MUSIC FESTIVALS – COVID-19 SUPPLEMENTARY GUIDANCE: AN INTERIM GUIDANCE BRIEFING NOTE

PART 1: COLLABORATIVE WORKING THROUGH COVID

1.1.0 INTRODUCTION

This interim guidance briefing note has been produced by the festival industry, who are continuing to work in collaboration with the Department for Digital, Culture, Media and Sport (DCMS) and Public Health England (PHE) on how music festivals could reopen with appropriate COVID-19 mitigation measures in place.

This document is for the specific use of music festival organisers and will be published on The Purple Guide website. It is designed to supplement "Organised Events Guidance for Local Authorities" and relevant COVID-secure guidance including the DCMS "Performing Arts Guidance" and the Event Industry Forum's (EIF) guidance for the Outdoor Event Industry "Keeping workers and audiences safe during COVID-19 (England)". Organisers should additionally refer to generic Government guidance designed to support a range of workplaces and public settings.

From organisers and business owners to public sector stakeholders there is a drive and determination to bring the festival and outdoor event sector back to life; delivering high-quality, COVID-19-secure events and entertainment where public health remains at the top of the agenda.

As the Government Roadmap towards reopening plots a route to full-capacity events, adaptability, flexibility and innovation remain key to safe delivery. The success of the vaccination programme; test, track, and isolate; and continued reduction in infection rates, is paving the way for the safe and gradual lifting of restrictions. Recognising this will be important that businesses and individuals maintain practices that minimise transmission as constraints are lifted. Over time, scientists expect COVID-19 to become endemic, meaning the virus will reach a stable, and hopefully manageable, level.

A range of measures will support the return of festivals, including successful vaccine deployment; effectiveness of vaccination in reducing hospitalisation and death; the continuing low levels of infection rates helping reduce pressure on local services; and that the situation is not changed by new Variants of Concern.

Additionally, there will be continuing review of the impact of measures taken at each step of the Government Roadmap including the return of outdoor socially-distanced attractions and hospitality (Step 2), and the impact of larger gatherings of up to 30 people and limited-capacity, large indoor and outdoor events (Step 3). Before moving into Step 4 and potentially the full reopening of events such as festivals in their traditional format, the results of further reviews are required, including the Social Distancing Review, the COVID-status Certification Review , and the Events Research Programme (ERP) (See APPENDIX D).

Future iterations of this guidance will take account of these results as they become available, including any steps that government takes as a result of these reviews, and will be published shortly after. In the meantime, the measures outlined here will facilitate discussions and support decision making.

1.1.1 INTENDED AUDIENCES

This document is intended to support festival organisers in planning and facilitating event delivery in a COVID-secure manner. It covers planning and operational detail specific to the industry, and is intended to facilitate conversation and integrated planning with other stakeholders in areas that sit outside of the current central government guidance, a list of which can be found here.

1.1.2 MOVING ON FROM VERSION 1

Version 1 of the festival planning guidance was released on 12 October 2020 to supplement the Events Industry Forum (EIF) *Purple Guide to Health, Safety and Welfare at Music and Other Events*. The document was delivered in collaboration with events industry professionals, the Department for Digital, Culture, Media and Sport (DCMS) and Public Health England (PHE), and established the strategic considerations relevant at the time.

Since its publication, there has been substantial change: to the virus trajectory; to the understanding of infection and control; and to Government response and priorities. At the time of writing, more than 39 million vaccinations have been given in the UK.

To that end, much of Version 1 has been superseded. This briefing note seeks to contextualise a situation that will continue to evolve, in line with the approach set out in the Government's Roadmap.

1.1.3 AIMS OF THIS DOCUMENT

1. Provide further strategic direction to the industry and its partners to support future planning, in the context of the Government's Roadmap.

2. Provide a planning framework for organiser and agency consultation, including Safety Advisory Group and Event Management Plan (EMP) delivery.

3. Consider the primary scenarios and operational issues that may arise when planning and delivering an event during COVID restrictions and beyond.

4. Provide an understanding of the risks in operational areas, to support a proportionate and measured approach in planning.

5. Outline practical operational steps that may be considered, building on existing COVID-secure guidance to help deliver safe events, in accordance with relevant legislation and guidance of the day.

1.1.4 GOVERNMENT ROADMAP AND TIMETABLE

The document COVID-19 Response – Spring 2021 (England) published on 22 February 2021 establishes how the Government will continue to protect and support citizens across the UK, and provides a roadmap out of the restrictions in place across England.

The Government committed to taking a cautious approach to easing those restrictions, guided by data instead of dates, to avoid another surge in infections that could put unsustainable pressure on the NHS. The roadmap set out "no earlier than" dates for these steps, which are five weeks apart. This allows four weeks for the data to begin to reflect the impact of the previous step and a further week's notice to individuals and businesses before introducing changes.

The proposed dates remain heavily caveated, with each phase subject to assessment on four tests before proceeding to the next:

- Test 1: The vaccine deployment programme continues successfully.

- Test 2: Evidence shows vaccines are sufficiently effective in reducing hospitalisations and deaths in those vaccinated.

- Test 3: Infection rates do not cause a surge in hospitalisations that would put unsustainable pressure on the NHS.

- Test 4: The Government's assessment of the risks is not fundamentally changed by new Variants of Concern.

Organisers must be aware of the sensitivity in planning events while the results of reviews and their impact on both the restrictions in place and Government guidance are still emerging.

Subject to its assessment of the four tests, the Government's aim is to reopen indoor and outdoor performance events with socially distanced audiences at Step 3 of the Roadmap (no earlier than 17 May) and subject to capacity caps (outdoors, non-seated: 4,000 or 50% of a site's capacity, whichever is lower).

Step 4 will take place no earlier than 21 June, and at least five weeks after Step 3, following a further review of the data against the four tests. As before, the Government will announce one week in advance whether restrictions will be eased as planned.

