



THE INDEPENDENT **FOOTBALL** COMMISSION

**ANNUAL**REPORT

2003

*a call for unity of purpose*

ANNUALREPORT | 2003

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## WITH THANKS...

The Independent Football Commission would like to thank the Football Association, the FA Premier League and the Football League for their co-operation and help during 2003, and all the other organisations and individuals who gave generously of their time to meet the members of the Commission and to share with them their views and ideas.

## LIST OF ABBREVIATIONS

ACPO	Association of Chief Police Officers	FLA	Football Licensing Authority
AGM	Annual General Meeting	FLD	Financial Licensing Documentation
AIM	Alternative Investment Market	FSA	Financial Services Authority
APG	All Party Group on Football	FSC	Federation of Stadium Communities
		FSF	Football Supporters Federation
BITC	Business in the Community	FSIF	Football Stadia Improvement Fund
BURA	British Urban Regeneration Society	FTF	Football Task Force
CEO	Chief Executive Officer	IFC	Independent Football Commission
CFA	County Football Association		
CRE	Commission for Racial Equality	KIO	Kick It Out
CRU	Customer Relations Unit		
CVA	Company Voluntary Agreement	LEA	Local Education Authority
CU	Compliance Unit		
		MMU	Manchester Metropolitan University
DCMS	Department for Culture, Media and Sport	MP	Member of Parliament
DDA	Disability Discrimination Act	MSKT	Martin Shaw King Trust
DfES	Department for Education and Skills		
DFL	Deutsche Fußball Liga	NADS	National Association of Disabled Supporters
DSA	Disabled Supporters Association		
		OFT	Office of Fair Trading
EO	Equal Opportunity		
		PFA	Professional Footballers' Association
FA	Football Association	PfS	Playing for Success
FAC	Financial Advisory Committee	PI	Performance indicator
FADSG	FA Disabled Supporters Group	PLC	Public Limited Company
FAPL	FA Premier League	PPV	Pay per View
FAR	Foxes Against Racism		
FAU	Financial Advisory Unit	SRTRC	Show Racism the Red Card
FC	Football Club	SSC	Study Support Centre
FES	Footballers Education Society	STH	Season Ticket Holder
FITC	Football in the Community		
FFE & VTS	Footballers' Further Education and Voluntary Training Society	UEFA	Union of European Football Associations
FL	Football League	WISA	Wimbledon Independent Supporters Association



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## CHAIRMAN'S FOREWORD



I am very pleased to introduce this, the second Annual Report of the Independent Football Commission. Building on the experience of our first year, we have conducted an extensive range of enquiries, projects and meetings, which form the basis of our recommendations. I hope that you will find this Annual Report both useful and stimulating, as a record of the ways in which the IFC is fulfilling its remit to monitor and evaluate the governance of football.

Football faced important challenges during 2003 and its image has been somewhat tarnished by events both on and off the field. There is thus a sharp relevance to issues of good governance and sound financial management which have figured prominently in the IFC's activities this year. The IFC believes it is both necessary and timely for the governing bodies to exert their supervisory role more prominently and we have recommendations to make in this area.

The IFC has also conducted an extensive review of racism issues, community programmes and relationships, disabled access, and match rescheduling: all issues which are of concern to supporters and have influenced the IFC's agenda. The Commission has also given its attention to the further encouraging progress on customer charters and their reporting.

The IFC is still a relatively new organisation and not all those actively involved in football are yet fully familiar with its role. The Commission does not have specific powers, but it does have influence. I believe that the IFC has demonstrated its influence already in two clear ways. First, as this report shows, the governing bodies responded positively to the 22 recommendations made in our 2002

*The Football League takes seriously its responsibilities to the Independent Football Commission. We share its commitment to improving customer relations and its desire for higher standards of governance in our national sport.*

*Sir Brian Mawhinney, Chairman, The Football League in his introduction to the Football League's Annual Report on Customer Charters, 2003*

*The Independent Football Commission produced its first formal report in January 2003 and we are pleased to have been given positive and constructive feedback from the IFC on both the content of the [Charter] reports and the structure of our reporting process.*

*Richard Scudamore, Chief Executive Officer, FA Premier League in his introduction to the FA Premier League Annual Charter Reports Season 2002/03*

Annual Report and most of our suggestions have been implemented. Second, in our regular dialogue with the authorities we have suggested important issues, such as a fit and proper person test, which they are now progressing.

I believe and hope that the governing bodies are now working more in concert than they were two years ago. It is essential that they do so and that in addressing major challenges the interests of football are put before those of individual leagues or organisations. Repeatedly, in its investigations in 2003, the IFC has concluded that to achieve radical improvements there is need for unity of purpose between the football authorities. Thus, this Report calls for concerted and collaborative action in addressing the financial crises at club levels; in improving financial standards; in effecting difficult change on governance issues; in making sweeping and demonstrable reforms to transform the representation of ethnic minorities in football; in promoting the achievements of community work and assisting the development of best practice; in creating banks of expertise in areas such as the staging of high-risk matches and establishing standards of good governance; in developing best practice in customer service and encouraging the sharing of ideas and successful enterprise. Football needs the authorities' collective commitment to benefiting the whole of football and this will demand a wide and generous perspective. It is in this context that the Commission takes as the theme of this Report, *unity of purpose*.

The IFC's approach has been to be thorough and searching in our scrutiny of football's policies and practice and I am confident that our recommendations are based upon sound principles and an extensive knowledge base. I commend them to the football authorities and look forward to their adoption during 2004.

There have been some changes in the composition of the Commission during the year. John Taylor, Kate Barker and Ann Taylor have left us. I thank them for their valuable contribution to establishing the IFC's credibility during its first two years. I am pleased that they will still have a role in football which will interface with the IFC: John on the Parliamentary All Party Group on Football, Kate at the FA and Ann at the Football Foundation. I am delighted to welcome in their place Garth Crooks, Clive Betts MP and Brian Lomax who bring new expertise to the Commission. To these and the other Commissioners I say thank you for your commitment and enthusiasm, both to the IFC and to football



Professor **Derek Fraser**  
CHAIRMAN

*As part of the new processes put in place by the three Governing Bodies (the FA, the FA Premier League and the Football League), the Independent Football Commission published its first Annual Report in January 2003. The report assessed the performance of the FA and the other governing bodies with respect to their Customer Charters and made recommendations as to how the process could be improved. The FA responded to these and an approach was agreed for this reporting year.*

*FA Customer Charter Report 2002-03*

# THE INDEPENDENT FOOTBALL COMMISSION

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## Members of the Commission



### **Professor Derek Fraser, Chairman**

Until his recent retirement Derek Fraser was Vice-Chancellor of the University of Teesside, a post he held for over 10 years. He has been watching football since 1947. His first love was Birmingham City. Career and location moves brought affinity to Leeds United and to Middlesbrough. His best football moment was being at Wembley to see England win the World Cup in 1966.



### **Clive Betts, MP**

Clive Betts has been a Member of Parliament since 1992 and was a Government Whip 1997-2001. He is a member of the Parliamentary All Party Group on Football. He is a lifelong Sheffield Wednesday supporter and is particularly interested in financial transparency in the game, and in the rights of football supporters and their involvement in the game.



### **Garth Crooks**

Garth Crooks played for Tottenham Hotspur in England and Europe in the eighties. He was Chairman of the PFA from 1988 to 1990 and has subsequently become a regular analyst and presenter for the BBC. In 1999, he was awarded an OBE for his services to sport. Garth leads the IFC's work on racism and equity.



### **Brian Lomax**

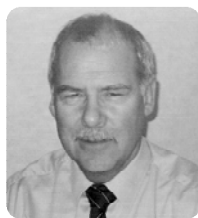
Brian Lomax served as Chair and Managing Director of Supporters Direct over a four year period. He retired in 2003. He was a founder-member and Chairman of the first Supporters' Trust, at Northampton Town, subsequently becoming the first democratically-elected Director to serve on the Board of an English football club.



### **John Simpson**

John Simpson has spent his career in finance, including Chief Executive roles at banks in London and Hong Kong. Currently he is a director of three fund management companies and Vice Chairman of his local NHS Primary Care Trust. He was brought up in North Wales and regularly supported Wrexham. John leads the IFC's work on finance and disability issues.





### **Alan Watson, Deputy Chair**

Alan Watson has a life-long affiliation with Newcastle United. He has been active in grassroots football through playing, coaching, refereeing and running youth teams. Until his retirement in 2003, he was Deputy Parliamentary Ombudsman, in recognition of which he received a CBE. He has extensive experience in customer care, codes of conduct and complaints resolution. Alan leads the IFC's work on complaints and on football's community work.



### **Julian Wild**

Julian Wild is a lawyer with substantial senior commercial experience. He is on the Executive Committee of Northern Foods plc, specialising in mergers and acquisitions. He has followed the fortunes of his home town team, Hull City, for over 40 years, both home and away, usually from the terraces. Julian leads the IFC's work on governance, and on customer charters.

**Lord Taylor of Warwick** resigned January 2003

**Kate Barker**, resigned July 2003

**Rt Hon Ann Taylor, MP**, Deputy Chair, resigned November 2003

## **IFC staff**

**Chris Gamble**, Company Secretary

**Claire Broadley**, Assistant Secretary

**Rob Latchford**, Research and Information Officer

**Alison Bone**, Personal Assistant

**Gillian Rathbone** (to October 2003), Administrative Assistant

**Ruth Adamson**, Administrative Assistant

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## EXECUTIVE SUMMARY

### Introduction

The role of the Independent Football Commission (IFC) is to evaluate the effectiveness of football's existing self-regulatory framework and to suggest improvements. The IFC is independent, both of those who provide services within football and those who use them. It aims to exert influence on the football authorities - the Football Association, the FA Premier League and the Football League - in order to bring about improvements in the way they meet the needs of the football community in England. The IFC's terms of reference can be found in Annexe A.

### The IFC in 2003

In 2003 the IFC turned to a set of serious issues that were pressing not only on it but on the whole of football. It set itself the following priorities:

- to win the trust and confidence of the governing bodies and to be seen as a valued resource on which they can draw;
- to investigate three principal dimensions of the financial problems besieging football: the crises at club level; governance; the contribution of the Financial Advisory Unit (FAU) to improving financial management;
- to understand the widespread perceptions of the media and ethnic minorities that football does not offer equality of opportunity and is failing to develop a football community representative of England's diversity of race, culture and talent;
- to address four major concerns of football's customers, brought to the IFC's attention in 2002: community work; relations with neighbourhoods in proximity to football stadia; facilities for disabled supporters; increased rescheduling of football matches, particularly in the Premier League and Division 1.

In all its work, the IFC's focus was on identifying best practice that could be replicated, and suggesting constructive change that might be made to existing regulatory systems, to rules, and to current practices, that could help address core problems and contribute to their being avoided, or at the very least lessened, in future.

Some degree of tension between a regulatory body and those whose work it is scrutinising is healthy. It exists between the IFC and the three governing bodies, which, however, reached a better understanding and a more comfortable co-existence in 2003. The year's work benefited from a greater degree of co-operation from the governing bodies. The dialogue on issues the IFC was addressing - almost all sensitive and complex - was frank, robust and challenging. The Commission would like an even freer flow of information between the governing bodies and itself, but it believes that working relations strengthened during the year, on the back of mutual respect and a common purpose.



In 2003 the IFC's work was at the heart of football's current dilemmas. This report on that work is the product of extensive discussions with many people, who, in general, support the IFC's role, although there are those who continue to deplore the Commission's lack of formal powers. The Commission is not as anxious for statutory regulation as many of its contacts. It welcomes the fact that the football authorities have taken notice of IFC recommendations and acted on them to date, and will look to their continuing to do so when it comes to hard topics in the 2003 IFC report, as well as the softer subjects that still need to be addressed but involve less discomfort.

The IFC believes the authorities increasingly recognise the value of independent, unfettered analysis of football's strategies for providing the game with leadership, regulation and good governance. It also believes that their response to the year's work will be positive and that they will recommend its findings to the football-going public that so very much wants football to work well.

