority to support person to do role and provide continued professional development.

Section 8: Business continuity and resilience arrangements

Document	Yes/No	Date of Doc
Service or Departmental Business Continuity Plan	YES	
Specific contingency/resilience arrangements for the safety at sports ground function should the lead officer be unavailable	YES	
Exercise testing of LA business continuity or resilience arrangements	YES	
Regional working protocols	YES	
Inspector's score		5
Evidence to support score		



There are robust business continuity plans in place developed by the local authority to ensure the continuity of services.

The plans include arrangements to cover the safety at sports grounds function in the absence of the lead officer. There are potentially staff who will be able to fulfil the function as may be required.

The local authority has tested, as required by legislation including the Civil Contingencies Act, their own business continuity and resilience plans.

Additionally the local authority has advised the club to run their own exercises in which the authority has participated, the local authority resilience team develops and test plans on a local basis.

There are good regional working protocols in place that are readily available to the officers, the local authority officer contributes to the regional safety of sports grounds working group.

The SGSA Inspector is satisfied the local authority is performing at level 5 for this criteria.

Guidance notes for evidence

1	No business continuity or resilience arrangements in place for safety certification process.
2	No formal planning in place although local authority staff have some resilience.
3	A plan is in place, but it has never been tested. Local authority staff not given the opportunity to act at a higher level to test the resilience of the system or their own abilities. There is no process for learning lessons from any incidents and developing contingency plans.
4	Plans are in place and have been tested. Local authority staff are trained and experienced to ensure service delivery continues but formal processes are not in place. Local authority staff flexibility leads to a higher degree of resilience. Continual improvement and review is limited.
5	Business continuity plans are documented and regularly reviewed and tested to ensure resilience. Plans are regularly reviewed by senior management with an emphasis on continual improvement. Staff resilience planning is in place to ensure continuity of the function. Staff are aware of what will be required of them to ensure continuity and staff have the necessary training and experience to undertake the roles they could be expected to perform. Staff respond well to the additional requirements needed at sports grounds following an epidemic e.g. COVID 19.

Section 9: Confidence in local authority discharge of duties and safety culture

Inspector's Score	4
Evidence to support score	



The lead officer with the safety of sports grounds function is a competent officer who has a large portfolio and works on reduced hours. The officer has to balance risk across all activities within her portfolio which has necessarily recently had to focus on other priorities, particularly relating to Covid enforcement matters.

Despite the challenges the authority is proactive and responsive to issues raised by either the club or SGSA. The commitment to safety by the local authority evidenced by the support given to the club in respect of the decision to install seats incorporating barriers and the hostile mitigation measures.

It was jointly agreed between the local authority officers and the SGSA Inspector the local authority is currently performing at level 4 in this criteria primarily based upon staffing resources within the local authority.

Guidance notes for evidence

1	No resources allocated to discharge local authority functions. No backing from senior management. No response to SGSA or club. The overall safety culture of the local authority in respect of regulatory duties is very poor.
2	The sports ground safety team is inadequately resourced with insufficient staff appropriate to the size of the club and the tasks faced. No backing of senior management. The local authority is limited in responding to SGSA engagement and requests for information/action when pushed. Local authority slow in response to club requests. The overall safety culture of the local authority in respect of regulatory duties is limited.
3	The sports ground safety team has limited resources who are pushed to their limit. There is minimum backing of senior management. The local authority is responsive to SGSA engagement and requests for information/action. Local authority responds to club requests. The overall safety culture of the local authority in respect of regulatory duties is satisfactory.
4	The sports ground safety team is satisfactorily resourced with enough staff appropriate to the size of the club and the tasks faced. There is acceptable backing of senior management. The local authority is responsive to SGSA engagement and requests for information/action. The local authority responds to club requests in a timely manner. The overall safety culture of the local authority in respect of regulatory duties is good.
5	The sports ground safety team is well resourced with the number of staff appropriate to the size of the club and the tasks faced. There is good backing of senior management. The local authority is quick to respond to SGSA engagement and requests for information/action. The local authority responds to club requests quickly and pro-actively. The overall safety culture of the local authority in respect of regulatory duties is high performing.