

## **Written submission from Fair Play For Women to the DCMS committee Call for Evidence for the Inquiry into sport in our communities.**

### **1.0 About Fair Play For Women**

- 1.1 Fair Play For Women Ltd is a campaigning and consultancy organisation which raises awareness, provides evidence and analysis and works to protect the sex-based rights of women and girls in the UK.
- 1.2 Founded in 2017, our work is focused on understanding when and how gender-and sex-based rights conflict in law and policy making. Our aim is to ensure everyone's needs are fairly balanced and women and girls are not overlooked in good policy-making.
- 1.3 We believe in compassion and fairness for all. We support the rights of trans people to live in safety and to be treated fairly. We also support the rights of women and girls, and this is our focus. Protecting these rights in law requires that sex is not conflated with gender identity.
- 1.4 We are experienced policy stakeholder representatives acting on behalf of women and girls. To date we have been invited to engage in transgender sport policy meetings held by, inter alia, the IOC, World Athletics, World Rugby, England Rugby, Wales Rugby, Sport England, UK Sport, and on non-sport policy issues by MOJ, IPSO, EHRC, GEO, ONS and numerous private organisations.

### **2.0 Executive summary**

- 2.1 This submission illustrates the threat to sport in our communities being caused by transgender inclusion policies which have been widely adopted at many levels in almost all sports without any Equality Impact Assessment and which are having a negative impact in sport.
- 2.2 This is leading to two specific problems:
  - a. Self-exclusion by women and girls.
  - b. confusion and difficulty for volunteers in community sports clubs, including coaches, referees/ umpires and safeguarding officers.
- 2.3 Just one trans-identifying male has an impact on many females, who may be deterred for reasons of privacy or fairness, or fearful for reasons of safety. The numbers are not yet high but they are rising rapidly, with substantial impact.
- 2.4 This may seem like an issue for another committee to deal with. It is not. Grass roots sport depends on volunteers operating within a framework that provides safety and fairness.
- 2.5 Unless this is addressed, all the good work done to increase female participation, and to ensure there are volunteers to enable female and junior participation, will be countered to some extent by rules created to support a small number of males but which impact a large number of females.

### **3.0 What are the biggest risks to the long-term viability of grassroots sport?**

- 3.1 The push for “trans inclusion” from elite sport down to all levels of participation is causing problems for volunteers and participants alike. This is leading to two specific problems:
  - a. Self-exclusion by women and girls.
  - b. Increasing reluctance by those who referee contact sports to continue.
- 3.2 We have been approached by women who are themselves participating or whose daughters are participating in rugby, football, cricket, gymnastics, judo, boxing and cycling.
- 3.3 A few have raised their concerns with their national governing body, and none so far has reported that the NGB is open to considering the negative impact of male-bodied people in the female category. Generally the response is that “inclusion” is more important.
- 3.4 Most are fearful of raising their concerns, as they have seen how others have been vilified, called transphobic, and dismissed, both in sport and in other fields.
- 3.5 The specific concerns reported to us by parents include:
  - a. Safety fears for girls playing with boys who wish to be treated as girls (“trans girls”).
  - b. Privacy concerns for girls, as such boys are given free access to the female-only changing rooms. This leaves girls reluctant to use them out of embarrassment or for religious reasons. (This also applies to adult women.)
  - c. Safeguarding concerns, as normal principles which apply to all males are suspended if those males self-declare as women.
- 3.6 We know of cases where either the girl or the parent decides further participation is not possible, because of these fears.
- 3.7 Self-exclusion is hard to track but we know it is happening. We have conducted confidential interviews with females aged from 12 to 43 who have reported exactly this. For example:
  - 3.7.1 “I didn’t want to tackle in case I got hurt. I didn’t want to be on the pitch.” – 18 year-old British female footballer
  - 3.7.2 “We all know the outcome of the race before it even starts. It’s so demoralising.” – 16 year-old American runner (from a published source, not our research)
  - 3.7.3 “This event is supposed to be for women only, and we have males turning up. There is a mixed event they can do instead. But they want to be in the women-only one.” – adult female cyclist
  - 3.7.4 “They [trans-identifying males] are fastest than the best women in the country. What chance do I have?” – 23 year-old triathlete
  - 3.7.5 “Females are being forcibly teamed and not consulted. The decision to include males in the female rankings was taken behind closed doors.” – adult female cyclist
  - 3.7.6 “It will destroy the chances of girls who could have had a career. We’ll never hear of those women. Why on earth would girls go into a sport if they’ve got no chance of winning?” – adult female cyclist

- 3.8 This may seem like a matter of just a few trans-identifying people, but just one trans-identifying male has an impact on many females, who may be deterred for reasons of privacy or fairness, or fearful for reasons of safety.
- 3.9 Women and girls are half the population but are under-represented in physical activity and sport. Many NGBs are working to change this. Their own trans inclusion rule, cascaded down from the IOC through the NGB to local clubs, is undermining this.
- 3.10 Grassroots participation creates pathways to national and international achievement. The gulf in capability between males and females after puberty demands separate pathways, as evidenced in [this peer-reviewed published scientific paper](#). In time, this inclusion of males in the female pathway will have a negative impact on female participation and performance.
- 3.11 Most grass roots sport clubs rely heavily on volunteers, to run the club, to coach juniors and beginners, to supervise juniors in training and play, and to fulfil specific roles such as match referees/ umpires/ safeguarding officers etc.
- 3.12 The specific concerns reported by volunteer match/ event officials include:  
a. safety fears for women playing contact sport against trans-identifying men  
b. personal liability concerns, since in most cases it is not permissible to challenge a trans-identifying player who presents themselves to play  
c. ethical concerns, in being expected to pretend all is safe and fair, when it is clearly not  
The safety issues have been carefully researched and documented by World Rugby, as reported on their website here: <https://playerwelfare.worldrugby.org/?documentid=230>
- 3.13 We have also heard of wider safety fears for both female and trans players, especially in junior matches, in the event of a trans-identified player injuring, or being perceived to injure, a female player. Angry parents could harm the trans player, emotionally and perhaps even physically.
- 3.14 This may seem like an issue for another committee to deal with. It is not. Grass roots sport depends on volunteers operating within a framework that provides safety and fairness.
- 3.15 Unless this is addressed, all the good work done to increase female participation, and to ensure there are volunteers to enable female and junior participation, will be countered to some extent by rules created to support a small number of males but which impact a large number of females.