## Summary of findings

The following paragraphs summarise the IFC's findings in the specific areas it examined in 2003. A complete list of recommendations in each area can be found on page 11.

## Finance and governance

### The crisis in club finances

The sharp increase in clubs going into administration in 2002-03 is a clear indication of the financial challenges facing football clubs at all levels. No system of regulation can or should remove from individual enterprises the responsibility for managing their own risks in pursuit of ambition. Nevertheless, closer supervision of football finance by the authorities is necessary. Furthermore, in the light of views canvassed by the IFC, firmer regulation would be welcomed by a wide cross-section of football's stakeholders, including football clubs. The football authorities must encourage good practice and require financial prudence.

## Governance

The governing bodies are not currently succeeding in changing public perceptions that the football business is ill-governed, nor are they answering the critics loudly or firmly. But, while not underestimating the scale of the problem, the IFC believes that recent moves to overhaul the regulatory framework are encouraging, and it senses a growing commitment to change. All three governing bodies need unequivocally to identify, agree and apply appropriate, timely and effective rules and sanctions. It is not acceptable to abdicate responsibility from behind clubs' company status, or laws that someone else might invoke. With a new raft of ideas and some positive initiatives such as the Financial Advisory Committee (FAC), the FA is positioned to demonstrate that it is an independent body, resolved, competent and strong enough to tackle the issues.

## The work of the Financial Advisory Unit

Few can doubt the continuing financial problems for English football. However, the IFC perceives a trend towards better financial management and believes this should be recognised. A new generation of financial directors is in place at Premiership clubs, raising professional standards; the FAU is contributing significantly to extending this trend at clubs in lower divisions. To do so requires investment: employing and/or training specialist staff at club level; properly resourcing the FAU; and giving it specific aims and full management support. Collaboration, co-operation and respect between the three governing bodies will be key to improving football's record and reputation in financial management.

## Racism

Football has achieved a great deal, notably the integration of black players and successful spectator education. There is no room for complacency, especially as the slow pace of change is damaging perceptions of the game, and of the will of the governing bodies to act. Too little is being delivered, and too slowly. The Premier League and the Football League must combine with the FA to show unity of purpose and take incisive action in 2004 that will deliver radical and demonstrable change. English football has the potential to become a powerful international exemplar of a business delivering and manifesting racial integration at all levels. It can do it. Will it?

## Customer concerns

### Community work

Community work is currently under-recognised as a positive contribution on the part of football to helping address important social issues. Steps are needed to clarify the activity focus and output, and to create more dynamic and practical funding and management structures. A collaborative, carefully produced and targeted promotional exercise to publicise football's achievements could be valuable but would have to be handled sensitively. The strategic importance of the community programmes is not wholly being realised.

### Neighbourhoods

Neighbourhoods are a distinct and individual part of the football community, and neighbourhood relations merit focused attention at both club and league level. Mismanagement can result in negativity that can take years to repair. Football must recognise that neighbours are not football "customers" and that "football" methods of communication, PR and consultation are not suitable. The football authorities can help to build the expertise and understanding necessary in an era of on-going stadium development.

### Facilities for disabled supporters

There is still work to be done; the IFC has highlighted areas for attention. The progress made at many levels of the game is commendable - including grassroots football where the FA reports a number of initiatives. The requirements of the Disability Discrimination Act (DDA) will sharpen the focus on access for disabled supporters in 2004. The immediate imperatives are to improve understanding of disability needs; to give importance to management input and staff training programmes; to rationalise ticketing practice and policy; to improve the flow of information - both to reassure disabled supporters that on difficult issues such as sightlines they are being heard, and to help clubs benefit from each other's experience.

### Match rescheduling

The football authorities should be reassured that match rescheduling is not having a negative impact on supporters in general, despite the particular unhappiness felt by members of supporters' groups. However, there are other effects to do with policing and neighbourhood relations that merit attention. Football is beginning to succeed in creating a positive impression with supporters about the game and about the environment in which the game is played, that now opens it to wider audiences.

## Charters and charter reporting

Considerable advances were made in improving the charters exercise in 2003. The three-way dialogue between governing bodies, clubs and customers still needs to be strengthened, but initiatives like the FA's new Charter Report and greater transparency generally will help develop positive relations with football's paying customers. The main areas for attention are: setting measurable objectives; reporting on outcomes; lightening administrative processes.

## Issues and complaints

In general the Commission finds that the football authorities respond promptly to issues it raises with them. An exceptional number were received in 2003 concerning the FA's early launch of the new England strip. The IFC is pleased that complaints processes have been simplified. However, the Commission would like clubs to be more scrupulous in drawing their complaints procedures to the notice of the public. Procedures for handling complaints to the governing bodies seem generally to work well.

## List of recommendations

### Finance and governance

1. The football authorities, led by the FA and perhaps through the vehicle of the Financial Advisory Unit, should develop central knowledge and expertise to be made available to clubs in financial difficulties.

2. The requirements imposed on clubs emerging from administration should be applied more generally, and in particular on changes of majority ownership. Standard requirements for all clubs should include the demonstration of security of tenure over grounds, annual budgets and business plans, and financial forecasts over a minimum of 2 years. In particular these should demonstrate the club's capacity to meet contractual salary costs as well as the capital cost of player transfer fees.

3. The football authorities should develop benchmarking data to assist clubs in their financial management, and organise regional gatherings of finance directors and accountants to encourage learning from each other. This should start no later than the 2004/05 season.

4. The current relevance of, and justification for, the football creditor rules should be reviewed during 2004.

5. The football authorities should introduce a sustainable fit and proper person test by the start of the 2004/05 season for directors of football clubs, and explore its extended application to shareholders.

6. The FAC should be charged with establishing a Code of Corporate Governance against which Directors should be required to report, progress to be reported to the IFC in December 2004.

7. The FA should set up a properly resourced and skilled Compliance Department dedicated to the enforcement of proper corporate and financial governance and reporting to a properly constituted Compliance Advisory Committee by the beginning of 2005.

8. Club Chairmen should be asked to introduce induction training on particular football circumstances for new directors; the FAPL and FL should gather examples of good governance within the game, on which FC Boards can draw.

9. The FA should review the resources of the FAU, ensuring it is staffed appropriately in terms of numbers and depth of expertise. Its capacity should allow a 3-year visits cycle and the skills to make it a credible source of expertise to the Premiership, initially in validating national licence compliance.

10. Clear and quantifiable aims for the FAU should be agreed with the FAC by 1 March 2004.

11. Necessary rule changes should be introduced by individual leagues to set standards for financial forecasting and include penalties for non-compliance within reasonable time periods.

12. The FAU and FA should regularly review what information they require from clubs and that the requirement has a clear purpose. Processes should be simplified. This exercise should include consultation with the FAPL, the FL, and other leagues to which the FAU provides services.



## Racism

13. There should be radical restructuring of FA Council and committees, with co-options and appointments from ethnic minorities to 6 committees and 3 places on Council, and to the FAPL and FL Boards during 2004. Wider targets should be put in place for the triennium to 2007.

14. The FAPL and FL must state their own racial integration strategies in brief form before the end of the 2003/04 season, with measurable objectives and timescales for delivery (starting in 2004). The FA should focus on a significant – but reasonable and achievable – number of measurable results each year. An independent process must be introduced for monitoring and reporting achievement.

15. Relevant football rules should be reviewed, and sanctions standardised and strictly enforced.

16. A joint programme of mandatory education and training, to include senior executives and coaching staff, must be devised and implemented by the three football authorities, with the aim of achieving appropriate and relevant diversity awareness and understanding.

17. The resourcing of equity work should be reviewed and enhanced, at the centre and in the counties; commitment must explicitly be given to the long-term funding of anti-racism and pro-diversity initiatives in football.

18. The FAPL and FL should scrutinise employment practices at clubs for compliance with EO policy, across all vacancies.

19. There must be co-ordination of best practice and ideas for widening the game's support amongst ethnic minorities, especially between clubs facing particular challenges, and with other sports.

## Community work

20. Community work should be reported and given high profile outside the Charter process and cover the aims and achievements of the whole of football. The FAPL and FL to explore possibilities before the 2003/04 reporting season.

21. The Premier League and Football League should encourage senior management and Board recognition of the strategic importance of community work.

22. The FA and FAPL should suggest a review of Football in the Community funding distribution to the Footballers Education Society.

## Neighbourhoods

23. Clubs should be asked to designate a staff member responsible for neighbourhood relations.

24. The FL and the FAPL should create a best practice resource on which clubs from all divisions can draw.

25. The FAPL should meet with the Federation of Stadium Communities to explore mutual concerns.

## Facilities for disabled supporters

26. The governing bodies should issue brief implementation reports on FTF implementation by September 2004, to be made available to all clubs and also specifically to the National Association of Disabled Supporters (NADS) and Disabled Supporters Associations (DSAs).

27. FTF recommendations on naming a contact for disabled supporters and an e-mail address; the ability for home and away supporters to sit amongst fellow supporters; and the standardisation of charging policies should become Charter requirements from 2004. Agreement should be reached on the level of service named contacts will be expected to provide.

28. The football authorities should engage in facilitating networking, and engaging wider consultation, to include all DSAs and not just NADS members.

29. The football authorities should consider, in consultation with clubs, how to raise the profile of disability awareness.

## Match rescheduling

30. Clubs should be required to include local residents when notifying and publicising match rescheduling.

31. The football authorities should initiate discussions with stakeholders about capturing and using best practice in the management of high-risk matches, and about improving consultation processes involved in match rescheduling.

32. The FA should address contingency planning for rescheduling England games.

## Charters and charter reporting

33. The pilot exercise on validating Charter Reports should be extended and incorporated into the football authorities' own processes. Validation should be used to move towards a standard for customer services in football: the FAPL to introduce this by 2005; the FL to start in 2006.

34. Charters must be used to make clear commitments to customers on a rolling basis, expressed in timebound and measurable terms. They should include policies on combating discrimination. Methods of conveying these commitments directly to supporters and other customers should be explored and introduced from the beginning of the 2004/05 season.

35. Charter Reports should be simplified and positive action taken to disseminate findings. The FA's Charter Report provides some useful ideas.

36. The FAPL and FL must make their own role in the Charter process clear to clubs and define who the Reports should be addressing; why the governing bodies gather information from them; to what use it is put; and what benefit accrues to clubs.

37. A summary of key points from Charter Reports should be produced for club use.

## THE IFC IN 2003

*“the transparency and accountability that (an independent) panel will bring will lead to an increased public confidence in the way the game is run”<sup>1</sup>*

2003 was the IFC's first full year of operation. Though it first met in January 2002, the Commission was inevitably preoccupied in its early months with establishing an office base, recruiting staff, building a network of contacts and – most important – establishing working relations with the governing bodies and the rest of football.

The requirement of government and the football authorities in 2002 was for the IFC to focus on charters and the charter process, which was still developing; and to examine key areas flagged in the IFC's terms of reference, including the work of the FA's Financial Advisory Unit (FAU), and complaints procedures. These, and reflections on follow-up from the Football Task Force Reports from the late nineties, were the IFC's focus in 2002 and the subject of the first IFC Annual Report. In that Report, the IFC made 22 recommendations, most of which the football authorities accepted and implemented (see Annexe B).

In 2003 the IFC turned to a set of serious issues that were pressing not only on it but on the whole of football. It set itself the following priorities:

- to win the trust and confidence of the governing bodies and to be seen as a valued resource on which they can draw;
- to investigate three principal dimensions of the financial problems besieging football: the crises at club level; governance; the contribution of the FAU to improving financial management;
- to understand the widespread perceptions of the media and ethnic minorities that football does not offer equality of opportunity and is failing to develop a football community representative of England's diversity of race, culture and talent;
- to address four major concerns of football's customers, brought to the IFC's attention in 2002: community work; relations with neighbourhoods in proximity to football stadia; facilities for disabled supporters; increased rescheduling of football matches, particularly in the Premier League and Division 1.

In all its work, the IFC's focus was on identifying best practice that could be replicated, and on suggesting constructive change that might be made to existing regulatory systems, to rules, and to current practices, that could help address core problems and contribute to their being avoided, or at the very least lessened, in future.

