

## DCMS Select Committee Inquiry: Women's Sport

### Written evidence from the Sports Grounds Safety Authority

#### Executive summary

1. The Sports Grounds Safety Authority (SGSA) has provided written and oral evidence to the Future of Women's Football review, currently being conducted by Karen Carney MBE. This submission highlights some of the relevant points from that evidence but we would encourage the Committee to review our fuller submission which is available on the SGSA [website](#).
2. The SGSA welcomes the growth of women's football and the rise of women's sport in general. It is important that this growth in audiences is matched with strategic investment in safety, with particular attention to:
  - governance;
  - physical infrastructure;
  - facilities that better meet the needs of the changing demographics of crowds, with higher proportions of women and children attending; and
  - the capacity and capabilities of safety management teams.
3. We have recommended to the Future of Women's Football review that the SGSA's regulatory remit is extended to cover the Women's Super League. This will provide parity of regulation and offer assurance to spectators that safety standards are equivalent in both the men's and women's game. 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.
4. The SGSA has no regulatory remit for other sports beyond football. While we would expect that the regulation of other women's sport should be broadly in line with that of the men's sport, a risk-based approach is needed to ensure proportionality.

#### Context

5. This written evidence is submitted in response to the DCMS Select Committee Inquiry into Women's Sport which will address the following six questions:
  - a. How can the growth in domestic women's football be accelerated?
  - b. What should other sports be learning from the growth of women's football leagues in the UK?
  - c. What is needed for women's sporting organisations to grow audiences and revenues?
  - d. What action is needed to tackle sexism and misogyny in sport?
  - e. What needs to change at a regulatory level to facilitate more parity between men's and women's sport?
6. In this response, the SGSA provides comment on questions (c) and (e). However, we would like to highlight the written evidence submitted to the Future of Women's Football review, which focuses on the regulatory aspects of women's football.

#### The role of the SGSA

7. 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 provide strategic support and advice (on a fee recovery basis) to other sports, governing bodies and others both in the UK and internationally. Further detail outlining our role is provided in Appendix A.
8. 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 responsibility for the women's game and all assistance offered to date has been solely on an advisory basis.

### **Spectator safety**

9. Safety is a broad term which means that people present at a sports ground are protected against dangers of physical harm or injury arising from being present. In today's changing world, such dangers could arise from a range of factors including sports ground structures, safety management arrangements, terrorism, crowd disorder and other anti-social behaviour by individuals or groups which may cause physical harm or injury. Safety at a sports ground is not limited to the safety of spectators; it includes the safety of all people present at the ground. This will include measures to ensure the protection of groups such as club employees, stewards, agency staff, medical staff, players and officials during an event.
10. Responsibility for safety at a ground where designated matches are played rests with ground management. Larger grounds, including all those used in the Premier League and EFL, are regulated by the safety certificate issued by a local authority under the 1975 Act. In overseeing how local authorities discharge their functions and in taking licensing decisions, the SGSA seeks to satisfy itself that appropriate provision is being made to secure reasonable safety at a ground. The SGSA therefore works in partnership and seeks to ensure the provision of reasonable safety at sports grounds at which designated football matches are played through education, guidance and persuasion. If such an approach fails and the SGSA is concerned that reasonable safety is being compromised by the actions or inactions of others, the SGSA will use its regulatory powers to ensure reasonable safety is maintained.

### **What is needed for women's sporting organisations to grow audiences and revenues?**

11. The increased popularity in all levels of women's football, driven in part by the success of the Lionesses over recent years, has been 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. Other women's sports, such as rugby union and cricket have also seen significant increases in attendances. In the SGSA's view, this growth in audiences should 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.
12. Accessibility for disabled spectators must also continue to be a critical part of the progression in women's football and wider women's sport. Whilst its regulation is outside

the statutory remit of the SGSA, we work closely with others, particularly Level Playing Field, to improve standards and facilities.

