



# COVID Event Update: Event Organisers

**13 January 2021**

## Key points:

- The Department of Health initiated a review of the COVID Event Plan approval process in October 2020 and has now finalised the process.
- The COVID Event Guidelines have been updated to reflect the outcome of the review.
- The updated COVID Event Guidelines provide more prescriptive guidance around requirements for events.
- All venue owners and operators, including those with an existing public building approval, are urged to adhere to the COVID Event Guidelines for events and gatherings.

## Review of events in WA

The Department of Health (the Department) initiated a review of the COVID Event Plan approval process in October 2020. The review was undertaken to determine whether the introduction of COVID Event Plans and associated risk mitigation measures allowed events to be conducted in a COVID safe manner.

While approved COVID Event Plans had been well implemented at many different types of events, a [review of high-risk events in WA](#) determined that despite a comprehensive COVID Event Plan and the presence of COVID Safety Marshals, it was not possible for a small number of high-risk events involving significant alcohol consumption and a primary focal point of interest where crowds congregate in close proximity (e.g. stages, some performances, dance floors, mosh pits) to occur in a COVID safe manner.

At the time of the review (5 November 2020), a small number of events were not approved in their proposed format, as they were deemed too high risk. The Department engaged with impacted event organisers and agreed to trial a range of different formats. The purpose of this trial was to determine whether events of this nature could in fact be conducted in a COVID safe manner by changing the way in which they were delivered.

Department officers have attended these, and a significant number of other events, over recent months. Their observations have been used to inform the prescribed set of requirements for a range of low, medium and high COVID risk event formats.

The findings of the review and resulting updates to the COVID Event Guidelines are outlined in this communique. This information is relevant to all event organisers, venue owners/operators and local governments who may be organising events and/or reviewing COVID Event Plans.

## COVID Event Plan Approval Process

The risk-based approach to approving events in WA has seen a range of event formats proceed in an otherwise challenging COVID environment. This process was introduced based on feedback from, and engagement with, a range of stakeholders, with the aim to:

- Ensure events in WA were conducted in a COVID safe manner to protect public health.

- Allow organisers the opportunity to adjust their event format and implement public health strategies to reduce the potential risk for COVID-19 transmission, thereby increasing their chances of COVID Event Plan approval.
- Permit music festivals to proceed once again, where previously they had not been permitted.
- Allow a range of innovative formats related to high COVID risk events to be trialled.

This approach was initially viewed favourably by many, particularly those organisers whose events were unable to proceed under existing Directions.

Over the three-month period in which the review was undertaken, the agile nature of the risk-based approach was at times misinterpreted as an inconsistent application of the guidelines by the Department when assessing COVID Event Plans. It is understood that this is creating significant concern among event organisers. As such, a more prescriptive model towards events will be adopted. The COVID Event Guidelines have been revised to include a defined set of requirements for a range of event formats.

For clarification, COVID Event Plans are not required for some gatherings held in stadiums, arenas or other dedicated venues where an ongoing public building approval for a particular format was granted prior to 25 September 2020. Such venues are either deemed ‘formerly affected places’ or are defined explicitly by the current Directions, issued under the *Emergency Management Act 2005*, and are required to have a COVID Safety Plan instead. However, if a variation has been made to the public building approval after 25 September 2020 or if additional approval is required to host the event at the venue, the gathering will not fall within paragraph 32(a) of the Directions. Instead, it will be captured by the definition of an “event” and a COVID Event Plan will be mandatory.

Where a **COVID Event Plan is mandatory**, the below requirements must be adhered to.

Where a **COVID Event Plan is not mandatory** (i.e. a venue has been issued public building approval prior to 25 September 2020), venue owners and operators are strongly urged to apply the principles of the COVID Event Guidelines and associated restrictions below. The Guidelines have been put in place to ensure public health remains a priority in WA and events/gatherings are conducted in a consistent manner across the State. It remains every venue owner/operator’s responsibility to assist in this process.

## Event requirements

### Seated concerts (permanent and temporary fixed seating)

The following requirements apply to seated, staged concerts:

- A minimum of 2 sqm/person required across the usable, seated event space.
- All attempts must be made to seat groups 1.5m apart.
- No dance area permitted.
- Maximum of 10,000 patrons permitted.
- Maximum of 6 hours alcohol service permitted.
- Ticketing, or implementation of a contact register system, required.

Please note, seating must be permanently or temporarily fixed in place (as defined by the *Health (Public Building) Regulations 1992*) for the above requirements to apply.

Ticketing must facilitate the collection of the minimum required contact information for each attendee, to allow for contact tracing.

## Other concerts (where patrons can be expected to remain seated)

The following requirements apply to staged concerts where there is NO fixed (permanent or temporary) seating, however, patrons CAN be expected to remain seated for the duration of the concert. This includes event formats where patrons bring their own picnic rug or chair to sit on:

- A minimum of 2 sqm/person of usable space is required in the designated seating area.
- All attempts must be made to encourage groups to position themselves 1.5m apart.
- No dance area permitted.
- A maximum of 6,000 patrons permitted.
- Maximum of 6 hours alcohol service.
- Ticketing, or implementation of a contact register system, required.

The number of patrons is reduced for this form of concert as there is less certainty that individuals will remain seated and physically distanced. During the trial period, some events where the event organiser advised that patrons were expected to remain seated, did not in fact remain so.

