

CHALLENGING SEX SEGREGATION: A PHILOSOPHICAL EVALUATION OF THE FOOTBALL ASSOCIATION'S RULES ON MIXED FOOTBALL

The Football Association (FA) has been under pressure to allow girls to play in mixed teams since 1978, following 12 year-old Theresa Bennett's application to play with boys in a local league. In 1991, over a decade after Bennett's legal challenge, the FA agreed to remove its ban on mixed football and introduced Rule C4 in order to permit males and females to play together in competitive matches under the age of 11. More recently, following a campaign by parents, coaches, local Members of Parliament and the Women's Sport Foundation, the FA agreed to trial mixed football for the under-12 to under-15 age categories in order to establish, among other things, the risk of injury to players in sex-integrated competitions. A series of exponential changes ensued: between 2010 and 2014, the age at which mixed football was permitted increased from U11 to U16. In 2015 the FA announced the decision to raise the age limit on mixed football from U16 to U18 for the forthcoming 2015-16 season. We critically examine the reasons given by the FA for enforcing segregated participation beyond the age of 18, namely that males have an unfair advantage and that females face an unacceptable risk of injury. We also discuss the argument that removing the ban might harm the women's game. In conclusion, we suggest that the FA ought to abandon the ban on mixed football over the age of 18.

KEYWORDS gender; football; mixed competition; sex segregation

Introduction

The fact that sports practices are usually formally structured along gendered lines is often taken for granted. The related idea that mixed-sex sport would be disadvantageous for women and likely limit female participation seems to have widespread support. However, these commonly held views have been questioned by some authors writing in the philosophy of sport, such as Burke (2010), Simon (2010), Tannsjo (2000), and Tamburrini (2000). Much of the existing literature distinguishes between two approaches to sex equality in sport, namely sex-blindness and pluralism (Simon 2010; Tamburrini 2000). The first approach requires that we attribute no special significance to sex, and therefore favours sex-integrated sport. The second considers sex difference to be relevant in some contexts. It is argued, for example, that we ought to recognise sex-related physiological differences which would disadvantage women in mixed sports. From this position sex-segregated competition is necessary to level the playing field and to ensure the representation of women across a range of sport contests.

Our aims here are precise and limited. We evaluate the Football Association's (FA) rationale for its recent rule changes, which allow mixed football from season 2015/16 for players

aged below 18 years, but not aged 18 or over (FA Handbook 2015-2016)ⁱ. We also evaluate the argument that further relaxation of the rules would damage the women's game.ⁱⁱ

Background and Context

Opportunities for women and girls to play football, and also share in its extrinsic rewards, have improved considerably in the UK over the last decade, for which the FA deserves some credit. Attempts to professionalize the elite level of the sport, with the introduction of the Women's Super League, suggest that the FA now takes women's football seriously (Jones and Edwards 2013). Such seriousness, again, might even help result in elite women footballers sharing comparably in sport's 'scarce benefits' (English 1978) of fame and fortune. Such benefits do not concern us here, since they are irrelevant to the background and context we presently sketch, to the FA's rationale (as we will see) for its current policy and to our critique of this rationale. The FA's current policy is a categorical separatism from the age of 18.

This approach, again, has fairly widespread support, yet the basis of the policy warrants closer scrutiny from a feminist perspective, as we try to show.

The Early Years

The FA first imposed a blanket ban on mixed-sex competitions in England in 1902 (Griggs and Biscomb 2010). According to Williams (2003, 27), the 1902 rule was motivated by established ideologies which viewed football as a site for the cultivation of masculinity and manliness. In 1921, the FA publicly announced that football was unsuitable for women (Jones and Edwards 2013), and despite the success and popularity of women's football during the First World War, the FA Council instructed its member clubs to stop any female players from using officially sanctioned Football League grounds (Williams and Woodhouse 1991; Williams 2003). This decision signalled the FA's disapproval of women's football and, according to Williams (2003, 33), was part of '...the League and Association's continued attempts to recoup and defend a masculine image for football'. The ban was removed in

1971 as a result of mounting international pressure (Griggs and Biscomb 2010; Williams and Woodhouse 1991), but it was another seven years before the FA's rule on mixed football was called into question. The characterisation of football as essentially male was taken for granted. For example, from 1904 the English Schools Football Association (ESFA) had as its primary objective 'the mental, moral and physical development and improvement of schoolboys through the medium of Association Football' (Griggs and Biscomb 2010, 669). The organisation seemed ignorant of the prejudice until the passing of the Sex Discrimination Act (SDA) in 1975 led administrators to question whether the 'omission and prohibition of girls might prove to be unlawful' (Griggs and Biscomb 2010, 669).