The year's work benefited from a greater degree of co-operation from the governing bodies. The dialogue on issues the IFC was addressing – almost all sensitive and complex – was frank, robust and challenging.

1. View of the football authorities, given in Government Task Force Commercial Report and Football Foundation: A Presentation on Two Key Football Issues, March 2000



## IFC 2003 AGENDA

Review and examination of:

- the work and success of the FA's compliance unit
- case studies on clubs in crisis
- financial regulation, including the impact of UEFA licensing on English clubs
- governance
- positive action to combat racism, in particular success in integrating ethnic minorities at all levels of the game
- ticketing issues, including rescheduling of matches
- validation of charter reporting
- the needs of disabled supporters, and compliance with the Disability Discrimination Act
- community issues

Some degree of tension between a regulatory body and those whose work it is scrutinising is healthy. It exists between the IFC and the three governing bodies, which, however, reached a better understanding and a more comfortable co-existence in 2003. *The year's work benefited from a greater degree of co-operation from the governing bodies. The dialogue on issues the IFC was addressing – almost all sensitive and complex – was frank, robust and challenging.* The Commission would like an even freer flow of information between the governing bodies and itself, but it believes that working relations strengthened during the year, on the back of mutual respect and a common purpose.

A comment that the football authorities made at the beginning of the year was that the IFC's agenda, summarised above, was too big, too challenging, and perhaps too hot to handle. In substance they were right. After 12 months intensive work, the Commission does not claim to have completed its work on finance, or on racism and equity issues. It expects these to carry forward on a rolling programme, that will include continued monitoring of the FAU; regular responses to topical issues passed to the Commission for comment or resolution; complaints adjudication; evaluation of the on-going work on Charters.

In 2003 the IFC's work was at the heart of football's current dilemmas. This report on that work is the product of extensive discussions with many people, who, in general, support the IFC's role, although there are those who continue to deplore the Commission's lack of formal powers. *The Commission is not as anxious for statutory regulation as many of its contacts. It welcomes the fact that the football authorities have taken notice of IFC recommendations and acted on them to date, and will look to their continuing to do so when it comes to hard topics in the 2003 IFC report, as well as the softer subjects that still need to be addressed but involve less discomfort.*

During 2003, the Commission deepened its contact with, and understanding of, the wider football community. It continued its practice of holding several of its Board meetings at football clubs, and thanks them for the invitations to do so. These occasions greatly assist IFC understanding of the priorities on the ground, and its discovery of best practice. The Commission also continued to consult with supporters groups; to exchange views with the media; to contribute to others' work on current issues, such as the Parliamentary All Party Group's (APG) enquiry into football finance; to test its findings on experts and professionals whose specialist knowledge outstrips the IFC's. Above all, the IFC goes to football matches in its official and unofficial capacity, at all levels of the game.

The year's findings have been fully discussed with the football authorities, at the highest level. There will be no surprises for them in the recommendations that have stemmed from the year's work and are contained in the 2003 Annual Report. *The IFC believes the authorities increasingly recognise the value of independent, unfettered analysis of football's strategies for providing the game with leadership, regulation and good governance.* It also believes that their response to the year's work will be positive and that they will recommend it to the football-going public that so very much wants football to work well.

*The IFC believes the authorities increasingly recognise the value of independent, unfettered analysis of football's strategies for providing the game with leadership, regulation and good governance.*

## FINANCE AND GOVERNANCE

The IFC's work on finance included individual case studies at six clubs, and meetings with administrators, the Inland Revenue, banking and finance companies, and research centres. In addition to examining current financial difficulties at club level and governance issues, the IFC additionally reviewed progress made by the FAU, examined the likely impact of UEFA licensing, and started work on wider issues of financial regulation.

The IFC's main findings are:

- public perceptions of the serious state and maladministration of football's finances are damaging and persistent; the governing bodies are not succeeding in changing them or answering widespread criticism
- issues of governance are now being purposively addressed by the FA, in consultation with a wide group of experts and stakeholders. This exercise must move rapidly towards a clear policy, and action
- the crises at club level are providing stark and steep learning curves. The lessons learned must be used
- there is a vital role for the FA, supported by the other football authorities, to impose strong and open governance and to protect football's communal and sporting nature
- appointments made to the Financial Advisory Committee (FAC) are welcome. Its role in monitoring the work of the FAU, and addressing issues of governance, is expected to be significant
- the FAU continues to contribute to raising standards of financial administration and control in the Football League and feeder leagues. It has no evident role with regard to the Premier League; any part it may play in validating the national licence has yet to emerge
- the governing bodies are beginning to review the regulatory framework but there is not yet clarity of purpose in addressing financial failure or concerted action across all three bodies for the unequivocal identification, agreement and application of appropriate and effective rules and sanctions

### The crisis in club finances

#### *a lonely, painful and expensive process*

Football has never had such a high level of external resourcing yet has never had so many clubs in financial difficulty. In recent years there has been a steady stream of Football League clubs going into administration, with the peak in 2002 when eleven clubs went into administration or Company Voluntary Agreement (CVA). Indeed, taking the further five clubs that followed in 2003, this represents a fifth of Football League clubs going into administration in little over 18 months (see fig.1), and indicates the seriousness of the financial problem. In order to understand and analyse this issue, the IFC conducted a wide ranging enquiry during 2003. This was based upon extensive discussions with clubs which have been through the process of administration, and involved meetings with chairmen and senior club officers, supporters groups, the football authorities, insolvency practitioners, the Inland Revenue, Customs and Excise, and interested MPs.

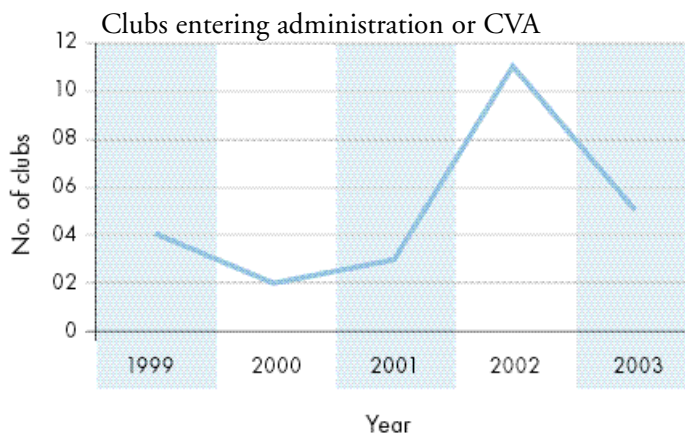


fig. 1 source: *The Ownership Structure of Nationwide League Football Clubs 2002-03*<sup>2</sup>

The peak in 2002 reflects the confluence of a number of factors and developments whose combined effects brought strong negative financial pressures upon football clubs. In discussion, clubs tended to cite these systemic changes, rather than shortcomings in their own management practice, as the main reason for the financial disasters which overtook them. Factors which have been identified by both clubs and informed commentators include the following:

- **The longer-term effects of the Bosman ruling.** The free agency provision at the end of a contract encouraged clubs to offer longer contracts, both as a means of preserving the financial asset represented by players and to enhance team building and club loyalty. The sharp acceleration in players' wages increased the overall salary costs to the club. If the financial risk taken was then not matched by sporting success, what began as a long term asset could easily and quickly become a long term liability.

- **The impact of relegation.** There is a close but not invariable connection between relegation and the onset of serious financial problems, largely because of the difficulty in quickly reconciling an inherited high cost base to a newly-acquired lower income level. This has been particularly associated with relegation from the Premier League because of the increasing gap between club income in that competition compared with the Football League. All three clubs relegated in 2002 eventually went into administration. However, it should also be noted that clubs in lower divisions also feel the impact of

relegation and trace the origin of their financial problems to relegation to the second or third division and the accompanying drop in attendances and income.

- **The collapse of the transfer market.** Historically, clubs whose income did not match their expenditure could expect to be able to trade their way out of potential insolvency by the sale of players. But in more recent times, the combined effects of higher salary costs, the spread of financial difficulties, and the increased recruitment, particularly in the Premier League, of overseas players has led to a sharp downturn in both the number and value of UK transfers. This has had a particularly serious impact on the Football League. Clubs facing financial shortfalls have been unable to reduce wage costs and realise capital assets through the transfer market. Though economists might cite this as a normal market correction to take account of changed financial conditions, it has severely impaired the capacity of clubs to manage the downturn.

- **The imposition of a transfer window.** Clubs with serious financial problems all believe that the introduction of the transfer window has exacerbated an already bad situation. It is widely felt that it favours buyers over sellers and further reduces the capacity of financially-strapped clubs from realising the full potential of players they wish to sell. Buying clubs inevitably use the imminent end of a window as a bargaining tool.

- **The collapse of ITV Digital.** There is some debate over whether the disappearance of income streams expected from the Football League's arrangement with ITV Digital was a symptom or a major cause of the financial crisis. Undoubtedly, clubs had quite properly budgeted for the expected revenues, which in the case of Division 1 could be between £2m and £3m. It was difficult to adjust in mid-year when it became clear that the funds would not be forthcoming. However, it has also been argued by some that perhaps clubs had spent the anticipated revenues already and that the loss of this income was only one factor among several. It should be noted that in one case the demise of the ITV Digital deal undermined a prospective long-term financing arrangement, because of the adverse effect on the club's cashflow projections.

<sup>2</sup> *The Ownership Structure of Nationwide League Football Clubs, 2002-03*, Stephen Hope, School of Business and Social Sciences, Roehampton, University of Surrey, August 2003. Subsequent to the publication of this research, a further two clubs entered administration in 2003, making a total of 5. This figure is reflected in fig. 1.



These systemic and structural changes interacted at club level with the unique circumstances which brought the club into administration. At one level of generalisation, all clubs shared the same fate that their costs exceeded their income, without the immediate prospect of bringing the two into balance. Yet in practice every club had a different story. In one case it might be an over ambitious chairman, insufficiently controlled by the club board, who arranged unwise and costly transfers; in another it might be the failure to sell players at a critical stage; in another the collapse of a long term financial deal or the sudden withdrawal of banking facilities. The loss of a benefactor deprives a club of a cushion of subsidy, which is not easily replaced; in several cases the separation of the ground from the ownership of the actual football club was a critical factor. Most clubs took the decision themselves to enter administration, often after taking external financial advice. However, in one important case, the club's main long-term creditor forced the club into administration, in the expectation that it would achieve a better deal from receivership than could be gained from a voluntary agreement. Overall, half-finished stands, expensive funding arrangements and frequent changes of managers have often been signals that all was not well.

**Withdrawal of credit facilities: crisis at club X**

*The club suffered successive relegations in a 3-year period. This led to a dramatic drop in attendances and income. Lack of success on the field was accompanied by frequent changes of manager, with each new one adding to the payroll by bringing in new players. With the collapse of the transfer market it proved difficult to move the players on who were now surplus to requirements. Expenditure was well above income. The bank withdrew credit facilities and the club was forced into administration*

Such is the severity of the crisis in the lower divisions, and of public perceptions that football is financially irresponsible, that responsibility must be taken by all three governing bodies.

Clubs going through administration have found it a lonely, painful and expensive process; they all report feeling isolated and unsupported. The existing regulatory framework was not found to be particularly helpful to clubs in financial difficulty. The IFC suggests that *there is a role for the governing bodies not only to enable clubs going into administration to learn from the experience of others, but to facilitate access to good practice for all clubs* - that may help raise standards and prevent the slide into administration. The dissemination of best practice by the Football League (without naming names) on a regular and systematic basis would be a start, and one that several clubs have raised with the IFC. But for a real step-change and wide-reaching effectiveness, the learning experience should be opened across league divisions. The Premier League already holds regional meetings for clubs' Finance Directors. Whilst some detail of these meetings may be confidential to the Premier League and its listed clubs in particular, nonetheless there is scope for sharing generally-applicable wisdoms, systems, practices and guidelines. That mutuality, which seeks to ensure the survival of all clubs, should make it possible to promote the sharing of experience without impairing confidentiality or undermining the competition which is at the heart of the game. Such is the severity of the crisis in the lower divisions, and of public perceptions that football is financially irresponsible, that responsibility must be taken by all three governing bodies.

