



# Safe Circus

Health and Safety reference document for the Welsh Circus Sector

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Cyngor Celfyddydau Cymru  
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# Introduction.

## **An Introduction to Health and Safety at the Circus**

Here we will try to unpick some of the paradoxes around safe circus and what we can do to mitigate the inherent danger of what is fundamentally a dangerous activity.

If it were black and white it would be simple... Circus would not be allowed. It is up to us to decide what is safe and to be prepared to take responsibility for the consequences.

With professional circus artists, it is much easier as it is reasonable to expect that they are aware of their technical ability and level of experience and are competent to assess the level risk involved in their activity and behave appropriately.

Working with amateurs, community learners and young people is a much bigger can of worms and requires a higher degree of responsibility and accountability from the organisation. Here we will more closely focus on this area as we have identified a need/request for guidance and clarity from this quickly developing, yet unregulated sector.

This information cannot be definitive as there is no one size fits all solution. All we can hope to do is pull together most of the relevant legislation and guidance and give you the tools and the confidence to make your own informed judgments or the wisdom and motivation to get help.

Most H&S legislation is written for industries where things are black and white, and risk-taking is generally avoided. How we apply it to our industry is open to interpretation, but that comes with culpability and legal responsibility.

## The 4 Keys to Success are:

- 1) Creating a safe environment with safe equipment
- 2) Creating a culture of health and safety where everyone takes responsibility for it
- 3) Having good clear documentation that:
  - a) communicates to the team their responsibilities and risk mitigation methodologies
  - b) demonstrates clear thinking and good practice should you ever be held accountable
- 4) Regularly reviewing policies and procedures in consultation with your team and updating them accordingly. Build the culture, foster the buy-in

Very often H+S is used as a mechanism for saying NO and sometimes that is necessary. But it should also be used as a way of saying yes and providing the framework to do it as safely as possible.

## Qualified or Competent?

There are very few qualifications that relate to teaching circus or running a training space.

The Law talks about qualified or competent individuals. Consideration needs to be given as to assessing competence and who is competent to assess competence and how that might be evidenced. Knowledge, experience, and common sense will get you a long way, but having done the homework should give you the confidence to know that you do everything you can to keep it as safe as you can and at the end of the day that is all you can do.

If you ever find yourself being sued by someone who was messing around in class, not listening to the teachers and broke their ankle you will be very glad that you have all the paperwork, assessments of competence, risk assessments, method statements, accident report forms, incident report forms, public liability insurance, equipment inspection records and so on. It could save you a lot of money, and should there be a more serious incident at least you will know you did all you could, and you are not at fault. We all need to sleep at night.

With that cheery thought, I wish you good luck.

There now follows a series of chapters kindly put together by:

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- Kate Parry. NoFit State Head of Community Programme
- Alison Woods NoFit State Chief Executive

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# Chapter One.

## Why Health and Safety Matters

We all have the right to a safe place of work and the knowledge that the environment is relatively free from danger, risk or threat of harm. Circus by default is considered a high-risk activity, but this does not mean that the risks cannot be properly controlled.

As an employer, you must protect your workers (and others) from getting hurt or becoming ill through work. Failing to do so could result in heavy fines.

Employers must provide:

- A safe place to work
- Safe systems of work
- Suitable and safe work equipment that is well maintained
- Adequate welfare arrangements
- Information, instruction, training and supervision

<https://www.hse.gov.uk/toolbox/workplace/facilities.htm>

## What Does the Law Say?

Both criminal law and civil law apply to workplace health and safety. You can be held accountable for both.

- A regulator such as a Health and Safety Executive or a local authority may take action against you under criminal law. This could result in a fine or imprisonment
- The person affected may claim compensation against you under civil law

<https://www.hse.gov.uk/simple-health-safety/law/index.htm>

## Legislation:

Health and safety law in the UK is made up of:

- Acts of Parliament
- Statutory instruments (regulations)

The main piece of legislation is the Health and Safety at Work Act 1974 (HSWA) with further significant modifications implemented in 2008. This Act provides a structure and legal framework for health and safety regulation and advice and is known as primary legislation.

<http://www.legislation.gov.uk/ukpga/1974/37/contents>

## Regulation:

Regulations are also the law. They are secondary legislation and are required to be linked to a particular piece of primary legislation. Typical examples in our industry would include:

- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

<https://www.hse.gov.uk/work-equipment-machinery/loler.htm>

- Work at Height Regulations 2005, as amended 2007

<https://www.hse.gov.uk/work-at-height/>

## Approved Codes of Practice:

Approved Codes of Practice (ACoPs) offer practical examples of good practice. They advise on how to comply with the law by providing advice on what is 'reasonably practical'. Terms such as 'suitable' and 'sufficient' can illustrate what this requires in particular circumstances. ACoPs have special legal status. If employers are prosecuted for a breach of health and safety law, and it is proved that they have not followed the relevant provisions of the Approved Code of Practice, a court can find them at fault unless they can show they have complied with the law in some other way or instances were put in place to make the work equally safe. Some examples would include:

- ABBT Code of Practice for use of Tallescopes for working at height in theatres 2014

<https://www.tallescope.co.uk/wp-content/uploads/2018/04/Code-of-practice-for-use-of-Tallescopes-for-working-at-height-in-theatres-Complete.pdf>

## Guidance:

Guidance can be industry-specific or a particular process or task that is used in a number of industry sectors. The main purpose of the guidance is to interpret and help people understand what the law says and to help people comply with the law. Some examples would include:

- Sound Advice: Control of noise at work in music and entertainment

<https://www.hse.gov.uk/pubns/priced/hsg260.pdf>

## What are my Obligations?

Under the HSWA:

'It shall be the duty of every employer to ensure, so far as is reasonably practicable, the health, safety and welfare of all his employees'

The 'shall' means that this an absolute duty. There is no defence, the employer must do it!

'So far as is reasonably practicable' refers to the employer's own understanding of risk, and the pre-emptive steps they have taken to control it. For example, asking an employee to work with a known hazardous substance without providing adequate PPE would not be considered reasonable care.

A person does not need to have been harmed for an offence to be committed only that there has been a risk of harm.

The most important thing you can do is manage and control risk in the workplace. Paperwork alone is not enough to prove you are complying with the law.

Implementing a culture of H&S within your organisation will be a far more effective tool than simply having mountains of paperwork to support your evidence of competent and skilled staff.

"References:

- A safe place of work

<https://www.hse.gov.uk/toolbox/workplace/facilities.htm>

- Health and safety at work: criminal and civil law

<https://www.hse.gov.uk/simple-health-safety/law/index.htm>

- Health and Safety at Work etc. Act 1974

<https://www.legislation.gov.uk/ukpga/1974/37/contents>

# Chapter Two.

## Developing a Culture

“It is an employer’s duty to protect the health, safety and welfare of their employees and other people who might be affected by their business. Employers must do whatever is reasonably practicable to achieve this”.

[www.hse.gov.uk/workers/employers.htm](http://www.hse.gov.uk/workers/employers.htm)

What does this mean in practical terms? Well HSE defines several factors that would allow for providing a safe work environment.

<https://www.hse.gov.uk/simple-health-safety/index.htm>

Most importantly, it is to provide assurances and accountability to both employer and employee alike. It is down to you and your organisation how you choose to staff and manage these measures, however a clear and concise health and safety structure that employees can understand and relate to is paramount to developing a positive culture through the organisation.

## Appoint a Competent Person:

<https://www.hse.gov.uk/simple-health-safety/gettinghelp/index.htm>

As an employer, you are responsible for appointing a competent person or people to help meet your

health and safety legal duties. This could be someone with health and safety training, work-based experience or ideally a combination of both. They would be responsible for monitoring, evaluating and, when necessary, putting controls in place to protect staff and the public from harm. There are several training providers but some of the more universally recognised ones are:

IOSH: <https://www.britsafe.org/training-and-learning/find-the-right-course-for-you/what-is-iosh/>

NEBOSH: <https://www.nebosh.org.uk/home/>

Here at NoFit State, we have a Safety Committee formed of senior roles or heads of department that regularly evaluate various issues and concerns relating to H&S matters. It enables a number of individuals with specialist experience to contribute to the overall policy and encourages a greater number of individuals to accept responsibility for their own and others' actions.