The Sex Discrimination Act and Theresa Bennett

The first legal challenge to the FA's stance on mixed football came in 1978 when Theresa Bennett applied to be registered as a member of Muskham United boys' football team. She wanted to continue playing in the team she had played with at primary school (Griggs and Biscomb 2010). But, despite the fact that Muskham United were prepared to include Bennett in the side, her application was refused on the basis that the FA prohibited mixed-sex football irrespective of particular circumstancesⁱⁱⁱ. Her parents filed a lawsuit on the grounds that the FA had 'failed to provide her with recreational facilities' (Hargreaves 1994, 176). Bennett's case against the FA came only three years after the introduction of the SDA^{iv}. The SDA, more recently replaced by the 2010 Equality Act, requires that:

... a person is to be treated by reference to his or her individual attributes and not by reference to the attributes possessed by or associated with an average person of his or her sex. (Pannick 1983, 7)

The Bill, however, includes special provision (Section 44) in the case of sport, entailing that not every sporting competition need be made available to both sexes (Griffith-Jones 1997). Michael Burke (2010, 12) refers to this kind of sports exemption as 'the Anatomical Exclusion Clause [AEC]'. The clause states:

Nothing ... shall, in relation to any sport, game or other activity of a competitive nature where the physical strength, stamina or physique of the average woman puts

her at a disadvantage to the average man, render unlawful any act related to the participation of a person as a competitor in events involving that activity which are confined to competitors of one sex. (Griffith-Jones 1997, 158)

The contradiction between the SDA and AEC could not be more flagrant, and it is reasonable to think that any such breaches of the principle of non-discrimination, enshrined in law, would have been 'the subject of intense debate in Parliament during the passage of the Sex Discrimination Bill' (Pannick 1983, 9)^v. Pannick (1983, 10) notes, however, that, 'A reading of the parliamentary debates makes clear that no justification was presented for preserving the legality of sex discrimination in sport.' Instead, the decision seems to have been based on prejudicial ideas about the necessity of sex segregation in sport.

In the Bennett case, the FA made use of the AEC in order to maintain its strict sex-segregation policy. The Court of Appeal agreed that football was exempt from the statute^{vi}. In a statement that luminously illustrates the gender stereotypes underpinning the decision, Lord Denning of the Court of Appeal said:

It is as plain as can be, I should have thought, that football is not within the Sex Discrimination Act, and I think most people would agree with that. If the law should bring football within it, it would be exposing itself to absurdity. Everyone would say with Mr. Bumble: 'If the law supposes that, the law is an ass – a idiot'. The statute would be 'an ass – an idiot' if it tried to make girls into boys so that they could play in a football league. (cited in Pannick 1983, 12-3)

He remarked that women 'have many other qualities superior to those of men, but they have not got the strength or the stamina to run, to kick or tackle, and so forth' (Pannick 1983, 11). The Court's decision became case law and the so-called "football clause" (Section 44) was used in similar cases to prevent young girls from playing mixed-sex football for the next 10 years (Hargreaves 1994, 177).

The FA's decision to ban 12 year-old Theresa Bennett from playing football in a boys' team is unsurprising, given the hostile attitudes towards women's football at the time. The notion that biological differences between girls and boys are so pronounced that girls would be unable to compete is patently false. Nonetheless, the FA exploited the "vague terminology"

of Section 44 by applying the term “average woman” to all female players, irrespective of age. Furthermore, the FA ignored the fact that Bennett could easily match the other members of the team in terms of footballing ability. She was described during the hearing as ‘wholeheartedly and undoubtedly the best player in the side...’ (Griggs and Biscomb 2010, 670), and if treated without reference to her sex, would have merited a place on the team.

