

## Call for Evidence – Future of Women’s Football

### Written evidence from the Sports Grounds Safety Authority (SGSA)

#### Overview

1. The Sports Grounds Safety Authority (SGSA) strongly supports the growth of women's football, and will work with the Department for Digital, Culture, Media and Sport (DCMS), the Football Association (FA) and others to ensure it fully benefits from the improvements made to the safety of the men's game in recent decades.
2. The SGSA's submission in response to this Call for Evidence will focus on the third theme of the review – structures and governance. The key points are summarised below:
  - The SGSA has been advising the FA on safety at women's football since 2019.
  - 18 of the 24 grounds used in the Women's Super League are already subject to the SGSA's licensing regime, due to ground sharing with teams in the men's game.
  - We recommend the extension of the SGSA's regulatory remit to cover the Women's Super League.
  - We do not feel this legal remit should be extended below the Women's Super League, however there should be clear minimum standards for clubs in the Women's Championship and below, which we would be happy to support the development of.
3. We are pleased to be meeting Karen Carney MBE to discuss the contents of this submission in further detail.

#### About the Sports Grounds Safety Authority (SGSA)

4. The SGSA is the UK Government's advisor on safety at sports grounds and a world leader in safety. We have a legal responsibility to licence league and international football grounds in England and Wales used for the men's game and regulate their safety certification by local government. We also set the standards for sports grounds safety through world-renowned guidance and provides strategic support and advice (on a fee recovery basis) to other sports, governing bodies and others both in the UK and internationally. The SGSA was established via the Sports Grounds Safety Authority Act 2011, replacing the Football Licensing Authority which had been set up following the Hillsborough disaster. Put simply, our purpose is to ensure sports grounds are safe for everyone.
  5. Since September 2019, the SGSA has provided the FA with advice and support in relation to the safe growth of the women's game at no cost. However, the SGSA has no regulatory remit and all advice and assistance offered to date has been solely on an advisory basis.
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## Structures and governance

6. The increased popularity in all levels of women's football, driven in part by the success of the Lionesses over recent years, has been hugely welcome. Average attendance figures so far during the 2022/23 season are around 6,000, with the highest attendance of over 47,000 for Arsenal v Tottenham Hotspur in September 2022. In our view, this growth in audiences ought to be matched with strategic investment in safety, with particular attention to governance, physical infrastructure, facilities that better meet the needs of crowds with higher proportions of women and children, and the capacity and capabilities of safety management teams.
7. To outline our current regulatory role, the SGSA has powers under the [Football Spectators Act 1989](#) (the 1989 Act) to issue licences to admit spectators to grounds which are used for designated football matches in England and Wales<sup>1</sup>. The 1989 Act states the purpose of such licences are "to provide for the safety of spectators...". It makes it an offence for a club/stadium operator to admit spectators for such matches without a SGSA licence or to contravene any term of a licence. The SGSA also has powers under the 1989 Act to oversee local authorities in their regulation (under the [Safety of Sports Grounds Act 1975](#)) of safety at all football grounds that are used for designated football matches in England and Wales.
8. At present, 18 of the 24 grounds (primary and secondary grounds of each of the 12 clubs) used within the Women's Super League are already SGSA licensed grounds, due to ground sharing agreements in place. In addition, all except four are designated grounds and have a General Safety Certificate issued by their local authority<sup>2</sup>. The four grounds currently out of scope are for Arsenal FC (Meadow Park), Chelsea FC (Kingsmeadow), Everton FC (Walton Park) and Reading FC (EBB Stadium). Of those, we know of two that have a Regulated Stand<sup>3</sup>. The details of the grounds are provided at Appendix A.
9. The SGSA's view, informed by our engagement with the women's game to date, is that it would be sensible and proportionate to extend the SGSA's licensing scheme to all grounds used in the Women's Super League to ensure high standards of safety.

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<sup>1</sup> A designated match is defined under the [Football Spectators \(Designation of Football Matches in England and Wales\) Order 2000](#) as "any association football match which is played at Wembley Stadium, at the [Principality] Stadium in Cardiff or at a sports ground in England and Wales which is registered with the Football League or the Football Association Premier League as the home ground of a club which is a member of the Football League or the Football Association Premier League at the time the match is played".

<sup>2</sup> Under the [Safety of Sports Grounds Act 1975](#) the Secretary of State (for Digital, Culture, Media and Sport) may designate any sports ground with accommodation for more than 10,000 spectators (or more than 5,000 spectators for grounds hosting Premier League / English Football League matches) as requiring a safety certificate to admit spectators. The 1975 Act also gives local authorities powers to issue such safety certificates to confirm that such sports grounds are safe.

<sup>3</sup> The [Fire Safety and Safety of Places of Sports Act 1987](#) extends the provisions for local authority safety certification to include covered stands with accommodation for more than 500 spectators in sports grounds not designated under the 1975 Act. These are known as 'regulated stands'.