Step 4 of the Roadmap:

With appropriate mitigations in place, by Step 4, the Government aims to:

a. Remove all legal limits on social contact, publishing accompanying guidance on how best to reduce the risk of transmission and protect ourselves and loved ones.

b. Reopen the remaining closed settings, including nightclubs, and enable large events, including theatre performances and festivals, above the Step 3 capacity restrictions, subject to the outcome of the scientific Events Research Programme (set out in paragraphs 132 to 134) and potentially using testing to reduce the risk of infection, subject to further evaluation.

As set out above, some measures may be required even after all adults have been offered a vaccine, because neither coverage nor effectiveness of the vaccine will be 100%. As a result, a significant proportion of the population will remain vulnerable to infection, some of whom will also be vulnerable to severe disease and death. This is reflected in the modelling of different scenarios for unlocking restrictions, which shows that the risk of further cases, hospitalisations and deaths remains after the adult population has been vaccinated, though modellers advise there is considerable uncertainty in these figures.

Roadmap Reviews (APPENDIX D):

As set out in the Roadmap, the Government established four programmes of work to consider different aspects of how we should handle COVID-19 from summer 2021 onwards. These reviews are looking at COVID-status certification, international travel, large events (the Events Research Programme) and social distancing.

There are some key questions the reviews will consider that will have important implications for planning and delivering festivals. These include:

Social Distancing Review:
When and under what circumstances social-distancing guidance can be lifted or amended.
The implications of lifting social distancing for other measures, including face coverings and working from home guidance.

Events Research Programme:
How the reopening of large events can be conducted safely with mitigation measures in place (including through a range of pilot events).

COVID-status Certification Review:
Whether COVID-status certification (for vaccination/testing) could play a role in reopening the economy and society, reducing restrictions on social contact, and improving safety.

The festival sector will continue to work in collaboration with the Government on these reviews, and event organisers should continue to monitor developments. Terms of reference and an update published on 5 April 2021 can be found here.

1.1.5 RESPONDING TO CHANGING CIRCUMSTANCES

Experience demonstrates that the trajectory of the virus remains unpredictable; therefore, incorporating the ability to respond to changes in both increased and decreased legislative and national/regional/local mitigation measures is essential.

In some cases, this may lead to the need to cancel an event. In others, it may be resolved through a programme of enhanced mitigations (for example: the reduction in capacity of an audience, or a change in the programme of entertainment). Conversely, a reduction in mitigations as infection rates reduce might also be factored into forward planning. It must be recognised that many events will be unable to go ahead under Step 3 of the Roadmap, and that the move to Step 4 remains subject to Government guidance, which will additionally be informed by the outcome of reviews, noted above.

As the industry and its partners progress, it should be acknowledged that:

- All events will need to follow Government regulations and relevant guidance in place at the time of the event.

- All stakeholders are working in uncharted territory.

- Collaborative working underpinned by a mutual understanding of risk and mitigation is essential in getting the industry back to full-capacity events at the earliest opportunity.

- Consistency in the understanding, and application of, the statutory and legislative licensing and public health context is essential as far as is possible.

- Things will change, therefore flexibility and contingencies in arrangements are essential on the part of all stakeholders.

1.2.0 LEGAL FRAMEWORK FOR EVENTS

To ensure event organisers consider both Public Safety and Public Health it is important to clarify where these sit in the legal framework. The legal summary laid out below has been established and underwritten by TLT Solicitors. The objectives of Public Safety and Public Health are underpinned by different legislative frameworks, and we suggest that they are considered in parallel with each other.

LICENSING ACT 2003

The Licensing Act 2003 governs the conduct of licensable activities (the sale of alcohol, provision of regulated entertainment, and provision of late-night refreshments) and provides a clear focus on the four statutory objectives that need to be addressed:

- Prevention of crime and disorder.
- Public safety.
- Prevention of public nuisance.
- Protection of children from harm.

Whilst the legislation supports a number of other key aims and purposes, Public Health is not a specific licensing objective and should not be treated as such. This contrasts with Scotland, where there is a fifth licensing objective of 'protecting and improving public health' as per the Licensing (Scotland) Act 2005.

1.2.1 NATIONAL LICENSING GUIDANCE

It is a long-established principle in licensing, referenced specifically within the [S182 Guidance issued under the Licensing Act 2003](#) (paragraph 1.19 on page 5), that other existing legislation should not be duplicated within a licensing context.

Section 4 of The Licensing Act 2003 provides that in carrying out its functions, a licensing authority must "have regard to" guidance issued by the Secretary of State under Section 182. As such, licensing authorities must have good reason and provide reasons for departing from the Guidance should they choose to do so.

In that context, paragraph 2.7 of the Guidance introduces the licensing objective of public safety. It states: *"Licence holders have a responsibility to ensure the safety of those using their premises, as part of their duties under the 2003 Act. This concerns the safety of people using the relevant premises, rather than public health, which is addressed in other legislation… there will of course be occasions when a public safety condition could incidentally benefit a person's health more generally, but it should not be the purpose of the condition as that would be outside the licensing authority's powers (be ultra vires) under the 2003 Act."*

1.2.2 CORONAVIRUS LEGISLATION

In addition to the stated licensing objectives outlined in section 1.2.0, there are also various elements of coronavirus legislation that are directly applicable to events and event organisers. These include:

HEALTH PROTECTION (Coronavirus, Restrictions) (England) Regulations:

[The Health Protection (Coronavirus, Restrictions) (Steps) (England)](#)   [Regulations 2021](#)
[The Health Protection (Coronavirus, Restrictions) (England) (No. 3)](#)   [Regulations 2020](#)

The Coronavirus Regulations derive their legal force from the Public Health (Control of Disease) Act 1984, and it should be acknowledged that coronavirus regulation is a matter of public health only and that it should be separated therefore from The Licensing Act 2003, which is founded on four entirely different licensing objectives.

What does this mean practically for organisers, and responsible authorities?

Under the Health Protection (Coronavirus, Restrictions,) (England) (No3) Regulations 2020, additional powers have been granted to local authorities to make directions that respond to a 'serious and imminent' threat to public health.