Pressure and Policy Changes

In 1991 the FA gave in to mounting pressure and changed its rules to allow mixed football in competitive matches for children under 11 (Griggs and Biscomb 2010; Hargreaves 1994). This ‘rather ungenerous’ policy change (Hargreaves 1994, 177) meant that the cut-off age in England was still one of the lowest in Europe and that there ‘have been fewer opportunities in England for girls to develop as football players in critical formative years, in comparison to Norway, Germany, Sweden, Denmark and France’ (Themen 2014, 8). Female players continued to appeal (unsuccessfully) to be allowed to play football in boys’ teams beyond age 11, often because of a lack of provision for girls to develop as players (or a lack of any provision at all) (Williams 2003). Yet the FA remained intransigent in its resistance to further amendments and continued to prevent girls and boys competing beyond 12, because of the supposed inherent biological differences between the sexes (Williams 2003). It is worth noting that the FA’s attitude towards sex-integrated football is reflected in the structure of international leagues and competitions. In 2004, for example, FIFA (Federation Internationale de Football Association) prevented Mexican international Maribel Dominguez from signing a two-year playing contract with a second division men’s professional club (BBC News 2004).^{vii} FIFA’s response to the possible signing was unequivocal: ‘There must be a clear separation between men’s and women’s football’ (Caudwell 2011, 335). In a later interview Dominguez (2005) stated: ‘I just wanted a chance to try. The thing is that in Mexico we don’t have even a decent amateur league for women, so you have to look for other options’ (Tuckman 2005).

In 2006 the Select Committee for Culture, Media and Sport (CMS) on women’s football met to examine the relative strength of the women’s game in the UK. They concluded, among other things, that ‘significant gaps in provision and pressures on limited coaching resources –

a lack of appropriate team leaders and club administrators - was exacerbated by age group limits on the more able and enthusiastic girls who wanted to continue playing in male sides' (Bell 2012, 357). One of the recommendations made in the report was that:

...the absolute prohibition on mixed football over the age of 11 should be removed and that an informed assessment by team managers and coaches of individuals' capacity to play in mixed teams should govern selection policy. (Culture Media and Sport Committee 2006, 8)

Thus, under continued pressure from parents, coaches, local Members of Parliament and the Women's Sport Foundation, the FA agreed to test the validity of their Under 11 ruling (CMS 2006). During the 2007-2008 season they conducted a series of mixed trials 'that were evaluated by Brunel University in order to determine the key issues involved in mixed gender football' (Themen 2014, 8). However, the recommendation to amend the rules on mixed football was again blocked by the FA shareholders. Finally, in 2011 the shareholders agreed to extend the age range to Under 13. This marked the beginning of a series of incremental extensions from Under 11 to Under 16 in just four years (ClubWebsite 2014).^{viii} Perhaps the most high-profile case that helped kick-start the FA's policy changes in 2011 was the story of Scottish teenager Alyshia Walker. In 2011 Walker appealed unsuccessfully to the FA for dispensation to play as a part of an Under 13 boys' team in a national tournament to be held in England^{ix}. The latest extension to the age limit on mixed-sex football was announced in June 2015 when the FA agreed a proposal to raise the age limit from U16 to U18 (FA 2015).^x

The FA has clearly travelled a considerable distance since the Theresa Bennett case. However, the rationale for its latest policy stands in need of examination.

The FA Rationale

Frustratingly, the FA has not published a policy document which explicitly seeks to justify the recent changes to its mixed-sex rule. Moreover, the Brunel research commissioned by the FA remains under embargo for the foreseeable future. However, the recent policy change on transgender and transsexual individuals betrays the association's rationale for exclusively sex-segregated competition beyond the age of 16, which it seems reasonable to infer has been nudged to a cut-off age of 18. It states that:

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 U16 age group and under 16's are entitled to play in boys' or girls' teams regardless of their natal sex. 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.

It continues 'Football is a gender-affected sport of a competitive nature where the physical strength, stamina or physique of average persons of one sex could put them at a disadvantage compared to the average persons of the other sex as competitors in a football match' (FA 2014, 3).^{xi} The immediately preceding explanation helps to clarify the FA's stance on mixed football. At first glance, the decision to sanction mixed football until the Under 16 and then Under 18 age group is an improvement on past approaches, which prohibited mixed football for players under 12. However, like the old policy it is open to criticism.

