Safety Guidelines for the Live Entertainment and Events Industries

Part 3. Hazard Guide 01 – Audience and Crowd Management

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Disclaimer

In legislative terms, the requirements of the **Australian WHS/OHS Framework** are mandatory. In contrast, a guide is designed to assist obligation holders to comply with the requirements of an act or regulation.

Obligation holders still have a duty to assess the risks in each work situation and take all reasonable steps to eliminate or minimise the risks that are specific to each work activity, so far as reasonably practicable. These obligations are described in the *Occupational Health & Safety Act 2004* (Vic) (Victorian OHS Act) at section 21 and in the Work Health Safety Acts in all other states and territories at section 19.

The information contained in the LPA Safety Guidelines for the Live Entertainment and Events Industries (LPA Safety Guidelines) is of a general nature and may not apply in all work situations, it is not mandatory and should not be regarded as legal advice. In any important matter, you should seek appropriate independent professional advice in relation to your own circumstances. Live Performance Australia (LPA) accepts no responsibility or liability for any damage, loss or expense incurred as a result of the reliance on information contained in this guide.



Definitions and terms used

Australian WHS/OHS Framework means Model WHS Legislation and Victorian Legislation

Employer means a person who employs one or more other persons under contracts of employment or contracts of training (Victorian OHS Act)

Model WHS Act means Work Health and Safety Act 2011 (Cth)

Model WHS Regulations means Work Health and Safety Regulations 2011 (Cth)

WHS Legislation Work Health and Safety Act 2020 (WA); Work Health and Safety Regulations 2022 (WA); Work Health and Safety Act 2012 (Tas); Work Health and Safety Regulations 2022 (Tas); Work Health and Safety Act 2012 (SA); Work Health and Safety Regulations 2012 (SA); Work Health and Safety Act 2011 (NSW); Work Health and Safety Regulations 2017 (NSW); Work Health and Safety Act 2011 (ACT); Work Health and Safety Regulations 2011 (ACT) Work Health and Safety Act 2011 (NT); Work Health and Safety Regulations 2011 (NT); Work Health and Safety Regulations 2011 (NT)

WHS Acts means Work Health and Safety Act 2020 (WA); Work Health and Safety Act 2012 (Tas); Work Health and Safety Act 2012 (SA); Work Health and Safety Act 2011 (NSW); Work Health and Safety Act 2011 (ACT); Work Health and Safety Act 2011 (QLD); Work Health and Safety Act 2011 (NT)

WHS Regulations means Work Health and Safety Regulations 2022 (WA); Work Health and Safety Regulations 2022 (Tas); Work Health and Safety Regulations 2012 (SA); Work Health and Safety Regulations 2011 (ACT); Work Health and Safety Regulations 2011 (QLD); Work Health and Safety Regulations 2011 (NT)

PCBU means person conducting a business or undertaking (Model WHS Legislation)

SWMS means safe work method statement

Victorian OHS Act means Occupational Health & Safety Act 2004 (Vic)

Victorian OHS Regulations means Occupational Health & Safety Regulations 2017 (Vic)

Victorian Legislation means Occupational Health & Safety Act 2004 (Vic); Occupational Health & Safety Regulations 2017 (Vic)



Audience and Crowd Management Hazard Guide

1. Overview

This guide provides information to assist in managing the risks associated with crowds attending events. Information in this guide is based on the **Australian WHS/OHS framework.** It is recommended that this information is referenced during the planning and delivery of events to assist in identifying hazards, assessing risks and determining appropriate control measures to eliminate and or minimise these risks, so far as is reasonably practicable.

This guide does not replace the need to implement risk management strategies, undertake research or seek specialist advice.

Each person conducting a business or undertaking (**PCBU**)/Employer who manages or controls a workplace, has a responsibility to understand their obligations under the Australian WHS/OHS Framework. Workers and employees also have a responsibility to ensure they do not endanger themselves or others. Australian and international standards provide approved guidance on how to meet work health and safety obligations. Codes of Practice and Compliance Codes are available from Safe Work Australia or the relevant state regulator eg: SafeWork NSW, or the WHS regulator in your state or territory.

A Code of Practice, or Compliance Code is a refined version of a Standard, which also refers to Australian WHS/OHS Framework. They can be easily read and understood, with information on specific work tasks and procedures, to assist you to achieve compliance required under the OHS/WHS Acts and Regulations in each state or territory.