The general message from administrators appears to be that the harsh medicine taken during the process of administration should have been anticipated by sensible management: preventative action could and should have been taken. While ambition, competition and risk-taking are the life blood of the game both on and off the pitch, recent experience suggests that the football authorities should, and are now beginning to, assume more responsibility for requiring financial prudence from clubs. The Football League's decision to impose a sporting sanction on clubs going into administration by the deduction of points may act as a powerful disincentive to any club contemplating administration as an easy way out of its financial problems, for example.

**Collapse of financial deals: crisis at club Y**

The club had a couple of years in the Premiership and, in the effort to maintain FAPL status, pursued an ambitious transfer policy. The rising wage bill was just manageable in the Premiership with the help of director loans. But with relegation came a drastic reduction in income, and the collapse of the transfer market affected the club's capacity to reduce its wage bill. Its strategy was to refinance its long-term indebtedness to provide new working capital. A possible deal was on the point of agreement when the ITV Digital news broke. The deal aborted. The club went into administration.

Proportion of players' wages to turnover

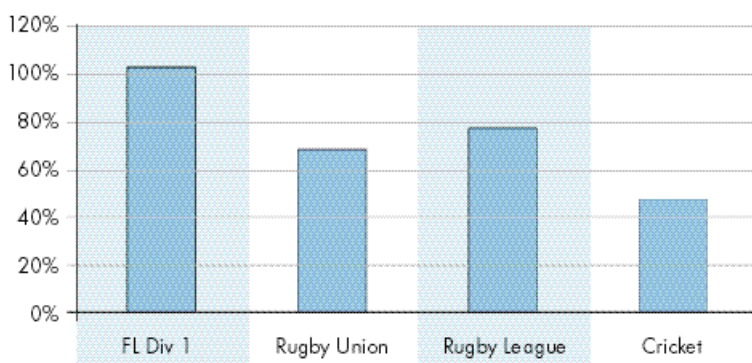


fig. 2 source: Deloitte & Touche Annual Review of Football Finance 2003<sup>3</sup>

Salary costs, spiralling out of control and cocooned by contractual arrangements of crippling constriction, are identified uniquely with football (see fig 2). To enforce stricter management of salary costs, the Football League is piloting the imposition of a salary limit on clubs in Division 3. This is a welcome initiative and is being voluntarily adopted by some clubs higher up the League, including at least one in the First Division. Nonetheless, the IFC recognises that some critics have flagged weaknesses in this proposal: clubs, players and agents are likely to find ways round the cap; and the system may pose an unfair sporting penalty on

**Unfinanced player wages and transfers: crisis at club Z**

The club once had a surplus of £3m from transfer fees. Then it was relegated from Division 2, but tied into player contracts. Income dropped. Wages were funded from the balance sheet, and the £3m disappeared. Soon the club was signing player contracts that couldn't be funded and were completely out of line - £2,000 a week for a player of average ability. The crisis developed as the club failed to cut expenditure in line with income, and speculated on bouncing back after relegation.

3. Deloitte & Touche Annual Review of Football Finance, pub. Deloitte & Touche, 2003

English clubs involved in European competition until salary limits apply throughout Europe and thus universally curb squad sizes. Ultimately, the cumulative impact of other pressures, especially if they occur in rapid sequence, can overwhelm any individual demonstration of prudence.

Sensible financial planning and prudent budgeting must become an essential feature of the management of football clubs. The authorities can both encourage good practice and require sound financial management. As Deloitte and Touche has commented:

*Those who observe "good business" have everything to gain from sensible internal football regulation and nothing to lose.<sup>4</sup>*

The Football League suspends a club's membership on its going into administration. The IFC has discussed with several clubs the conditions they have to meet to regain membership of

the League. By and large these are regarded as rigorous and demanding but, in the circumstances, reasonable. Included in these requirements are: a demonstration of security of tenure over grounds; a three-year business plan, including cashflow forecasts; evidence of funding to discharge liabilities for a defined period; FL approval of a change in club ownership. The IFC suggests that the football authorities should apply these fundamental tests of football and financial viability more generally.

In particular, the IFC believes a test of the kind outlined above would be appropriate when the majority ownership of a club changes hands, and that obligations on benefactors should be introduced to the FA's regulations. There have been several instances of new owners coming into a club with no plans in place for its business survival, and no commitment to its long-term sustainability. An owner who loses interest and departs can leave a club with commitments, particularly in the form of

THE TIMES TUESDAY JULY 8 2003

## Should footballers' salaries be capped?

A wages cap could hit just small teams — and widen the gap between first and second-rate clubs, says **Julian Moore**

**A**lthough Chelsea may have secured their future after the recent takeover by Roman Abramovich, the Russian oil magnate, many of the rest of Europe's football clubs are facing an uncertain financial future: television revenues have nosedived and the transfer market has all but disappeared. Yet, at the same time, players' salaries have soared. It is against this background that the European football community has been discussing the need to adopt some form of what is seen by many as the most radical form of cost control — salary capping. The purpose is simple. Caps limit the amounts that clubs can spend on players, thereby controlling increases in players' wages and limiting the risk of clubs spending more than they can afford on players, while also maintaining the competitiveness of the league. The form of cap under considera-

**'Clubs would have to slash wages or sack staff to comply'**

tion by the Football League and by the G14 group of Europe's 18 "elite" clubs is a scheme in which each club's spending would be limited to a percentage of its turnover. The basic position under European

regulation is that clubs must not spend more than they receive in revenue. In contrast, many smaller clubs gamble in order to compete at the highest level. Astonishingly, in 2001, for example, the average Nationwide League first division football club was spending 101 per cent of its revenue on players' wages alone and, since then, few clubs have taken any significant steps to limit their spending on wages.

If the proposed cap were introduced, each of these clubs would be forced to slash wages or sack staff to comply with the cap. The position would deteriorate further if revenues continue to drop and some clubs could go out of business in the process.

So, rather than creating competitive balance and preserving the "very existence of credible pan-European competitions", arguably, the very opposite would happen as the effect of a cap would further widen the gulf between Europe's elite and the chasing pack. Arguably, therefore, the cap in the form under consideration would be a restriction of competition and would not be given exemption, especially as there are alternative courses of action open to clubs to prevent wages from spiralling out of control.

If Uefa is unable to obtain the satisfactory level of support for the proposed cap required from the clubs, players and unions, it is unlikely that it will make the decision to impose a cap and risk both a strike by players or

4. *ibid*

player wages, which it cannot bear. Benefactors who wish to invest in clubs should not be discouraged, but where that investment leads to significant increases in the cost base, financial forecasts, as a standard part of the information requirements, should demonstrate the club's capacity to meet ongoing salary costs as well as the capital cost of player transfer fees.

The IFC has no wish to see unnecessary bureaucratic demands imposed on clubs, nor to inhibit enterprise and ambition. But the painful experience of clubs both in and out of administration suggests that the exercise of more effective powers by the governing bodies would be of benefit to the game and be welcomed. One of the distressing aspects of the cost-cutting imposed by administrators has been the dismissal of long-serving administrative staff. This sits uneasily alongside the security of players whose contracts must be honoured under the football creditor rules, which are part of football's insolvency policy. The appropriateness of this rule is often queried. Some administrators to whom the IFC spoke did not believe the rule is fair to all parties and expressed concerns about having to apply it at the behest of the football authorities. The FAU has set out the FA's case for the rule to the IFC, arguing that it prevents administration being used as a mechanism to get rid of players and the dumping of debt, both of which have the potential to produce unfair sporting advantage within football's competitions. The reduction in transfer dealings which has lessened inter-club debt has, to some extent, reduced the need for the rule. The new Enterprise

Act will have an impact as it changes the status of Crown Debt during the process of administration; this may render the rule unsustainable, in its current form, in the longer term. In view of this changed situation, the IFC suggests *it would be appropriate for the football authorities to review the current relevance of and justification for the football creditor rules.*

During an open discussion<sup>5</sup> on football's financial troubles the game was represented as a series of cliffs. If you fall off – you are in trouble. Playing in the Champions League is a cliff. Relegation is a cliff. The difference between FAPL and the rest is a cliff. The Conference is another cliff. Left on their own on the edges of these cliffs, it is inevitable that clubs are going, one after the other, to tip over.

Elsewhere in this report, the IFC applauds measures the football authorities have taken to bring about positive improvements, to begin to repair football's image, to set examples of good practice to other Football Associations in Europe. There is much that is being done well. But *the football authorities, collectively and individually, can and should do more to control financial excesses.* In the light of current financial difficulties, the regulatory framework should be subjected to close scrutiny and should reflect the changed circumstances of football today within the harsh business environment in which it operates. From the outside, football gives the appearance of being awash with money, arguing about it in public, and seemingly incapable of financial conduct throughout its structure to a standard that eliminates recurrent crises. The football authorities must act.

*the football authorities, collectively and individually, can and should do more to control financial excesses*

5. BBC Sports Summit, March 2003



## Summary conclusion

The sharp increase in clubs going into administration in 2002-03 is a clear indication of the financial challenges facing football clubs at all levels. No system of regulation can or should remove from individual enterprises the responsibility for managing their own risks in pursuit of ambition. Nevertheless, closer supervision of football finance by the authorities is necessary. Furthermore, in the light of views canvassed by the IFC, firmer regulation would be welcomed by a wide cross-section of football's stakeholders, including football clubs. The football authorities must encourage good practice and require financial prudence.

## Recommendations

- The football authorities, led by the FA and perhaps through the vehicle of the FAU, should develop central knowledge and expertise to be made available to clubs in financial difficulties.

- The requirements imposed on clubs emerging from administration should be applied more generally, and in particular on changes of majority ownership. Standard requirements for all clubs should include the demonstration of security of tenure over grounds, annual budgets and business plans, and financial forecasts over a minimum of 2 years. In particular these should demonstrate the club's capacity to meet contractual salary costs as well as the capital cost of player transfer fees.

- The football authorities should develop benchmarking data to assist clubs in their financial management, and organise regional gatherings of finance directors and accountants to encourage learning from each other. This should start no later than the 2004/05 season.

- The current relevance of, and justification for, the football creditor rules should be reviewed during 2004.

## Governance

*greater transparency, greater awareness, greater disclosure*

The IFC examined issues of governance on three grounds:

- the requirement in its Terms of Reference to review the rules and regulations of the governing bodies relating to financial and business matters;
- the vital link between corporate governance, solving the crises at club level, and the new functions of units within the FA with which the IFC is concerned: the FAU, the Financial Advisory Committee and the Compliance Unit (CU);
- the widespread perception that football is exceptionally poorly governed.

This last is perhaps the most important, and certainly a valid starting point. Whatever the actual state of governance in football, the perception is that it is not good. Expression of this perception is found in various places. For example, during the autumn and winter of 2003, a wave of television and radio programmes judged the seeming crisis in football worthy of extended air time. At the same time the Parliamentary All Party Group on Football was sufficiently perturbed by all it was hearing to launch its own enquiry into the state of the game<sup>6</sup>. And the tabloids found plenty to write about, ranging from the FSA's interest in listed clubs, through to loud coverage of supporter demonstrations and protests against the way their club is run.

The damage to football is not only the extent and nature of this interest, but the further perception that where there is known or perceived bad practice, little or no action is taken by the game's governing bodies. In looking at what is needed to improve corporate governance, the words the IFC heard again and again were "greater transparency". The problems the governing bodies face, – and the FA above all, as the overarching governing body and the National Association – are indisputably big and complicated. Football clubs are almost all public or private companies (see fig 3). This makes them subject to company law, over and above football regulation. Moreover,

6. The APG's findings were not available at the time this Report was compiled (December 2003); its scheduled report date was February 2004.

it is less and less common for a club, in its entirety, to be one company. Many see football's governance problems stemming from the day in 1983 when Tottenham, the first club in Europe to list on a stock market, set up a new holding company, Tottenham Hotspur plc, of which the football club was simply a subsidiary. This allowed the club to evade the FA's Rule 34 which limited the payment of dividends to the directors of football clubs. The FA took no action; other clubs were quick to follow suit; and rule 34 fell into disuse. Many clubs now are structured around multiple companies, making it difficult not only to determine where legal, sporting or international jurisdiction might apply, but also difficult in some cases to determine the ownership of football clubs and the numbers and identities of directors and shareholders. Moreover, the nature of restructuring has both encouraged and enabled diversification into wide-ranging business ventures. This can be a positive development, allowing football clubs to build a financial resilience to the unpredictable and fluctuating fortunes of football itself; but also hazardous if the sub-businesses fail. All this helps complicate the business of football.