### **What needs to change at a regulatory level to facilitate more parity between men's and women's sport?**

13. Currently, 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 have recommended to the Future of Women's Football review that SGSA's regulatory remit is extended to cover the Women's Super League. This will provide regulation proportionate to the risk profile, parity with the men's game and, importantly, establish the principle that both the men's and women's games should be equally safe for supporters.
14. We do not feel SGSA's regulatory remit should be extended below the Women's Super League given the lower risk profile of these fixtures. However, there should be clear minimum standards for clubs in the Women's Championship and below, and we stand ready to support the development of such minimum standards and to provide advice at grounds used in the Women's Championship.
15. 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, for example, consumption of alcohol or football-related violence.
16. An expansion of the SGSA's regulatory remit to include women's football is also a recommendation within an independent review of our organisation conducted in 2022 as part of the Government's Public Bodies Review Programme. The Government's written response to that review is anticipated shortly.
17. The SGSA has no regulatory remit for other sports, although we do work on an advisory basis to support improvement in safety in cricket via the English and Wales Cricket Board. We regulate on a risk-based approach, and we believe this principle should also apply to women's sports where regulation is necessary.

**SGSA**

**January 2023**

## Appendix A – Role of the SGSA

1. Our predecessor body, the Football Licensing Authority (FLA) was established following the Hillsborough Stadium Disaster Inquiry led by Lord Justice Taylor.
2. The Football Licensing Authority was reformed by the [Sports Grounds Safety Authority Act \(2011\)](#) which established the SGSA and gave the organisation powers to provide advice to other sports and in other territories. The SGSA has over three decades of experience in regulating the safety of football grounds in England and Wales. The 2011 Act did not affect the organisation's core regulatory role, which is set out below.
3. Under the provisions of the Football Spectators Act 1989 (1989 Act) the SGSA has two regulatory responsibilities:
  - To keep under review the discharge by local authorities of their functions under the Safety of Sports Grounds Act 1975 (1975 Act) in relation to grounds at which designated football matches are played (section 13 of the 1989 Act) which includes the issuing and monitoring of conditions within the General Safety Certificate.
  - To issue licences to admit spectators to any premises for the purpose of watching any designated football match played at those premises (sections 10-12 of the 1989 Act). Licences are renewed annually, informed by SGSA's matchday inspections and with direct oversight from the SGSA Board, for a fee of £100 per club, which the SGSA gathers on behalf of the Exchequer.

Designated football matches are defined as those matches played at the home grounds of clubs in the Premier and English Football Leagues, Wembley, and the Principality Stadium<sup>1</sup>. SGSA has published a [Oversight and Licensing Policy](#) which sets out how it discharges its duties. The SGSA has no regulatory role in relation to football matches in other parts of the UK or in relation to non-football sporting events.

4. The SGSA is a small organisation (c21 Full Time Equivalents), comprising a regionally based Inspectorate and a secretariat which oversees strategy, policy, communications and corporate services. It is funded primarily through grant-in-aid (c£1.6m per annum), supplemented by income (c£300-400k per annum) from its advisory services. The [strategic plan for 2020-2024](#) sets out the SGSA's key objectives, which are to:
  - Continuously improve our performance as the safety regulator for football grounds in England and Wales;
  - Raise the profile and status of sports grounds safety in the UK and internationally;
  - Become the strategic safety partner of choice for governments, sports governing bodies and organisers of major events; and
  - Improve our efficiency and performance as a non-departmental public body.
5. The SGSA provides advisory services to other sports on a cost-recovery basis, as permitted within the Sports Grounds Safety Authority Act; for example, the SGSA has a five-year agreement to provide advice and support to the England and Wales Cricket Board, as well as similar long-term arrangement with Sport Northern Ireland. Other current clients include FIFA, the Football Association of Wales and the Scottish Government. The organisation may also provide free advice to event organisers and other partners; for example, the SGSA was the strategic safety partner for Birmingham City Council in relation to the 2022 Commonwealth Games and provides strategic

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<sup>1</sup> For full statutory definition see: [Football Spectators \(Designation of Football Matches in England and Wales\) Order 2000](#).

consultancy to the Football Association in relation to the safe growth of the women's professional game. Further information on SGSA's statutory and advisory work can be found in its most recent [annual report](#).

6. The SGSA publishes guidance that is used by football, wider sport and the wider events industry as 'best practice' in event safety management. Its guidance is also used by architects across the world to ensure modern stadia are designed with good safety principles in mind. The SGSA's cornerstone guidance document, the [Guide to Safety at Sports Grounds](#) ("Green Guide") is now in its sixth edition and is provided free of charge to each club that we licence and to each local authority that we regulate. In 2021, we published [SG03: Event Safety Management](#) which provides further support for venues on the core elements of event safety management.