

A very quick initial comparison of what the Government said in relation to the Fan-Led Review, and what has actually been included in the White Paper.

Fan-led recommendation	Review	Initial Government response	What the White Paper says
<p>(A) The government should create a new independent regulator for English football (IREF).</p>		<p>Accept the recommendation to introduce an independent regulator.</p>	<p>The Regulator will operate a licensing system, where all clubs in the top five tiers of the English football pyramid need a licence to operate as professional football clubs.</p> <p>Legislation will establish four Threshold Conditions of the licence - on appropriate financial resources, suitable owners, fan interests, and approved competitions. The Regulator would set detailed Specific Licence Conditions to clubs, under each Threshold Condition.</p> <p>The Regulator will assess whether clubs were ready, willing, and able to comply with the Threshold Conditions in principle upon application, and then monitor compliance with the detailed Specific Licence Conditions on an ongoing basis.</p> <p>Specific Licence Conditions would be risk-based. This means regulation would be proportionate to a club's circumstances. The</p>

		<p>requirements on a club might vary based on criteria like league, club size, and financial health or riskiness.</p> <p>The Regulator will monitor and supervise licensed clubs, with the support of the leagues. This would identify non-compliance with Specific Licence Conditions that might require enforcement action. It would also surface any material change in the club's circumstances that might require a change to their Specific Licence Conditions.</p>
<p>(B) To ensure financial sustainability of the professional game, IREF should oversee financial regulation in football.</p>	<p>Accept, with further detail on the precise model to follow.</p>	<p>A football club must have adequate financial and non-financial resources and controls in place, to meet committed spending and foreseeable risks. See (A) and (H).</p>
<p>(C) New owners' and directors' tests for clubs should be established by IREF replacing the three existing tests.</p>	<p>Accept, with further detail to follow on a strengthened Owners' and Directors' Test.</p>	<p>The Regulator will establish new owners' and directors' tests consisting of three key elements:</p> <ul style="list-style-type: none"> • a fitness and propriety test (owners and directors), • enhanced due diligence of source of wealth (owners), • and a requirement for robust financial plans (owners). <p>Fitness and propriety tests will be designed to ensure that prospective owners and</p>

		<p>directors have sufficient integrity, honesty, financial soundness, and competence to be suitable custodians of football clubs.</p> <p>The Regulator will combine the disqualifying conditions currently applied by the football leagues with selected criteria that address specific harms identified in the Review.</p> <p>The Regulator will conduct fitness and propriety tests for owners and directors, and potentially for other individuals at a club deemed to exercise significant decision-making influence, and clubs will be required to declare their Ultimate Beneficial Owner. See (A)</p>
<p>(D) Football needs a new approach to corporate governance to support a long-term sustainable future of the game.</p>	<p>Accept.</p>	<p>The Regulator will establish a compulsory 'Football Club Corporate Governance Code', to be enforced through the 'Appropriate resources' Threshold Condition. To demonstrate compliance with the Football Club Corporate Governance Code, and provide greater transparency to fans, clubs will be required to report annually on corporate governance compliance.</p>

<p>(E) Improved equality, diversity, and inclusion (EDI) in clubs with committed EDI action plans regularly assessed by IREF.</p>	<p>Accept the need for action, and support clubs' commitment to improvement while remaining flexible on plans for action.</p>	<p>The government will monitor progress in this space as the football leagues continue to drive measures within clubs, shifting the culture in football to be more diverse, fully inclusive, and reflective of the communities that clubs serve.</p>
<p>(F) As a uniquely important stakeholder, supporters should be properly consulted by their clubs in taking key decisions by means of a shadow board.</p>	<p>Support, with further consideration of the mechanism.</p>	<p>Disappointingly, a shadow board is an expectation, but not a requirement. For a club of the standing and resources of the Rovers, they would need to come up with a weird and wonderful reason to be excluded from having a shadow board. Supporters Trusts are specifically put forward as the main representative group (whether a shadow board or otherwise).</p>
<p>(G) Football clubs are a vital part of their local communities, in recognition of this there should be additional protection for key items of club heritage.</p>	<p>Support, with further detail on options to follow.</p>	<p>The Regulator will set a minimum standard of fan engagement as part of its licensing regime through the 'Fan interests' Threshold Condition, in line with the aims of the Review. This would require clubs to have a framework in place to regularly meet a representative group of fans to discuss key strategic matters at the club, and other issues of interest to supporters (including club heritage), but disappointingly, no requirement for a 'golden share'.</p>

<p>(H) Fair distributions are vital to the long-term health of football. The Premier League should guarantee its support to the pyramid and make additional, proportionate contributions to further support football.</p>	<p>Support, with an expectation of further action from the football authorities.</p>	<p>A football-led resolution to this important issue remains the government’s preference. However, the Regulator will need targeted statutory powers to intervene as a last resort, if necessary, should certain thresholds be met. This will be to a statutory timetable and start with arbitration by the Regulator.</p> <p>The Regulator would ideally not need to intervene in this space, and the process will be designed to empower and encourage football to find a solution first. However, the White Paper makes it clear that if football fails to deliver a solution, the Regulator will deliver one, via targeted statutory powers.</p> <p>The government is giving further consideration to the exact model for the Regulator’s targeted power of last resort. One option they are considering is binding final offer arbitration - the parties would each submit their proposal, the Regulator would assess them against predetermined criteria, and would choose and impose one as the binding arrangement.</p>
<p>(I) Women’s football should be treated with parity and given its own dedicated review.</p>	<p>Accept.</p>	<p>The independent review of the Future of Women’s Football launched in September 2022. The review’s report is expected in 2023, and the government will respond afterwards.</p>

<p>(J) As an urgent matter, the welfare of players exiting the game needs to be better protected — particularly at a young age.</p>	<p>Support, as a matter for the football authorities.</p>	<p>Recommends that the football leagues and the FA seek to address this issue, and work together to develop a consistent programme of support which allows all academy players to access an offering of independent support and advice as and when required.</p>