The lack of transparency in ownership and business structures has been the subject of several research exercises. An investigation in August 2003 by the University of Surrey into club ownership in the Football League<sup>7</sup> noted that,

*... it would seem a reasonable minimum requirement that the game's authorities know who, both as organisations and as individuals, are currently in control of clubs.*

But the author went on to acknowledge that,

*Details of the management and ownership of the 72 clubs are not at the moment a matter of generally accessible public record.*

This research self-evidently did not cover the Premier League, nor did it cover the ownership of grounds, as opposed to clubs. The IFC suggests that *the football authorities should consider further investigation into ownership* themselves, and welcomed the Football League's decision in 2003, following the publication of the Surrey research, to update its records on ground ownership and tenancy.

The IFC is not alone in recognising the size and the complexity of the task facing the FA if it wishes to impose - or reimpose - firm regulation. But doing nothing can no longer be an option, if the governing bodies are to do what they should intend to do: clean up the image of football.

The FL initiative on ownership records is one of a handful of steps that the authorities have started to take recently, which suggest that the will is there. There are two that are particularly significant. The first is the establishment by the FA of its Financial Advisory Committee, following the IFC's recommendation in its 2002 Annual Report that the proposed Advisory and Compliance Committee - which had been without appointments

### Legal structures

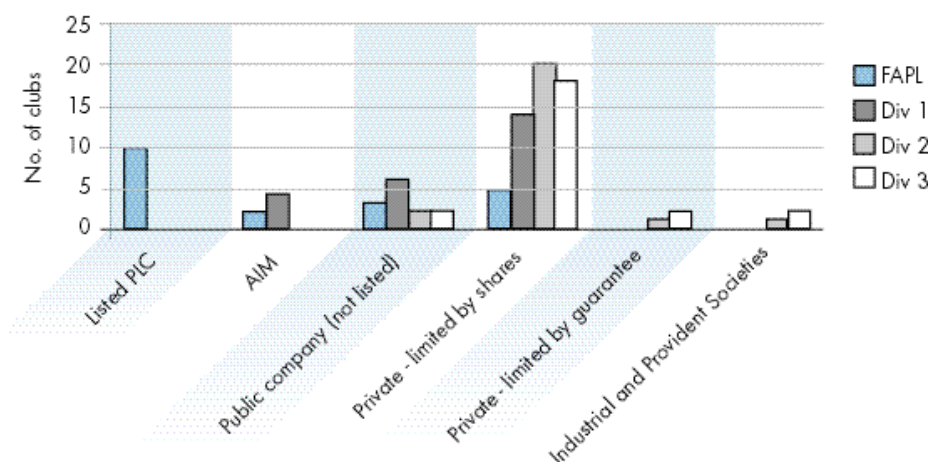


fig. 3 source: FAPL; *The Ownership Structure of Nationwide League Football Clubs 2002-03*

7. *The Ownership Structure of Nationwide League Football Clubs, 2002-03*, Stephen Hope, School of Business and Social Sciences, Roehampton, University of Surrey, August 2003.

for 2 years - should be promptly and properly constituted. The IFC believes that the FAC will forge precisely the link that is needed between the monitoring of financial control throughout the game, and assessing the adequacy of corporate governance: both these requirements are stated in the FAC's Terms of Reference<sup>8</sup>. The IFC looks forward to working alongside the FAC as, together, the two bodies represent a significant move on the part of the FA to achieve rigorous control and tighter, more effective processes in the next three years.

The FAC is at the heart of the second major development, the collective move by the three governing bodies to introduce a fit and proper person test for directors of football clubs. The IFC understands that the FAC will be the owner of this test and review its efficacy and appropriateness. The FA has explored a fit and proper person test several times in the past, but the test's recognised flaws always resulted in nothing being done. *The IFC strongly urges the FA to take this initiative forward firmly now, and to have the fit and proper person test in place by the start of the 2004/05 season*, and to investigate its extended application to shareholders<sup>9</sup>. It will not be straightforward to introduce and will not solve all the governance problems: impeccable credentials may well disguise incompetence or worse; the test is unlikely to catch "shadow" directors; it will need to be policed (by whom is not yet clear); the frequency of its being applied will be contentious; as will the prospect of sanctions. Not least, the FAPL and FL will have to persuade club chairmen to accept the test. The IFC suggests that the latter is the most significant: *it hopes that the governing bodies will act in concert to bring about difficult, unpopular, essential change. If they do, it will be a singularly clear signal that they mean business. And, at the very least, the fit and proper person test will send a similarly clear signal to football club directors about what is expected of them.*

Transparency in corporate governance was widely discussed in 2003, especially following publication of the Higgs Review<sup>10</sup>, in January. Some of Sir Derek Higgs' remarks echo in the context of football: the link between lapses of governance,

corporate malpractice and value destruction; costly boardroom failures, resulting in the loss of value and jobs; the recognition that corporate failure is not going to go away.

*Corporate failure ... will always be with us. Enterprise creates prosperity but involves risk. No system of governance can or should fully protect companies and investors from their own mistakes. We can, however, reasonably hope that boardroom sins of commission or omission – whether strategy, performance or oversight – are minimised.*<sup>11</sup>

So widespread have been the corporate failures in football, so inexplicable has been the seeming irresponsibility in the boardrooms of financially troubled clubs, so difficult has it been for lovers of the game to find out who are its custodians and be reassured by them, that some have seriously asked the question whether football is unique, outside the conditions and conventions of "normal" business. The IFC believes it is not, but is gravely concerned that there is no evident responsibility within the game's regulatory framework for requiring greater awareness in boardrooms of the obligations upon directors to

- discharge their duties to shareholders
- safeguard the club's assets
- address the company's long-term survival
- manage risk.

Birkbeck's Football Governance Research Unit's Annual Report on the governance of football clubs bleakly stated in 2002 that:

*all the evidence suggests that general standards of corporate governance in football are poor with a lack of adequate internal and external control mechanisms*<sup>12</sup>.

8. See *The FA Handbook Season 2003-2004*, p. 24

9. Also recommended by the Football Task Force in 1999 and Sir John Smith in his 1997 report, *Football – its values, finances and reputation*, 1998. Neither recommendation led to change.

10. *Review of the role and effectiveness of non-executive directors*, Derek Higgs, pub .DTI, January 2003

11. *ibid*

12. *The State of the Game: The Corporate Governance of Football Clubs 2002*, Football Governance Research Centre, Birkbeck

*The IFC hopes that the governing bodies will act in concert to bring about difficult, unpopular, essential change. If they do, it will be a singularly clear signal that they mean business.*

The report produced some depressing data, drawn directly from a survey of the clubs themselves<sup>13</sup> and from Companies House records. The findings included the news that:

- less than a quarter of the respondent clubs had an internal audit committee
- of those, almost one-third had no regular Board review of risk assessment
- several clubs stated that they would not provide information on the share register to shareholders, apparently unaware that this would contravene company law
- nearly 70% said a guide to good governance would be useful, and
- nearly 80% wanted advice on company law (with over 40% saying this would be either very useful or crucial).<sup>14</sup>

Birkbeck's findings were reinforced a year later, in its 2003 report.

This all indicates a disturbing lack of understanding of corporate responsibility and a core failure to monitor and assure the quality of corporate management. The IFC suggests that *the FA should establish a Code of Corporate Governance for clubs, and models of best practice, against which Club Directors should be required to report*. Again, the IFC recognises that this will not cure all the ills, but it believes that, in conjunction with a fit and proper person test, it will strongly signal the FA's determination to take firm action and deter those who seek out football club Boardrooms for leisure, glamour or easy financial pickings. *Deterrence is a laudable objective*.

The IFC appreciates that good practice and sensible, prudent strategies do exist. It is sad that some of them surface out of troubles. There was, for example, some expectation at the end of the 2002/03 season that one if not two relegated FAPL clubs would go into administration. Whilst the temptation must have been there – there being so many precedents – to retain Premiership levels of expenditure and gamble on promotion the following season, in fact quite extensive sales of star players took place and expenditure was reined in. The disappointment

of supporters is inevitable in this situation and adds to pressures on Directors. But the IFC believes that *supporter awareness of the need for sensible governance is growing* and that the clamour to invest in players, whilst still noisy from time to time, is generally more subdued. The growth of Supporters Trusts is probably an influential factor.

The financing of debt has changed too, and with some indications of success. Clubs that once would have funded major projects such as stadium development from working capital and short-term loans, have more recently turned to securitised private placement of debt. In some cases, the price of prudent risk assessment is some element of football ambition. Some FAPL clubs are seemingly settling for mid-table and financial viability, in preference to gambling millions on a place in the top four and Champions League football. With a loyal enough supporter base, the strategy can work. Other clubs have recognised that Premier League football brings with it problems in the form of higher wages and higher expectations, and have adopted strategies which include: managing out a cycle of long-term player contracts and making no further commitment to long-term contracts; drop-down clauses in player contracts; downside management (i.e. budgeting for relegation); budgeting for short cup-runs; setting targets for players' wages not to exceed 50% or 60% of turnover; diversifying income streams. Such clubs are managing themselves into stability by themselves; for their practices to become more widespread probably needs assistance from the football authorities. As explained in the discussion of clubs in financial difficulties, above, clubs frequently feel isolated and unsupported when in financial danger and many clubs can't cope within the structure of football that has emerged since 1992. Critical financial difficulty is not confined to FL clubs: at least seven ex-FAPL clubs have gone into administration.

13. 51% of the 92 clubs in the FAPL and FL returned the Birkbeck survey – a relatively high percentage for a postal survey.

14. *ibid*





With tougher disciplines must come measures to impose disclosure and compliance. Here again, the football authorities have ground to make up. The FA will find it hard to escape from its reputation – justified or not – of failing to apply such regulations that are or have been in place. Rule 34 is one example; the business of football has moved on too far for it to be revived. But *the FA's duty to protect clubs' communal and sporting nature is a constant, and should be a driving force for modernising the rule, not abandoning it.* The 10% rule is another example – designed to prevent an individual from having a stake of more than 10% in more than one club: the FA seems to retreat behind the difficulties of tracking ownership (see page 23), contributing to the unpleasant perception that there seems to be little if any real vetting of ownership at all. In general, there seems to be little scrutiny of the timeliness and completeness of returns and dues required by national law. The Financial Services Authority (FSA) was concerned enough about compliance with Listing Rules to issue a letter to the directors of all listed football clubs in June 2003. Payments to agents, player transfer deals, conflicts of interest are areas which the IFC has not yet examined but which have been brought regularly to its attention as ones where disclosure is, at best, incomplete.

Where the rules are not protecting clubs, then they must be either changed or created. The IFC believes that the authorities are, in some instances, showing a preparedness to act.

- Asset stripping has occurred on sufficient occasions as to seem uncontrolled. The IFC therefore welcomes the FA's support for the Supporters Direct initiative that calls for football pitches to be classified, over time, as community assets, that cannot be sold or transferred for alternative purposes unless the asset has already been replaced.
- The relocation of Wimbledon to Milton Keynes followed the FA rulebook to a final appeal that produced a result – approval of the move – that not one of the governing bodies wanted or expected. The IFC, which investigated the process of the decision's being reached, has been assured by the Football League that a rule change is under consideration to prevent the situation recurring. It welcomes this and looks forward to further details.
- Inappropriate levels of influence by shadow directors has

contributed to disaster at more than one club. The FA is at least now frankly acknowledging these and related problems, recently telling the IFC that the football authorities recognise that the present governance model isn't working; that there are questions about the onus on directors to make statements to shareholders; that non-executive directors are not all taking their role seriously; about the need to ask the right questions of owners and benefactors.