Audience safety and crowd management are intrinsic to the success of every event. While a PCBU/Employer is ultimately responsible, they may not have the specialist knowledge of managing crowds and may have to draw upon competent crowd management expertise to identify the crowd-related hazards and advise on the appropriate control measures required to mitigate the risk to a tolerable level. Event organisers should satisfy themselves that the event security companies they contract have the necessary expertise to *manage*, not just *control*, crowds.

Crowds are made up of individuals, each with their own agenda. Individuals form larger groups, which then become joined by a common purpose. This purpose can be for celebration and joy but can also be anger, panic or violence. Those attending your event will naturally assume that the event will be safe, well planned and will ultimately meet their expectations. Event organisers can minimise risks to enjoyment and safety by ensuring the safety of the attending audience is a priority.

History has demonstrated that events that are poorly designed, have poor management, ineffective risk assessment or insufficient control measures can have catastrophic outcomes. Event organisers can also be faced with other risks, which despite robust planning, sufficient levels of workers/employees and effective communication, can turn into potentially dangerous crowd conditions. To address this, contingency planning should include a range of event specific *what if* scenarios that carefully consider a range of circumstances that could have an adverse effect on the crowd, and the actions required to manage such instances.



A key issue is understanding the specific roles and responsibilities relating to the management of the crowd. To ensure there is no ambiguity about this, and to identify any gaps, it is suggested a statement of intent is drawn up that:

- Identifies key agencies including but not limited to the promoter, venue manager, event security contractor, event safety officer;
- Highlights the roles they will play, and
- Records and what is understood to be the accepted roles and responsibilities of each agency.

An event-specific crowd management plan should be independent of the security management and event management plans but should be an integral part of the overall event management documentation. The crowd management plan is solely focused on the crowd and how it will interface with the event design, venue layout, amenities and performance. The plan should provide clarity to stakeholders of how the crowd has been considered, the identification of the specific crowd hazards, the suggested control measures and how the crowd will be monitored and managed in both normal and emergency conditions.

Each event will have its own unique idiosyncrasies but generically, the crowd management plan should include a specific overview of as many potential hazard issues as possible, including at least some of the following points of consideration:

- Type of event
- Event duration
- Event location proximity to transport hubs, car parks, coastlines etc.
- Modes of transport to the event
- Indoor/outdoor (or mixture of both)
- Topography
- Roles and responsibilities/statement of intent
- Performers
- Profile of the performers
- Other attractions/activations
- Event site plans
- Temporary structures
- Alcohol/Drugs
- Concession stand/merchandising
- Audience demographics
- Historical incidents relating to this event
- Methods of communication with the crowd
- Advance information
- Ticketing/wrist-banding methodology
- Search criteria
- Flow rates ticket distribution, opening times, performance times
- Crowd density calculations
- Emergency evacuation (full and localised)
- Command and control structure (crowd)
- Medical access to groups or individuals in the crowd
- Vehicle access through the crowd
- Technical access to the performance areas through the crowd
- How the crowd will be monitored



- Catering plans
- · Rubbish collection and removal
- Toilets
- Fresh drinking water
- Contingency planning
- States of readiness
- Event security numbers
- Signage
- Crowd-specific risk assessment
- Areas of specific concern
- Terminology
- Potential of terrorism attack
- Show stop procedure
- Inclement weather

The crowd management plan is a live document. It should be constantly updated, based on other risks that may adversely affect the audience.

Crowd management planning should commence at the very first phase of your event. This will enable all parties to better evaluate the effects of their concepts on the crowd, together with the reasonably practicable solutions required to make the event safe and successful.

As part of the crowd planning process the following event phases should be considered:

- Arrival phase
- Ingress phase
- Event circulation
- Egress phase

For each phase, both normal and emergency conditions should be considered in terms of managing the crowd. Crowd related incidents have historically occurred at each phase of an event and as such, must be planned for accordingly.

All the risks are amplified when multiple stages are being used within the one event, or where camping or other accommodation is involved, or very long and/or late hours are planned.

An engineered structure with regular similar events, such as a sporting event in a stadium, will be more focused on reviewing each event on a case-by-case scenario, risk assessing accordingly and implementing the necessary control measures.



