

**Kent & Medway Public Health Risk Assessment
Circus Zyair - Hop Farm**

Maidstone Road – Paddock Wood

TN12 6PY

23rd October 2020

This area is in Local [COVID Alert Level: Medium](#)

Review Register

| Summary of changes | Issue number & date | Presented to | Action |
|--|--------------------------------|--|--|
| Risk assessment of event based on an 8-page assessment titled "Circus Zyair - COVID-19 Statement' document" and a 2-page document titled 'Covid Statement Circus Zyair'. | Version 1.0 22/10/2020 | ASC by exception on 22/10/2020 by email | Initial decision for circus not to proceed |
| Update draft incorporating clarifications from Adam Ingham, organiser of Circus Zyair | Version 1.1. 23/10/2020 | Teleconference with public sector stakeholders at 12:30pm on 23/10/2020; Gill Hall (Kent Police), Mark Rolfe (GT EPE), Ruth Parker (Kent Police), Sian Deller (Kent Resilience Team), James Whiddett, Simon Alland (Kent Police), Andrew Scott-Clark (Kent Public Health), Logan Manikam (Public Health), Yasmin Bou Karim (Public Health) | Direction to be set out by KCC for circus & confirmed by ASC |

Summary

Circus Zyair is a 1hr event with an estimated attendance of 200, set to take place between 23rd October - 1st November. On Friday, 23rd, there will be two performances, one at 5pm and another at 7:30pm. From Saturday, 25th October – Sunday, 1st November, there will be three performances each day, 11am, 2pm and 5pm.

The risk assessment provided by the organisers of Circus Zyair as well as additional information gathered on 23rd October do not strongly support the organisers’ request for approval of the event as it is not evident how social distancing will be maintained at all times and how crowds will be managed during and between performances.

As of October 23rd, 2020, Kent is classified under the ‘Medium’ COVID alert level, however, the rolling rate in Marden is of 81.7 and there is a rise in number of cases in the region. Given what is known about the event and the COVID context in the area where the event will take place, Circus Zyair should not go ahead with immediate effect.

In accordance with national guidance (<https://www.gov.uk/government/publications/containing-and-managing-local-coronavirus-covid-19-outbreaks/covid-19-contain-framework-a-guide-for-local-decision-makers>) & Health Protection (Coronavirus, Restrictions) (England) (No. 3) Regulations 2020, it is necessary and proportionate to do so in order to respond to a serious and imminent threat to public health and control the transmission of COVID-19 in Kent & Medway.

| Evidence Required | COMMENTS |
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| REGULATIONS | |
| The event (gathering) organiser is complying with the Health Protection (Coronavirus, Restrictions) (No. 2) (England) Regulations 2020 and must demonstrate that: | |
| <ul style="list-style-type: none"> The event (gathering) is being organised by a business, a charitable benevolent or philanthropic institution, a public body, or a political body | |
| <ul style="list-style-type: none"> there is a risk assessment, including COVID-19, in line with regulation 3 of the Management of Health and Safety at Work Regulations 1999(1), whether or not they are subject to those Regulations | |
| <ul style="list-style-type: none"> all reasonable measures to limit the risk of transmission of COVID-19 including following relevant government COVID-19 secure guidance, will be taken | |

Adapted with permission from the Surrey County Council Public Health.

RISK ASSESSMENT

The risk assessment is comprehensive and identifies what activity or situations may cause transmission of COVID-19

The risk assessment identifies the different groups and individuals that could be at risk of transmission of COVID-19 including:

- Staff
- Volunteers
- Suppliers/delivery drivers
- Performers
- Attendees – local, national, international
- Independent vendors

1. There is little mention of potential transmission pathways during the event.
2. There is no mention of the number of staff involved and their demographics.