Solving these problems will be a long haul and will need heavy weaponry. The FA at present relies on its Compliance Unit (CU) to investigate allegations of any malpractice in the game, administer penalties if possible and enforce compliance. The CU's focus is predominantly on disciplinary matters. Of nearly 700 files it handled in 2002/03, around 90% were field offences. Finance and governance play only a tiny part in the unit's work and only recently has specific recruitment expanded its small staff to include finance specialists. Moreover, the unit's jurisdiction covers an impractically enormous area, from the FAPL to the top of the non-league pyramid. Potentially it is authoritative, with far-reaching powers. In fact, decisions at the point of sanction are out of its hands, referred to the FA Council and/or commissions and appeals boards. The process can be cumbersome and long, with sometimes inappropriate penalties and decisions and inexplicable delays in reaching them. The IFC supports the establishment of the CU two years ago and the FA's decision to take an investigative and adversarial approach to compliance. But it believes that the CU is under-resourced, and suspects that it, too, has negative perceptions to combat. Press reports have suspected that CU investigations have not been wholly unfettered and its business unnecessarily mysterious; whilst on questions of governance and financial accountability, a reasonable expectation must be that after two years of CU investigations, a reduction in financial scandals and disasters might be expected. Instead, the period seems to have coincided with a significant upswing. The IFC suggests that consideration be given to splitting the remit of the CU to *create a properly-resourced and skilled department responsible solely for enforcing proper corporate and financial governance, and with discrete powers of prosecution and penalty.* The IFC would also like to see a clear reporting line for the department, noting that "compliance" is outside the remit of the FAC, without there being an obvious alternative body.

*Deterrence is a laudable objective.*

## Summary conclusion

The governing bodies are not currently succeeding in changing public perceptions that the football business is ill-governed, nor are they answering the critics loudly or firmly. But, while not underestimating the scale of the problem, the IFC believes that recent moves to overhaul the regulatory framework are encouraging, and it senses a growing commitment to change. All three governing bodies need unequivocally to identify, agree and apply appropriate, timely and effective rules and sanctions. It is not acceptable to abdicate responsibility from behind clubs' company status, or laws that someone else might invoke. With a new raft of ideas and some positive initiatives such as the FAC, the FA is positioned to demonstrate that it is an independent body, resolved, competent and strong enough to tackle the issues.

## Recommendations

- The football authorities should introduce a sustainable fit and proper person test by the start of the 2004/05 season for directors of football clubs, and explore its extended application to shareholders.
- The FAC should be charged with establishing a Code of Corporate Governance against which Directors should be required to report, progress to be reported to the IFC in December 2004.
- The FA should set up a properly resourced and skilled Compliance Department dedicated to the enforcement of proper corporate and financial governance and reporting to a properly constituted Compliance Advisory Committee, by the beginning of 2005.
- Club Chairmen should be asked to introduce induction training on particular football circumstances for new directors; the FAPL and FL should gather examples of good governance within the game, on which FC Boards can draw.

## The work of the Financial Advisory Unit

### *raising standards*

The IFC continues to review the FAU's role and effectiveness. In 2003 the Commission monitored the unit's response to IFC recommendations in 2002. The IFC also considered some wider issues of financial regulation. Additionally, the Commission examined progress on national licensing required by UEFA. To inform its work, the IFC met with the FAU, a wide range of senior managers and practitioners, and the Chairmen of feeder leagues.

## The work and scope of the FAU

The establishment of the Financial Advisory Committee in 2003 provided the FAU with a clear reporting line. This the IFC welcomes. The IFC is also pleased that the FAU produced, in November 2003, its first Annual Report for the FAC. The FAC in turn will present a report to the IFC. This puts in place the reporting structure for which the IFC called in its 2002 Annual Report<sup>15</sup>. However, the FAU's explicit terms of reference and specific milestones have yet to be made clear; the IFC understands they may be outlined in the FAU Annual Report to the FAC but it suggests that *they should in any case be formally agreed with the FAC, by the beginning of March 2004 at the latest*.

The IFC has heard much favourable comment on the FAU, particularly from the feeder Leagues. It recognises the challenges the unit faces and commends the progress it has made after a relatively short period of existence (3 years), notably:

- gaining the support and confidence of clubs;
- bringing about rule changes that are consistent between the feeder leagues and the Football League, and reflect best practice;
- addressing the tension between keeping a club going, whatever the immediate difficulties, and ensuring financial good practice.

<sup>15</sup> IFC Annual Report 2002, pp 43 - 45

The IFC retains the view it expressed in its 2002 Annual Report, that the FAU is a good initiative: the unit's focus on its advisory purpose is clear; it aims to assist continuous improvement in financial practice and understanding; it offers relevant guidance on improving financial management. Its principal benefit at an operating level is in raising awareness and standards at small clubs.

As at 26 October 2003<sup>16</sup> the FAU had reported on 203<sup>17</sup> clubs and CFAs – a little under two-thirds of those it covers. The profile of these reports is illustrated in fig. 4. While almost all clubs in the Football Conference have now been visited and reports issued, and over 40% of FL clubs, the FAU has yet to visit a Premier League club. Its focus thus continues to be on the bottom end of the football structure. It feels its educatory and advisory role is best served by working from the bottom up. In support of this, the FAU has now held two seminars for non-league clubs. The IFC's impression is that these are well-organised and well-attended and that delegates generally have found the meetings useful. Their purpose is not only to provide advice in areas such as PAYE and tax, but also to offer

information and guidance on funding opportunities and extending the potential of FC assets such as stadia. The IFC hopes that the FAU will continue this effort [to help bring new ideas and money to clubs, as well as supplying an internal audit function](#). The seminars might be improved by some formal feedback system that will allow the FAU to evaluate its performance and also guide the design of future events to match clubs' expressed needs.

In reviewing clubs' financial performance, the FAU has access to a number of submissions. Some of these represent standard information required by the FA, such as Form A, which all clubs in full or associate membership are asked to complete and return by 1 October each year. This return includes statutory, governance, membership and financial details, including information about ownership of FC grounds and tenure (which the FL is surveying independently) and the club's commercial activities, as well as accounting information such as amounts owing (VAT, PAYE etc) and amounts outstanding to football creditors. In theory, Form A should be an invaluable

Number of clubs reviewed by the FAU

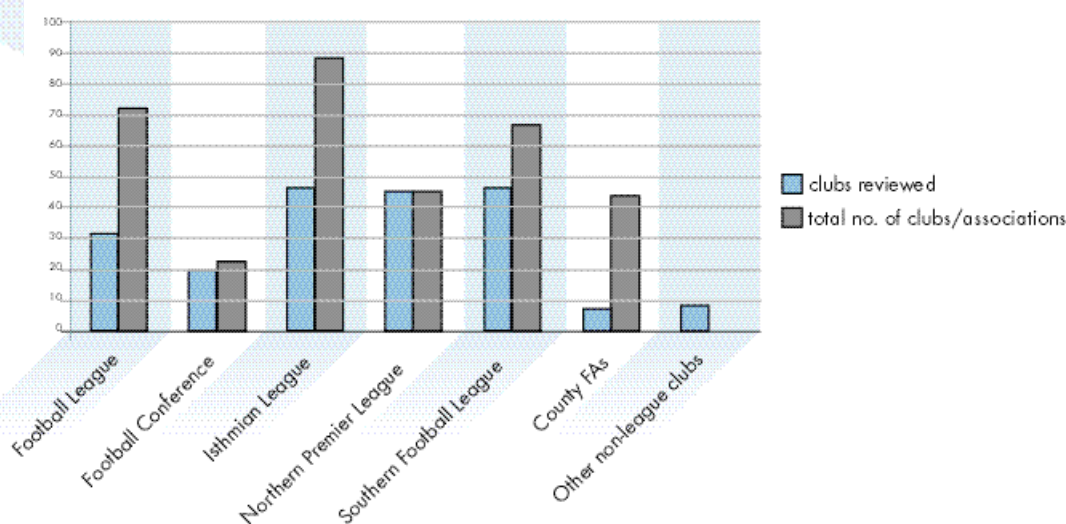


fig. 4 source: Financial Advisory Unit

16. Figures supplied to the IFC by the FAU

17. Including 9 clubs outside the feeder leagues

source of information to the FA, the FAPL and the FL. However, the IFC has found no central bank of information on, for example, the extent of unpaid VAT and PAYE at clubs. At least one firm of administrators which has handled a number of FC administrations has suggested that non-payment of PAYE is not spotted early enough, or at all, at the centre but could, in fact, be the appropriate point of intervention and possible sporting sanctions. Due PAYE obviously accumulates fast in football because of high player wages, and the cumulated debt to the Inland Revenue is a cause for concern and a key contributory factor to the crisis at club level. Although the FAU says it uses form A to identify risk areas and influence its visits programme, the Commission wonders to what wider purpose Form A is put, and what its value is to the League and the Premier League, whose clubs complete it. The Commission's impression is that although technically all clubs complete Form A, perhaps some do not, and that senior management at the FA possibly suspect that Form A is ripe for review. In general, the Commission suggests that *the FAU should regularly – perhaps on a biennial basis – review what information it asks for, and to endeavour to simplify as far as possible, within the need to promote financial rigour.*

This ties in with the question, raised by the IFC in its 2002 Report<sup>18</sup>, of the regularity and timeliness of information, and the FAU as a conduit of information to and from the leagues. There is evidently a balance to be struck between obtaining up-to-date information, and creating data sinks. The FAU explains that it can only work within existing frameworks included within the rules of each League, and that there is little consistency between the level of information required. The IFC hopes that this will be addressed.

The IFC commends the FAU's work with the Southern Football League, which, over the last three years, has required clubs to submit, on an annual basis, a budget for the season, in advance of that season beginning. While this information

adds to clubs' administrative load, it is necessary management information and the IFC endorses the initiative as a mechanism for identifying potential difficulties at an early stage and encouraging realistic financial management. The IFC has not had opportunity to hear views on the pilot from Southern League clubs but notes that the FAU is analysing the results – presumably against a clear and agreed set of objectives – and will be discussing, in 2004, the introduction of formal procedures for reviewing club budgets against actual performance. The IFC looks forward to the results of these exercises. A statement of the purpose of forecast budgeting might usefully be included in the FAU's Guidance Notes for participating clubs. The FL, the Conference and the Northern Premier League have introduced similar requirements. The IFC suggests that *rule changes should be considered to support new procedures.*

The FAU is clearly beginning to fill a wider role in non-league football. Its success will depend on winning and retaining the respect and confidence of clubs. It must have not only adequate numbers of staff, but also staff with relevant knowledge, skills and experience to convince its customers that it adds credible value. There is work to do in this area at Football League club level. Feedback the IFC has received on FAU visits, whilst generally positive, does include scepticism about the value added. The biggest challenge lies, however, in the unit's interface with the Premier League. At present it has none. Given that the FAU's cumulative experience stems from lower and non-league work, and the fact that the FA's own finances are in some difficulty, the FA's FAU is poorly placed to convince anyone that it can contribute to better financial management in the Premier League. The issue, however, is FAU resourcing and how best to strengthen it. The IFC firmly suggests that *the Premier League cannot exclude itself from scrutiny by the FA in this or other areas*, a point the IFC Chairman has made personally to the FAPL. The FA is the overarching governing body with the job of regulating football. Whatever the Premier League's view of its competence, that regulatory role obtains.

*the Premier League cannot exclude itself from scrutiny by the FA*

<sup>18</sup>. See recommendation 18 in the IFC Annual Report 2002.