2. Key Considerations – Audience and Crowd Management

The following questions are examples of what could be considered during event design, planning and delivery. Use them to identify hazards and plan how risks will be managed.		No	Action/Comments
2.1. Design and planning			
Has the venue been finalised and contracts exchanged?			
Has the ticketing system been finalised and will this reduce the flow rate for people entering your event?			
Are tickets designed so that they are secure, can be scanned or read easily?			
Is there a contingency in place in the event of any technical failure on ticket scanners (if used)?			
Is there more than one entrance for the event?			
Are tickets colour coded to represent different entrances?			
Are event security staff familiar with the venue to direct members of the audience?			
Will tickets be sold on the event day?			
Will members of the audience have to be wrist banded on entry?			
Are guest, VIP and media ticket collections located in a secure area that has no adverse impact on the attending audience?			
Is there a dedicated disability entrance?			
Is there a designated accessible viewing area?			
Are there any age restrictions?			
Is there a search requirement for some or all patrons?			
Has the entertainment been confirmed and finalised?			
Has the audience demographic been identified and agreed with all parties?			



The following questions are examples of what could be considered during event design, planning and delivery. Use them to identify hazards and plan how risks will be managed.	Yes	No	Action/Comments
Have there been any historical crowd related issues with previous performances or events of this nature?			
Have there been any changes to the venue/site that may affect the crowd management?			
Are there any other events occurring on the same day which may affect your audience when arriving or leaving?			
Have other PCBUs and workers who will be affected by this activity been identified?			
Have arrangements been made to consult with and coordinate activities with other PCBUs?			
Have all site/venue specific safety requirements or procedures been considered?			
Have the evacuation times and event occupant capacity been determined?			
Has it been agreed who will have overall responsibility for the safety of the audience?			
Has an event security contractor been appointed who can demonstrate crowd management experience with this size and type of event?			
Does the event security provider have evidence that their staff have been trained in crowd management not just crowd control?			
Have suitable and sufficient numbers of event security staff been booked for this event?			
Has a competent crowd risk assessor been appointed to identify the event specific crowd hazards and control measures required?			
Has a suitable event site plan showing temporary structures, entrances/exits been provided?			
Are suitable and sufficient barriers being considered for areas of loadbearing?			



The following questions are examples of what could be considered during event design, planning and delivery. Use them to identify hazards and plan how risks will be managed.	Yes	No	Action/Comments
Has a competent barrier provider been contracted who can manage all the event barrier requirements?			
Have event security numbers been based on the findings of the risk assessment rather than ratio?			
Have contingency plans been drawn up?			
Is a show stop procedure in place for the event?			
Has a communication plan been designed that allows clear lines of communication in both normal and emergency conditions?			
Has it been determined how the crowd will be monitored throughout the event?			
Have roles and responsibilities in relation to the audience safety been agreed? (Inc. police roles)			
Has available audience space been accurately measured and agreed?			
Are systems in place to communicate any event cancellation/postponement for any reason?			
2.2 Event delivery			
Has a pre-event safety checklist been completed to ensure the event site is safe for the attending audience?			
Have the event security team been fully briefed on the crowd risk assessment, states of readiness and emergency procedures?			
Does the event security team have a robust command and control structure for this event?			
Is there a suitable area for staff to rest on their breaks?			
Are sight lines for the audience impeded in any way?			
Are queue systems adequate?			
Are staff readily identifiable as event security/crowd safety staff?			



The following questions are examples of what could be considered during event design, planning and delivery. Use them to identify hazards and plan how risks will be managed.	Yes	No	Action/Comments
Are suitable and sufficient numbers of event security staff in position ready to receive the audience?			
Is appropriate signage erected to provide normal and emergency information?			
If volunteers are being used, have they been fully briefed?			
Are volunteers appropriately supervised?			
Have event communication systems been tested?			
Are crowd safety spotters in position?			
Have barriers been erected and inspected?			
Have all structures been inspected and a completion certificate provided for each?			
Have performers and production been briefed on the event show stop procedure?			
Is the weather being continually monitored for any adverse effects?			
Is the medical team in place and a part of the communication system?			
Is there an event re-entry policy?			
Does this event have the potential to attract a disruption such as a protest or terrorist attack?			



3. General Guide – Crowd Safety

3.1 Responsibilities

The Work Health and Safety Acts in all states and territories impose specific requirements on PCBUs/Employers concerning audience safety.