The regulations include powers to:

- Restrict access to, or close, individual premises.
- Prohibit or restrict certain events (or types of event).
- Restrict access to, or close, public outdoor places (or types of outdoor public places).

In general, events are permitted to take place where the comply with COVID legislation. There are specific criteria for concern that a local authority must be satisfied with before it can give a direction:

- That giving such a direction responds to a serious and imminent threat to public health,

- That the direction is necessary for the purpose of preventing, protecting against, controlling or providing a public health response to the incidence or spread of infection by coronavirus in the local authority's area, and
- That the prohibitions, requirements or restrictions imposed by the direction are a proportionate means of achieving that purpose.

Sufficient evidence must be gathered by Local Authorities to pursue the direction with further consideration given to the following criteria:

- The location of the event;
- The risks associated with the event, including, for example, the anticipated level of attendance and the activities that are due to take place;
- The likelihood of attendees travelling from national or international locations which may have higher transmission rates;
- The documentation provided by the organiser, including risk mitigations and COVID-secure policies and processes.

A direction under this regulation may only impose prohibitions, requirements or restrictions on:

- The owner or occupier of premises for an event to which the direction relates;
- The organiser of such an event;
- Any other person involved in holding such an event.

It should be noted that guidance also qualifies that Local Authorities must:

- Take reasonable steps to give advance notice of the direction;
- Take a 'proportionate and common sense' approach.

There is a right to appeal through the magistrate's court.

[Local authority powers to impose restrictions: Health Protection (Coronavirus, Restrictions) (England) (No 3) Regulations 2020 - GOV.UK (www.gov.uk)](#)

1.2.3 SUMMARY OF IMPACT ON PLANNING, MONITORING, AND DECISION MAKING

1. Coronavirus legislation has added an additional layer to the traditional decision-making processes and consultees that organisers must consider, and the No. 3 Regulations give local authorities a power to pursue any concerns they may have as to whether, for example, an event is doing enough to address COVID concerns;

2. The practical considerations outlined in the (No. 3) Regulations should form the basis of organisers' considerations when compiling risk assessments, plans and other documentation, as well discussions with Public Health and Local Authorities;

3. Local authorities can allow or prohibit organised events from taking place in their local area, including directing individuals to leave a location or removing them from that location. This can have the overall effect of shutting down the event if all attendees are dispersed;

4. Engagement at the earliest opportunity to ensure partnership working and approach is essential.

Specific guidance for local authorities and those engaging with them has been published by the Government, supporting both licensable and non-licensable events – "Coronavirus (COVID-19): Organised events guidance for local authorities" (6th April 2021). This provides detail on the practical application of the Roadmap, and gives further detail on local authority decision making and powers of enforcement.

1.2.4 APPROACH TO CONSULTATION AND EVENT MANAGEMENT PLANNING

Organisers should endeavour to follow a proactive and open approach to consultation and event management planning, liaising with responsible authorities and other stakeholders at the earliest opportunity.

Local authority guidance states:

'The local authorities should consider convening a Safety Advisory Group (SAG) where appropriate in order to bring together representatives from the local authority, emergency services and other relevant bodies. The local Director of Public Health (DPH), should also be invited to the SAG. If a SAG is not convened, or if the DPH is unable to attend, local authorities should engage the DPH at the earliest opportunity.'

Based on the legal principles, what is the best framework for COVID strategic planning?

Mirroring the approach laid out in the legal section; it is recommended that the same principles are adopted during planning discussions with multi agency partners; primarily maintaining separation between:

1. 'Business as usual' operational event-management planning discussions/documentation; and

2. COVID planning and risk assessment.

This achieves the following:

- SAGs are able to deliver their traditional role of scrutinising plans and event operations without the additional responsibility of implementing and interpreting the latest COVID guidelines and losing sight of public safety responsibilities.

- Public Health officials are able to support event organisers with infection control and public health requirements without needing to fully engage in operational planning details often associated with complex outdoor event delivery.

Whilst it is inevitable that there will be clear interdependencies between the two areas, the event organiser would work in partnership with agencies to structure discussions, and present planning documentation in this manner.

1.2.5 CONSULTATION

Consultation with Responsible Authorities:

Whilst the weight of COVID concerns will remain at the forefront of everyone's considerations, it is essential that this is not to the detriment of the delivery and scrutiny of the usual Public Safety standards and licensing objective considerations expected when delivering an event.

By following the 'parallel track' identified in the legal summary, and separating the discussions, this will ensure management of business-as-usual is not subsumed in COVID-related discussions.

Safety Advisory Groups

Safety Advisory Groups (SAGs) are non-statutory bodies that provide professional and specialist advice to event organisers. They do not have legal or enforcement powers. To ensure a continued focus on operational, public safety and licensing priorities, it is recommended that SAGs continue to meet in their usual capacity, following their usual agreed Terms of Reference and set agendas.

Public Health

With the recent significant increase in responsibility, early engagement to seek support and guidance in planning is recommended. With a variation in approaches across local authorities, clarity should be sought on the most appropriate contact; this could be the local Director of Public Health, a representative from PHE or an environmental health colleague from local government.

Discussing COVID

Depending on the size and scale of the event, there may be different ways in which oversight is managed by the local authority and SAG members.

For larger events, a COVID-specific subgroup or working group may be established that is better focused to sit in advance of the SAG, feeding in the outcomes and recommendations of discussions. Such a group can be dissolved when the situation returns to business-as-usual. For smaller events, plans may be discussed as a separate standing item on the SAG agenda.

Irrespective of the forum, organisers may consider requesting that COVID planning is a standing item on SAG agendas enabling focused conversation and providing surety that it remains a topic of discussion.

APPENDIX A includes a sample list of attendees, and roles and responsibilities for organisers and partners attending SAGs. It is envisaged that this will support organisers to seek clarity from partners on the type of information and advice they may need.