The risk assessment includes how likely it is that someone could be exposed to COVID-19 and considers age, ethnicity, health status, and other factors that may give rise to increased risk of severe illness from COVID-19 for attendees, staff, volunteers, suppliers, performers, and that:

- Where possible, they have acted to remove any activity or situation that is at risk of transmitting COVID-19
- Where not possible, they have controls in place to mitigate the risk of transmitting COVID-19

The risk assessment includes travel to and from the venue including impacts on local transport hubs and public transport

The risk assessment includes the cumulative impact of other gatherings in the area at the same time or pre/post event (e.g. increase numbers in local food/drink outlets) where additional mitigation measures may be needed to reduce the risk of transmission of COVID-19

1. The risk assessment states; "Doors open 45 minutes prior to each performance and this timescale is intended to help manage arrivals and to avoid crowding and queuing." Organisers need to clarify how they will manage crowds in between performances. For example, when a 1hr 2pm performance ends, they will only have 1.25hrs between the end of one and the time the doors open for the next one. They need to consider the fact that exiting a venue with 200 people, when they are trying to social distance throughout might take longer than expected and although the entrance and exit are separate, what happens in the parking lot when crowds coming in and out at the same time?

Organisers could not explain how crowd management will be done in the parking lot. No evident mitigations for a parking lot crowd management have been put in place by the circus. According to the organisers, Hop Farm is the organisation that has control over that.

2. How many exits are there? Need to clarify how many staff will be by the doors at the end and before the start of a performance.
There are 3 exits and 1 entrance.

3. In the document titled 'Covid Statement Circus Zyair', it is said, "You will be required to select seat numbers when booking (these will aid with the social distancing requirements and do not necessarily represent where you will be seated)" It is unclear whether the seats are numbered and pre-assigned to attendees or not. If not pre-assigned, how will they manage the crowd. They should consider providing allocated seating and managing seating plans

through ticketing systems. If unallocated seating is provided, organisers should consider installing seat separation or labelling the seats that should not be used, or deploying staff to support the audience in adhering to social distanced seating.

Seats will be numbered and allocated.

4. The organisers should clarify how ventilated the venue is.

There will be fans at the top of the tent circulating air. The doors will be closed when people come in and out of a performance, but during the day it they are left open for ventilation.

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| The risk assessment shows the event organiser engaged appropriately with neighbouring businesses and transport operators to assess and mitigate risks arising from pressure on local and public transport | No mention. |
| The risk assessment includes the risk to local population health taking into account prevailing trends in the prevalence of Covid-19 | No mention. |
| The risk assessment considers additional risk factors created by attracting a national or international audience for the event | No mention. |
| EVENT PLANS | |
| <p>The plan includes:</p> <ul style="list-style-type: none"> ● site map ● duration of event ● maximum capacity based on COVID secure measures including social distancing ● numbers of staff/volunteers to ensure COVID secure measures are maintained at all times | <p>1. The risk assessment states that "An additional 50 seats will be available to allow for changes, i.e. not for additional persons". It is unclear what they mean by this. Will the organisers allow for an extra 50 people to buy tickets if the situation arises? Organisers should clarify what they mean by 'changes' and how they will manage these changes.</p> <p>It was clarified by Adam Ingham that although they can “confidently” seat 250 people while maintaining social distancing, they will not sell out to a maximum.</p> <p>2. The number/type of staff present at the event is not mentioned in the assessment.</p> |

The plan demonstrates how **SOCIAL DISTANCING** will be maintained **AT ALL TIMES** between:

- attendees who are from different households or support bubbles e.g. maximum capacity, zoning, circulation space, pinch points/congestion areas, entrances/exits, queues, toilets and wash stations, movement flows between areas, seating arrangements, popular activities./exhibits etc
- attendees and staff and performers e.g. staff areas, performance areas, movement flow through attendee areas, ticket and security bag check areas

1. Organisers need to clarify how many toilets there will be. It is important to remember that many children might attend the event and might need to use the toilet regularly.

There will be 5 toilets in total and they will be placed outdoors, outside the tent.

2. When discussing how to avoid transmission amongst staff when the circus is set up, the risk assessment says staff will be encouraged "to only work together up to 15 minutes at a time." Organisers need to clarify how this is feasible and how it will be done. Will they keep a record of which staff is doing what and when? Will there be a set rota?

2. Risk assessment states that staff will be "working in fixed teams to minimise exposure". Will these teams be allowed to mix with each other?

3. Organisers need to clarify their social distancing mitigations. How far apart are the seating areas for family 'bubbles'?