Evaluation of the FA Rationale

Fairness

The first point of dispute is the FA's claim that (post-puberty) fairness requires sex discrimination in football. It is *generally* true that in sports where features such as height, weight, and body mass are heavily performance relevant the best men will excel over the best women. This is at least partly because *generally* men have an advantage over women in terms of their aerobic capacity, explosive and maximum strength and so forth. But this argument does not provide grounds for the FA's complete ban. As Buzuvis (2010, 38) rightly points out, the argument that fairness necessitates the strict separation of men and women from competing is at once overinclusive and underinclusive. She explains:

It is overinclusive in that it applies even in situations where strict separation does not produce fairness. It is underinclusive because it ignores factors other than sex that are more likely to create an uneven field for competition. (Buzuvis 2010, 38)

The principle is overinclusive since there is significant overlap between the sexes in terms of these performance-related attributes. Or, as Buzuvis (2010, 38) puts it: '[o]wing to the wide variation of physical characteristics within sex categories some of the athletes in the female group will be similar in size, shape, and musculature to those in the male group.' A lot of female sports performers will be taller, heavier and have greater body mass than many male performers. Imposed segregation reinforces a gender binary, where a continuum exists. As Kane (1995, 201) elucidates:

Although, given current conditions, it is certainly the case that most elite male athletes can beat most elite female athletes in sports that privilege men, it does not automatically follow that *every* elite male can outperform *every* elite female in these same sports. Yet this is precisely what we are trained to believe because it is one of the cornerstones of the oppositional binary.

Kane (1995), furthermore, takes the view that sex-integrated sport has the transformative potential to challenge this binary thinking by recognizing 'sport as a *continuum of competence* along which some women outperform or are athletically equal to some men' (cited in Sailors 2014, 72) (emphasis added).

Moreover, it should be observed that the hormone-advantage connection gestured at in the FA rationale has been significantly discredited in the case of testosterone, for a raft of reasons rehearsed by Davis & Edwards (2014, 48-9). These include the fact that individuals have dramatically different responses to the same amounts of testosterone, which is as liable to be affected by as to affect athletic performance; the fact there are no data to suggest that precompetition testosterone levels predict an athlete's performance; the fact that women with CAIS (Complete Androgen Insensitivity Syndrome), whose tissues are unresponsive to testosterone, are overrepresented among elite athletes; and the fact that there is a 10-fold gap in male and female endogenous testosterone levels, but smaller differences, including overlap, in nearly all aspects of athletic strength and performance. And if it were to be so that testosterone (or oestrogen) confers advantage, it is far from clear that such advantage should be considered unfair (see Davis & Edwards 2014, 49-51).

The principle is underinclusive since sex segregation fails to consider numerous other factors likely to create an uneven playing field. As Loland (2002, 58) points out, 'Variations in

predispositions to develop athletic performance within each sex are greater than the mean variation between the sexes.’ Loland (2002, 54) observes, moreover, that elite football players in particular vary in height between roughly 160 and 210 centimetres. Inequalities in body size are relevant to the athletic test in football. Differences between players’ height, strength and stamina are part of what makes the game interesting. Part of the challenge facing a team whose opponents have a 6’ 6” striker is to decide the best way to counter their advantage in the air.^{xii} This applies in men’s football and women’s football no less than it would apply in mixed football. Contrariwise, body size is not of singular importance in football, demonstrated by the success of male players such as Moralez, Gomes, Messi, Maradona, Gordon Strachan, Shaun Wright-Philips and Jermaine Defoe. Since most of the game is played on the ground, smaller players of agility, control, touch, awareness or speed can excel. It is instructive, indeed, to reflect upon the most iconic of footballers. As Giulianotti (2005, 99) puts it,

They are the ‘artists’ who (like Maradona) are often small and seemingly vulnerable in stature. In football, Maradona is joined by other technical talents like Zico (Brazil), Baggio (Italy), Platini (France) and Best (Northern Ireland) ... Through sporting dramas, these brilliant players outwit and deceive tougher opponents; physical power and aggression are disarmed, becoming handicaps rather than pre-conditions of successful masculinity in play.

Safety

The second, related point of dispute is the FA’s claim that (post-puberty) the strict separation of the sexes is necessary to create safe competition. In addition to the arguments made above, this argument seems inconsistent with the FA’s policy on age classification. The FA has a dispensation policy which allows a child to play in an age group other than their own. To play in an open competition a child must have attained the age of 16 (FA Handbook 2014-2015).^{xiii} It is unclear why the FA ignores the physical risks which result from physically mismatched male players (Burke 2010). An audit of injury in men’s professional football is unlikely to lead to the separation of smaller, lighter players from competing with their taller, heavier counterparts (Williams 2003). The decision to enforce a ban which prevents women from competing with men because of an increased risk to players is inconsistent at best. As

Schneider (2000, 126) concludes: 'women have the right, just as men do, to decide what risks of harm they will run'.