Whether you choose to meet weekly, monthly or quarterly is down to the organisation and its need for constant evaluation in relation to the risk of activities it is undertaking. However, what is key is that the topics discussed are reviewed, monitored and, if necessary, any changes implemented and recorded online for future reference.

If you feel your organisation does not have the competency within the workforce to manage health and safety in-house (or you feel as if it is too much a conflict of interest) then consider using a consultant or advisor. However, bear in mind this can be expensive and alienating to the workforce. Your employees may feel like they have had no consultation on how to best manage their own workspace environments effectively.

### Measuring Competency:

This is tricky as one person can seem experienced (and therefore competent), but be less risk-averse than another who may be less knowledgeable or experienced, but extremely cautious. Finding the sensible and pragmatic solution to what can often be so specific to circus is in itself a skillset, however there are a few easy points to refer to when trying to measure competency:

#### SKATE

- Skills
- Knowledge
- Attitude
- Training
- Experience

Using SKATE will help to identify something that does not seem safe. As mentioned with competency, not all are created equal so consider how different people have different particular requirements. This could include:

- Young workers
- Expectant mothers
- People with disabilities

Using PETE as a reference will help when considering the various factors that may affect risk:

People

Equipment

Task

Environment

Consider how different people have different particular requirements and how they may react to a task or environment differently. This could include:

- Young workers
- Expectant mothers
- People with disabilities

### **Appointing a Covid Officer:**

A dedicated Covid Officer is necessary to ensure your organisation responds to the legal obligations relating to any activity concerning the current advice and regulations. This can be your H&S officer but depending on the scale and complexity of your activity needs careful planning, understanding and awareness of current guidance and legislation so an additional person may be required:

- Make sure that you understand the Welsh Government's COVID-19 regulations and guidance
- Have a plan that explains the approach that you intend to take as you resume activity
- Test the practicality of these plans through a thorough risk assessment process
- Consult the website of specialist trade and technical associations
- Communicate your plans and intentions to those who you will be working and connecting with, or sharing facilities
- Have a clear understanding of what the social and physical distancing requirements mean for the activities that you are planning
- Ensure that all necessary training is provided to those who will be leading and/or coordinating activity
- Designate someone with sufficient seniority in your organisation to hold specific responsibility for ensuring that all necessary COVID-safe actions are taken. That person should be known to all other workers as the "COVID officer"

### **Preparing a Health and Safety Policy:**

<https://www.hse.gov.uk/simple-health-safety/policy/index.htm>

It is the law for every business to have a policy for managing health and safety within the organisation. If there are five or more employees, it must also be a written document. Generally speaking, it is advisable

to have written evidence of your policies regardless of size.

Sometimes it is also useful to provide toolbox talks for new or unknown activities so your employees can ask questions and raise concerns about something they don't know. Crucially it ensures your employees feel confident you are managing and controlling any potential risk.

Your policy should cover three areas:

- Statement of Intent
- Responsibilities for health and safety
- Arrangements for health and safety

<https://www.hse.gov.uk/simple-health-safety/policy/how-to-write-your-policy.htm>

These policies do not need to be overly long or complex, and it is important to write out what works best for your organisation and its employees- the clearest and most concise documentation for you and your employees to understand and take on board. An example of our organisation's policy can be found in the putting pen to paper chapter.

### Managing Risks (RAMS):

<https://www.hse.gov.uk/simple-health-safety/risk/index.htm>

Templates can be found in the putting pen to paper chapter so consider what works best for the activity or environment you are assessing and remember risk management is best viewed as a step by step process:

- Identify hazards
- Assess risks
- Control the risks
- Record your findings
- Review the controls

Using **SKATE** will help to identify something that does not seem safe. As mentioned with competency, not all are created equal so consider how different people have different particular requirements. This could include:

- Young workers
- Expectant mothers
- People with disabilities

Seek to identify and eliminate (or at least control) the risk. Once measures have been put in place always record and later review as they may no longer be effective or relevant. Speak to your employees, don't rely on just paperwork. Engage them regularly as chances are, they will be aware of near misses that you may have not seen.

Always keep and refer to accident and ill-health records as these can help you identify less obvious hazards. Simple things like good housekeeping can go a long way to reducing common injuries such as falls, slips and trips.

And remember you are not expected to eliminate all risks, but you do need to do all that is 'reasonably practicable' to protect people from harm. This means balancing the level of risk against the measures needed to control the real risk in terms of money, time or trouble.

Consider using a consultant or advisor if you feel you cannot write effective RAMS in-house. This can be particularly useful for things like fire assessments whereby a specialist fire management company would assess and compile a report and recommendations. Receiving an independent report can ensure that you have taken the best measures possible to identify and assess the high or more complex risks. However, remember that it is still your legal duty to ensure the risks are controlled, recorded and further reviewed in case of changes to the situation.

### **Risk Assessments and Covid:**

Covid risk assessments will now need to be implemented into all activities your organisation undertakes. This should include but not be limited to:

- The risk of transmission either airborne or on surfaces
- Social (physical) distancing measures in relation to the size and type of building or venue
- The behaviour of the audience/ attendees and measures taken to mitigate the risks (i.e. consumption of alcohol, pinch points at exit/entrances etc.)

### **Consulting the Workforce:**

<https://www.hse.gov.uk/simple-health-safety/consult.htm>

Consulting with the workforce on health and safety is always useful. Allowing employees to actively engage and possibly influence decisions on managing health and safety will always be appreciated. Within NFS all employees have the opportunity to speak to one of the HSEs, and we also include it as part of our overall weekly team meetings. It can be as formal or informal as you decide, some organisations may be small enough to consult each other directly. Ultimately the workforce may not always be happy about H&S restrictions placed upon them, but they are likely to be more understanding about it if they have been consulted beforehand.

### **Provide Information and Training:**

<https://www.hse.gov.uk/simple-health-safety/training/index.htm>

Keeping your teams (however small) up to date with current guidance and legislation is a useful tool in ensuring your staff remain competent. Perhaps you have an experienced individual who has been in circus for a long time and has developed bad habits, or has done something one way since they first began. It might be a perfectly safe way to approach a task but if it is not in line with current guidance can prove problematic in the unfortunate world of liability should an accident occur.

It also allows them to raise concerns about their own competency or experience and whether they are comfortable with the tasks they are undertaking. It may be necessary to provide additional training in order to comply with competency. The upside is that a highly skilled in-house team will always prove

worthwhile in the long run.

There are many affordable training DVDs and online tutorials for basic competency training (manual handling, food handling etc.). However, by law it must be free for employees. Keep training records and regularly evaluate weak areas or when a refresher may be necessary.

It often will come down to the complexity and risk attached to the activity as to the level of training they may require (or whether you need to bring in a specialist or contractor). Bringing in a contractor or specialist does give you some assurance that the work (if particularly complex) can be signed off by a professional. However, be aware that it is still down to the organisation to ensure you have received the relevant paperwork, qualification and/ or proven level of experience from a contractor or self-employed person. You will still have overall responsibility for the work they are undertaking on your behalf.

### Correct Workplace Facilities:

<https://www.hse.gov.uk/simple-health-safety/workplace-facilities/index.htm>

In circus a safe workplace is paramount. Equipment must be well maintained and regularly inspected and serviced:

Lifting equipment will generally fall under LOLER (such as industrial shackles, round slings, SWR etc.) or PUWER (overhead static equipment such as fixed lighting bars, curtain tracks etc.) and must be inspected and tested (if necessary) annually and in some instances every 6 months.