Adam Ingham (Circus Zyair contact), clarified there will only be 6 members of staff on the ground throughout each performance (excluding performers). Their responsibilities are as follows;

- One staff will conduct temperature checks on attendees.
- One will be at the entrance to point people to the direction they should go for their seats.
- One who will show attendees to their seats.
- One will operate the toilets.
- Two staff members will ensure compliance

to rules throughout the show.
It does not seem realistic for only 6 staff to be monitoring the entire event during a performance. Although the venue is a circle, there will be 2 seating areas, separated by the 30m diameter of the 'stage'. Given the crowd will be so far apart, it seems unfeasible to only have 6 staff members onsite to ensure compliance to COVID-19 regulations.

It was also clarified by Adam Ingham that all attendees will be seated, and every other seating row will be blocked off (1m). There will also be a 1m space between bubbles. Organiser did not give much detail on the set up of the 'bubble areas'.

The plan shows how the contact details for ALL those present at the event will be recorded and stored for 21 days, to assist NHS Test and Trace with requests for the data if needed, and must:

- include first name, surname, address including postcode, contact phone number or contact email, date (for multiday events) at venue - for ALL attendees
- include first name, surname, address including postcode, contact phone number or contact email, role, date (for multiday events) at event - for ALL staff, volunteers, suppliers/delivery persons, performers, independent vendors
- demonstrate compliance with GDPR
- consider when and how this data will be collected e.g. in advance (mandatory online, linked to ticket purchase), on site for those not completing in advance (entry denied until contact details provided)
- consider additional data if systems allow e.g. time of arrival and departure, location on site (zoned areas, work stations, entrance gate numbers)

The plan demonstrates how **communication with attendees** will be made for:

- short notice cancellation in a way they would prevent large numbers of people 'crowding' near the venue site
- ensuring ALL attendees provide contact details to organiser to assist NHS Test and Trace e.g. under terms of booking
- providing POSTCODE OF VENUE to enable attendees to provide this to NHS Test and Trace should they become symptomatic, to aid outbreak identification.
- reminding attendees to wear face coverings when using public transport or in enclosed areas as per [government guidance on face coverings](#)
- adherence to a code of behaviour i.e. not attending if they have symptoms and /or are self-isolating, maintaining social distancing at the venue, hand hygiene and minimising spread of respiratory droplets e.g. under terms of booking
- re-enforcing message that entry will be refused if displaying symptoms
- providing information to attendees about risk factors that may make them more susceptible to serious illness from COVID-19, so they can make an informed choice about their personal risk relating to their attendance
- advising about the hand hygiene facilities on site
- minimising hand to hand transactions on site
- bringing as few items as possible to the event

1. Unclear what the message on posters and signage will be or what the purpose of the warning tape is.
2. Unclear whether the use of face coverings is mandatory throughout the performance. According to the most recent national guidance for performing arts events (updated on 21st October), it is a requirement to remind customers of the need to wear face coverings unless exempt, for example through prominent display of signs, and/or verbal reminders to customers. Organisers should confirm whether that is the case
Face covering will be mandatory throughout.

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| <p>The plan shows the COVID-19 safe ingress and egress from the venue and local area, and considers:</p> <ul style="list-style-type: none"> • Travel routes e.g. one way routes between transport hubs and venue (the 'last mile' concept), avoiding peak public transport times, • Staggered entry / exit times • Additional entrances / exits points to reduce congestion • One-way entry / exit routes • Markings and signage for social distancing • Queue management including surrounding areas • Sanitisers at entry / exit points • Refusing entry to ALL those displaying symptoms – attendees, staff, volunteers, suppliers, delivery drivers, performers, independent vendors | | |
| <p>The plan limits the amount of hand to hand transactions during:</p> <ul style="list-style-type: none"> • booking process e.g. in advance, online and phone • on entry e.g. ticket less • payment for goods/services on site e.g. pre-payment/card only/contactless • activities e.g. rides, shared equipment | | |
| <p>The plan shows the COVID-19 safe movement of ALL persons around the venue to maintain social distancing including:</p> <ul style="list-style-type: none"> • one-way routes to and from on-site facilities e.g. toilets, wash stations, food and drink outlets, performance areas, • markings and signage for social distancing • use of barriers/screens/face coverings to protect staff/volunteers where social distancing can not be maintained | | |
| <p>The plan caters for sufficient number of handwashing facilities and sanitiser points, at multiple locations (e.g. entrances/exits, food/drink areas, toilet areas, etc) including signage on good hand washing, to enable people to:</p> <ul style="list-style-type: none"> • wash hands for at least 20 seconds • dry hands thoroughly • dispose of used drying materials safely | | <p>The number of handwashing facilities is not mentioned and the messages on signage is unclear.</p> |