1.2.6 DOCUMENTATION

The parallel approach to the management of COVID should continue to be reflected in the presentation of documentation developed by the event organiser.

Event Management Plans

Event management plans should continue to be produced to summarise primary operational plans and processes, in accordance with requirements of the authorisation under the Licensing Act 2003 and in consultation with the SAG.

These should address all required operational plans to demonstrate the event is being managed in accordance with the four licensing objectives and the operating schedule of requirements set out in the relevant authorisation.

COVID Management Strategy

COVID-specific issues and mitigations must be dealt with separately through the development of a separate COVID Management Plan and supporting COVID Risk Assessment, where relevant mirroring the chapter headings of the EMP. This ensures consistency in approach.

PUBLIC SAFETY	PUBLIC HEALTH
Licensing Act 2003 Premises Licence: PRL	The Health Protection (Coronavirus, Restrictions) (No. 3) and (All Tiers) (England) (Amendment) Regulations 2021
Event Management Plan	COVID-19 Management Plan
(Sample) Event Management Plan Chapters: Event Overview and Licensable Activities Command, Control and Coordination Plan Site Design and Layout Health and Safety Fire Safety Traffic and Transport Infrastructure; Sanitation, Waste and Water Noise Management and Monitoring Security and Stewarding Crime, Terrorism and Emergency Planning Crowd Safety and Evacuation Medical and Welfare Traders and Concessions Alcohol Management	COVID-19 Risk Assessment Relevant EMP chapters will be included in the C19 Risk Assessment

COVID Management Plan

This should be used to summarise:

- Context of the planned organisational approach to operational and risk management processes.

- How it is intended the event will be delivered in accordance with current COVID legislation and guidance.

The plan should be informed by discussions with the SAG, and should summarise the steps being taken to address key areas of work. Headlines may include:

Enabling Factors:

What are the primary factors that may influence and affect your decision making?

Examples may include:

- Current Government laws and guidance.

- Transmission rates regionally, nationally and internationally.

- Developments in lateral flow or similar testing methods.

- Progress of the vaccine roll-out programme.

PART 2: MITIGATING RISKS FROM COVID-19 AT MUSIC FESTIVALS

This guidance briefing note is an evolving document and will be updated on the basis of both findings from the Events Research Programme in June 2021, and from other sources.

The Government and stakeholder organisations have developed COVID-secure guidance that should support the reopening of performance events (including live music) with socially distanced audiences at Step 3 of the Roadmap. This guidance was used to deliver outdoor music events in summer 2020, however, most festivals have not been operationally viable whilst social distancing measures remain in place.

To plan for events from Step 4, event organisers should use existing COVID-secure guidance as a starting point, including the DCMS Performing Arts guidance and the Events Industry Forum guidance on Outdoor Events. Event organisers may also draw on Government guidance including:

- Restaurants, pubs, bars, and takeaway services.
- Visitor economy.
- Construction and other outdoor work.
- Offices and contact centres.

Where events are contingent on future policy changes that go beyond current Government regulations and guidance, notably social distancing and audience capacity caps, organisers should be explicit on this and consider the risks of proceeding with their planning.

Ahead of Step 4 of the Roadmap, the Outdoor Events and Festivals Group will review existing COVID-secure guidance to establish where further guidance may be required at Step 4 that is specific to a festival context. The group, working in collaboration with DCMS and PHE, will consider the emerging findings of the Events Research Programme, including with regards to how events could be delivered without social distancing but with other mitigation measures in place. See APPENDIX D.

2.1 POLITICAL, ECONOMIC, SOCIAL, TECHNOLOGICAL, LEGAL, ENVIRONMENTAL (PESTLE)

This series of challenges is intended to support event organisers in exploring the external and dynamically evolving influences that may impact on their ability to deliver the event. These sit outside of the stated Government Roadmap factors that will provide a legal yes/no.

The list is not exhaustive but should form part of the business planning and feasibility considerations when determining the viability of an event.

It is important to emphasise that these risks remain the sole responsibility of the organiser. They should not form part of wider discussions with Responsible Authorities / SAG partners unless explicitly impacting on the areas of Public Health or Public Safety.

Please refer to APPENDIX C for the content of the PESTLE analysis. There may be additional external threats and risks to consider, based on the specifics of the event and audience profile.

This section captures key points of uncertainty within the sector, which remain largely unresolved at the time of writing. It is expected to evolve quickly.

2.2 RISK ASSESSMENT

Any decision to proceed with holding (or restricting, modifying, postponing, cancelling) a music festival requires a rigorous legally compliant COVID-19 risk assessment that is bespoke to the festival. Such a risk assessment should be ongoing and regularly reviewed in light of changes in government legislation, advice and guidance.

It is expected that event organisers will already have their own systems of risk assessment, which they should continue to use to provide a COVID-specific RA. Any existing RA can provide the framework for additional COVID considerations.

When identifying your risks and planning mitigations it is important to remember:

- Not all risks will exist at every event.

- A risk assessment enables the selection of a proportionate mitigation. It is this proportionality that is at the heart of a successful return to live events.

Where they are identified, mitigations may need to consider that the test of what is "practicable" may be more stringent for COVID than for more traditional areas of risk. This should not automatically preclude a discussion on what is "reasonable", however.

2.3 RISK MITIGATIONS AT FESTIVALS

The following section has been developed to support organisers and other stakeholders to identify risks and consider appropriate mitigations.

The scenarios, and suggested mitigations that follow, are designed to offer options. They are not prescriptive and should be considered in the wider context of the event and the regulations and guidance in place at the time of the event.

It is not intended that a worst-case-scenario approach is adopted by statutory bodies but consensus achieved to mitigate relevant risks in line with relevant HMG regulations, policy and guidance at the time of the event.

The table of mitigations (below) has been driven by a list of non-pharmaceutical interventions considered by SAGE.

The mitigations offered in this document provide festival-specific context to some of the principle issues that festival organisers should consider at the early planning stage to ensure that they understand the ramifications of key risks.

