

**Written evidence submitted by Dr Alex Culvin, Dr Beth Fielding-Lloyd and
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**Department for Culture, Media and Sport
Committee Call for Evidence – February
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Summary

This call for evidence is particularly apposite as athlete welfare and EDI issues continue to appear in mainstream media discussions, alongside a burgeoning interest in these topics within academia. During COVID-19, people yearned for the return of sport, both as participants and spectators, and during the current economic downturn, sport continues to provide routine, distraction and joy. Pressure is often placed on elite women athletes to be role models, to inspire young people, to be exemplars who energise the public into physical activity which might prevent and alleviate poor health. It is essential that those who govern and deliver sport acknowledge the precarity of women athletes and sport, and ensure that the workplace conditions, physical and mental health, safety and economic wellbeing of women athletes are safeguarded and prioritised as attempts are made to grow sport.

The seminal moment of 'equality' in women's sport is highly coveted. However, it is important to ask equal to what? For women's sport to reach 'equality' we must first shift the needle to discuss equity; without equity, equality is impossible. Sport is heavily shaped by socio-cultural trends and shifts, which emphasises the need for equality, diversity and inclusion strategies, implementation and regulation. A lack of diversity in sport leads to a perpetuation and exacerbation of already existing barriers for athletes.

Our evidence will be focused on two of the questions in the call which will allow us to allow us to offer a corrective to calls for a rigid, numbers driven approach to developing women's sport which may place at risk the very athletes who, using the Euro 2022 winning squad as an example, raised the profile of women's sport and inspired us over the summer:

- I. How can the growth in domestic women's football be accelerated?
- II. What should other sports be learning from the growth of women's football leagues in the UK?

The key arguments we present are:

1. Player welfare and universally standardised, sustainable working conditions for players in women's football are fundamental to the future success of the sport.
2. The professionalisation processes that are occurring and evolving in women's football are distinct from those in the men's game and therefore gender-specific considerations must be made that reject a uniform, mainstreamed, approach to working conditions and player welfare.
3. Whilst support (financial, networks, resources) from men's professional clubs is welcome, it cannot be relied upon for the long-term interests of women's sport due to a likely continued lack of sustained and planned commitment.

4. The upward trajectory of women footballers and their performances on the field has not been matched with a corresponding investment in appropriate levels of support staff with relevant expertise in high-performance cultures, which limits the potential growth of women's sport and puts athletes at risk at work.
5. Women's professional football in England is currently being under-sold due to a lack of willingness to invest and take risks in promoting the sport as a product worthy of fan attention and expenditure.

Information on evidence contributors

We have decided to submit evidence in response to the DCMS Committee's call for evidence on women's sport as we have shared professional interest in the global development of women's sport and more specifically on sport as a site of identity negotiation, gender equity advocacy and social justice. We have produced a number of internationally peer-reviewed publications related to the topics of women's football, professionalisation of women's sport and sport equity (details at end of submission). Our collective expertise and experience is internationally focussed which means we can offer a diverse and unique perspective on the women's sport landscape.

Dr Alex Culvin works in global policy and strategic relations at FIFPRO, the global union of professional footballers. Alex is also a senior lecturer in Sports Business at Leeds Beckett University. Alex is a former professional footballer who played in both England and Europe and was an England youth international. Alex's PhD was the first to examine football as work for women in England, focusing on employment policy and workplace conditions. Her research interests centre on elite sport, policy, gender and business. Alex is the chair of the Football Collective, a global network of football scholars and a Policy Advisor for Fair Game. Alex's work has been published in the Telegraph, BBC Sport and The Independent. She tweets from @alexculvin.

Dr Beth Fielding-Lloyd is Principal Lecturer in sport communication and culture at the Academy of Sport and Physical Activity at Sheffield Hallam University. She is an internationally recognised scholar of gendered organisational practices and media representations in sport using methods of discourse analysis. Her current research interests are in the global development and professionalisation of women's football, media representations of major sport events and women's sport as a space for social justice and advocacy. She is also co-founder of the Sport, Media and Identity network (@SM_Identity), which aims to bring together sport journalists and academics to promote critical and inclusive practices in sport media.

Dr Donna Woodhouse is a Senior Lecturer in the social and cultural aspects of sport at the Academy of Sport and Physical Activity at Sheffield Hallam University, with a specialism in EDI. Her FA and ESRC funded PhD at the Sir Norman Chester Centre for Football Research examined the growth of football for females in England, Norway and the USA. She has worked in the voluntary and statutory sectors as a community safety and community development officer and manager on a number of regeneration projects. Her work covered areas such as training groups in stadia communities and working with local authorities and professional sports clubs (Federation of Stadium Communities), writing policy (Hammersmith and Fulham Social Services) and running initiatives to address crime and anti social behaviour (Government Office for the West Midlands SRB). She has also written about women's football for Sportal, as well as being a contributor/monitor for the Guardian's Football AllTalk web site.