The plan shows how cleaning will be maintained prior, during (including multiday) and after the event; including cleaning regimes and waste disposal management for:

- high contact surfaces and equipment
- work areas
- barriers / screens
- toilets and washing facilities, ensuring adequate supplies of soap and hand drying materials, and frequent removal of waste materials

Organisers need to clarify what are the main 'touch points' in the venue and how it will be cleaned. The layout of the venue is unclear.

The main touch points in the venue are handrails and seats. Adam Ingham stated that all attendees will be required to sanitise their hands on their way in and that handrails would be cleaned regularly with 'anti-bacterial spray'. This raised the concern about the type of products the organisers are using to clean their surfaces and whether they are also anti-viral.

The plan shows how staff/volunteers/independent vendors on site will be trained and briefed on COVID-19 secure measures and protected from the risk of COVID-19 transmission while:

- providing goods / services e.g. working in fixed teams, use of barriers/screens, sufficient space to maintain social distancing within work area, hand washing facilities, training on correct use of face coverings
- providing emergency medical assistance e.g. appropriate PPE
- managing security, including dealing with constant breaches in social distancing
- on rest breaks

The risk assessment mentions training of staff, but no details are given.

It was clarified that performers are part of one bubble and the staff is in a different bubble and they do not mix.

The plan shows how performers will be protected from the risk of COVID-19 transmission and considers:

- avoiding sharing professional equipment and personal items e.g. labelling with name of designated user, personal headsets/radios/earpieces
- designated storage for large items
- regular cleaning and disinfection of equipment
- singing by performers only e.g. avoid face to face singing and position back to back or side to side, extend social distancing to 3 metres or more between singers and others, limit numbers in singing groups, utilise technology

Very little mention of how performers will be protected from COVID-19.

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| <p>The plan demonstrates that the event can be delivered safely without the involvement of the emergency services and considers:</p> <ul style="list-style-type: none"> • crowd management • emergency medical assistance, including the measures to take for someone with COVID19 symptoms | <p>No mention of medical assistance.</p> <p>It was clarified that there will be 2 first aiders and that if an attendee reported symptoms after entering the venue, the organisers would postpone the show and advise people to seek medical support. This does not seem like a feasible solution.</p> |
| <p>The plan shows that all mitigations can/will be operated effectively</p> | |
| <p>FINANCIAL RISK</p> | |
| <p>The event organiser is aware that the event may need to be cancelled if the COVID-19 situations changes due to local outbreaks, local sustained community transmission, second COVID-19 wave, and that they will be responsible for all financial losses</p> | <p>The organisers are aware the event might be cancelled if the COVID-19 situation changes.</p> |

Further advice maybe found at,

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/the-visitor-economy>

<https://www.gov.uk/guidance/covid-19-guidance-for-mass-gatherings>

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/performing-arts>

<https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-phased-return-of-sport-and-recreation/guidance-for-the-public-on-the-phased-return-of-outdoor-sport-and-recreation>

<https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-phased-return-of-sport-and-recreation/return-to-recreational-team-sport-framework>

<https://www.eventsindustryforum.co.uk/index.php/11-features/14-keeping-workers-and-audiences-safe-during-covid-19>

<https://www.britishhorseracing.com/regulation/covid-19-coronavirus-industry-guidance-and-updates/>

<https://www.britishcycling.org.uk/about/article/20200512-about-bc-news-British-Cycling-Updated-Coronavirus-Guidance-0>

<https://www.britishtriathlon.org/britain/documents/covid-19/guidance-documents/final-covid19-clubs-guidance-04.06.20.pdf>