

**Women's football
consultation:
Ensuring consistent
spectator safety levels**

February 2024



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Executive summary

The Sports Grounds Safety Authority (SGSA) is the UK Government's expert body in respect of sports ground safety. It supports sports grounds, clubs, local authorities and others to create a safe and enjoyable experience for spectators. The SGSA has a regulatory duty, outlined in the Football Spectators Act 1989, to issue licences to admit spectators to grounds which are used by the men's teams operating in the Premier League and English Football League, as well as Wembley Stadium and the Principality Stadium.

Since 2019, the SGSA has supported the growth of women's football, through a partnership with the Football Association (FA). This has been delivered on a cost-free advisory basis and has helped to improve safety management and related processes in the women's game

In July 2023, Karen Carney published an independent review of women's football which included a recommendation that SGSA licensing is extended to include the Women's Super League. This consultation is the first step to implementing the recommendation. The aim of this consultation is to gather the initial views of industry on how the implementation of SGSA licensing and wider support for women's football can be achieved.

At the same time, we are conducting an information gathering exercise with all grounds in the Women's Super League and Women's Championship to get a better understanding of the spectator safety arrangements at grounds.

All of this information will feed into a second consultation, to be launched later in 2024, which will outline more detailed proposals on how licensing and oversight of the women's game can be achieved.

The closing date for responses is 22 April 2024. We welcome input from all clubs and grounds operating in the FA women's football pyramid.



1. Introduction

1.1 The SGSA is the safety regulator for professional football grounds in England and Wales and the UK Government's independent advisor on sports ground safety. We provide independent, expert advice based on three decades of ensuring football in England and Wales is a safe and enjoyable experience for fans. We use our experience to advise and support other sports in the UK and internationally. Put simply, our purpose is to ensure sports grounds are safe for everyone.

We have three core roles:

- **Regulatory** – we licence men's league and international football grounds in England and Wales and oversee regulation of their safety certification by local government.
- **Standards** – we set and raise safety standards through our world-leading best practice guidance, including the Guide to Safety at Sports Grounds (Green Guide), which is used to build and develop sports grounds around the world.
- **Advisory** – we provide strategic support for sports grounds, governing bodies and others, both in the UK and internationally.

1.2 The SGSA was established, initially as the Football Licensing Authority, in 1990 under the Football Spectators Act 1989, following the Hillsborough Stadium tragedy and subsequent inquiry led by Lord Justice Taylor. Its mandate was, and continues to be, to improve spectator safety at men's league and international football grounds in England and Wales. The 1989 Act introduced a requirement for a licence¹ to admit spectators for grounds where designated football matches² are played – that is any competitive men's football match played at a Premier League or English Football League (EFL) football ground, Wembley Stadium, or the Principality Stadium.

1.3 In 2023, Karen Carney MBE published an independent review of women's football – [Raising the bar – Reframing the opportunity in women's football](#). This recommended:

“The SGSA should extend its licensing scheme to all grounds used in the WSL to ensure high standards of safety, while the Women's Championship should implement a self-regulation model with guidance, support and assurance provided by SGSA”.

The [Government agreed to these recommendations](#) in its response, published on 4 December 2023.

1.4 This consultation is the first step to implementing the recommendation. This consultation will inform our proposals around licensing the women's game. These proposals will be published later in 2024. Our focus for this consultation is two-fold:

- Information gathering – getting a better understanding of the safety management arrangements at grounds in the Women's Super League and Women's Championship
- Opinion gathering – getting initial views on how the implementation of SGSA licensing and wider support for women's football can be achieved.

¹ Section 10 of the [Football Spectators Act 1989](#).

² Designated football matches defined in the [Football Spectators \(Designation of Football Matches in England and Wales\) Order 2000](#).



- 1.5 The consultation period will run from 26 February until 5pm on 22 April 2024. Throughout the consultation period, the SGSA will provide opportunities to engage with the process. These can be found at: <https://sgsa.org.uk/document/womens-football-consultation>.