I: How can the growth in domestic women's football be accelerated?

Given the specific question in the DCMS call for evidence on 'examine growth of women's football and support for women's sport', it is evident that the Department acknowledges the growth of women's football and women's sport more broadly, whilst simultaneously asking 'what next and how?' To this end, it is of great importance that we highlight that both equitable working conditions and player welfare are paramount to the continued growth of women's football and women's sport more generally.

Athletes are the most important resource to any club or federation. Without the athletes, sport in any sense ceases to exist. Yet academic analyses to date rarely take a player-centric approach, indeed discourse in the media positions athletes as a homogenous group of 'lucky individuals' who get to play sport for their career and that they should 'shut-up and play'. This discourse is problematic as it is simply untrue. For the majority of athletes, their careers are precarious, short and littered with uncertainties. Culvin's (2019) research supports this notion, as her research examined the employment and workplace conditions of professional women footballers in England. This research demonstrated that their careers are precarious, uncertain and compounded by their gender. Further, the research highlighted that it is not enough to have the term 'professional' without the necessary conditions that allow players to compete at their peak.

Whilst it is commonplace to herald the professionalisation of women's football in some countries as evidence of significant progress in gender equality in the sport, and a sign of a positive future for the game, we argue that the English Football Association's (FA) conceptualisation of the Women's Super League (WSL) has not consistently worked in the best interests of the sport and its players, clubs, and fans. Standards of player welfare in English women's football have lagged behind those of the male game. Injured players, for instance, have only received their basic wage for the same 18 month period as in the English Premier League (EPL) since the current 2022/23 season, whereas they could previously be sacked with 3 months' notice from diagnosis if unable to play because of injury or ill health for more than 3 months. With injuries an occupational hazard, the FA should work to limit gendered precarity, given that a female footballer is more likely to suffer a ruptured ACL than a male counterpart. The causes of ACL injuries are often presented as being rooted in biology but they are exacerbated by conditions in the workplace, support being unequal and sometimes inaccessible. Women players also suffer the effect of unevenly distributed expertise, with support staff having limited knowledge of high-performance cultures, alongside a more general lack of sport science research into women.

Historically, sports science research has predominantly focused on men. The outcome of this preoccupation with male-centric research is that women, their bodies, their performance and their physiology is not accounted for in the scientific literature. Consequently, and perhaps more problematically, women are marked and analysed as 'little men' in their performance and subsequent

analysis; therefore the physiology and performance of women athletes is presumed, rather than tested with any scientific rigour. Fundamentally, women are omitted from research and this threatens their performance, their potential as athletes, their work conditions and also their careers.

Professionalisation is not a silver bullet when it comes to better working conditions and centralising player welfare. As women's sport continues to professionalise, it becomes essential to better understand the gender-specific needs of athletes. Universal playing standards must be introduced, enforced, and regulated which allow professional women athletes to perform at their peak. To this end, we are calling for greater recognition and resources into women's sport to better understand the gender-specific needs of their profession and establish sustainable working practices.

Maternity and parental cover should be recognised as a fundamental part of the policies and regulations in federations and clubs. Research from FIFPRO (2017) and Culvin (2019; 2021) demonstrates that sport will lose a high percentage of its athletes if they feel as though they have to choose between a family and their career. This is a decision that athletes should never have to make but also is a potentially huge loss to the industry and future of women's sport. In January 2023, Sara Bjork became the first player to win a claim against her club using the FIFA maternity regulations. Bjork worked with the worldwide representative organisation of professional footballers FIFPRO, to successfully claim against her former employer Olympique Lyonnais. Bjork's case is not only historic as the first to successfully utilise the FIFA maternity regulations, but also serves as a reminder that whilst players have rights as workers, those rights need to be protected, enforced and regulated at all times.

Employment for female players is precarious and the women's game remains in a risky economic position amidst integration into the existing system of male professional football, with many players on short term contracts and employed in dual careers. The salary cap, driven by the FA's ambition to ensure financial sustainability and self-sufficiency, restricts club spending on wages to no more than 40% of turnover, although some clubs benefit from "philanthropic" investment from parent clubs. The average professional player is thought to earn less than £35,000-a-year. International labour standards are essential mechanisms to ensure that the growth of the global economy ensures benefits to all. Sporting exceptionalism often positions sport as an outlier, when in fact, sport is first and foremost an economic activity. Therefore the establishment and enforcement of universal labour standards are as essential and relevant to the continued development of women's football and women's sport more broadly as they are to any other industry.