The WHS Acts, under Division 2 - Primary Duty of Care, section 19(2):

'A person conducting a business or undertaking (PCBU) must ensure, so far as is reasonably practicable, that the health and safety of other persons is not put at risk from work carried out as part of the conduct of the business or undertaking'.

In Victoria, the OHS Act 2024 under Division 2 - Main duties of employers, section 23(1) - Duties of Employers to other persons:

'An employer must ensure, so far as is reasonably practicable, that persons other than employees of the employer are not exposed to risks to their health or safety arising from the conduct of the undertaking of the employer.'

Duty holders may also have additional responsibilities under state and territory safety regulations.

3.2 Training and competence

Different licensing and competency requirements apply across Australian states and territories. Event organisers should check with their state security regulators to clarify what type of licence is required for the various roles being contracted. Various roles require different training experience and licenses, these can include, but are not limited to:

Security

- Event security consultancy
- Event security provider
- Event security staff
- CCTV operator
- Bodyguard
- Armed security (cash in transit)

Medical

- Event first aid
- The event ambulance service

Cleaning and house keeping

- Portaloo provider
- Safe rubbish removal

Driving

- Truck driving
- Performer access
- Truck, Elevated Work Platform (EWP) and forklift during setup and bump out



Concessions

- Food preparation and other health considerations
- Responsible Service of Alcohol (RSA)

3.3 Consultation, cooperation and coordination

The WHS Acts and the Victorian OHS Act make consultation with workers/employees a legal requirement. Consultation, cooperation and coordination between PCBU/Employers is a requirement where they share a duty for the safety of a worker or for work to be done.

PCBUs/Employers should use the information in this guide to consult with workers/employees, including event staff, to determine the crowd hazards and risks associated with an event, and how to best eliminate or minimise these risks using the hierarchy of controls.

Consultation should start as early as possible, before decisions are made, and continue throughout the duration of the event. Consider the other parties who will need to be involved in the consultation process in the planning stages of the event and determine what information needs to be shared and discussed.

Ideally consultation should start with the initial risk assessment supplied at the design stage, and all PCBUs/Employers, employees and contractors need to be part of the process.

3.4 Design and planning

In the early stages of design and planning for an event, the following criteria, and any other criteria identified via risk assessment should be addressed:

- Preparation and dissemination of the initial risk assessment
- Consultation with relevant PCBUs/workers or Employer/employees
- Consultation with emergency services, local council, public transport providers
- Consultation with crowd management professionals
- Development of specific crowd safety risk assessments including controls agreed to during consultation
- Selection of the event security providers
- Whether the event is free or unticketed
- Agreed production scheduling and allocation of resources to minimise impact on others
- Number of entrances
- Ticket provider whether on or off site, who takes cash and card or credit card only
- Wrist banding if relevant
- Strategy to provide information to audience e.g. social media, media screens, audio announcements
- Emergency planning and contingencies
- Clear and concise roles and responsibilities pertaining to crowd management
- First aid and fire safety requirements specific to the site and type of event
- Number and widths of emergency exits
- Audience parking, surfaces of parking areas e.g. length of grass, potential bogging areas
- Guest parking
- How the audience will be arriving/leaving (train, bus, car, foot, dropped off)
- Any other major events occurring on the same day in the same local area or city



- When the audience will start arriving
- How the performers will access the event e.g. pathways to back of house
- Secure accreditation system
- Whether police presence is required
- Suitability of site design to minimise threats to enjoyment and safety
- Audience demographics
- Suitability of event attractions, amenities and services for the needs of the audience
- Audience capacity and ability of the venue to safely accommodate this figure when considering temporary structures, sight lines and evacuation requirements.

3.5 Event delivery

In the delivery stages of an event the following criteria should be addressed to minimise the likelihood of crowd-related incidents:

- Ensure a pre-event safety checklist has been produced which is wholly relevant to your event.
 This checklist should be completed by a competent person and discussed with the PCBU/Employer
- Ensure all staff are briefed on the event emergency procedures, amenities, running order and site layout/ provide site maps for ECO or site emergency service crew
- Ensure temporary structures are sited correctly and site electrician is contact abled during the event
- Ensure any signs are positioned to enable uninterrupted views
- Ensure all plant and equipment are secured away from the public
- Ensure crowd monitors are in position for incident reporting and management
- Ensure suitable and sufficient medical and fire staff are on site and in position
- Carry out pre communication tests for hand-held devices and public address systems
- Ensure all parties are aware of communication procedures for the event
- Test CCTV (where applicable)
- Where applicable, ensure crowd flow times are understood
- Ensure all completion certificates/engineer reports are finalised
- Ensure Incident Report Forms are accessible for staff
- Ensure all staff and contractors are clear on who can authorise the event to be opened to the
 public and who has the authority to temporary halt, or if required evacuate the event site and
 shut the event down
- If the event has reached capacity, position event staff, signs and barriers to prevent persons without tickets accessing the event or mingling outside
- Inform production managers, stage managers about the show stop procedure
- Review, consult and adjust control measures as required on site

3.6 Review

After an event, the following criteria should be reviewed in consultation with relevant parties:

- Incident reports and outcomes including near misses
- CCTV footage (where applicable)
- Effectiveness of the control measures
- Identification of pinch points, bottlenecks or extensive queues
- Were flow rates on entry acceptable?



- Were there any levels of increased density?
- Could the food, beverage and amenities been positioned better to reduce density levels within the event site?
- Was the scheduling appropriate for the demographics attending or was there conflict?
- Medical incident data
- Ejection and arrest data (where applicable)
- Customer service
- Areas for improvement
- Occasions of non-compliance
- Any new hazards or risks identified

3.7 Documentation and records

The following documents and records should be created, maintained and kept on site during an event:

- Event-specific crowd management plan
- Crowd and overall event risk assessments
- Event safety management plan
- Event security roster
- Event communication plan
- Pre-event security checklist signed
- Event security briefing
- Event running order
- Evidence of consultation
- Engineering certification, work permits and sign-off records
- Incident report forms
- Contingencies

These documents may be requested to be sighted by other PCBUs/Employers for verification or clarification and should be readily available at all times.

4. Built Environment

A built environment or an engineered structure is a building such as a stadium, arena, theatre or other permanent structure, which has designated entrances and exits.

Even though these venues are typically well established and are purpose-built for staging events, each event must be considered on its own merits as differing crowd demographics present differing crowd-related risks.

An example of this may be a reserved-seating function with a young audience who may be attending their first ever concert, versus an older, alcohol-drinking crowd, with vast experience of concerts at a general admission event. While it may be the same venue with potentially the same number of audience members, there will be completely different risks for inside and outside the event.

Similarly, a sport fixture match between two historic adversaries, where the crowd-related incidents are well documented, versus another match where both clubs have had zero issues and pose a low



level threat. Each event will be planned to encompass normal and emergency considerations but each match faces other crowd considerations that will have to be dealt with very differently.

5. Temporary Structures

A temporary structure is a portable or built-to-order structure designed for a specific event or number of events over a specific length of time — both long and short term. Examples include stage or performance area, marquees attached to or separate from the performance area, safety fencing, temporary toilets, merchandise and refreshment outlets, delay towers and first aid posts.

Depending on design, size and duration of exposure, temporary structures may need to be signed off by a structural engineer. For further information see Hazard Guide 9 – Temporary Structures.

Temporary structures serve the events requirements and add to the overall aesthetics, but if not positioned properly they can also add significant crowd related issues, including:

- Sightline issues
- Bottlenecks
- Pinch points
- · Queues obstructing thoroughfares
- Reduction of available space
- Increased crowd density
- Reduced egress capability in normal and emergency conditions

6. Human Spatial Memory and Orientation

A key concern with crowds is the brain's capacity to understand and interpret signifiers in the venue that relate to ingress, circulation, safe passages and egress.

For a fan with a season ticket to a sports stadium, who watches their team from the same seat every week, their hard wiring becomes familiar with the locations of entrances, exits, toilets, bars, food outlets etc. If the same person returns to the venue, set up in a different configuration for a concert or other special event, their spatial memory becomes distorted as the venue layout is now completely different, and as such this must be considered in the crowd risk assessment.

Crowd disorientation can also occur for young people attending an event for the first time, in a new venue, or a venue that that has been completely reconfigured. Multi-layout venues are particularly prone to leading to disorientation of crowds whose memory is confused by things not being as they expect.

Stress and anxiety within a crowd can have a highly contagious effect and can be avoided by engaging competent persons, well versed with crowds, to produce a suitable and sufficient crowd management plan and the associated risk assessment.