The Department will determine the likelihood that patrons will remain seated based on their experience in public events, footage of the concert held in a previous year and/or footage of the artist performing at an event involving a similar format. The Department reserves the right to source its own evidence/video footage in determining the likelihood of a crowd remaining seated at a proposed event.

It is important that event organisers are realistic about the likelihood of individuals remaining seated at an event. Failure to comply with a COVID Event Plan may result in the event being closed down or future COVID Event Plans by the event organiser being rejected. It may also impact future events by the same artist performing in a similar format.

Ticketing must facilitate the collection of the minimum required contact information for each attendee, to allow for contact tracing.

## Music (and other) festivals

Music and other festival formats, where alcohol is a primary or secondary focus, consistently present increased challenges in maintaining a COVID safe environment for the duration of the event. Departmental officers observed that whilst many events start well, the ability and/or willingness of patrons to maintain physical distancing and adhere to other public health measures is significantly reduced as alcohol consumption increases, particularly when there is a focal point of interest. This occurs despite a comprehensive COVID Event Plan and the presence of COVID Safety Marshals.

As such, the following requirements apply for festival formats (including, but not limited to, music and beer/wine festivals):

- Maximum of 10,000 patrons.
- Maximum of 6 hours alcohol service.
- No dance area permitted.
- No visible stages, entertainment, performances or focal points of interest permitted.
- Ticketing, or implementation of a contact register system, required.

Ticketing must facilitate collection of the minimum required contact information for each attendee, to facilitate contact tracing.

As stages and/or focal points of interest will not be permitted at events of this nature, the event format must encourage individuals to be dispersed more evenly throughout the event space. Stages may be located remotely but must NOT be visible from within the event space. Screen and/or speaker set-ups must not be used to recreate a focal point where individuals will be likely to congregate in large numbers.

### **Stages for events with less than 1,500 patrons**

Stages and live music are currently permitted in some venues, including nightclubs and hotels. Whilst this presents a degree of risk, it is generally considered lower due to the reduced number of patrons at these venues, compared to those at music festivals.

To align the Department's COVID Event Guidelines with indoor venues, stages with DJs or live performances likely to draw a crowd will be permitted for events with 1,500 patrons or less. This number has been calculated based on the average capacity of indoor venues currently permitting stages, DJs and live music. Please note, staged event formats involving a larger number of patrons that are split into groups of 1,500 will NOT be permitted.

Ticketing or a contact register system must also be implemented at events of this nature. The ticketing process must facilitate collection of the minimum required contact information for each attendee, to allow for contact tracing to occur.

Maintaining physical distancing remains a key strategy in reducing the potential risk associated with COVID-19 transmission. Whilst a stage/performance is permitted at events involving less than 1,500 patrons, the Department strongly encourages event organisers to reconsider their inclusion if it will not be realistic for organisers to ensure that patrons will maintain physical distancing for the duration of the event.

### **Ambient music performances**

Acoustic ensembles, symphony/orchestral acts and other performances that are intended to deliver ambient music are unlikely to draw crowds in front of a stage or performance area. As such, they are generally considered acceptable at events without the need for seating or adherence to a maximum of 1,500 patrons. However, all other requirements related to the event format (e.g. patron numbers, duration etc) must be adhered to.

The Department will determine whether a performance is considered ambient music and reserves the right to source its own evidence/video footage of the artist in making this determination. For the avoidance of doubt, DJs are not considered ambient music.

## **Responsibility of the Event Organiser**

### **Advertising of events and sale of tickets**

Event organisers are encouraged to submit their COVID Event Plans in the initial planning stages, so that approval can be sought prior to event advertising and tickets sales occurring.

It remains the responsibility of the event organiser to ensure events are advertised in line with their approved COVID Event Plan, and where possible, ticket sales should be avoided prior to the COVID Event Plan being assessed. This will minimise the requirement for refunds to be issued should the event not receive approval and/or avoid advertising that misrepresents the event should the format require significant modification.

## Compliance with Directions and Guidelines

It is particularly important that event organisers remain aware that relevant Directions or Guidelines impacting events can change rapidly based on the advice of the Chief Health Officer or risk of COVID-19, requiring modification of an event format, postponement or cancellation at very short notice.

It remains the event organiser's responsibility to ensure all events continue to comply with their approved COVID Event Plan, the Directions and Department's Guidelines current at the time of the event (not at the time of event approval). It is also important for event organisers to discuss implications with their insurer, and address all actions relating to modification, delay or potential cancellation of their event in their Risk and Emergency Management Plans.

## Events into the future

It is acknowledged that many stakeholders will have been hoping for a relaxing of restrictions related to events at this time. Unfortunately, the increased level of community transmission in the eastern states coupled with rising numbers of COVID-19 cases internationally and the threat of a new strain of the virus has meant that this will not be possible at this time.

The above requirements will be reassessed in March 2021. It is unknown whether a relaxing of requirements related to events will occur at that time. Further decisions related to events in WA will be based on the best available health advice in response to the risk of COVID-19.

The Department remains committed to working with event organisers and supporting events in WA, however, public health remains our priority. It is therefore important for event organisers to ensure they develop a comprehensive, achievable COVID Event Plan and remain agile in their response to any unforeseen issues that may arise during the event, to maintain compliance with their plan.

## Further information

For further information, please contact the Department's Public Events Team on (08) 9285 5500 or email [Public.events@health.wa.gov.au](mailto:Public.events@health.wa.gov.au)

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