

## Briefing for Parliamentarians from Sex Matters, April 2024

Should boys and men who identify as trans be allowed to play sport in girls' and women's categories? The UK's Sports Councils [Guidance for Transgender Inclusion in Domestic Sport](#) in 2021 said: "The inclusion of transgender people into female sport cannot be balanced regarding transgender inclusion, fairness and safety in gender-affected sport". As football is a contact sport, there are both safety and fairness issues.

### **Male inclusion in women's football is already a serious problem**

The Football Association (FA) has approved more than 50 males to play in women's teams in England. There may be many more. Each male player affects many females – as seen in the Sheffield & Hallamshire league.

### **Current FA policy is not aligned with Sports Councils guidance or with FIFA**

**FA policy** was developed in 2014 in response to the 2013 Sports Councils Equality Group guidance (which said male players could play in female teams if they suppressed their testosterone).

**FIFA policy** (from 2011) is sex-based, and says nothing about testosterone levels. Current review focuses on definition and verification of sex, and how to treat players with differences of sexual development (DSDs).

### **The FA consulted on this in 2023 and has a revised policy ready but unpublished**

The FA has said it is waiting for FIFA and UEFA, but:

- FIFA policy (from 2011) refers to men's and women's teams; no mention of testosterone suppression
- FA policy has never been aligned with FIFA
- many UK governing bodies have diverged from their International Federation policy, in both directions.

### **The current policy is incompatible with the Carney report**

Recommendation 8 of the report by former Lioness Karen Carney MBE says "Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls." Meaningful access requires male-free play and changing rooms.

Recommendation 2 says: "The FA needs to fix the talent pathway in order to create generation after generation of world beating Lionesses." A talent pathway requires fair, safe playing opportunities. Different policies at different levels make no sense and are unworkable.

### **Questions for the FA**

- You say you are trying to grow the women's game, so why don't you protect it?
- How many male players are there now in women's football in England? How fast is this growing? Isn't the problem just getting bigger, especially as other sports restrict their female categories?

If there is any reference to "elite" vs grassroots:

- In what circumstances do you think it acceptable for you NOT to choose fair safe sport for women and girls?
- Why would some women deserve fairness while others do not?
- Most football is not elite. Where do you draw the line, and why?
- If their sport is unfair and perhaps unsafe lower down, how do girls get through to elite?
- What happens to the trans-identifying males when they move through towards elite? Isn't this just setting up false expectations for them?

### **Current FIFA policy (now being reviewed)**

“For FIFA men’s competitions, only men are eligible to play. For FIFA women’s competitions, only women are eligible to play.”

[\(2011. Regulations: FIFA Gender Verification\)](#)

### **Current FA policy**

Under 18s: no restrictions.

Over 18s: Blood testosterone within natal female range for an appropriate length of time so as to minimise any potential advantage. Hormone treatment to be verified annually.

“2.1 The FA has undertaken a review of its 2007 Policy, which adopted the International Olympic Committee’s position on transgender athletes as set out in the Stockholm Statement of May 2004.

2.2 The FA has given careful consideration to the Sports Council Equality Group “Guidance for National Governing Bodies of Sport” on “Transsexual People and Competitive Sport” and is pleased to adopt its recommendations to provide an inclusive environment which is supportive of and welcoming to trans people in football. As part of its review The FA has also sought the input and guidance of a specialist trans organisation.

2.3 The FA’s policy is based on the fact that during the growth period, leading up to puberty, there is little difference in male and female strength development. Mixed football is allowed until the U18 age group and under 18’s are entitled to play in boys’ or girls’ teams regardless of their birth sex.

2.4 However, hormonal changes brought about by puberty may result in: a. safety issues, due to a general distinction between males and females in sport as a result of different muscle strength caused by testosterone; and b. fair play issues, due potentially to differences between the sexes, and the fact that oestrogen and testosterone which is often taken as part of an individual’s gender reassignment, can also have physical effects which may lead to competitive advantage.

2.5 For this reason, it is necessary to have in place a fair and considered policy to allow participation for all in football, and ensure fair competition and the safety of all those on the field.

### **Under 18**

1. Pursuant to FA Rule C4(A)(xiii) on mixed football, any person playing football in the age ranges Under 7 to Under 18 may play in a match involving boys and girls, without restriction. There are therefore no conditions regarding any individual playing in a match under their reassigned/affirmed gender in these age ranges.

### **18 and over players (Adult players)**

2. Pursuant to FA Rule J3 on mixed football, any players playing in an age range above the Under 18 age range must be of the same gender.

3. However, an individual may be eligible for participation in their affirmed gender. This will be subject to the approval of The FA on a case by case basis; how The FA reviews an application is set out below.

4. In reaching a decision, The FA will have regard to the following two factors: (1) the safety of the applicant and fellow players, and (2) the need to ensure fair play and fair competition.

The FA will assess a players’ application to play in their affirmed gender on a case by case basis in line with its commitment to promoting Football for Everyone. It is the FA’s firm view that gender identity should not be a barrier to participation in football.

[\(The Football Association \(2015\). Policy on Trans People in Football.\)](#)

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