2. Current situation

SGSA regulatory remit

- 2.1 Under the Football Spectators Act 1989 the SGSA has two regulatory responsibilities:
- To issue licences to admit spectators to any premises in England and Wales for the purpose of watching any designated football match played at those premises (sections 10-12 of the 1989 Act).
 - To keep under review the discharge by local authorities of their functions under the Safety of Sports Grounds Act 1975 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.
- 2.2 Both of these legal duties relate solely to the men's game. The SGSA does not currently have any regulatory responsibility for women's football.
- 2.3 The SGSA conducts its regulatory functions using a number of formal visits and assessments at all licensed grounds throughout the season (as outlined in its [Oversight and Licensing Policy](#)):
- **Matchday inspections.** These are a central tool in overseeing the safety management of licensed grounds and the oversight by local authorities through observing compliance with conditions included within the ground's General Safety Certificate.
 - **Ground assessments.** Based on an Inspector's knowledge and first-hand observations, this process provides a comprehensive assessment of the ground's compliance with relevant sports grounds safety legislation and guidance.
 - **Licence application assessments.** These are the assessments of the annual licence applications submitted by grounds. They provide evidence that the relevant areas of the ground meet the safety standards required to be able to admit spectators.
 - **Local authority audits.** These determine how well a local authority is ensuring compliance with relevant safety at sports grounds legislation by the ground(s) in its area subject to SGSA licensing.
 - **Attendance at Safety Advisory Group (SAG) meetings.** SGSA Inspector attend SAG meeting to provide advice and support to local authorities and other partners, and promote consistency in local decision-making.
- 2.4 In 2022, the Department of Culture Media and Sport (DCMS) carried out an independent review of the SGSA as part of the Government's public body review programme³. The review made 13 recommendations which included expansion of the

³ Sports Grounds Safety Authority [Independent Review](#).



SGSA's remit to cover the WSL, subject to the assessment of risks to fan safety. This is in line with the proposals in the Carney Review, outlined in paragraph 1.3.

SGSA support for women's football

- 2.5 In 2019, the SGSA commenced its support of women's football in an unpaid, advisory role. Working alongside the Football Association (FA), the SGSA has helped to improve safety management and related processes in the women's game. This included establishing minimum safety requirements such as producing operations manuals, ensuring a senior member of staff was dedicated to leading on safety related issues, player engagement, legislative requirements and verifying safe capacities at the grounds.
- 2.6 The SGSA has provided strategic advice to enable improvements to competition rules and to enhance the safety culture at venues which are not licensed by the SGSA. It is also a key contributor to the quarterly Safety Officer forum.
- 2.7 Matchday inspections have also been conducted at WSL and Women's Championship venues to help inform the SGSA's and FA's understanding of safety practices in women's professional football and to shape and share good practice. SGSA Inspectors also provided support to venues and to UEFA during the Women's European Competition held in England in 2022.
- 2.8 These observations have assisted the SGSA in identifying the different spectator safety requirements between the men's and women's games, particularly in relation to:
 - Spectator profile;
 - Ground infrastructure; and
 - Safety management.
- 2.9 These findings are being used to help shape further development of the wider competition rules and safety matters. This work has enabled the SGSA to build a picture of the challenges and opportunities that come with the growth of women's football.

Women's football

- 2.10 While there are commonalities, the women's professional game differs significantly from the men's game in terms of its maturity, funding and resources, structures/governance, supporter profile and the facilities used to host elite fixtures.
- 2.11 Over recent years, inspired by the success of the England women's national team, women's professional football is experiencing significant change and expansion. Spectator attendances are increasing as new fans are being attracted to the game by a greater prominence in the media. The establishment of NewCo highlights that the governance structures running the competitions are professionalising and expanding.
- 2.12 Clubs in the WSL and Women's Championship are required to nominate both a primary and secondary ground. For most clubs in the WSL, these nominated grounds are already licensed by the SGSA (as they host men's Premier League or EFL football). However, grounds nominated for use in women's football have frequently changed due to short-term leases and ground-sharing agreements.



- 2.13 In the 2023/24 season, 75% of the 24 primary or secondary nominated grounds in the Women's Super League are licensed by SGSA for the men's game. This drops to 42% of the 21 nominated grounds in the Women's Championship.

	SGSA licensed ground	Non-licensed ground
Women's Super League	18	6
Women's Championship	9	12

- 2.14 While this is changing, crowds in men's football have historically seen a much larger proportion of men than women attending matches. The current infrastructure and facilities available at grounds, the legislation surrounding the operating of those grounds and the safety requirements of clubs to manage the grounds have therefore reflected this male-dominated fan demographic.

3. Implementing SGSA licensing

- 3.1 As outlined in the introduction, the Government has accepted the recommendations from both the Carney Review and the SGSA's organisational review that the SGSA should look to become the regulator for women's football. This consultation aims to consider aspects related to SGSA licensing the women's game. It does not outline the details of the implementation, which will follow later in 2024.
- 3.2 The SGSA's suggested approach to implementation of the above recommendations is as follows:
- Both the primary and secondary grounds of clubs in the Women's Super League become licensed by the SGSA with effect from 1 August 2025.
 - The clubs and grounds within the Women's Championship are not regulated by SGSA, but are provided with enhanced advice and guidance.