10. An expansion of the SGSA's remit to include women's football is also a recommended consideration within an independent review<sup>4</sup> of our organisation conducted earlier in 2022 as part of the Government's Public Bodies Review Programme.
11. Expanding the scope of the SGSA to the Women's Super League in this way would require a statutory instrument to be laid before Parliament for the legislative change required to the current definition of a designated football match. It would also require some minor modification of SGSA match-day inspection processes, a consultation with stakeholders and, given that improvements to grounds to meet the expected standards of licensed grounds require time and resources, grace periods for WSL clubs to come into compliance.
12. There would be costs involved in the widening of the SGSA's remit, and how these will be met should be subject to consultation. However, these costs are expected to be relatively low given that currently just six grounds are outside the scope of the SGSA's current licensing regime.
13. Below the Women's Super League, including the Women's Championship, average attendances tend to be significantly lower. The SGSA's view is that there should be clear minimum standards, which are appropriate for the level of risk and are kept under review as attendances continue to increase. We would welcome the opportunity to work with the FA and others to ensure a set of proportionate standards for the Women's Championships and lower steps in the women's pyramid.
14. In addition, we recommend consideration is given to how best to support smaller clubs competing at home in cup competitions against Women's Super League clubs that attract significant travelling support. This might include, for example, validating the safe capacity of the venue in line with the SGSA's Guide to Safety at Sports Grounds<sup>5</sup>. It may also be possible for the FA to introduce, through its competition rules for the tournament, minimum requirements for venues to host matches, most notably in the latter stages of the competition.

### **Wider regulation**

15. Accessibility for disabled people must continue to be a critical part of the progression in women's football. Whilst its regulation is outside the statutory remit of the SGSA, we work closely with others, particularly Level Playing Field, to continually improve standards and facilities. In the last few years, a number of grounds in the men's game have seen significant advances, including in the number of disabled spaces available at the expansion of support facilities, such as sensory rooms. We would encourage the review to engage with Level Playing Field and supporter groups to ensure the women's game provides a positive experience for disabled spectators.

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<sup>4</sup> To note, the final report has not yet been published.

<sup>5</sup> The Guide to Safety at Sports Grounds (also known as the Green Guide) is recognised around the world as best practice for the design and planning, and the safety management and operation of sport grounds. Its aim is to assist in the assessment of safe capacity of a sports ground.



16. More widely, the SGSA does not consider that there should be a blanket application of all football-related legislation to the Women's Super League or the wider women's game; indeed, this may be counter-productive to the growth of the game as it seeks to compete with other less-regulated sports. In our experience, issues such as safeguarding have more relevance to the women's game than consumption of alcohol or football-related violence. The SGSA would recommend that this review engages the UK Football Policing Unit and the National Police Chiefs Council lead on football policing, Chief Constable Mark Roberts, and explores the case for new research into the different crowd characteristics and dynamics of the women's game before any further changes are made to the legal framework.

Sports Grounds Safety Authority  
October 2022



## Appendix A – Breakdown of Women’s Super League grounds

Women's Super League Club	Regulated by SGSA	Designated Ground (with General Safety Certificate)	Regulated Stand
Arsenal FC Primary – Meadow Park (Boreham Wood FC)	No	No	Yes
Arsenal FC Secondary – Emirates Stadium	Yes	Yes	
Aston Villa FC Primary – Bescot Stadium (Walsall FC)	Yes	Yes	
Aston Villa FC Secondary – Villa Park	Yes	Yes	
Brighton and Hove Albion FC Primary – Broadfield Stadium (Crawley Town FC)	Yes	Yes	
Brighton and Hove Albion FC Secondary – Amex Community Stadium	Yes	Yes	
Chelsea FC Primary – Kingsmeadow	No	No	Yes
Chelsea FC Secondary – Stamford Bridge	Yes	Yes	
Everton FC Primary – Walton Hall Park	No	No	N/K
Everton FC Secondary – Goodison Park	Yes	Yes	
Leicester FC Primary – King Power Stadium	Yes	Yes	
Leicester FC Secondary – Pirelli Stadium (Burton Albion FC)	Yes	Yes	
Liverpool FC Primary – Prenton Park (Tranmere Rovers FC)	Yes	Yes	
Liverpool FC Primary – Anfield Stadium	Yes	Yes	
Manchester City FC Primary – Manchester City Academy Stadium	No	Yes	
Manchester City FC Secondary – Etihad Stadium	Yes	Yes	
Manchester United FC Primary – Leigh Sports Village	No	Yes	
Manchester United FC Secondary – Old Trafford	Yes	Yes	
Reading FC Primary – Select Car Leasing Stadium	Yes	Yes	
Reading FC Secondary – EBB Stadium (Aldershot Town FC)	No	No	N/K
Tottenham Hotspur FC Primary – Breyer Group Stadium (Leyton Orient FC)	Yes	Yes	
Tottenham Hotspur FC Secondary – Tottenham Hotspur Stadium	Yes	Yes	



West Ham FC Primary – Chigwell Construction Stadium (Dagenham and Redbridge FC)	No	Yes	
West Ham FC Secondary – London Stadium	Yes	Yes	