## UEFA licensing

From 2004, UEFA will require clubs wishing to participate in UEFA club competitions to have obtained a licence from their National Association, that confirms their compliance with standards laid down in phase 1 of the UEFA licensing system. UEFA's aim is to improve the overall fabric of the game, "by investing in specific and measurable standards in the game at club level..."<sup>19</sup>

### UEFA licensing criteria

Phase 1: 2004/05 criteria	Phase 2: 2006/07 additional criteria	Phase 3: date to be agreed
1. annual, audited financial statements, according to local legislation for incorporated companies	5. production of Financial Licensing Documentation (FLD), examined through specific procedures	Proof of positive equity and auditing of interim documentation
2. supplementary documentation covering the interim between the statutory closing date and the licence date, so that the actual financial situation of the applicant club is represented. It will not be audited	6. liquidity plan, proving club's ability to meet liquidity needs for the period to be licensed	
3. proof that the club has no overdue payments for transfer activities	7. declaration of any liquidity shortfalls as they appear, and regular monitoring of liquidity by the National Association, with plans for overcoming the situation	
4. proof that it has no payments owing to its employees (including taxes and social charges).	8. notification, during the season, of negative deviations from the budgeted profit and loss account	

fig. 5 source: UEFA Club Licensing System, 2002

The bulk of UEFA licensing covers standards of financial management and control. Although the requirements for phase 1 are relatively undemanding, and within the existing compass of most Premier League clubs, phase 2 (for implementation from 2006) is more rigorous; phase 3 could be challenging. No date has been set for the implementation of phase 3. The licensing requirement applies only to clubs aspiring to enter European club competition. In England, the IFC understands it is expected to apply to all clubs in the Premier League and Division 1. The licensor in England is the FA<sup>20</sup>.

The IFC has seen the National Licence in draft, and has discussed with the FA and the Premier League some of the problems encountered in its preparation and in obtaining UEFA's agreement to it. These mainly relate to demands for

information which are in conflict with company law, and regulations governing stock exchange listings, and with timetabling.

Compliance with the national licence will have to be verified. This may - and perhaps should - be a role for the FAU; the IFC understands that detailed discussions have not taken place. A decision on validation is looking overdue.

The IFC is interested in the approach to licensing in both Germany (where a national licence has been in place for some 35 years) and Scotland, where, the IFC is told, validation will be conducted by an outside company, specializing in the accreditation of quality standards.

19. UEFA Club Licensing System, 2002

20. Which may delegate authority to, for example, the Premier League.

## Wider issues of financial regulation

The IFC's work on this is at an initial stage. Discussions with the authorities have covered:

- the protection of assets (stadia and pitches): this is discussed on pages 23 and 26;
- transfers and payments to agents: the FA undertook a review of transfer activity in the early part of 2003. The IFC has asked to see the results of this review and the conclusions drawn. It hopes the results will be ready for examination in early 2004; this will be one year after the exercise took place;
- clubs in administration and the imposition of sanctions: this is discussed on page 19. The IFC notes that FA rules require it to be informed of any club in administration and that the FA liaises with the Football League when FL clubs are involved. The FL has its own skilled and professional managers to deal with the issues, however, and thus the FAU's role is not extensive. It has a greater involvement with clubs lower down the football pyramid. These at present fall outside the remit of the IFC;
- common issues arising from FAU reviews of clubs: inadequate documentation of directors' loans is understood to be a recurring issue, for example.

The IFC compared German and English regulatory systems. In Germany, a regulatory body, the Deutsche Fußball Liga (DFL), operating independently of the Bundesliga, is heavily empowered and can impose sanctions - including points deduction, and stopping promotion - on teams found not to be in compliance with the conditions of the national licence, which the DFL administers. The DFL defines itself as an administrative body to help clubs, and a sanctioning body, thus combining the equivalent roles of the FAU and the CU.

The IFC was interested in the German practice whereby the ownership of clubs is tightly controlled, within the system of financial regulation. The majority of shares (50%+1) has to remain with the club. Stocks can be bought by investors but control of the Board of a limited liability company (which most FCs are) has to rest with the club. It is against the rules for a club to be owned by a third investor. This prevents

sponsor/benefactor takeovers and is a deterrent to passing investors who might lead a club to overreach and then back out. Examining a club's independence to ensure it is not dependent on a single investor is part of the financial check for the annual licence.

## Summary conclusion

Few can doubt the continuing financial problems for English football. However, the IFC perceives a trend towards better financial management and believes this should be recognised. A new generation of financial directors is in place at Premiership clubs, raising professional standards; the FAU is contributing significantly to extending this trend at clubs in lower divisions. To do so requires investment: employing and/or training specialist staff at club level; properly resourcing the FAU; and giving it specific aims and full management support. Collaboration, co-operation and respect between the three governing bodies will be key to improving football's record and reputation in financial management.

## Recommendations

- The FA should review the resources of the FAU, ensuring it is staffed appropriately in terms of numbers and depth of expertise. Its capacity should allow a 3-year visits cycle and the skills to make it a credible source of expertise to the Premiership, initially in validating national licence compliance.
- Clear and quantifiable aims for the FAU should be agreed with the FAC by 1 March 2004.
- Necessary rule changes should be introduced by individual leagues to set standards for financial forecasting and include penalties for non-compliance within reasonable time periods.
- The FAU and FA should regularly review what information they require from clubs and that the requirement has a clear purpose. Processes should be simplified. This exercise should include consultation with the FAPL, the FL, and other leagues to which the FAU provides services.

## RACISM

### *perceptions matter*

During 2003 the IFC gave priority to examining progress since the Football Task Force report on *Eliminating Racism* in 1998. The Commission also conducted a wide-ranging enquiry into attitudes, aspirations and new initiatives throughout football. This included meetings with representatives at grassroots level and County Football Associations (CFAs).

The IFC's main findings are:

- good progress has been made by the governing bodies and the FA in particular in tackling racism, with notable successes in improving spectator awareness and behaviour
- there is genuine recognition that a wider agenda must now be addressed; plans exist for new and sometimes radical approaches, led by the FA
- the pace of change has been slow and now needs to accelerate, with greater engagement from the Premier League and the Football League and convincing leadership from the governing bodies collectively
- the IFC has serious concerns about the continuing lack of ethnic representation, outside playing and low-grade staffing positions. These concerns are widely shared
- perceptions that the authorities are uncaring should worry them, and the fact that ethnic minorities in all parts of the game, along with campaign groups and practitioners, are mistrustful and unconvinced by new messages from the top and genuine commitments to change
- unity of purpose must drive greater co-ordination and imaginative sharing of best practice across the three governing bodies, between leagues and divisions, between league and non-league football, between football and other sports
- achieving and sustaining race equality is not simply desirable, it is fundamental to the long-term health of the game

### Review of progress

In the sixties and seventies, there was merely a handful of black players in English football. Those that there were learned to live on the field of play with the bananas, the monkey noises, the racist abuse from the terraces. There weren't any Asian players. And there weren't many ethnic groups in the crowds either. There were exceptionally few black or Asian referees, or linesmen, or managers or coaches. There were no black or Asian faces at the FA, nor in the county structures, nor, apart from cleaning and some catering staff, among the support staff at clubs. There was none at all in the boardrooms. The ethnic minority population of England<sup>21</sup> was less than 1%.

21. Assumption based on figures from 1991, which was the first census that gathered data on ethnicity, and advice from the Office for National Statistics that the information was too small to gather in the sixties and seventies.

Thirty years on the change has been dramatic and emphatic. There are black players throughout the Premier League and the Football League. Some clubs field all-black sides; the England first team is rich in black talent. Chanting from the terraces at an English game is rare. While racist abuse is still heard, it is infrequently at the level of hatred found forty years ago, and is less tolerated by supporters. But .....

There are still exceptionally few Asian<sup>22</sup> players in professional football. That statement will sometimes be contradicted. The Premier League will name two examples at FAPL clubs. One has made it regularly to the reserves but infrequently to the first team and is currently on loan to a first division side; the other is of mixed race - and perhaps he is the exception that proves the rule. There are disappointingly few young Asian players coming through the ranks<sup>23</sup>. There still aren't many non-white faces in the crowd<sup>24</sup>. Black and Asian referees? - one in the top flight, several that have given up. There are very few black or Asian managers and few black or Asian coaches except at youth level or in community schemes<sup>25</sup>. There are still no non-white faces at the FA that anyone can see, and just one at a CFA (since November 2003). Low-grade staffing positions are still where you find the black and Asian faces at football clubs. The boardrooms of English football remain predominantly white. The ethnic minority of the population in England is now 9%<sup>26</sup>.

We start on this note not to be negative, because progress has been made, but to illustrate the full scale of the situation that has to be confronted. The Football Task Force (FTF), addressing the issues nearly six years ago in 1998, was faced with the same perspective and raised a series of questions, set out in fig. 7.

Why are there no top flight Asian professional footballers when there is huge enthusiasm for the game amongst Asian children?

Why do so few Asian people go to football matches in England - even in cities where there is a large Asian population?

Why is the number of black spectators decreasing at a time when more black players are succeeding at the highest level of the game?

Why are so few black and Asian people employed in non-playing positions at football clubs and in administrative positions within the game?

Why are there so few black and Asian referees and coaches?

Why is there no black or Asian representation on the FA Council?

fig. 7 source: *Eliminating Racism: a report by the Football Task Force, March 1998*

### Ethnic population attending live football

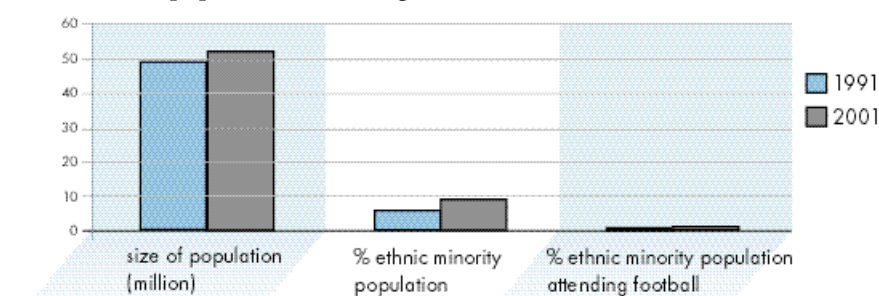


fig. 6 source: *Office for National Statistics; FAPL National Fan Surveys 1995 and 2001, FL Supporter Surveys 2001*

22. "Asian" is conventionally used in English football to refer to people from the Indian subcontinent and their families in Britain. For the purposes of this report, the same definition is used. The IFC assumes that the same definition was applied in the FTF Report. "Asian" is defined in the FA's *Asians in Football Monitoring Report 2002* as "Indian, Pakistani and Bangladeshi groups". The Asians in Football Working Group was established by the FA in 1998. The IFC has no evidence that the group's aims and activities are much known. *Football for All*, the FA's report on its work to combat racism and disability discrimination, produced in November 2003, states that the group is under review and that a new one is planned for 2004.

23. Kick It Out reported in 1997 that only 0.2% of players at professional clubs' Schools of Excellence were Asian. The lack of progress is supported by research at Manchester Metropolitan University in 2002 which found that "the majority of clubs are nowhere near having talented Asian boys come through the ranks". This information is included in the *Asians in Football Monitoring Report 2002*.

24. Just 2% of FAPL STHs and members describe themselves as "non-white" in the FAPL National Fan Survey 2002/03 Season

25. There are no precise figures as records are not kept. See page 40

26. 2001 census



The IFC continued to ask these questions, both of itself and those it has met. Generally, it found very few satisfactory answers, but it did find that in the last few years, perhaps prompted by the FTF Report, progress has indubitably been made. The Commission was particularly encouraged by the following:

Frank and **honest acknowledgment of its problems** by the FA in its 2003 report on ethics and sports equity, *Football For All*.

The FA achieved the **preliminary level of Sporting Equals' Achieving Racial Equality: A standard for sport** by its target date (March 2003). It is now committed to achieving the intermediate standard in 2004. The Premier League has also signed up to achieving the standard.

The FA has developed a far-reaching **Ethics and Sports Equity strategy**. This was completed in August 2002 and passed by the Board in October 2002. The Board's endorsement was significant as the strategy calls for a departure from many established conventions and behaviours.

The FA and the Premier League give significant **financial backing to Kick It Out (KIO)** and in 2003 contributed £70,000 each. All three governing bodies publicly endorse KIO; it is actively supported by all FAPL and FL clubs.

The partnership with KIO has had demonstrable success in the major **reduction in racist behaviour inside football grounds**.