Non-Discrimination and FA Policy

Finally, given what we have argued above, the FA's mixed-sex rule (past and present) violates the principle of *non-discrimination*. Not only is this principle enshrined in the Sex Discrimination Act and in the later Equality Act, but it was given compelling nineteenth century expression by J.S. Mill:

...it is felt to be an overstepping of the proper bounds of authority to fix beforehand, on some general presumption, that certain persons are not fit to do certain things. It is now thoroughly known and admitted that if some such presumptions exist, no such presumption is infallible. Even if it be well grounded in a majority of cases, which it is very likely not to be, there will be a minority of exceptional cases in which it does not hold: and in those it is both an injustice to the individuals, and a detriment to society, to place barriers in the way of their using their faculties for their own benefit and for that of others. (John Stuart Mill 1869, 18-19)

According to this principle, sex roles are objectionable because they impose irrelevant expectations and limitations on the individual. As Simon (2010, 116) explains, according to proponents of the sex-blind model of sex equality, 'Sex roles are especially objectionable. Whether they arise from biological differences between men and women or from socialization and learning, they are imposed rather than chosen'. The intent of the SDA is to ensure that women and men are unimpeded by the sorts of 'sexist attitudes based on stereotypes about the different capabilities of the two genders' (Burke 2010, 14). Yet, the FA's policy on mixed football discriminates against individual female players, not on their own competence to play, but rather on the basis of these stereotypes.

A Future for Sex-Segregated Football?

The preceding argument should not be taken as a clarion call for the end of sex-segregated football competition. It might well be that if mixed football was enforced, then the options available for female football players would significantly decline. Continuing to develop the women's game in the UK (and elsewhere for that matter) might be the most effective way of ensuring that girls and women have opportunities to play football. Women still suffer significant material and symbolic inequality, which already restricts their participation and performance in sport. As Coggon, Hammond, and Holm (2008, 9-10), following Schneider (2000), put it, '... it is surely better to have an imperfect system that fits more happily in a world that is also imperfect than a philosophically perfect system that disadvantages 50 per cent of the population in the present (imperfect) world'. At the same time, if the best women are able to compete against men, then the FA should not prevent them from doing so (and see the next section).

Furthermore, Sailors (2014, 71) invokes Birrell's distinction between segregation that is imposed and segregation that is chosen, affirming that the former can be weakening but the latter empowering. And it might indeed be that the consequences for women's football, material and symbolic, are critically inflected according to whether the segregation is imposed from without or chosen by female players.

Indeed, the immediately preceding points illustrate that our treatment quite radically underdetermines practice. Its only categorical upshot is that in football falling under FA jurisdiction, women aged 18 or over should not be prohibited on the ground of their sex from playing with men. This does not entail that any women over 18 in fact do play with men, and again, leaves pockets of underdetermination. Exactly how the opportunities for women are structured, for instance, in the absence of the current prohibition, is something we don't address here. Nor do we envisage a one-size-fits-all approach. We acknowledge the distinctions and related arguments provided in Sailors' (2014, 73-5) compelling essay, albeit she appears to flirt with a paternalism about 'direct competition' sports – of which football is one – which we, along with Schneider (above), reject. Nor, finally, should it be forgotten that we have the precedent of football jurisdictions (see below) which don't have the prohibition.

Would Removal of the Ban Damage Women's Football?

An objection to the preceding arguments is the putative upshot that the most able female players will inevitably choose to play with and against men. Sailors (2014, 73) notes Tamburrini's (2000, 126) suggestion that 'the movement of the most talented women into men's competitions would have devastating effects for female sports'. In reference to football, however, this response is inconclusive. The conclusion that removing the ban on mixed-sex football would be detrimental to the women's game is not supported by the evidence, which suggests that the majority of female players are continuing to choose to play in women's teams even where mixed football is available (FA Q&A document 2011).^{xiv} Moreover, countries such as Norway and Sweden have maintained strong men's and women's football leagues, despite having no age restrictions on mixed football. Of course, even if this were not the case, we would still have to provide an argument to show that this damages women's football (and that this concern should be prioritised).