The FA's implementation of the professionalisation of women's football sought to prioritise the sustainability and financial viability of the WSL, as opposed to the work conditions and welfare of players. As documented above, this priority has led to significant oversights in working conditions and player welfare and also to simplistic assumptions around how women's football can be integrated into existing (male) professional structures. The insistence that the WSL's future is best secured by clubs aligning

themselves with male 'parent' clubs *has* led to more buy-in from EPL clubs. However, some historically established women's clubs have been excluded from the highest level or even folded. In 2009, without backing from the men's club, Doncaster Rovers Belles became a sport-based social enterprise, a model which precludes them from obtaining a licence from the FA. Notts County Ladies, formerly Lincoln Ladies, had to relocate to secure the support of a male club then were forced to withdraw from the WSL in 2017, the parent club saying that it could not afford to continue support. The concern here is that WSL success will be monopolised by a small cadre of EPL supported clubs whose male clubs can afford to absorb potential losses from women's teams. This monopolisation has the potential to stunt the growth of women's football by exacerbating already pronounced competitive imbalance in the WSL.

However, even when male clubs *can* afford to support a women's team, they may choose not to do so adequately. Liverpool Women's commercial revenue in 2019 was £831,699, much less than Chelsea's £3,334,604 and Manchester City's £2,048,000. WSL champions in 2013 and 2014, the club suffered relegation in 2020 at a time when the parent club posted pre-tax profits of £42 million. The club regained its WSL place in 2021-22 but is placing low in a League in which competition for the title is, in reality, only between 4 or 5 clubs i.e. the League lacks strength in depth. Furthermore, we have seen that WSL clubs' integration with EPL clubs does not typically extend to equal access to appropriate facilities, infrastructure and personnel support. In January 2023, a number of WSL fixtures were postponed at short notice due to frozen pitches at smaller stadiums with one game abandoned after just 6 minutes of play. Frozen pitches are a risk to player health and safety, frustrate fans, particularly away fans who may have made long journeys, and also present risks to the reputation of the League when those postponements impact on televised coverage as was the case recently with Brighton v Arsenal.

In 2020, the Covid-19 outbreak exposed and underlined the fragility of elite women's football. In comparison to men's football, the women's FA Cup was suspended, as well as all play below the Championship, and the season was curtailed due to a lack of funding for testing. In contrast, a £4 million investment meant the EPL could be completed. Reading FC furloughed its women's squad with no equivalent action being taken in the men's professional game, further evidencing a lack of commitment and investment in women's football as a product. Moreover, the EPL gifted the WSL \$1.2 million for Covid testing to ensure the 2020/21 season could restart. This lack of investment during the pandemic was not just felt acutely in England. During the Asian Football Confederation's 2022 Women's Asian Cup in India, a Covid outbreak occurred in the Indian team which meant their tournament withdrawal due to the team triggering article 6 of the Women's Asian Cup 2022 regulations, of having a minimum of 13 players for their match. To contextualise further, the Women's Asian Cup also doubled up as the qualifiers for the Women's World Cup 2023 and the Indian women's team had been in a Covid bubble for 6 months in preparation. It is important to highlight the global undervaluation of women's football and how this impacts the conditions and welfare of women's players.

Attempting to ensure the sustainability of women's sports by adopting a merger model is not new, having been encouraged in other sports such as cricket (Lusted & Fielding-Lloyd, 2017), at different levels. However, the approach typically relies on male clubs dictating the level of resource sharing which in practice does little to challenge the continued prioritisation of male clubs' interests. For example, when looking at club structures, FIFA (2022) recently found that 15% of football clubs have a specific women's football department that has no support from other departments in the club, such as sport science, welfare, etc. and only 17% of clubs could describe their support and responsibilities for men's and women's teams as being fully integrated.

The FA is apparently exploring whether the EPL might take over the running of the WSL. The proposed handing over of the domestic elite women's club game and the uncoupling of control between professional domestic and international football carries risk. WSL clubs have fielded 202 players from 28 countries outside of the UK and Ireland, the desire to raise the profile of the League potentially conflicting with supporting Championship clubs to ensure competitiveness. There is a need to ensure aspirations for international success across age groups do not become secondary to the ambitions of the WSL and the FA has indicated that it will introduce Home Grown Player rules. However, here there is another disparity between the male and female game. EPL teams may have a maximum of 17 players who are not home grown in a squad of 25; WSL squads, which have a maximum of 23 players, must have a *minimum* of 12. This sits alongside a points-based system where only international players of the highest calibre who are able to make a significant contribution in footballing terms to the development of the women's game are eligible for FA support in terms of Tier 2 (Sportsperson) and Tier 5 Temporary (Creative and Sporting) visas. It is crucial that the governing body views the sport as a chain from grassroots to international and avoids making decisions based on promoting short term League spectacle which may undermine feeder leagues below WSL, as well as WSL itself, and ultimately have a negative impact on international performance.

II: What should other sports be learning from the growth of women's football leagues in the UK?