Portable electrical equipment (such as theatre lighting, sound and video etc.) should be inspected and tested based on your risk assessment of the equipment you are using and in what capacity. Given the relatively high-risk nature of the equipment in a performing arts space, it is recommended a PAT test is completed annually. However, this may need to be increased if a show is touring and equipment is being moved to multiple locations as the risk of damage is greater than in a fixed venue. A competent (and ideally PAT test certified) person can do this firstly with a visual inspection (where 90% of faults are discovered), before electronically PAT testing all equipment.

It is good practice to generally do a visual check before using any equipment and the more you can get performers into the habit of doing so the safer your activities will be. If you have ensured they are competent to undertake the activity there is no reason that they cannot form this as part of a checklist which can, in turn, be recorded and evaluated for your records.

### Maintaining Premises:

Premises must be well maintained with adequate welfare facilities for both staff and attendees using the building or event space. Under current guidance you will now be expected to form an enhanced cleaning schedule which should include:

- Frequent cleaning of work areas and equipment between uses, using your usual cleaning products
- Frequent cleaning of objects and surfaces that are touched regularly such as coffee or vending machines or staff handheld devices and making sure there are adequate disposal arrangements for cleaning products
- Extra, frequent deep cleaning of shared spaces such as audition spaces, rehearsal and back stage areas

- Owners keeping instruments and other personal equipment clean, and not sharing these items with others
- Clearing workspaces and removing waste and belongings from the work area at the end of a class, rehearsal or performance

If you are cleaning after a known or suspected case of COVID-19 then you should refer to the specific guidance. Have a considered and well thought out fire and evacuation plan in place (more information can be found in building and spaces).

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings>

### First Aid Arrangements:

<https://www.hse.gov.uk/simple-health-safety/firstaid/index.htm>

By law you must have:

- A suitably stocked first aid kit
- An appointed person or persons to take charge of first-aid arrangements
- Information for all employees regarding first aid arrangements

Assess your first aid needs based on the activity, risks involved, persons involved and any history of accidents in the activity. If you are working onsite you may also want to consider distance to emergency services, work patterns of staff and provisions for non-employees and members of the public.

It can be useful (and is advised by the Purple Guide to Health, Safety and Welfare at Music and Other Events) to create a risk matrix to assess your particular needs and therefore the level of first aid required

If you do require a first aider they must be trained by a competent provider:

- Emergency first aid at work (EFAW) – at this level qualified to give emergency first aid to some one who is injured or becomes ill while at work
- First aid at work (FAW) – at this level qualified to EFAW but can also supply first aid to a range of specific injuries and illnesses

Please note on larger or more complex events involving members of the public there may be a greater need to employ higher trained medical staff (First Responder, paramedic or ambulances onsite). You should refer to:

- Yellow book

<https://www.abtt.org.uk/resources/technical-standards-for-places-of-entertainment/>

- Event safety guide

<https://www.hse.gov.uk/event-safety/publications.htm>

- Purple guide

<https://www.thepurpleguide.co.uk>

As well as any local authorities who may be involved in the event to best discuss your particular event needs. Please note you will now need to consider how your first aid or medical staff are compliant under Covid legislation (the use of PPE etc. when social distancing measures cannot be met). The Welsh Government has published guidance on the use of PPE:

<https://gov.wales/coronavirus-and-personal-protective-equipment-ppe>

This guidance should be followed and will be updated regularly. The Welsh Government has also published guidance on face coverings. This covers how and when you should wear a face-covering to protect those around you:

<https://gov.wales/face-coverings-frequently-asked-questions>

### **Display the H&S Law Poster:**

<https://www.hse.gov.uk/simple-health-safety/display.htm>

If you employ anyone you must either display the H&S law poster in an easily recognisable place where employees can read it or provide each worker with the equivalent leaflet. It is advisable to provide visual reminders of the importance of regular hand washing, with basic signage:

<https://gov.wales/safety-and-physical-distancing-signs-employers-coronavirus>

### **Reporting Accidents and Illness:**

<https://www.hse.gov.uk/simple-health-safety/reporting-accidents-ill-health.htm>

By law, you must report certain workplace injuries, near misses and cases of work-related disease to HSE. Known as RIDDOR this can be done either online or by telephone.

<https://www.hse.gov.uk/riddor/report.htm>

A RIDDOR report is required only when the accident is work-related or results in an injury of a type which is reportable.

Types of reportable incidences include:

- Death
- Fractures
- Occupational diseases
- Dangerous occurrences
- Gas incidents

The full list can be found here:

<https://www.hse.gov.uk/riddor/reportable-incidents.htm>

It is important that your organisation demonstrates knowledge and understanding of Test, Trace and Protect, and that you are taking all reasonable measures to minimise the risk of exposure to coronavirus

in workplaces and premises open to the public.

<https://gov.wales/test-trace-protect-coronavirus>

<https://gov.wales/taking-all-reasonable-measures-minimise-risk-exposure-coronavirus-workplaces-and-premises-open>

### References:

- Employers' responsibilities

<https://www.legislation.gov.uk/ukpga/1974/37/contents>

- Managing those involved in the performing arts

<https://www.legislation.gov.uk/ukpga/1974/37/contents>

- Steps needed to manage risk

<https://www.hse.gov.uk/simple-health-safety/risk/steps-needed-to-manage-risk.htm>

# Chapter Three.

## Buildings & Spaces

All premises/sites whether temporary, existing or new should be designed, constructed, maintained and managed to ensure the health and safety and welfare of the occupants, visitors and all people that use them. Where applicable the premises/site should be designed and managed to conserve energy.

In today's current climate infection prevention measures are necessary in order to allow buildings to reopen, and additional measures are now expected to be in place to demonstrate this.

Knowing the event and its audience is an important factor in a successful building/ site design. This means considering:

- The proposed size of audience and workforce
- Knowledge of the audience type/profile
- Knowledge of the proposed event activities and whether they are indoors or outdoors
- Whether the audience will be standing, seated or a mixture of both
- Site access and infrastructure
- Emergency plans

- Duration and time of year that the event will take place
- Ventilation

### **The Law:**

The Licensing Act 2003 is an Act of Parliament which establishes a single integrated scheme for licencing premises in England and Wales (only) which are used for the sale or supply of alcohol, to provide regulated entertainment, or to provide late night refreshment.

<http://www.legislation.gov.uk/ukpga/2003/17/contents>

The basic standards of construction for new premises are contained in the Building Act 1984 and the Building Regulations

<http://www.legislation.gov.uk/ukpga/1984/55>

### **Guidance:**

Further guidance can be found in Technical Standards for Places of Entertainment designed specifically to help licencees, technical managers and enforcers to understand the requirements and needs of places of entertainment.

<https://www.abtt.org.uk/resources/technical-standards-for-places-of-entertainment/>

Further detailed guidance on venue capacity calculation, exit widths and numbers, seating and gangways can also be found in

The Guide to Safety at Sports Grounds (Green Guide):

<https://sgsa.org.uk/greenguide-availablenow/>

### **Assessing Venue/Site suitability:**

Once you have a clear understanding of the event or the use of the building, it is worth assessing the space to determine its suitability.

Seek any advice from the landowner, local authority or venue management team particularly if you intend to do structural works.