Conclusion

We have argued that the FA's ban on mixed football over 18 ought to be removed. The FA rationale in terms of fairness and safety is unpersuasive. Furthermore, selection according to sex as opposed to merit denies female players access to the highest (or preferred) competitive opportunities available. Burke (2010, 19) is right to argue that imposed segregation in sport provides 'apparent justification for the hierarchy of gendered social assignments and positions in the contemporary sporting and social world.' This problem is particularly prominent in football, where there are still obvious differences in funding, resources and the status of women's football (Williams 2003, 130). According to Williams (2003, 130), the provision of separate women's teams is unlikely to 'foster rapid or fundamental shifts either to the place of women in sport or to the structures of football itself, precisely because the brightest and best cannot access the highest competitive opportunities available'. Nor is there any evidence that removal of the current ban would damage the women's game.

Furthermore, we have also argued that by denying male and female footballers the opportunity to compete against one another, the FA helps to 'suppress evidence of a sports continuum' (Kane 1995, 208). Providing opportunities for players such as Alyshia Walker and Maribel Dominguez to compete with males would help draw attention to the fact that there is an overlap between male and female performance and that some women can outperform most men. Paraphrasing Kane (1995, 213), it time for the FA to give up its mantra that the safety of female players and the fairness of competition mean that women cannot compete with or against men.

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ⁱ [The FA Handbook Season 2015-2016, Rules and Regulations of the Association](#).

ⁱⁱ The FA has recently announced the decision to raise the age limit on mixed gender football from U16 to U18 for the forthcoming 2015-16 season (<http://www.thefa.com/news/my-football/players/2015/may/more-to-benefit-from-mixed-football>).

ⁱⁱⁱ The Nottinghamshire Football Association rejected Bennett's application on the grounds that 'they were bound by being governed by the Football Association (FA) and the European Football Union, which prohibited women players' (Griggs and Biscomb 2010, 670).

^{iv} In 2010 the Equality Act replaced the 'old system of discrimination law where each form of unlawful discrimination was regulated by legislation specific to it' (2, 461). However, as Gardiner et al (2012) note, the SDA remains of relevance in interpreting the 2010 Equality Act. Moreover, the sports exemption clause, formerly Section 44, is continued in the new Act in Section 195.

^v In fact, Pannick (1983) points out that, apart from sport, each area of life that was granted an exception to the principle of non-discrimination was carefully examined during the passing of the Bill. He notes that, in each other case '[t]he reasons for and against special treatment were eloquently, if not always persuasively, presented' (Pannick 1983, 9).

^{vi} The FA's decision to ban Theresa Bennett from playing was initially overturned (Hargreaves 1994; Griggs and Biscomb 2010). The Judge concluded: If the evidence suggests, as it does, that girls under 12 are not put at a

disadvantage to the average man – or boy under 12 – that must mean that Section 44 as defence in this case fails. However, the FA appealed and the decision was reversed.

^{vii} <http://news.bbc.co.uk/1/hi/world/americas/4110027.stm>

^{viii} <http://www.clubwebsite.co.uk/news/2014/06/26/mixed-football-age-limit-raised-to-under-16s/>

^{ix} Walker's team had already won the final of the Scottish Youth Cup and had therefore qualified for the Tesco Cup UK Home International Final. At that time the Scottish Football Association (SFA) rules permitted matches involving girls and boys up until age 15, whereas the English rules continued to operate with a policy which banned mixed football after age 11. She was denied the opportunity to compete because of the different age limit on mixed football in England compared to Scotland. To add to the confusion the Welsh Football Association (WFA) continues to operate a policy which prevents mixed football after the age of 11.

^x <http://www.thefa.com/news/my-football/players/2015/may/more-to-benefit-from-mixed-football>.

^{xi} <http://www.thefa.com/news/governance/equality/2014/nov/fa-launches-transgender-policy>.

^{xii} The aerial advantage of height is itself limited by the fact than a player of average or even small stature might be one of the best headers on the field if they possess excellent timing or the ability to 'hang in the air'. Examples arguably include Gerd Muller, Denis Law and Henrik Larsson.

^{xiii} www.thefa.com/~media/8ff9383bf30744069dd1b88f6eae287.ashx.

^{xiv} <http://www.kentschoolsfa.org.uk/14-15%20Pages/General/MixedFootball.htm>.

^{xiv} <http://www.thefa.com/news/governance/equality/2014/nov/fa-launches-transgender-policy>.