The FA has struggled to articulate a consistent and coherent vision for the professionalisation of women's football in England and appear to have settled on a paradox where the sport is marketed as a product different from the male game, extolling its virtues as a family friendly game with conventional connotations of femininity, whilst simultaneously extolling the virtues of women's clubs being financially dependent on the male professional game. The marketing strategy from both the FA and WSL clubs themselves, and popular media representations, have commonly presented the women's game as "fairer" and "more innocent" than the men's elite game. Whilst other sports might see this framing of women football players as a positive representation, it reveals the gendered expectations of football players as role models where

women players are expected to be elite athletes, promote athlete-fan intimacy as social media ambassadors, and inspire girls to play to an extent that is not required at the elite level of men's football.

Social media has been seen by the FA as key to providing increased visibility for the WSL, a decision originally driven due to the lack of mainstream media profile of women's football but now with the aim of transforming the player-fan relationship, part of constructing an identity for women's football distinct from the men's game. However, much social media interaction is often not focussed on the game but rather the personal lives of players, forcing them to expose their private lives in a way not true of male players, and compelling them to carry out time consuming, emotionally invested work. Caution should be taken not to alienate a historically engaged fan base who look less to social media and also not to present the game as niche or trivial due to an over reliance on social media.

We learnt during the COVID-19 pandemic how crucial fan created atmosphere is to producing alluring television broadcasts when games were played behind closed doors or in front of limited crowds. Due to the England National Women's Team's success in Euro 2021, expectation for increased attendances at WSL fixtures in 2022/23 was high. Such expectation proved well placed when, with a sustained marketing campaign Arsenal sold 60,000 tickets for their first fixture against their north-London rivals Tottenham. However, crowds at club games remain low overall, with Everton averaging only a little over 1000. Sky reported viewing figures of 482,000k for a pay per view Liverpool v Chelsea fixture, and the BBC registered a peak figure of 800,000 for an Everton v Manchester City game. So, although live attendance and viewing figures have improved (as has the production quality of TV coverage), attendance remains an area of concern and it is unclear what the strategy for further growth is.

The argument is frequently made that it is better for both player and spectator experience to hold women's matches in smaller stadia, increasing the likelihood that there will be full(er) attendance and a noisy atmosphere, than have larger stadia with spectators spread, empty seats and diffuse crowd noise. However, the underlying message which might be read into this approach is that less is expected of a women's sport event, a rather patronising and apologetic stance. Further, professional women's sport is not at the stage where it can afford to refuse the additional ticket revenue and sponsorship potential of holding women's games in large, well-known stadia, well-connected to infrastructure. The majority of women's clubs, for instance, play most or all of their games at grounds far from men's stadia, and these venues are typically less accessible by public transport. Whilst some players representing Iceland at Euro 22 viewed it as a training facility, disappointed at not being based at the stadium of a men's professional team, Manchester City's 7000 capacity Academy stadium is purpose-built for the women's team, located a short walk from the men's Etihad stadium and is well-served by public transport. Clubs such as Arsenal, Chelsea and Everton have stadia which, whilst not this close, are reachable by a short public transport journey. However Manchester, Tottenham, Brighton, Birmingham and Leicester play 60-90 minutes away from the parent club stadium. In ground sharing arrangements which would arouse fan

fury in the male game and generate intense media coverage, Aston Villa play at the home ground of Walsal's men's club, a West Midlands rival and Liverpool at the home of Merseyside men's rivals, Tranmere.

The FA equated WSL success with: winning the 2023 World Cup; improving player welfare; doubling participation; doubling attendance, the latter a decision not made in partnership with women's clubs. The decision to focus on attendances meant some clubs falsified returns to meet what they saw as unachievable targets. Given that building, enhancing and maintaining a good relationship with fans is a fundamental principle of sport marketing, the FA, understandably, wished to attract more fans to WSL and decided to focus on appealing to fathers and their teenage daughters who had not previously attended women's club matches (Fielding-Lloyd, Woodhouse & Sequerra, 2020). However, there was an absence of strategy around retaining and enhancing the existing fan base, contrary to sound sports relationship marketing approaches which emphasise the need for building trust and commitment which then leads to a commitment to attend, buy merchandise, engage with media coverage and promote the sport via word of mouth. Furthermore, WSL clubs frequently give away free tickets to artificially boost attendance figures and enhance the atmosphere. However, other sports should be aware that the use of complimentary tickets is problematic in that it is unlikely to encourage repeat attendance so does not aid financial sustainability, and also devalues the product (the elite women's club game) as well as making attendance disposable. We contend that rather than concerning themselves with artificially inflating attendance or inducing 'atmosphere', women's sport leagues need to show confidence and ambition in their products by promoting them as viable forms of sport entertainment that are worthy of fan attention and expenditure in stadia that are accessible and well-equipped.

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Women's Sport - Department for Culture, Media and Sport Committee Call for Evidence – February 2023

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