### **Venue/Site Capacity:**

The capacity of a venue or site depends on the available space for people. Limiting factors will be:

- Emergency exits
- Audience circulation capacity of the venue/ site

If your event is ticketed or limited by seating, then you will have a clear plan of maximum numbers of people present. Currently, this will need to be in line with social distancing guidelines (2 meters):

<https://gov.wales/coronavirus-social-distancing-guidance>

- Ensure that the size of audience, the arrangements and performances staged are consistent with ensuring safe distancing – risk assessments should specifically consider the maximum capacity for a given performance when the reasonable measures to minimise the risk of exposure to the virus and physical distancing requirements are factored in and the ability to manage audience behaviour

<https://gov.wales/taking-all-reasonable-measures-minimise-risk-exposure-coronavirus-workplaces-and-premises-open>

- Reduce premises or venue capacity and limiting ticket sales to a volume which ensures 2m physical distancing can be maintained at all times

If occupant numbers are unknown, then the simple calculation method can be used, however it currently cannot exceed current social distancing capacity:

- Free, open, un ticketed and unfenced performances or events will need to demonstrate a reasonable approach to controlling numbers if too many people begin to arrive, and show that appropriate social distancing measures are in place
- The width and capacity of the exit routes to allow people to escape safely

The number of persons who can safely reside on the premises. Using the floor space factor will assist in working this out:

$$\text{Number of people} = \text{Floor area (m}^2\text{)} / \text{Occupant density}$$

### Floor Space Factor:

Occupied Area Type	Typical Occupant Density m <sup>2</sup> /person
Standing spectator/audience area or bar area	0.3
Assembly area, public house, dance floor or hall	0.5
Dining area or restaurant	1.0
Sports area	2.0
Shop sales area	2.0
Display, production or workshop area	5.0
Office	6.0
Shop (bulky goods) sales area	7.0

**N.B.** Seating should be arranged to allow free and ready access directly to the exits. In fixed seating, there should be a clear space of at least 305mm between rows. Gangways should be adequate for the number of seats served (see previous escape route capacity) and at least 1,050 mm wide. In general, no seat should be more than seven seats away from a gangway. If temporary seating is provided these should be secured in lengths of not fewer than four seats and not more than twelve.

**N.B.** Each auditorium or performance premises or venue should be managed to ensure the maintenance of social distancing

## Seating Principles:

Key principles to follow for seating include:

- Audiences should be seated as individuals or groups from the same household or extended household  
<https://gov.wales/visiting-people-private-homes#section-55023>
- These individuals and groups should maintain 2m social distancing between each other
- Common areas will need to be supervised to ensure social distancing is being maintained
- Seating and space for those requiring disabled seating or wheelchair space should be considered within the social distancing arrangements with due regard to accessibility responsibilities under the Equality Act 2010

Additional steps that will usually be needed include:

- Providing seating in a way which ensures social distancing between individuals or groups from the same household or extended household can be maintained. Consider measures such as:
  - providing allocated seating and managing seating plans through ticketing systems or manually to ensure 2m social distancing is maintained between different groups and individuals
  - if unallocated seating is provided, installing seat separation or labelling seats which should not be used, or deploying staff to support the audience in adhering to socially distanced seating
- It is expected that guests will take responsibility for their own and others' welfare and abide by social distancing in the auditorium. Staff should nevertheless be deployed to ensure that these measures are being observed. (This may include signage and announcements, increased checks and supervision, in particular before and at the end of each performance)
- Encouraging audience members not to bring bags and coats into auditoria where possible to reduce clutter at seats
- Allowing for longer intervals so that audience members can safely use toilets
- Reminding guests who are accompanied by children that they are responsible for supervising them at all times and should follow social distancing guidelines
- Having designated positions from which premises or venue staff can provide advice or assistance to guests whilst maintaining social distance

- Cleaning auditoria very frequently and scheduling performances to allow sufficient time to undertake necessary decontamination before the next audience arrives
- Setting clear use and cleaning guidance for welfare facilities to:
  - ensure they are kept clean and social distancing is achieved as much as possible; for example, by reducing the number of urinals, cubicles, washbasins and hand dryers available
  - consider the likely patterns of use during a performance, for example during intervals, and modifying entry and exit times to reduce the likelihood of these areas becoming pinch points
  - encourage guests and audience to take responsibility for their own and others' welfare

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-health-care-setting>

## Means of Escape:

As escape routes should be adequate for the number of people likely to use them, you need to consider the largest number of people, including staff, public and outside contractors that may be present at any one time.

Once you have calculated the occupancy for the size of the premises you must check that this is below the maximum numbers the escape routes can accommodate. Reasonable escape times are 2 1/2 minutes for normal risk premises. Most places of assembly fall into this normal risk category. The following can be used to determine the general capacities of escape routes within this time:

A clear width of at least 750mm can accommodate up to 100 people at normal risk premises.

In most places of assembly, the minimum width of an escape route should ideally be 1050mm but in any case, not less than 750mm (unless it is for use by less than five people in a separate part of your premises). A width of at least 1050mm can accommodate up to 200 people at normal risk premises. Thereafter an additional 75mm is required for each additional 15 persons (or part of 15).

**N.B.** Where wheelchair users are present then the minimum width should not be less than 900mm.

As a general rule, stairways should be at least 1050mm wide and their capacity should be sufficient to accommodate the number of people on the floors using them. For existing premises, the width and number of staircases may limit the safe numbers on upper floors regardless of the calculations for available floor space and exit width for that floor, all exit routes are governed by their narrowest part.

When calculating the overall available escape route capacity for premises that have more than one way out you should assume that the widest exit is not available, because it has been compromised by fire. The maximum occupancy should then be limited to that accommodated by the aggregate width of the remaining escape routes. The exit capacity must be greater than or the same as the number of occupants.

<https://www.gov.uk/workplace-fire-safety-your-responsibilities>

## Key considerations:

To maintain social distancing when people move around the premises or venue during performances, the following steps will usually be needed.

- Limiting the number of entrances and exits and managing these to prevent crowding of people
- Adapting performance scheduling to support social distancing and appropriate cleaning regimes. For example, scheduling sufficient time between performances to reduce the possibility of different audiences coming into close proximity and to allow time for cleaning

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-health-care-settings>

- Using space outside the premises or venue for queuing where available and safe to do so. Outside queues should be managed to make sure they do not cause a risk to individuals, other businesses or create additional security risks, for example by introducing physically distanced queuing systems, having staff direct visitors or audience, and protecting queues from traffic by routing them behind permanent physical structures such as street furniture, bike racks, bollards or by putting up barriers.
- Working with your local authority or landlord to take into account the impact of your processes, for example, queues on public spaces such as high streets and public car parks.

## Queuing:

- Reducing instances where people might be required to queue. For example, at:
  - entrances and exits to the building
  - escalators, stairs and lifts
  - ticket and concessions kiosks and ticket validation points
  - entrances and exits to auditoria
  - toilets and washrooms.
- Where possible, designating staff to manage queues and regulate guest access between areas
- Ensuring that you have agreed on appropriate evacuation procedures and muster points in the event of an emergency
- Encouraging visitors to use hand sanitiser or handwashing facilities as they enter the premises or venue
- Using queue management and marking out one-way flow systems through the premises or venue to reduce contact points. For example, introduce one-way systems through the common areas, so that guests are not required to pass each other when entering and exiting these spaces
- Helping visitors maintain social distancing by placing visible markers along the floor or walls, advising on appropriate 2m spacing

## Entering and Exiting the Premises:

- Ensuring any changes to an entry, exit and queue management take into account reasonable adjustments for those who need them, including disabled visitors. For example, maintaining pedestrian and parking access for disabled customers
- Considering the particular needs of those with protected characteristics, such as those who are hearing or visually impaired
- Extra marshalling may be needed at key pinch points and care should be taken to remove barriers at exits that might cause crowding. This should be considered part of the crowd management plan, in consultation with those responsible for managing security and marshalling
- Management of crowd density points, such as where people stop to watch displays, must be considered as part of this planning to ensure social distancing can be maintained
- Limiting the potential for guest contact with performers and support staff by, for example:
  - using theatre security to keep stage door areas clear before and after a performance to allow performers and other workers to enter and exit safely
  - not permitting visitors backstage
  - not permitting autograph signing or photographs with performers

## Existing Structures and features:

Find out if existing structures and features pose a hazard, e.g. restricted height access for vehicles/lifting equipment/operations. Make sure any roads, bridges etc. are structurally sound and able to withstand the additional load of heavy vehicles and the number of people attending your event.

