



## **A Sustainable Future- Reforming Club Football Governance Summary of the FA's response to the White Paper**

The FA has stated its support for more independent financial regulation of football since the Fan-Led Review was published. This paper is a short summary of The FA's detailed response to the White Paper.

### **1. Structure and Location of the Regulator**

The FA is the regulator of the game in England. We are a robust regulator in areas of the game where we have primary responsibility- for example in anti-doping or betting. However, the primary responsibility for financial regulation lies with our sanctioned leagues, and not with The FA.

In response to the Fan-Led Review we developed a model whereby a new regulatory system could be created through an independent body sitting within The FA with its own independent board. This model has been shared with the Government and remains an option if so desired, but we respect and understand the Government's reasoning for wanting to initially set up a regulator externally.

We welcome the proposal that the Regulator could be positioned within the FA in the future and, in the meantime, we recommend that The FA has full representation on the Regulator's Board so that the Regulator could benefit from our football expertise.

### **2. Overall stability of the football pyramid**

One of the primary roles of the Regulator is to ensure the systemic stability of the football pyramid. This is a once-in-a-lifetime opportunity to support and secure the future of 18,000 clubs across the National League System and grassroots pyramid. The need for redistribution to the grassroots was recognised in the Fan-Led Review, but not the White Paper, so we recommend that the Regulator ensures that any redistribution of income from the professional game covers the whole football pyramid, including the grassroots game. To implement this effectively, the Regulator should audit the professional game's contribution to the grassroots game.

### **3. Fan Engagement and Club Heritage**

We support the White Paper's proposals to ensure that every club has an appropriate level of fan engagement. The design of such requirements will need full consultation with fans. We also welcome the White Paper's positive acknowledgement of the changes made to FA Rules with respect to club heritage and necessary fan engagement and we will continue to work with the Government on the issue of ground locations.

#### **4. Including the Women's game within the Scope of the Regulator**

We recommend that the women's game – professional and grassroots - is included within the scope of the Regulator. If the principle of the Regulator is to include the long-term financial sustainability of clubs, this applies just as much to the women's game as the men's.

#### **5. Equality, Diversity and Inclusion**

We recommend that, as part of the new Football Club Corporate Governance Code, there is an obligation for all clubs to publish their workforce diversity data and targets annually as the FA itself already does.

#### **6. European Super League**

The European Super League is completely contradictory to our values of sporting competition. When it was originally proposed, we acted quickly, using our rules to stop the proposals. While we have strengthened those rules since, statutory underpinning of those rules would be beneficial in order to provide extra protection to any challenge under Competition Law.

#### **7. Creating a model which adheres to FIFA and UEFA requirements**

There are potentially significant implications for the English national team and English clubs if UEFA and FIFA do not support the Regulator as their statutes require that football is run without influence of third parties. The Government will need to engage effectively with UEFA and FIFA to ensure they support the model.