

Women and Girls in Sport Strategy Consultation

Submission by Working It Out

May 2025

Working It Out (WIO) has prepared this submission guided to provide feedback on the *Women and Girls in Sport Strategy: Consultation Guide* (the Guide).

As Tasmania's sole dedicated support, advocacy, and education service for the lesbian, gay, bisexual, transgender, intersex, queer, and asexual (LGBTIQA+) community, WIO is committed to fostering change through education grounded in lived experience. Our goal is to empower LGBTIQA+ Tasmanians to lead fulfilling lives.

WIO welcomes this opportunity to bring the LGBTIQA+ perspective, especially the inclusion of transgender and gender diverse (TGD) women and girls, as well as women and girls with innate variations of sex characteristics (intersex), to this consultation process.

It is pleasing to read in the Guide that the intention for the Strategy is “to provide a strategic framework to enable *all* women and girls in Tasmania to access and engage in a sport or active recreation activity of their choice in a *safe, inclusive*, and fun way” (my emphases). The case for change is clear and well-articulated. The draft vision specifies the focus of the strategy on “equitable access to participate ... in a *safe, inclusive* and fun way” (again, my emphasis), and the potential focus areas are clear, again with mention of “Safe and welcoming environments”.

It is vital, in making such statements about creating safe, welcoming and inclusive sporting environments for *all* women and girls, that the unique experiences and barriers faced by LGBTIQA+ women, girls, including trans women and non-binary people and those with innate variations of sex characteristics, are understood and addressed. Since 2020, WIO has been supported by the Tasmanian Government, initially via the Department of Health's Healthy Tasmania Fund, then by the Department of State Growth's State Grants Program, and now the Active Industry Fund, to provide information, education and support to the sport and active recreation sector on LGBTIQA+ inclusion.

Early in this period, we conducted a community survey to investigate the experiences of LGBTIQ+ people participating in community sport here in Tasmania. Key results from WIO's survey - where 58% of participants identified as women/female and a further 9% as non-binary, with 17% of all respondents indicating they had a transgender experience – indicated that:

- 66% agreed or strongly agreed that attitudes, language and behaviours exist in sport in Tasmania that may prevent LGBTIQ+ people from feeling safe and welcome;
- 58% had witnessed language, attitudes or behaviours that may be hurtful to or may exclude LGBTIQ+ people; and
- 83% thought more needed to be done to create a safe and welcoming environment for LGBTIQ+ people in sport in Tasmania.

Sexual Orientation

These findings supported international research projects *Out on the Fields*¹ in 2015, and *OutSport*² in 2019, which investigated homophobia in sport and found:

- 80% of respondents had witnessed or experienced homophobic behaviour in sport;
- 35% of lesbian/bisexual females aged 15-21 have been the target of homophobic behaviour in sport;
- 73% of gay, bisexual and straight people believe it is not safe for LGB people to come out in youth sport environments; and
- Nearly 90% of LGBTQ people surveyed in 2019 believe homophobia and transphobia remain current problems in sport.

Coupled with these experiences of homophobia is the negative stigma associated with female participation in sport, most often seen in sports historically dominated by men such as Australian rules football, cricket or soccer (football). Monash University published a research report in 2020, “Identifying effective programs to maintain and increase women and girls’ participation in sport”³, conducted as part of the Victorian government’s *Change Our Game* program to increase participation of women and girls

¹ “Statistics on Homophobia and Transphobia in Sport”, <https://outonthefields.com/media/>; Retrieved 9/5/2025.

² “Statistics on Homophobia and Transphobia in Sport”, <https://outonthefields.com/media/>; Retrieved 9/5/2025.

³ Bevan, N, Jeanes, R, & Denison, E, 2020, *Identifying effective programs to maintain and increase women and girls’ participation in sport*, Monash University, https://9a8f3e48-7f75-4dc7-90f6-bba7116a7837.usrfiles.com/ugd/9a8f3e_d4d86ffa3f324cdc90b55bd0fc6028aa.pdf; Retrieved 10/5/2025.

in team sport. Analysis of responses to questions asking why some girls stop playing male-dominated sports, and what can be done to make sports clubs more inclusive and welcoming, revealed one of the key themes was “Gender and sexuality stigma, which perpetuates common attitudes and negative language towards women”. Put simply, participation in sports that are seen as non-conforming with ‘biological sex’ can lead to stigma, bias and exclusion.

This translates to assumptions being made around sexuality, for example, with 88% of women rugby players surveyed in a British study⁴ reporting that most people assumed they were a lesbian because they played rugby. This can impact negatively on participation rates of women and girls of all ages, including in sports not historically dominated by men, with sports participation being perceived as ‘manly’ in general, according to the Monash study⁵, and therefore undesirable to many women and girls not wanting to be seen as such.

There are clearly barriers at play here, predominantly related to club culture and the acceptance of sexist and homophobic language, often in the form of ‘jokes’, which negatively impact on the safety, welcome and inclusion felt by straight, cisgender and LGBTIQ+ female participants alike.