If your event is in the street, street lighting and other street furniture could affect your plans. Do railings, bus stops or other structures create additional hazards such as pinch points that present risks to the audience? If so, can they be temporarily removed?

## Ground Conditions and site topography:

Ground conditions and site topography will help you to decide where to position any temporary demountable structures required like stages and seating, plus the size and position of any signage.

Find out what the load-bearing capacity of the floor/ground is for any intended structure and what the ground conditions are likely to be at any structural anchoring points. It is worth getting a qualified engineer to calculate and sign off on this however please note this will need to be adapted should you change or amend the original intended use.

Find out how the site copes with extreme weather like flooding, as this may affect your site design and even the time of year you hold the event.

Don't create pinch points where channelling the public could lead to dangerous overcrowding during emergencies – extra space may be required around structures.

Find the prevailing wind direction is, what impact a windy spot may have on your ability to erect structures safely and whether you can design the site using the topography to reduce wind loading on them.

## Access

The premises or site should have a sufficient frontage to a road or to an open space having sufficient access to a road to enable the rapid dispersal of people from the premises in an emergency.

Adequate arrangements should be provided for access for the fire brigade for firefighting.

On larger sites consider safe access for vehicles and pedestrians onto and around the site. This includes onsite parking, camping and caravanning facilities, plus holding areas for plant and equipment and trade vehicles.

## Infrastructure and local amenities:

Assess the site's proximity to a hospital, fire station, public transport links, parking, major roads, local services and facilities. This information will influence the type and scale of any additional provisions and services you may need to provide.

If you need to bury temporary services or drive stakes into the ground to support structures like marquees and tents, consider the hazards from underground services.

## Fire Controls:

Ensure you have a clear fire safety risk assessment and evacuation plan. Details of any fire control measures incorporated in the premises should be provided for the fire service:

The premises should be adequately protected against the effects of a fire occurring within the building or in an adjacent building.

Adequate provision should be made to control the spread of smoke through the premises in the event of a fire.

All parts of the premises should be provided with adequate illumination. All routes of escape and parts of the premises to which the public have access should be provided with adequate and assured illumination from two independent supplies and systems.

Adequate firefighting equipment should be provided for the premises. Adequate safety signs should be provided throughout the premises.

An alarm warning system and efficient means of communication in case of emergency should be provided throughout the premises.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/14899/fsra-5-step-checklist.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/14899/fsra-5-step-checklist.pdf)

## Electrical Installation:

Electrical installations should have a valid electrical installation condition report in accordance with BS7671 and be periodically inspected. Guidance suggests that systems used for entertainment and performance have a regular testing programme.

The electrical installation should be mechanically and electrically safe and suitable for the intended use of the premises.

Best practice within the entertainment industry advises that a periodic inspection should be approximately every 12 months. Licensing authorities, education authorities and insurance companies often stipulate how often they want a new periodic inspection certificate; this period is commonly 12 months.

Any mechanical installation should be arranged to minimise any risk to the public, performers and staff.

Any special effects should be arranged to minimise any risk to the safety of the public, performers and staff.

## Sound and Lighting:

To reduce transmission and maintain social distancing where possible whilst managing sound and lighting, the following are examples of the steps that could be taken, to include:

- Using sound and lighting control rooms where provided, behind glass and monitored through speakers (in the case of sound). Access to the room should be limited to those needing to use it and any people in the control room should maintain 2m social distancing according to the capacity of the room
- Creating a screen (e.g. an acoustically transparent gauze screen) around sound and lighting desks to create a barrier between the sound team and audience or other crew
- Where the sound desk is positioned close to audience seating, consider leaving empty the closest row of seats
- Regularly cleaning desks, for example, sound, lighting, mics and battery packs
- Allowing additional time for cleaning during 'get-in' and 'get-out'

## Other Equipment:

To reduce transmission through contact with all equipment the following steps will usually be needed:

- Encouraging increased handwashing and introducing more handwashing facilities for workers or providing hand sanitiser where this is not practical
- Avoiding sharing personal items such as phones, chargers, pens, and owners take responsibility for regularly disinfecting their personal equipment
- Avoiding sharing professional equipment wherever possible and place name labels on equipment to help identify the designated user
- Making available extra radios and headsets or earpieces, dedicating a member of each team to be responsible for them for the duration of the production, and making sure these are appropriately cleaned if not single-use
- If equipment has to be shared, regularly disinfecting it (including any packing cases, handles, props, chairs etc.)
- Consider limiting the number of suppliers when hiring equipment. Responsibility of cleaning hired kit should be discussed with the suppliers

- Cleaning hire equipment, tools or other equipment on arrival and before first use. If receiving deliveries in advance of when required, store in a clean location and clean before first use
- Creating picking-up and dropping-off collection points where possible, rather than passing equipment such as props, and mics hand-to-hand and cleaning before and after drop off
- Not permitting other attendees touch equipment, props, instruments, set or other objects used by performers
- Taking precautions when handling heavy equipment, including:
  - re-evaluating spaces to avoid people working in close proximity (e.g. using more trucks for transport of goods)
  - increasing the use of mechanical handling equipment (such as forklifts) to reduce large numbers of workers working in close proximity (e.g. lifting heavy cases and scenery)
  - using a consistent pairing system if people have to work in close proximity, for example, during two-person working, lifting or maintenance activities that cannot be redesigned
  - reducing job and equipment rotation
  - cleaning procedures for the parts of shared equipment you touch after each use, thinking about equipment, tools and vehicles

### **Welfare Facilities:**

Adequate ventilation should be provided to all parts of the premises to maintain healthy conditions.

Good ventilation can help reduce the risk of spreading Coronavirus, so it will be important to focus on improving general ventilation, preferably through fresh air or mechanical systems.

Where possible, you can consider ways of maintaining and increasing the supply of fresh air, for example, by opening windows and doors (unless fire doors).

Advice on safely re-occupying buildings is available from the Chartered Institute of Building Services Engineers (CIBSE):

<https://www.cibse.org/coronavirus-covid-19/emerging-from-lockdown>

Permanent means of heating all regularly occupied parts of the premises should be provided and should be arranged so as not to cause any safety or fire hazard.

The premises should be provided with a permanent water supply and adequate drainage.

Adequate and free sanitary accommodation should be provided taking into account the type of entertainment to be given at the premises.

## Hygiene:

To help everyone keep good handwashing and respiratory hygiene at all times the following steps will usually be needed:

- Using signs and notices to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available

<https://gov.wales/safety-and-physical-distancing-signs-employers-coronavirus>

- Providing hand sanitiser in multiple accessible locations in addition to washrooms. Consideration should be given to wheelchair users when deciding where these should be placed
- Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved as much as possible
- Enhancing cleaning for busy areas
- Providing more waste facilities and more frequent rubbish collection
- Providing hand drying facilities – either paper towels or electrical dryers

## Cloakrooms:

Adequate cloakrooms for patrons together with adequate changing facilities for staff, including performers should be provided, having regard to the operation of the premises

Performance venues and premises and events will need to review how they operate cloakrooms, in particular:

- Closing cloakrooms where necessary given the challenges in operating them safely
- Cleaning them very frequently
- Considering using no contact procedures where applicable, such as lockers. However, lockers will need to be cleaned thoroughly after each use

## Drinking Water:

An adequate supply of free drinking water should be provided for all staff including performers, together with free drinking water for patrons where the type of entertainment to be given at the premises makes this desirable for the health and welfare of patrons.

It is important that prior to reopening all the usual checks are undertaken to make sure the building is safe. If buildings have been closed or had reduced occupancy during the COVID-19 outbreak, water system stagnation can occur due to lack of use, increasing the risks of Legionnaires' disease.