It is intended that a more extensive exploration of mitigations with specific relevance to festivals will be published in future editions of this guidance, building on existing COVID-secure guidance, the outcomes of the Events Research Programme, and other reviews (APPENDIX D)

The table considers some scenarios at festivals and outdoor events, and outlines some practical steps and mitigations that organisers can deploy to minimise the risk of COVID transmission and respond to outbreaks, and when considering the core principles of:

1) Eliminating or minimising opportunity for <u>aerosol transmission</u> (singing, loud speech, aerobic activity, enclosed atmospheres).

2) Eliminating or minimising opportunity for <u>contact transmission</u>; (high-touch points).

Non-Pharmaceutical Interventions (NPIs):

NPIs are preventative public health measures such as enhanced ventilation, social distancing, handwashing, screens, cohorting or bubbling of staff, and the use of PPE.

COVID-specific NPIs have been researched and approved by the World Health Organisation and form an essential part of UK Government policymaking and COVID-secure guidance.

A list of NPIs considered by SAGE is available at APPENDIX B.

Hierarchy of Control:

To further ensure risks are dealt with proportionately, and the measures applied are appropriate to the circumstances, a traditional well-established hierarchy of control method has been used. This helps demonstrate the impact on transmission risk and is illustrated in the diagram below:

It is recognised that these measures generally decrease in effectiveness from Elimination to PPE, though it should be noted that it is not always necessary to select the most stringent mitigation, particularly as community occurrence of COVID decreases. Relevant regulations, HMG and sector guidance should be applied at the time of the event.

Whilst these terms may not be commonplace to all event organisers, they are essential in grounding the guidance in robust scientific principle, which should be recognisable to Responsible Authorities and Public Health representatives.

Risk area: worker-to-worker transmission

Example scenarios: arrivals and accreditation checks, crew catering, event control, multi-person build tasks, offices, meetings & briefings, vehicle sharing (onsite), post-work social contact, close-quartered living.

Hierarchy-of-control risk management applied to example risks and linked to SAGE Non-Pharmaceutical Interventions for assurance.

Activity / Scenario	Can it be eliminated? How?	Substitution?	Engineering Control	Administrative Control	Personal Protective Equipment
Managing crews in the build / break	Staff tested prior to entry, plus testing regime (e.g. regular random asymptomatic testing agreed as part of contract) (1a) Identified sensitive roles i.e. pit crew/event control tested prior to start of each shift - Lateral flow tests (or other) made available for self-testing in own accommodation, and self-isolation awaiting results prior to shift (1a) Drivers tested prior to entry, reduce number of suppliers, reduce number of deliveries (1a) There is no way to avoid a build/break phase. However, can the number of crew be reduced through a smaller/more simplified show? Longer build time? (1b)	Bubble working: Stage crew, office or discipline operates as a social bubble for working, eating and recreation (2b) Segregate camping areas for high-risk workers i.e. scaffolding teams; medics & welfare; pit security (2b) Replace daily face-to-face mass staff gatherings for meetings/briefings in smaller groups, outdoors or online meetings (2b, 2c, 2e) Replace contact at accreditation - bubble team leader to distribute wristbands; wristbands to be posted in advance (where security is not an issue) (2b)	Remote signing-in to shift (through change of admin process or engineered changes i.e. scanning, GPS locating etc (3b) Anti-microbial surface treatment in high-touch areas (3a)	Focused briefing of staff in social distancing requirements and covid protocols (e.g. online training/briefings; toolbox talks) (4c, 4i) Update policies and procedures (4i) Accreditation, passes, hi-vis jackets, paperwork and any other items can be prepared in stored/wiped bags for individuals to collect (4a); Stagger staff start times (4j) Increase cleaning regimes; more hand-sanitiser stations to be used before entering any structure or building, and staff encouraged to also bring own sanitiser (4a, 4b, 4d)	Mask wearing: advice should be given on suitable face masks, i.e. medical (N95) masks (as opposed to washable, cloth masks) for improved protection (5a) Gloves issued where appropriate (5d)
Crew socialising	Temperature checks at entrance to bar/catering (1a) Formal arrangements for crew out of work hours interactions can be removed, but need to consider impact on crew welfare and mental health. Remember: unofficial arrangements will be harder to manage or control, and events must further consider impact on staff recruitment (1b) Reduce the need for staff to leave site daily (impact on local community and interaction with local virus transmission) by providing onsite services: such as tuck	Organise bar and crew catering services as take-away only (2a) Crew to undergo testing regime and socialise in bubbles (2b)	Install hot-water hand-wash stations at crew catering & bar, with anti-viral hand soap (3c)	Personal hygiene signage and marshals at entrance to crew catering to remind about hand-washing before eating, smoking, not sharing utensils & cigarettes (4c, 4i) More hand-sanitiser stations to be provided, and staff also encouraged to bring their own (4d)	

	shop, crew catering, crew bar, laundrette, crew chill-out area (1b). All can be managed with COVID mitigations - schedules and rosters; screens, space, table service, rule of 6, cleaning regimes & hand sanitisers, mask wearing (2b, 3d, 4j, 4a, 4b, 4d, 5c).				
Crew and artist vehicular movement around site (internal)	Consider moving crew & artist areas closer to entertainment areas and encourage walking - space permitting (1b) Additional internal vehicle passes issued to allow personal vehicle use onsite; (consider risk impact on internal traffic movements, sustainability and pedestrian safety) (1b)	Where unavoidable, review the mechanisms used: tractors with open-topped trailers; electric bikes; standard bikes; rickshaws (2c)	All vehicles have openable windows and windows kept open (3c)	Shared vehicles to have COVID protocols - cleaning regimes, hand sanitiser, limited occupancy (4a, 4b,4d) Reduced capacity on minibuses, with more minibus journeys required (4j)	Mask wearing and gloves where appropriate (5a, 5b, 5c, 5d)
Office workspaces	No	Replace portacabins with more easily ventilated tents (this creates additional risks relating to noise, security, and temperature considerations) (2c) Hot desks to be available outdoors - weather, Internet and visibility permitting (2c) Meetings to be held outdoors - weather, noise, and confidentiality of subject permitting (2c) Offices run silently to reduce need for raised	Introduce ventilation: Select cabins with windows for offices, heat cabins if cold, move cabins to quiet areas - to enable open windows, remove sides from marquees (3c) Use screens between workers (3d) Anti-microbial surface treatment in high-touch areas (3a)	Use bigger/more offices to enable lower-density occupation. Limit number of personnel working in cabins - particularly in small, poorly ventilated (i.e. anti-vandal) cabins. Consider the space available according to staff numbers, and allow for additional space (4j) Reduce risk of transfer via shared equipment & uniform i.e. tools, hi-vis, stationery, computers, radios, scanners etc where possible. People encouraged to bring own equipment i.e.	Mask wearing (see established guidance for driving under COVID restrictions in other industries) (5a, 5b, 5c)