Question

In principle, does this approach seem appropriate?

What questions, comments or concerns, if any, do you have about the approach? Please outline.

Principles for licensing the Women's Super League

- 3.3 The SGSA has developed the following principles to underpin its approach to licencing the Women's Super League and provide strategic oversight of the Women's Championship.



The SGSA's approach will be:

- a. Proportionate and tailored to the needs of women's football;
- b. Non-burdensome for either the industry or the SGSA;
- c. An advocacy-first approach to regulation and compliance; and
- d. Affordable for the women's game on a sustainable basis.

Question

Do you think these principles are appropriate?

What else could be included? Please outline your response.

Factors impacting safety management

3.4 Women's professional football attracts a different demographic to fixtures, including a greater proportion of women, children and families. This in turn may have an impact on the safety management of these fixtures through factors such as:

- Ingress, flow rates and late walk-ups to matches, including a larger proportion of people carrying bags. Impacts include the time taken to conduct bag searches and ensuring there is an adequate number of female stewards to conduct ingress searches and checks);
- Egress and general movement around the ground during matches, including the impact of these if there was an emergency during a game;
- A sufficient number of safeguarding officers, and/or trained stewards who can assist with the differing demographic of fans;
- Ticketing strategies;
- Fan engagement with players pre- and post- match.

3.5 Through the work the SGSA and FA have completed to date, the management of these factors occurs through matchday planning and risk management by the safety teams at grounds.

Question

Do the factors outlined in paragraph 3.4 sufficiently cover the safety management considerations at WSL and Women's Championship matches?

If not, what other challenges and factors need to be considered?

Please provide details in your response.

Considerations for SGSA licensing and oversight

3.6 The SGSA is considering the activities and resources it requires to licence the WSL and support the Women's Championship. A risk-based approach based on the experience of the SGSA will be utilised. The activities will take into consideration the



current status of grounds and the activities required for those currently licenced by the SGSA and/or certified by local authorities or grounds that are neither licenced or certified. The following table outlines differing licensing approaches that may be applied for WSL grounds, based on whether they are subject to the SGSA licensing and/or local authority safety certification.

Current status of ground	Suggested SGSA approach	Suggested SGSA actions
Licensed by SGSA and certificated by local authority	Add condition to SGSA licence requiring ground management to undertake match-specific risk assessment by competent person for WSL fixtures	<ul style="list-style-type: none"> • Risk-based matchday inspections (MDIs) to examine effectiveness of operations (potentially one WSL fixture per season). • Adapt existing ground assessment and local authority audit methodology to reflect the ground's usage in the women's game.
Local authority certificated-only	Issue SGSA licence to admit spectators, conditioned as above	<ul style="list-style-type: none"> • Risk-based ground assessment and MDIs to examine effectiveness of operations (potentially two per season, in line with other grounds licenced by SGSA) • Engage local authority and consider the safety certification process is appropriate
Not licenced or certificated	Issue SGSA licence to admit spectators (following application assessment), with condition requiring as a minimum a) Operations Manual in place and b) match-specific risk assessment by competent person for WSL fixtures	<ul style="list-style-type: none"> • Same actions as above

Questions

Do you have any comments on the approaches and suggestions outlined in the table at paragraph 3.6? Please outline.

What issues, challenges or concerns do you feel may arise from the approaches above? Please outline.

For both the WSL and Women's Championship, what advice and support can the SGSA provide to set and improve safety standards for grounds? Please outline.



4. Decision making process and timelines

- 4.1 The SGSA is planning to conduct a two-stage process for consultation with industry on the licensing of the WSL and support of the Women's Championship. This first stage will run from February 2024 – April 2024.
- 4.2 The second stage of consultation will present the key findings from stage 1 and the recommended approach for any final feedback before it is finalised and ratified by SGSA's Board. Stage 2 of consultation is expected to commence in May 2024, subject to the outcomes of the first stage.

5. How to provide feedback

- 5.1 The SGSA welcomes feedback and responses to this consultation document in a number of ways.
- 5.2 Ideally, please submit your response to the questions outlined via this online link: <https://www.surveymonkey.com/r/MYRWSY5>.
- 5.3 Alternatively, you can email us directly at: steve.stathakis@sgsa.org.uk.

The closing date for responses is 5pm, 22 April 2024.