Drinking Water Inspectorate's guidance on bringing buildings back into use after a period of disuse may be helpful. The guidance covers a range of quality issues that should be considered and is available on the DWI's general web page.

Adequate provision should be made for the safe storage and ready removal of refuse.

All facilities intended for use by the public should be clearly indicated.

### Plan of Action:

Understanding exactly what you intend to do and for whom is the crucial starting point for everything else that will follow. With this in mind you can begin to create the site design and the provisions needed to deliver it safely. This would include:

If your event is ticketed or limited by seating, then you will have a clear plan of maximum numbers of people present. If your event is un-ticketed and you are unsure about occupant numbers, then the method below can be used (based on the lesser of the two following calculations):

Please note in the current crisis the size of the audience will need to be consistent with the social distance guidelines determined by the government (see chapter on Covid compliancy)

### Type of event:

Regardless of the size of the event there is a likely possibility that it will have a number of risks and hazards that need to be considered in relation to the site you will choose. For example, will you be using large sets or staging? Will there be flying performers involved? You will need to carry out a number of preliminary assessments in order to first determine the suitability of any site you choose:

- What do you intend to do on your chosen site?
- Is the site fit for purpose? What are the cost implications to make it suitable?

### Planning:

- Consider what the structure will be used for, what it needs to be able to do, who will use it and how?
- Prepare a clear specification for the structure's required use. This should include the technical details required to enable a design to be undertaken by your appointed contractor / designer
- Contractors / designers hired to design, supply, build, manage and take down a structure for you, should be competent and adequately resourced.
- Provide contractors / designers with relevant site information and/or allow them site access to carry out their own site assessments.
- Your contractor should ensure that the proposed structure has a design prepared by a competent person, which takes account of the use and conditions in which it is to be installed.
- Novel or unusual structures may require additional testing by a designer to demonstrate the integrity of the design.
- Whoever builds the structure should undertake an assessment of the likely construction hazards and risks. To help with an assessment and to find out more about construction hazards and risks see:

- Falls from Height

<https://www.hse.gov.uk/event-safety/falls-from-height.htm>

- Construction safety topics (including lifting operations and vehicle safety)

<https://www.hse.gov.uk/construction/safetytopics/index.htm>

- Health risks in construction

<https://www.hse.gov.uk/construction/healthrisks/index.htm>

- Plan and work with your contractors to develop safe systems of working and make sure all significant risks on the site are properly controlled, e.g., use of cranes and lift trucks. lift trucks.
- Plan to minimise confusion and conflict, particularly between those contractors carrying out concurrent or consecutive activities on the same structure.
- Consider the extent of control that you and your contractors have over the work activity and workplace during each phase of the build, use and deconstruction cycle of a structure. Organisers and contractors should agree the extent of their control at the planning stage, so that responsibility for structural safety is understood and maintained throughout the event.

### Building and dismantling:

- The assessments done under Planning (above) should serve as a guide on how to build and dismantle the structure safely.
- Make sure there is sufficient time and resources available to build and dismantle the structure safely.
- Use competent staff and have a suitable onsite operational management system in place to supervise and monitor safety compliance.
- A programme of works, including key safety checkpoints, can be helpful to communicate critical erection / dismantling stages to the site manager / crew bosses and operatives.
- Build the structure to the agreed design in accordance with a safe system of work.
- Arrange for the structure to be checked to make sure that it has been built according to the design.

### While it is in use:

- Have arrangements in place to inspect the structure for deterioration during the time it is installed in line with a documented management plan and, if needed, arrange for remedial works.
- Have arrangements in place to ensure that any measures required to keep the structure safe during use are implemented. For example, if the structure is susceptible to the weather, monitor and measure the local weather conditions. In adverse weather conditions, know what to do with the structure to protect its stability, e.g., when to evacuate.

<https://www.hse.gov.uk/event-safety/temporary-demountable-structures.htm>

**For outside events also consider the following:**

- Layout (performance areas, traders, public areas, access routes etc)
- Power requirements
- Details of and access to any mains (utility) power supply
- Location of any existing overhead power lines or buried cables
- Environmental conditions
- Electrical environment as defined in BS 7909
- Emergency power requirements
- Timetable of power requirements
- Use of generators
- Earthing
- Routing of temporary overhead or underground cables
- Mains isolators controlling the electrical supplies to the stage lighting, sound, special effects, emergency lighting and lifting equipment
- Special power supplies for some equipment, eg non-UK equipment, hoists, portable tools etc
- Electrical requirements for emergency lighting and exit signs
- Power supplies for catering equipment, first-aid points, incident control room, CCTV cameras etc
- Power supplies for heating or air conditioning
- Control and restriction of access to electrical installations by unauthorised people
- Use and/or integration of renewable power sources such as solar cells or wind power and associated equipment such as inverters
- Use of battery charged equipment (e.g., radio communication equipment for event staff)

<https://www.hse.gov.uk/event-safety/electrical-safety.htm>

**References:**

- Venue and site design  
<https://www.legislation.gov.uk/ukpga/1974/37/contents>
- Calculating occupancy in places of assembly  
<https://www.legislation.gov.uk/ukpga/1974/37/contents>

- Temporary demountable structures (TDS) – stages, seating, marquees etc  
<https://www.hse.gov.uk/event-safety/temporary-demountable-structures.htm>
- Electrical safety  
<https://www.hse.gov.uk/event-safety/electrical-safety.htm>
- Ground conditions and site topography  
<https://www.hse.gov.uk/event-safety/venue-site-design.htm#suitability>
- Technical Standards for Places of Entertainment  
Technical Standards 2015 A2 Technical Conditions C ABBT+CIEH+DSA+IOL+TT

# Chapter Four.

## Putting Pen to Paper

As an employer or a self-employed person, you are responsible for health and safety in your business. You can delegate the task to someone competent but ultimately you are responsible.

If your business has fewer than five employees you do not need to formally record your assessment of the health and safety risks that may arise out of their work. However you should still be aware (as should the employee) of the risks and the controlled measures you have put in place to eliminate or control them. In our experience regardless of the number of employees, it is always advisable to make an official note of the risks and record your assessments.

### Health and Safety Policy:

Policies document how you manage health and safety, clearly stating who does what, how and when.

<https://www.hse.gov.uk/simple-health-safety/policy/index.htm>

### Risk Assessments:

Risk assessments shouldn't be about creating never-ending paperwork. They should be clear and simple, identifying and focussing on suitable control measures to manage risks in your organisation.

<https://www.hse.gov.uk/risk/controlling-risks.htm>

What is the difference between a Risk Assessment and a Method Statement? A risk assessment is an examination of what, in your work, could cause harm to people, so that you can weigh up whether you have enough precautions or whether you should do more.

A safety method statement isn't required by law. It describes exactly how a job is to be carried out in a safe manner and without health risks. It includes all the risks identified in the risk assessment and the measures needed to control those risks. This allows the job to be properly planned and resourced.

### **Fire Risk Assessment:**

Under the Regulatory Reform (Fire Safety) Order 2005 it is a legal requirement for a fire risk assessment to be carried out in almost all premises where people could be working.

It must identify what might cause a fire, who might suffer harm and what is needed to control the risk.

This can be written by your appointed 'responsible person' or can be done using specialist consultants.

<https://www.gov.uk/workplace-fire-safety-your-responsibilities/fire-risk-assessments>

### **Covid Risk Assessment:**

Before resuming activity, comprehensive risk assessments must be in place specific to the activity and risks associated with it. This could be in relation to a community project, a circus class or a large-scale production. Regardless of the activity, it is important that you can demonstrate that you have considered:

- Social (physical) distancing
- Cleaning regimes
- Infection prevention in studios and rehearsal rooms
- Handwashing and respiratory hygiene

### **Accident/Incident Reports:**

Under health and safety law you must keep a record of accidents, incidents and work-related disease. In addition, certain ones need to be reported to the HSE under RIDDOR.