| | | | | radio earpieces, laptops; increase numbers of hired equipment i.e. radios. Sanitise between uses where this is not possible (4d, 4f)

Issue uniform/hi-vis individually for the duration of the show. Provide laundry facilities where not possible (4f, 4a)

Appoint COVID coordinator with dedicated COVID staff to monitor compliance (4i)

More hand-sanitiser stations to be provided, and staff also encouraged to bring their own sanitiser (4d) | |
| voices (2d)

Meetings to be held online (2e) | | | | | |

These scenarios and suggested mitigations are not prescriptive and should be considered in the wider context of the event, demographics, location, prevailing national guidelines & infection rates

Risk area: audience-to-worker/worker-to-audience transmission

Example scenarios: accreditation and wristbanding, medical & welfare, security searches; queue/crowd management.

Hierarchy-of-control risk management applied to example risks and linked to SAGE Non-Pharmaceutical Interventions for assurance.

Activity /Scenario	Can it be eliminated? How?	Substitution?	Engineering Control	Administrative Control	Personal Protective Equipment
Ingress - gate processes Wristbanding	Temperature checks on regular basis (staff) (1a) Testing regime - regular asymptomatic test on contractually agreed basis (staff) (1a) Testing regime (public) with evidence of -ve test, or evidence of vaccine through a COVID passport or other - details tbc (1a) Remove wristband exchanges by posting out wristbands (where there are minimal security concerns, the numbers allow, and contingencies are planned for forgotten/lost wristbands, scams and forgeries) or ask public to apply own wristband under supervision (1b)		Operate all wristbanding through box office arrangements, i.e. windows/screens between public and staff (3d) RFID and cashless payment systems for on-gate ticket purchase (3b)	Hand sanitiser - provided for all counter-tops (4d)	Mask wearing: advice should be given on suitable face masks, i.e. medical (N95) masks (as opposed to washable, cloth masks) for improved protection (5c) Gloves issued where appropriate (5d)

Ingress - gate processes Searches	Temperature checks at the start of shift (staff) (1a) Testing regime - regular asymptomatic test on contractually agreed basis (staff) (1a) Testing regime (public) with evidence of -ve test, or evidence of vaccine through a COVID passport or other - details tbc (1a) Plan covid search requirements in conjunction with the event security risk register, and licensing requirements, which may mean it is appropriate to reduce searching (1b) 1- day events: consider removal of cloakrooms and mandating no bags on entry, to be communicated to the audience in advance (1b)	Search staff to form bubbles for camping, eating and recreation (2b)	Anti-microbial treatment in high-touch areas esp. search tables (3a) Use of mechanical aids to reduce contact e.g. wands, x-ray machines, see-through plastic bags (airport-style) for possessions; detection dogs (drugs/explosives) (3b) Use screens between staff and audience for bag searches (audience demographic and compliance dependent) (3d)	Focussed briefing of staff in social distancing requirements and COVID protocols, thorough online training/briefings, toolbox talks, limited-number outdoor briefings (4i) COVID signage and information readily available: posters, apps, staff handbooks and site induction (4i) Increased cleaning regimes - high-touch areas such as tables, barriers in queuing areas, countertops, furniture etc. (4a, 4b) More hand-sanitiser stations to be provided for all search tables, and staff also encouraged to bring their own (4d)	Face covering mandatory for staff where close contact is unavoidable: advice should be given on suitable face masks, i.e. medical (N95) masks (as opposed to washable, cloth masks) for improved protection (5c) Gloves issued (5d) Visors considered where ID checking and therefore public removal of face masks required (5e)
Queue / crowd management	Temperature checks at the start of shift (staff) (1a) Testing regime - regular asymptomatic test on contractually agreed basis (staff) (1a) Testing regime (public) with evidence of -ve test, or evidence of vaccine through a COVID passport or other - details TBC (1a) Replace indoor venues with outdoor stages to enable ventilation (1b)	Event control teams either FOH or BOH, and not to mix, communication via radio/WhatsApp/Zoom (2b) Event/contractor management to have eyes and ears on the ground to avoid moving through public areas (2b) Provide stewarding and security staff with loud hailers (not shared) to communicate with the public from a removed location (i.e. platform) (2e) Pit crews to form bubbles for camping, eating, and recreation (2b)	Use elevated platforms for crowd monitoring (3e)	Cleaning regimes - Increased in areas such as barriers, toilets, and catering. Added in areas not traditionally cleaned such as furniture, countertops, barriers (4a, 4b) More hand-sanitiser stations to be provided, and staff & public also encouraged to bring their own (4d) Focussed briefing of staff in social-distancing requirements and COVID protocols, thorough online training/briefings, toolbox talks, limited-numbered outdoor briefings (4i) Reduce number of people extracted by limiting public cultural behaviours: moshing, crowd surge, wall of death, etc, by briefing artists to discourage such activity, stage signage (4i) COVID signage and information readily available: posters, apps, staff handbooks and site induction (4i) Pre-event communications to attendees Appoint COVID coordinator with	Face covering mandatory for staff where close-contact is unavoidable: advice should be given on suitable face masks, i.e. medical (N95) masks (as opposed to washable, cloth masks) for improved protection (5c) Visors considered where ID checking and therefore public removal of face masks required (5c) Gloves issued (5d)

				dedicated COVID staff to monitor compliance (4i)
				Increase circulation space (or reduce capacity of the public) to allow greater public self-management (4j)
				Allow extra space, increase width or number of gates, change queue style - straight line/channel queuing or socially distanced Disney/serpentine queues, encourage front-to-back queues (4j, 4l, 4m)
				Increase the capacity of queuing systems to allow more square metres per person (4j)
				Review designs of queuing systems i.e. Disney queues, to reduce crowd flows coming face-to-face (4m)