Crowd support staff should be clearly visible and easily identifiable to enable patrons to approach for directions/information and to provide reassurance and direction under normal and emergency conditions. Depending on the size of the crowd this support can range from stewards/ushers in a



traditional front-of-house role, to dedicated security personnel whose function can extend to bag checks, supervision of bars and physical crowd control.

Another issue to be aware of when planning crowd control and allowing for spatial awareness is the tendency for crowds to try to exit via the way they gained entry. This should be considered when an event is being planned if the proposed concept is to have separate exits and entrances.

7. Summary

Crowds should be carefully planned for with suitable and sufficient contingencies. Those with overall responsibility for crowds should satisfy themselves that the level of expertise they are contracting to manage crowds on their behalf is commensurate with the risks the audience is exposed to.

Consideration must be given to a range of normal and emergency scenarios when managing crowds. Event organisers should satisfy themselves that numbers of staff are based on the risks rather than a staff to audience ratio. Consideration must be had for event staff engaging with lively patrons when determining whether or not security/crowd controller should be engaged.

One item that is more often being required to be considered in the current global political climate is the potential of a terrorist attack. A number of venues have been targeted in recent years and while the risk potential in Australia is low, recent events in Sydney and other events in Paris and Moscow show that anywhere the public may gather is a potential target and steps must be taken to eliminate or minimise these risks.

8. Legislation, Standards and Guidance

There are many legal considerations to be observed when planning a major event and none are more important than audience safety. From standard theatre productions where access to the bar and toilets at interval seem to be the main concern, to green field music festivals where just getting the audience into the area is fraught with difficulties, the risk assessment coming from a crowd management plan is essential.

A risk assessment is required from the outset. Councils or other authorities will want to see them at the development application stage. A risk assessment must be a living document, it will need to be referred to and updated constantly.

Currently the best source of advice internationally is 'The Purple Guide' endorsed by the UK Health and Safety Executive'. This is an event guide written by the industry and it covers many aspects of crowd management. This is available by subscription at:

- The Purple Guide. Concert Guide UK
- Event safety Crowd management (hse.gov.uk)

8.1 Australian WHS/OHS Framework

Duty of care

Model WHS Acts (NSW, QLD, ACT, NT, SA, TAS and WA)

Part 2 - Health and Safety Duties



- Division 2 Primary duty of care, s 19
- Division 3 Further duties of PCBU, s 20, 21, 26

Victorian OHS Act

Part 3 - General Duties Relating to Health and Safety

Division 2 – Main duties of Employers, s <u>21</u>, <u>22</u>, <u>23</u> and <u>31</u>

Consultation

Model WHS Acts (NSW, QLD, ACT, NT, SA, TAS and WA)

Part 5 - Consultation

- Division 1 Consultation, cooperation and coordination between duty holders, s 46
- Division 2 Consultation with workers, s 47, 48 and 49

Victorian OHS Act (Vic)

Part 4 - Duties of Employers to consult

- Duty of employers to consult with employees, s 35
- Duty to consult with other employers in relations to duties relating to labour hire, s 35A

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Other sources of information

Local and specific guides

- Worksafe Victoria Worksafe Victoria Crowd control at Venues and Events
- Worksafe NSW <u>Safety and security for your event | NSW Government</u>
- Health WA <u>Guideline for concerts events and organised gatherings (health.wa.gov.au)</u>
- Queensland <u>Events in Queensland Best practice guidelines for event delivery in Queensland</u> (www.qld.gov.au)
- AIDR Manual 12 Safe and healthy mass gatherings

Local regulations from council development approvals

International best practice –<u>ANSI E1.21-2013 – Entertainment Technology</u>

Crowd Science

- Standing Crowd Density | Prof. Dr. G. Keith Still (gkstill.com)
- <u>Introduction to Crowd Management: Managing Crowds in the Digital Era: Theory and Practice |</u>
 Springerlink
- Crowd Management 101: How to Manage Crowds at Events Billetto Blog

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Version 2 note: Version 1 of the LPA Safety Guidelines were written when the Model WHS was believed to be rolled out in all Australian states and territories. This did not occur, and Victoria maintains its OHS Act and Regulations. The key differences include the use of the terms 'Employers' (as opposed to PCBU) and 'employees' (as opposed to workers). This version of the Guidelines has been modified to include this difference.