These records will help in identifying patterns of accidents or incidents within your organisation. Insurance companies may require these records in the event of a work-related claim.

<https://www.hse.gov.uk/toolbox/managing/reporting.htm>

### **Health and Safety Law Poster:**

If you employ anyone you must either display the poster or provide each employee with a copy.

<https://www.hse.gov.uk/pubns/books/lawposter.htm>

# Chapter Five.

## COVID Compliancy

Arts organisations throughout the world are feeling the effect of the Coronavirus and the implications it has for their companies. No one knows what shows will look like in a post COVID-19 world.

With government guidelines changing all the time, the threat of second/ third/ fourth waves etc. it's tricky to see how we will ever go back to how we previously ran a circus. Even now as we have had some clarity in England, we still anxiously await the decisions from the Welsh government regarding the restrictions for both audiences and performers, and whether they will differ.. And even then, the audience will be at reduced capacity for the foreseeable future to comply with distancing regulations.

There are some excellent articles and information from various industry sites that give up to date advice and guidance (see below). However it is always worth monitoring government websites yourselves as things can change so quickly. It is also important to recognise that what is allowed in England is not necessarily so in Wales so always best to review both sites for guidance and critically legislation.

Crucially organisations need to be adaptable to the ever-changing guidelines. Fortunately, as an industry that is something, we are adept at doing!

We are all aware of the key measures that should be implemented however this often isn't practical to our industry and so we need to look at how best we can adapt the guidance to make it work for both the organisation and its audience. It is after all vitally important that you gain employee and attendee confidence in that you are managing the safety of themselves and others:

## Hygiene Standards:

All venues/ buildings are expected to have a high level of hygiene standards in place, and it must be taken very seriously if we are to allow the industry to move forward. Organisers will need to ensure the activities can be performed safely and hygienically. Enhanced cleaning schedules, additional staff and closing of common spaces are all examples of how companies are restructuring their organisations.

Detailed guidance can be found on the gov.wales website however as a rule of thumb some of these measures below should be seen as good working practice:

- Ensure additional cleaning of hard and regularly touched surfaces, (for example hand rails, door handles)
- You need to be prepared with the appropriate PPE supplies and staffing for multiple cleanings per day of common spaces
- Cleaning supplies and hand sanitizer must be sufficient to maintain a safe working environment with cleanings multiple times a day
- Using signs and posters to build awareness of good handwashing technique, the need to increase handwashing frequency, avoid touching your face and to cough or sneeze into a tissue which is binned safely, or into your arm if a tissue is not available
- Providing hand sanitiser in multiple accessible locations in addition to washrooms. Consideration should be given to wheelchair users when deciding where these should be placed
- Setting clear use and cleaning guidance for toilets to ensure they are kept clean and social distancing is achieved as much as possible
- Enhancing cleaning for busy areas
- Providing more waste facilities and more frequent rubbish collection
- Providing hand drying facilities – either paper towels or electrical dryers

## Infection Prevention in Studios and Rehearsal Rooms:

- All physical therapy equipment must be disinfected between uses. Performers should not congregate in physical therapy spaces and gyms
- Adequate time should be allotted for a full cleaning of multiple-use areas
- High-touch areas need to be specifically cleaned thoroughly and regularly such as barres, elevator buttons, door handles, copy and fax machines, stair railings, and bathrooms/dressing room areas

Remember as always to include these in a risk assessment so you have clear records of your intentions and that these are being met.

## Social Distancing:

Staff and attendees alike will want to be sure that all performances/ activities have been fully considered to ensure that they are safe. Some people will care more about this than others, but it is likely going to be a major factor in whether people will come back again or not!

Both the nature of the event and the design of the space must be taken into consideration to ensure effective delivery of social distancing can be met. This will include measures in people flow (including staff as well as attendees) and their behaviour. As per gov.wales guidance:

- Social distancing (2 metres) should be maintained as far as it is practical – plan your programme of activity with the current guidelines in mind
- If your activity requires close physical contact (for example dance), ensure mitigating measures are in place, such as PPE. Where PPE or other measures cannot be used, the performance should be adapted to avoid close contact or work with participants divided into discrete clusters
- Use the stairs, wherever practical, and avoid the lifts. If you must use a lift, agree on the occupancy limit, and explain this with appropriate signs
- Institute a one-way system to maintain social distancing when moving around the building or rehearsal space
- Ensure that clear signage and floor markings are placed in high traffic areas
- Make sure that the needs of disabled people are properly provided for

## Using Space:

The potential for person traffic jams around toilets or common areas is often high so consider a system such as one in one out for toilets or simply closing common areas altogether.

One-way systems are effective in controlling people flow with suitable and clear signage. Floor markings are a useful and clear instruction of managing high traffic areas, but you are responsible for ensuring attendees are observing and following them! Barrier systems can more easily mark areas to help people maintain social distance regulations though this is generally used if you have a greater flow of persons where floor markings etc. may not be easily observed.

Consider how congestion points like registration desks can be managed such as self-service that minimise queues and contact between people. Companies have begun implementing various measures to combat congestion areas such as pre-booked/ prepaid sessions where attendees can be invited at allocated times etc.

As mentioned, there are circumstances where maintaining a 2m physical distance between individuals during training, rehearsals or performance may not always be possible and so several different strategies can be considered. These could include:

- Minimising time where individuals cannot maintain 2m distancing. This could include reducing cast/group/class sizes in accordance with room capacity
- Where it is essential for performers in training to breach social distancing, mitigating factors such as PPE are required, ensuring that they are in breach of social distancing for the minimum possible time

- The use of fixed teams or 'discrete clusters' of performers where PPE cannot be used

It will often be open to interpretation what is considered essential close contact in performance and, should you decide that it is, make sure you are absolutely confident you can justify your decision. Your supporting documents (risk assessments/ method statements) will be your proof of mitigation so please make sure they are up to date in line with government guidance.

### Reduced Capacity:

Currently, attendance numbers will look to be greatly reduced regardless of any other mitigating measures you will have put in place. The overall amount of people will ultimately depend on the size of your space. Both the physical distance regulations and maximum numbers of people legally allowed to meet need to be followed in accordance with current legislation. As the Welsh Government currently states:

- Ensure that the size of audience, the arrangements and performances staged are consistent with ensuring safe distancing – risk assessments should specifically consider the maximum capacity for a given performance when the reasonable measures to minimise the risk of exposure to the virus and physical distancing requirements are factored in and the ability to manage audience behaviour
- Reduce premises or venue capacity and limiting ticket sales to a volume which ensures 2m physical distancing can be maintained at all times. Free, open, un ticketed and unfenced performances or events will need to demonstrate a reasonable approach to controlling numbers if too many people begin to arrive and that appropriate social distancing measures are in place
- Manage performance scheduling so that audiences for different performances are not using the premises or venue at the same time in a way that compromises adherence to social distancing, and to allow for adequate cleaning
- Make sure risk assessments carefully consider worker safety, especially of those working closely with a large number of members of the public or audience
- Manage the risk of alcohol impairing social distancing measures through, where needed, controls on the purchase or consumption of alcohol
- Consider where crowding could take place such as at points of ingress and egress, car parking, handwashing and toilet facilities, waiting areas, bars and restaurants and areas in proximity to the performance area and take appropriate measures to manage the physical distancing and movement of people
- Consult with relevant authorities and specialist advice to best evaluate impact, develop mitigating strategies and coordinate relevant external agencies if required

### Contactless Transactions:

Not a uniquely new technology but the need for contactless transactions has been greatly accelerated as a result of the pandemic. Several areas where cash is exchanged should be reviewed as to whether it can be exclusively contactless such as ticketing and payments and catering and refreshments:

- Where possible attendees should purchase tickets online and use e-ticketing
- If there is a need for on the door ticket sales, ensure contactless payment is available