These scenarios and suggested mitigations are not prescriptive and should be considered in the wider context of the event, demographics, location, prevailing national guidelines & infection rates

Risk area: audience-to-audience transmission

Example scenarios: circulation (between stages, concessions, toilets), egress (at performance end), front of stage and other high-density entertainment areas.
Hierarchy-of-control risk management applied to example risks and linked to SAGE Non-Pharmaceutical Interventions for assurance.

Activity /Scenario	Can it be eliminated? How?	Substitution?	Engineering Control	Administrative Control	Personal Protective Equipment
Crowd circulation	Testing regime (public) with evidence of -ve test, or evidence of vaccine through a COVID passport or other - details TBC (1a) Replace indoor venues with outdoor stages to enable ventilation (1b) Remove public showers (camping festivals) (1b) Reduced touch points - remove furniture around markets and food concessions (1b)	Enable bubbles for those who require - designated spaces for bubbles, raised viewing platforms per bubble, pods, drive-ins, segmented campsites with pre-allotted pitches (2b)	Anti-microbial surface treatment in high-touch areas - queue and front of stage barriers (3a) RFID and cashless payment at all pay-points - e.g. bars, caterers, lockers, phone charging, merchandise, shuttle-bus tickets (3b) Increased washing or sanitiser facilities at bars and catering outlets (3c, 4d)	Cleaning regimes - increased in areas such as barriers, toilets, and catering. Added in areas not traditionally cleaned such as furniture, countertops, and barriers.(4a, 4b) More hand-sanitiser stations to be provided, and public also encouraged to bring their own (4d) Limiting public cultural behaviours: moshing, crowd surge, wall of death, etc, by briefing artists to discourage such activity, stage signage (4i) Audience communication to	Face covering mandatory for staff where close-contact is unavoidable (i.e. pit staff, security response teams, medics, and welfare): advice should be given on suitable face masks, i.e. medical (N95) masks (as opposed to washable cloth masks) for improved protection (5c) Visors considered where ID checking and therefore public removal of face masks required (5c) Gloves issued (5d)

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				encourage social distancing and sanitation pre-event and during the show - increased onsite public messaging capabilities - LED signs, VMS signs, stage screens signs, apps, programmes, text-messaging services, posters, PAs, social media, campsite hubs (4i) COVID signage and information readily available: posters, apps (4i) Appoint COVID staff to monitor compliance (4i) Increase circulation space (or reduce capacity of the public) to allow greater public self-management (4j) Enable audience to experience acts from a distance - Better sound fields/PA/extra delays/large screens (4j) Reduce peak density in access systems and in front of stages - programming to split the crowds, and generate longer dwell time at stages; allocate arrival slots, colour-code gates, zones and areas for designated space allocation (4j) Allow extra space, increase width or number of gates, change queue style - straight line/channel queuing or socially distanced Disney/serpentine queues, encourage front-to-back queues (4j, 4m)	
These scenarios and suggested mitigations are not prescriptive and should be considered in the wider context of the event, demographics, location, prevailing national guidelines & infection rates					

APPENDIX A – SAMPLE ROLES AND RESPONSIBILITIES AT SAG FOR STAKEHOLDERS AND ORGANISERS

Attendee	Role
Regional Director of Public Health or nominated deputy	- To update the group on current and relevant COVID legislation, guidance and best practice. - To provide an update of the national and/or regional infection rates and predictions for future patterns of infection. - To advise and offer suggestions to event organisers on their proposed COVID-infection control measures and processes. - To provide a reassurance to SAG representatives that the Public Health element of the Event Management Planning process is being considered within the existing parameters of COVID legislation and guidance. - To provide proportionality to plans, underpinned by scientific and working knowledge of infection control. - To facilitate engagement with Health Protection Teams to manage response and contact tracing requirements.
SAG Chair	- To chair the Public Health Subgroup. - To provide an update and summary of activity to the SAG of the discussions and outcomes of the Public Health Subgroup if approproate.
Local Authority EHO - Public Safety	- To update the group on current and relevant COVID legislation, guidance and best practice. - To provide input and clarity on areas where Public Safety, and Public Health potentially meet. - To support the development of infection control measures whilst continuing to ensure the necessary public safety objectives are achieved: i.e. operational safety at the event e.g. queuing systems and crowd management.
Police Representative	- To update on the Force's position on the enforcement intentions of COVID legislation. - To support the development of Public Health measures whilst continuing to ensure necessary crime and disorder objectives are achieved.
Event Organiser	- Event Organisers to attend on a case-by-case basis. - Present COVID-identified risks and mitigations for discussion and advice.

APPENDIX B: SAGE-CONSIDERED NON-PHARMACEUTICAL INTERVENTIONS (NPIs)

Summary of rationale for each measure:

1. Elimination

    a) Prevent the presence of an infectious person in the environment.

    b) Remove the use of a particular environment.

2. Substitution

    a) Reduction of time spent in an environment.

    b) Change work patterns to work in a cohort.

    c) Move to outdoor working.

    d) Changes to restrict "loud" activities (e.g. reduce talking time, no singing).

    e) Technology to replace face-to-face interactions.