Gender

Separating the gender and sexuality stigma associated with women and girls in sport is almost impossible as they are so intersecting and intertwined in general societies’ basic understanding⁶. However, the issues surrounding sport participation for TGD and/or intersex women and girls are unique complex, and also a result of the dominant but often misinformed discourse influencing society.

Almost since the first woman competed at an Olympic Games, women’s gender has been scrutinised (almost exclusively by men) because their participation in physical activity was perceived as a masculine pursuit. This ultimately led to ‘gender verification’ at elite levels to ensure a ‘level playing field’, a concept which has become a central argument for excluding some women from women’s sport. Gender verification has

⁴ “New research shines the light on discrimination in women’s rugby”, 2020; <https://premiershiprugby.com/content/new-research-shines-the-light-on-discrimination-in-womens-rugby>; Retrieved 10/5/2025.

⁵ Bevan, N, Jeanes, R, & Denison, E, 2020, *Identifying effective programs to maintain and increase women and girls’ participation in sport*, Monash University, https://9a8f3e48-7f75-4dc7-90f6-bba7116a7837.usrfiles.com/ugd/9a8f3e_d4d86ffa3f324cdc90b55bd0fc6028aa.pdf; Retrieved 10/5/2025.

⁶ Bevan, N, Jeanes, R, & Denison, E, 2020, *Identifying effective programs to maintain and increase women and girls’ participation in sport*, Monash University, https://9a8f3e48-7f75-4dc7-90f6-bba7116a7837.usrfiles.com/ugd/9a8f3e_d4d86ffa3f324cdc90b55bd0fc6028aa.pdf; Retrieved 10/5/2025.

varied from physical inspections of women's genitals to blood tests for chromosomes or testosterone levels⁷. As long as sport is primarily segregated based on a binary view of gender – male and female – these views and practices will likely continue⁸.

In 2021, the International Olympic Committee released their **Framework on Fairness, Inclusion and Non-Discrimination on the Basis of Gender Identity and Sex Variations** (the Framework). The IOC described the Framework as seeking to “promote a safe and welcoming environment for everyone involved in elite-level competition” as well as recognising:

“both the need to ensure that everyone, irrespective of their gender identity or sex variations, can practise sport in a safe, harassment-free environment that recognises and respects their needs and identities, and the interest of everyone – particularly athletes at elite level – to participate in fair competitions where no participant has an unfair and disproportionate advantage over the rest”⁹.

Importantly, the IOC emphasised that while the Framework was drafted with the specific needs of elite sports competitions in mind, the general principles of inclusion and non-discrimination should be promoted and defended at all levels of sport, especially for recreational and grass-roots sport.

These principles are in alignment with those expressed in the 2019 Australian Sports Commission's (ASC) **Guidelines for the inclusion of transgender and gender diverse people in sport**¹⁰, developed with the Australian Human Rights Commission (AHRC) and the Coalition of Major Professional and Participation Sports (COMPPS). These guidelines were developed to “provide guidance to sporting organisations on promoting the inclusion and participation of transgender and gender diverse people in sport”¹¹.

⁷ “Competitive Sport”, https://www.clearinghouseforsport.gov.au/kb/sexuality-and-gender-perspectives-on-sports-ethics#competitive_sport; retrieved 10/5/2025.

⁸ “Competition Structures”, https://www.clearinghouseforsport.gov.au/kb/sexuality-and-gender-perspectives-on-sports-ethics#competition_structures; retrieved 10/5/2025

⁹ “IOC releases Framework on Fairness, Inclusion and Non-discrimination on the basis of gender identity and sex variations”, 2021, International Olympic Committee, <https://www.olympics.com/ioc/news/ioc-releases-framework-on-fairness-inclusion-and-non-discrimination-on-the-basis-of-gender-identity-and-sex-variations>, retrieved 11/5/2025.

¹⁰ “Guidelines for the inclusion of transgender and gender diverse people in sport”, 2019, Australian Human Rights Commission, https://www.sportaus.gov.au/integrity_in_sport/transgender_and_gender_diverse_people_in_sport; retrieved 11/5/2025.

¹¹ “Guidelines for the inclusion of transgender and gender diverse people in sport”, 2019, Australian Human Rights Commission, https://www.sportaus.gov.au/integrity_in_sport/transgender_and_gender_diverse_people_in_sport; retrieved 11/5/2025.

These guidelines have provided a framework for many National Sporting Organisations (NSO) to develop inclusion policies for both community and elite level competitions.

Unfortunately, in the years since the release of the IOC Framework and the ASC Guidelines, several international sporting bodies have responded to concerns around the ‘level playing field’ concept at the elite level (and more recently in community sport in the UK and USA) in a way that has created fear at all levels. The misinformed fear is that allowing transgender (and intersex) women and girls to participate as their affirmed gender will see them dominate competitions due to a perceived ‘unfair advantage’. Much of the research cited when sports have introduced such policies, designed to *exclude* some women from the women’s category rather than *include*, wrongly refer only to the advantage that cisgender men have over women¹², and usually only in a physiological sense, ignoring the myriad of factors that influence sporting performance. They have also come about as a result of a moral panic regarding the definition of a woman, with arguments centring round a fear that the rights of women are being eroded and that their safety is at risk (ignoring real concerns such as inequitable access, funding and leadership, and sexual assault perpetrated predominantly by cisgender men).