- Payment points/ equipment should form part of your enhanced cleaning regime
- Maintain social distancing when checking tickets. The use of screens to create a physical barrier should be considered at box office and concession points
- Consider online ordering and 'seat service' at intervals to reduce pinchpoints at bars and concession stands. Consider merchandise for sale movement online only
- Manage entrance and exit points where congestion can occur

**Social distancing should continue amongst staff during performances to reduce transmission.**

- using sound and lighting control rooms where provided, behind glass and monitored through speakers (in the case of sound). Access to the room should be limited to those needing to use it and any people in the control room should maintain 2m social distancing according to the capacity of the room
- creating a screen (e.g. an acoustically transparent gauze screen) around sound and lighting desks to create a barrier between the sound team and audience or other crew
- where the sound desk is positioned close to audience seating, consider leaving empty the closest row of seats
- regularly cleaning desks, for example, sound, lighting, mics and battery packs
- allowing additional time for cleaning during 'get-in' and 'get-out'

<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>

**There will be a number of challenges to face when attempting to reduce transmission through props and equipment and the following measures should be considered:**

- encouraging increased handwashing and introducing more handwashing facilities for workers or providing hand sanitiser where this is not practical.
- avoiding sharing personal items such as phones, chargers, pens, and owners take responsibility for regularly disinfecting their own personal equipment.
- avoiding sharing professional equipment wherever possible and place name labels on equipment to help identify the designated user.
- making available extra radios and headsets or earpieces, dedicating a member of each team to be responsible for them for the duration of the production, and making sure these are appropriately cleaned if not single use.
- if equipment has to be shared, regularly disinfecting it (including any packing cases, handles, props, chairs etc)
- consider limiting number of suppliers when hiring equipment. Responsibility of cleaning hired kit should be discussed with the suppliers.
- cleaning hire equipment, tools or other equipment on arrival and before first use. If receiving deliveries in advance of when required, store in a clean location and clean before first use.

- creating picking-up and dropping-off collection points where possible, rather than passing equipment such as props, and mics hand-to-hand and cleaning before and after drop off.
- not permitting other attendees touch equipment, props, instruments, set or other objects used by performers.
- taking precautions when handling heavy equipment, including:
  - re-evaluating spaces to avoid people working in close proximity (e.g. using more trucks for transport of goods);
  - increasing the use of mechanical handling equipment (such as forklifts) to reduce large numbers of workers working in close proximity (e.g. lifting heavy cases and scenery);
  - using a consistent pairing system if people have to work in close proximity, for example, during two-person working, lifting or maintenance activities that cannot be redesigned;
  - reducing job and equipment rotation;
  - cleaning procedures for the parts of shared equipment you touch after each use, thinking about equipment, tools and vehicles.

<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>

Within your venue seating will need to be carefully thought out to ensure the maintenance of social distancing. This should include arriving to and departing as well as during performances should audience move around

### **Key principles to follow for seating include:**

- audiences should be seated as individuals or groups from the same household or extended household;
- these individuals and groups should maintain 2m social distancing between each other;
- common areas will need to be supervised to ensure social distancing is being maintained
- seating and space for those requiring disabled seating or wheelchair space should be considered within the social distancing arrangements with due regard to accessibility responsibilities under the Equality Act 2010.

### **Additional steps that will usually be needed include:**

- Providing seating in a way which ensures social distancing between individuals, whilst allowing groups from the same household or extended households to be maintained. Consider measures such as:
  - providing allocated seating and managing seating plans through ticketing systems or manually to ensure 2m social distancing is maintained between different groups and individuals;
  - if seating is unallocated, installing seat separation or labelling seats that shouldn't be used, or deploying staff to support the audience in adhering to social distancing;

- it is expected that guests will take responsibility for their own and others' welfare and abide by social distancing in the auditorium. Staff should nevertheless be deployed to ensure that these measures are being observed. (This may include signage and announcements, increased checks and supervision, in particular before and at the end of each performance);
- encouraging audience members not to bring bags and coats into auditoria where possible to reduce clutter at seats.
- allowing for longer intervals so that audience members can safely visit toilets
- reminding guests who are accompanied by children that they are responsible for supervising them at all times and should follow social distancing guidelines.
- having clearly designated positions from which premises or venue staff can provide advice or assistance to guests whilst maintaining social distance.
- cleaning auditoria very frequently and scheduling performances to allow sufficient time to undertake necessary cleaning before the next audience arrives.
- setting clear use and cleaning guidance for welfare facilities to:
  - ensure they are kept clean and social distancing is achieved as much as possible; for example, by reducing the number of urinals, cubicles, washbasins and hand dryers available;
  - consider the likely patterns of use during a performance, for example during intervals, and modifying entry and exit times to reduce likelihood of these areas becoming pinch points;
  - encouraging guests and audience to take responsibility for their own and others' welfare.

<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>

To maintain social distancing when people move around the premises or venue during performances, the following steps will usually be needed:

[https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html - section-55138](https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html-section-55138)

- limiting the number of entrances and exits and managing these to prevent congregation of people
- adapting performance scheduling to support social distancing and appropriate cleaning regimes. For example, scheduling sufficient time between performances to reduce the possibility of different audiences coming into close proximity and to allow time for cleaning.
- using space outside the premises or venue for queuing where available and safe to do so. Outside queues should be managed to make sure they do not cause a risk to individuals, other businesses or create additional security risks, for example by introducing physically distanced queuing systems, having staff direct visitors or audience, and protecting queues from traffic by routing them behind permanent physical structures such as street furniture, bike racks, bollards or by putting up barriers.
- working with your local authority or landlord to take into account the impact of your processes,

for example queues, on public spaces such as high streets and public car parks.

- reducing instances where people might be required to queue. For example, at:
  - entrances and exits to the building;
  - escalators, stairs and lifts;
  - ticket and concessions kiosks and ticket validation points;
  - entrances and exits to auditoria; and
  - toilets and washrooms.
- where possible, designating staff to manage queues and regulate guest access between areas.
- ensuring that you have agreed appropriate evacuation procedures and muster points in the event of an emergency
- encouraging visitors to use hand sanitiser or handwashing facilities as they enter the premises or venue.
- using queue management and marking out one-way flow systems through the premises or venue to reduce contact points. For example, introduce one-way systems through the common areas, so that guests are not required to pass each other when entering and exiting these spaces.
- helping visitors maintain social distancing by placing clearly visible markers along the floor or walls, advising on appropriate 2m spacing.
- ensuring any changes to entry, exit and queue management take into account reasonable adjustments for those who need them, including disabled visitors. For example, maintaining pedestrian and parking access for disabled customers.'
- considering the particular needs of those with protected characteristics, such as those who are hearing or visually impaired.
- extra stewarding/marshalling may be needed at key pinch points and care should be taken to remove any barriers at exits that might cause crowding. This should be considered as part of the event's crowd management plan, in consultation with those responsible for managing security and marshalling etc.
- management of crowd density points, such as where people stop to watch displays, must be considered as part of this planning to ensure social distancing can be maintained.
- limiting the potential for guest contact with performers and support staff by, for example:
  - using theatre security to keep stage door areas clear before and after a performance to allow performers and other workers to enter and exit safely;
  - not permitting visitors backstage;
  - not permitting autograph signing or photographs with performers.

<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>

## References

- Cleaning regimes and hygiene  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Infection prevention in studios and rehearsal rooms  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Rehearsals and performance  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Training  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Sound and lighting  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Handling props, musical instruments, technical equipment, and other projects  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Managing audiences and performances  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Seating arrangements and use of common areas (including welfare facilities)  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>
- Entrances, exits and managing the flow of people  
<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html>

## Useful reading

<https://gov.wales/rehearsing-performing-and-taking-part-performing-arts-guidance-phased-return-html#section-50296>

<https://eventsindustryforum.co.uk/images/documents/ElfDCMS-COVID-19-Working-Safely-24-September-2020.pdf>

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All Information correct as of December 2020, future amendments may be necessary