3. Engineering

    a) Anti-microbial surfaces.

    b) No-touch technologies.

    c) Provision of new hand-wash stations.

    d) Screens/partitions.

    e) Increased fresh-air ventilation rate for poorly ventilated spaces.

    f) Change to room-air distribution patterns.

    g) Application of room-scale air cleaning/UV devices.

    h) Installation of local exhaust systems or local air cleaning devices.

    i) Propping open internal doors to enhance airflow.

    j) Personalised ventilation systems.

    k) Use of UV/HPV decontamination.

    l) Good maintenance of sanitation/drainage systems.

    m) Enhanced sunlight in buildings.

4. Administration

a) Frequency of high-touch surface cleaning.

b) Frequency of general room surface cleaning.

c) Training on quality and effectiveness of cleaning.

d) Provision of hand sanitiser.

e) Replacement of jet dryers with paper towels.

f) Avoidance of shared equipment (e.g. IT, hot-desking).

g) Management of waste.

h) Hygiene behaviours in bathrooms (e.g. putting the toilet lid down before flushing).

i) Changes to touch behaviours (e.g. education programmes).

j) Lower density of occupants.

k) Maintain two-metre distancing.

l) One-way systems for moving through spaces.

m) Orientation of people.

5. Personal protective equipment (PPE)

a) Respirator (N95/FFP3) face masks.

b) Surgical face masks.

c) Face coverings.

d) Gloves.

e) Protective clothing.

APPENDIX C: PESTLE ANALYSIS TO SUPPORT EVENT OWNERS' STRATEGIC DECISION-MAKING WITH REGARD TO EVENTS PROCEEDING

POLITICAL	ECONOMIC	SOCIAL	TECHNOLOGICAL	LEGAL	ENVIRONMENTAL
Sector-wide					
Necessarily gradual and cautious approach to decision making regarding the release of steps, based on results of reviews and established stages of HM Government Roadmap	Impossibility of COVID insurance cover. No government-backed insurance scheme	Potential for conflict between attitudes and remaining perceptions towards social contact	Uncertainty around lateral flow testing effectiveness, and product availability	Evolving COVID-specific legislation and guidance	PPE and disposal of single-use items
Enforced capacity limits (substantial at Step 3, still possible at Step 4 based on outcome of reviews)	Cost increase to existing insurance and other economic protections (e.g. seeking legal advice)	Audience and staff risk perception and appetite for events	Ongoing test-and-trace process	Lack of clarity/subjective interpretation on laws and guidance on 'COVID-safe' events	Reduced update of public transport/shared use of site vehicles
DCMS and the Department for Business, Energy and Industrial Strategy have been working with representatives from industry and civil society to explore when and how events with larger crowd sizes, less social distancing or in settings where transmission is more likely (i.e. indoors), will be able to return safely. Outcomes of these reviews are still unknown	Costs of enhanced control measures e.g. medical and welfare, testing kits, PPE, Sanitiser, screens, enhanced cleaning measures etc	Negative press/local opinion around events operating in the area	Sufficient broadband to manage extra tech requirements	Threat of prosecution/cancellation/restriction under both coronavirus and Public Health legislation	Additional water usage to facilitate handwashing
Test event programme festivals unlikely to be included in first phase, and may be supplementary after primary results available	VAT relief to stop	Belief/perception that it is solely down to organisers to keep people safe, not individual actions of crew or audience	Vaccine effectiveness (inc. supply chain)	Assault. COVID as a weapon	Single-use or individually wrapped items to improve hygiene = increase in non-recyclable waste
Ongoing social restrictions including social distancing	Cash flow impacted by" *Lack of ticket sales *Large deposits required from suppliers		Improved/enhanced requirements of cashless/paperless transactions	Requirement to await outcome of certification review	
Political influence on consumer confidence (i.e.	Increased costs for infrastructure due to:		Technical management of risk control measures	Organiser Liability (Public Liability Insurance)	

political appetite for risk	*Supply chain collapse *Essential kit already requisitioned			*Transmission onsite *Onward transmission *Long-term COVID diagnosis post-event and potential loss in earnings	
New devolved responsibilities and powers of Local Directors of Public Health	Reduced audience appetite for events		Complexity of handling and integration of health data into ticketing and entry processes	Terms and Conditions to support COVID policies. Ability to enforce	
Misinformation may damage public confidence	Potential for last-minute event cancellation on Public Health grounds		Eviction systems		
Central political 'judgement' on what constitutes a safe event	Cost increase of key services due to under supply e.g.: *Staff (industry staffing fallout) *Infrastructure (proliferation of late-season events)				
Subjective local political perspective on what constitutes a safe event	Availability of goods on sale or return				
Local political appetite to deliver events	Larger physical sites required to support social distancing (increased land/infrastructure/ staffing costs)				
Local SAG unwilling to support planning due to delay in industry guidance whilst outcomes of reviews are considered	Long-term reputational and financial implications if event is run badly				
Capacity of local licensing partners and RAs to scrutinise and support					
External political pressure and lobbying organisations					
Reduction/finish of furlough scheme, lack of financial support for freelancers resulting in loss of key staff					
Lack of recompense for staff required to self-isolate					
TRAVEL AND TRANSPORT					

International/regional travel restrictions		Increase in car use due to reservations around shared public transport/car shares			
National operators' guidance					
				Border control and quarantine arrangements for visitors/acts/workers/touring productions	
Availability of special arrangements for public transport (Special trains/movement of bus stops/park and ride)					
Ticketing					
	Additional cost of health/vaccine verification process			Consumer Law – ability to market events without guaranteed permission to go ahead	
Site Adjustments and Close Contact					
Exclusion of specific activities (e.g. singing)			Technology to support isolating crew and key staff during event to ensure minimal contact		
			IT technology to support close-contact working		

APPENDIX D: TERMS OF REFERENCE, COVID-19 RESPONSE – SPRING 2021

The Government has published the terms of reference for the reviews committed to in the 'COVID-19 Response - Spring 2021.'

1. COVID-status Certification Review
2. Events Research Programme
3. Social Distancing Review
4. Roadmap Review: Update (5 April)

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