In terms of community sport, most enquiries WIO has received from clubs and sporting organisations regarding TGD sport participants are about seeking advice on how to create safe and inclusive environments. These community sport representatives are often aware of the ASC’s Guidelines and/or the IOC Framework, however it has been common for people to tell us they have sought advice or information via the Sport & Recreation/Active Tasmania webpage and not found anything developed locally for the local context. This is a gap that needs addressing.

Tasmanian Context

In developing the *Women and Girls in Sport Strategy*, there must be clarity about how sports administrators, officials, coaches, players and volunteers are to ensure a safe, welcoming, inclusive and fun environment for *all* women and girls, including LGBTIQ+ women and girls, but especially TGD and intersex women and girls. The Strategy must at minimum address the following local factors:

1. Tasmania’s Anti-Discrimination Act – State Sporting Organisations (SSOs), as well as local associations and clubs, and TGD and intersex sports participants, need to know their legal rights, responsibilities and obligations under this Act. It

¹² Hamilton, B., Guppy, F. & Pitsiladis, Y. Comment on: “Transgender Women in the Female Category of Sport: Perspectives on Testosterone Suppression and Performance Advantage”. *Sports Med* 54, 237–242 (2024). <https://doi.org/10.1007/s40279-023-01928-8>. Retrieved 10/5/2025.

contains higher levels of protections than those provided under the Commonwealth's Sex Discrimination Act, which is the legal framework used in the ASC's Guidelines.

2. Tasmania's Gender Recognition laws – in 2019, Tasmania introduced some of the most progressive legislative changes regarding gender recognition on legal documentation. These laws recognise TGD people's right to autonomy and self-determination, and means people can change their birth certificates without undergoing medical affirmation (transition); that parents can choose not to have a gender marker on their newborn's public facing birth certificate; and that parents of children born with variations of sex characteristics (intersex) have a longer time to register the sex of their child, ensuring a more informed and less pressured decision can be made. This can be important for sporting bodies to understand when registering players.
3. The Tasmanian Department for Education, Children and Young People (DECYP) guidance - DECYP released their *Supporting Sexuality, Sex, and Gender Diversity in Schools (SSSGDS) Policy*¹³ in 2022, and an accompanying *SSSGDS Procedure* in 2024. Both documents support school staff to provide inclusive learning environments for LGBTIQA+ students, with the SSSGDS Procedure providing guidance regarding competitive sporting or physical activities for students (as distinct from Health and Physical Education lessons). This includes supporting students to participate in a way that best aligns with their affirmed gender, and for intersex students, participation should be in accordance with their assigned/chosen gender without restriction. The SSSGDS Procedure recognises that there will be pathways between school and community or representative sport that is administered separately to DECYP, and this should be managed through student-led discussions. To avoid conflicting policies, SSOs and other organisations administering sports and physical activities for children and young people should be required and supported to develop policies which are in line with the ASC Guidelines, the Tasmanian Anti-Discrimination Act (and Federal Sex Discrimination Act for under 12s), and the current SSSGDS Procedure for students in government schools.
4. Tasmania's 2025-2030 LGBTIQA+ Inclusion Strategy and Action Plan – this soon to be released framework will represent the Tasmanian Government's commitment to LGBTIQA+ inclusion, and to providing safe and inclusive

¹³ "Supporting Sexuality, Sex, and Gender Diversity in Schools Policy", 2022, Department for Education, Children and Young People, Tasmania, <https://www.decyp.tas.gov.au/learning/lesbian-gay-bisexual-transgender-intersex/>; retrieved 11/5/2025.

environments across all aspects of Tasmanian society. This whole of government plan builds on and brings together LGBTIQ+ Action and Work Plans already developed a range of Tasmanian Government agencies including Health, DECYP, Justice, DPfEM, Libraries Tasmania, and more.

Conclusion

There is no doubt there will be opponents to the inclusion of TGD and intersex people in women and girls sporting categories in both elite and community sport and physical activities here in Tasmania. They will be emboldened by decisions in both the USA and UK regarding excluding TGD and intersex women and girls from participating in the category that best aligns with their affirmed gender, and assigned/chosen sex for intersex people. However, such positions simply serve to weaponise sport against the TGD community. They often come from people who are otherwise uninterested in women's sport, and ignore the perspective of dedicated supporters who know that it is better when it is inclusive. Indeed, many women's sports exist as they do in Tasmania today because of diverse women and girls who refused to accept exclusion.

TGD women have been participating unnoticed in women's sport in Tasmania for decades – unnoticed because there was no perceived unfair advantage which warranted concern, let alone a blanket ban. Working It Out encourages Active Tasmania to extend their commitment to “equitable access to participate in all aspects of sport and active recreation in a safe, inclusive and fun way” to *all* women and girls, regardless of sexual orientation, gender identity or variations of sex characteristics, and to communicate that clearly and firmly through the Strategy.

This submission was prepared by:

Olivia Hogarth

CEO, Working It Out

ceo@workingitout.org.au