**New FA rules** specifically cite discrimination by reason of ethnic origin, colour, race, and nationality amongst prohibited behaviours<sup>27</sup>; racist abuse on the pitch is now a **sending-off offence**<sup>28</sup>.

A separate **training module on ethnic issues for stewards** has been introduced; more stewards are from ethnic minorities.

**County FA plans** address ethnic and ethnicity issues. The West Riding County FA has led a pilot project to achieve better education, greater awareness, and fairer representation. In November 2003 it became the first CFA to **co-opt a member**

**from an ethnic minority** to its Council. Other CFA's such as Leicestershire and Hampshire are introducing specific coaching courses for ethnic minorities.

**English football leads Europe** in promoting diversity and refusing to tolerate racist abuse<sup>29</sup>. This is evident when clubs or the national team play in Europe. Scenes of racial intolerance that have not been witnessed in England for a decade are seen as disgraceful and shocking.

The FAPL and FL have required all clubs to include, in their **Charter Reports**, action they have taken to combat racism.

**Football's community programmes** seek to achieve greater ethnic minority participation in schools and junior football; many clubs are partners in social inclusion projects.

**Football Foundation funding** for grassroots football is higher than ever. The Foundation specifically supports projects that will raise the capacity of organisations in areas with a high ethnic population to engage in football, and is monitoring how its projects perform in reaching ethnic groups.

Much of this marks a significant breakthrough and all of it signifies a growing commitment to achieving genuine, meaningful racial integration in football. And because this is so, the IFC believes that none of those who has contributed will dispute that racial intolerance continues and that defeating it is going to require as yet unthought-of levels of determination and dynamism.

These are the issues:

- Leadership
- Representation
- Structures
- Participation
- Education
- Results
- Perceptions
- Pace of change

<sup>27</sup> Rule E3 of the Rules of the Association

<sup>28</sup> Guidance to referees on Law 12

<sup>29</sup> UEFA's *Unite against racism in European football - UEFA guide to good practice*, published in June 2003, cites more examples of good practice from English football than from any other member country.

## Leadership

The FA's strategy calls for affirmative action to bring about change. It is backed, according to the FA, by the Premier League and the Football League - key to the strategy's delivery at club level. Both told the IFC that they were familiar with the strategy and had been consulted during its development. Neither saw it as a strategy for them, but rather one that was for Soho Square and the FA Council. Inasmuch as part of the FA's strategy is for the FAPL and FL also to develop strategies, then the FAPL and FL are part of it. Now the FA has gone first, the Premier League is planning an Equity Plan; the Football League is awaiting the outcome of projects at three FAPL clubs which are piloting a standard for racial equality in football, devised by KIO. But this "wait and see" approach suggests [there is a worrying vacuum where determination and direction should be at the League and the Premier League](#). The IFC found it difficult to clarify the FL and FAPL position on some key areas such as scouting, and equality of opportunity in employment policy, or how they inform themselves of club policy and its consistent application. While most clubs make a statement of EO policy in their Charter, for example, it is often a brief and standard text, and its implementation is seldom covered in the Charter Reports. [If there is to be real equality of opportunity, born of effective policies, then results should show and their appropriateness should be monitored.](#)

In other areas there is an evident willingness at club level to sustain what has been achieved in the last 10 or 15 years. A reading of Club Charters and Reports indicates what sanctions many clubs have in place for dealing with racist behaviour. They are, however, hugely variable - and varyingly applied. There are lifetime bans at one end, and cautionary words at the other. The FAPL had no ready information available, when the IFC asked, on how many bans are currently active and how many arrests have been made in the last season for racist behaviour - indicators of the nature and size of the issue and whether the policies are working<sup>30</sup>. In 2003, the Football League asked all its clubs to include in their Charter Reports anti-racism initiatives they had taken outside the annual anti-racism action week. 15 clubs either did not report or reported that they had taken no initiatives. The usual reason given

### FL Club initiatives to combat racism

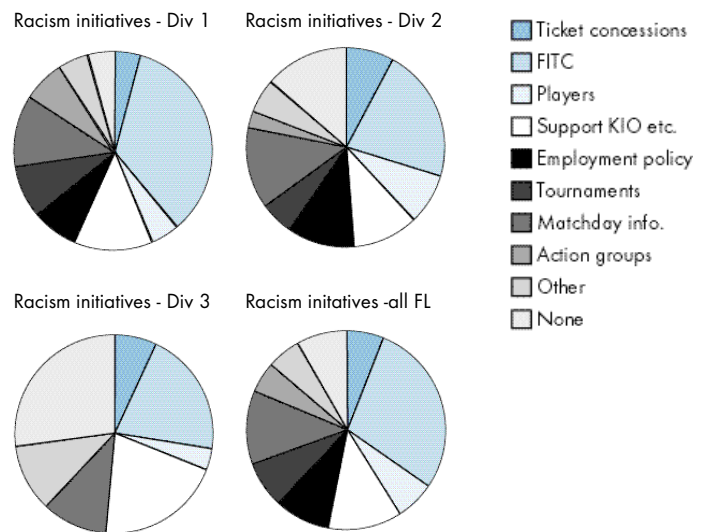


fig. 8 source: *The Football League Annual Report on Customer Charters 2003*

### FL club "promises" on racism

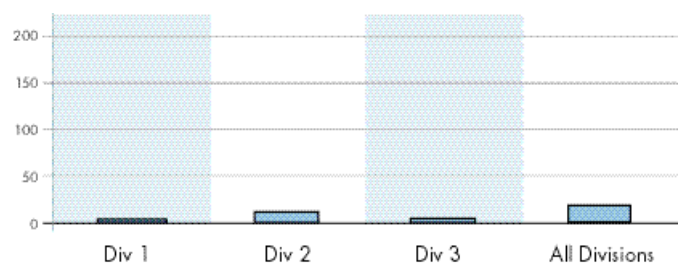


fig. 9 source: *The Football League Annual Report on Customer Charters 2003*

was that none was necessary as the club is in an area with a low ethnic minority population; visiting supporters weren't mentioned. The FL also asked its clubs to make three "promises" for the coming season for priority issues they were going to address. Of the 213 promises<sup>31</sup>, just 17 touched on racism (see figs. 8 and 9). How do clubs judge how important an issue racism is for football? Noticeably none of the three governing bodies' own Charters makes a statement about policy or the priority it gives to racism. [It has been put to the IFC that it is not a "customer issue". It is. And a lead must be given](#)<sup>32</sup>.

[It has been put to the IFC that racism is not a "customer issue". It is. And a lead must be given](#)

30. It was able to find out: 14 arrests, 3 bans. FL Charter figures: 50 bans, 19 arrests. The IFC recognises that the decisions of police and magistrates can restrict independent action clubs can take. But see also p. 36.

31. One club did not submit a Charter Report; the figure therefore reflects 3 promises at 71 clubs.

32. See also page 70 of this Report.

Racial discrimination is against the law. Football is responsible for ensuring that its business is conducted in accordance with the law, and where the law is broken then penalties will be decided by the criminal courts. Those discriminated against have also the option of action in the civil courts. Where there is contravention of the law, or unacceptable behaviour, in areas that, for football, have the gravest implications and which they condemn as damaging to the game, football has, and applies, its own additional penalties. Where these are most effective, the offences are described unequivocally by the authorities and the sanctions are absolutely clear. The IFC suggests that racism in any form falls into this category and that *the football authorities should review relevant football rules and reissue them in unmistakable terms; standardise the penalties that infringement will incur; and enforce application at all levels of the game, whatever the role of the offender.* Sharing practice and experience with other sports, particularly rugby and cricket, which have been effective in introducing codes of behaviour and uniformity of action at club level, could be beneficial – not least because these sports have public respect not regularly enjoyed by football.

## Representation and structures

The FA's strategy includes the results of a survey conducted in 2002 that demonstrates, unsurprisingly and conclusively, that football is still a white, male-dominated sport<sup>33</sup>. To kick-start truer representation of England's racial diversity and the demography of football's extended community, the strategy proposes to introduce the principle of co-option to governing

councils and committees, starting with the FA Council itself. This is a brave tactic which the IFC wholly approves, though to be meaningful, changes will have to be radical. The challenge is enormous. Not only have these structures been in place for over a century, but they are the product of conventions that will be hard to shift: a seat on the FA Council is seen as a reward for 40 years hard work in the counties.

The IFC encountered an interesting range of views on this stratagem in its discussions, and at a seminar the Commission itself convened for representatives of grassroots football. Some dismissed co-options as tokenism, and argued that "one black face" wouldn't make a difference. Others insisted that the right co-option would transform attitudes, that those who felt excluded or discriminated against would see someone to whom they could relate and would begin to feel trust and confidence. Almost everyone doubted that co-options would happen quickly or in places that mattered, where real influence could be wielded. A further contention was that attempts to integrate were hard work and often fruitless, that segregation was a better alternative, allowing minority organisations to manage their own growth until they were big enough to make themselves heard.

*"You can knock and knock and knock at the door but how often do you have to knock before you realise you're not welcome?"*  
(IFC seminar, October 2003)

Despite the polarity of views that the IFC encountered, there were three clear messages:

- there must be fairer representation;
- disbelief that the will for radical structural change exists;
- suspicion that co-options will have marginal impact.

*In the last two years the CFA has helped our (Asian) league a lot. They've helped clubs join County Cup competitions; they've made referees available so we get quite a high standard of refereeing now. The relationship is good, very positive.*  
(IFC seminar, October 2003)

<sup>33</sup>. GOAL. *A better future for football*, FA Ethics and Sports Equity Strategy, August 2002. The survey included FA Council members, FA staff, CFA staff, referees, coaches and medics, and *englandfans*.

The IFC believes that co-options must be used. The challenge of remoulding the shape of football is too formidable for the reformers to abandon tools that have been put in their hands. However, co-options can be given greater force if combined with appointment, and affirmative action. England is rich in skills and talents amongst its ethnic communities, and at this particular moment football has need of them to help its reforms. Headhunting and strategic appointments are not unknown in the game, especially at its highest levels. The IFC suggests football widens its net and that *ethnic representation in the boardrooms, on FA committees, Council and the boards of the FAPL and the Football League, as well as in senior management on and off the pitch is an achievable target over the next three years.*

## Participation

The vast majority of steps taken to eliminate racism in football have been directed towards spectators. Success in combating racism is measured by the incidence of trouble in the crowd; the loudest threats and steepest penalties in the game are directed at supporters (the withdrawal of a season ticket at a top Premiership club is not taken lightly)<sup>34</sup>. The tactics have

been effective and the IFC greatly respects what has been achieved. It also agrees that the campaign must continue if results are to be sustained. But there is a question as to whether spectator behaviour is the only part of the game that merits this profile and attention, and whether the larger football environment is in fact being overlooked.

That there has been virtually no growth over the years in the numbers of ethnic minorities attending football matches does not chime with the growing interest in football amongst the current generation of ethnic minorities, nor the direct evidence of the growth and popularity of football in areas where there are large ethnic minority populations. The IFC visited a number of professional clubs in these areas. They had in common:

- a recognition that the communities on their doorsteps are the next generation of supporters and that it is pretty important to win them;
- that they are not succeeding;
- a range of theories, but little certainty, as to why not.

The most widely-voiced conclusion outside the clubs was that football grounds are not considered to be safe and welcoming if you are black or Asian. A straw poll conducted at the IFC seminar had an overwhelming majority disagreeing that professional football games are safe for ethnic minorities in England. Measures taken to attract these absentee supporters are varied, though most clubs try some of them: community activity; advertising in ethnic minority newspapers; free and concessionary tickets; badges; player visits to schools; opportunities for ball boys and mascots. None claims particular success. Most clubs did not have precise figures on the percentage of ethnic minorities attending live games, though everyone was definite that the numbers were small and not rising significantly. Few monitor growth. Clubs like Leeds and Leicester, however, are tackling the problem with real energy. Leeds is one of the clubs piloting the KIO standard. Its pro-diversity campaign benefits from the full backing of the board and the involvement of senior management. The club has a

LEICESTER MERCURY, SATURDAY, MARCH 13, 2002

SPECIAL DAY: FANS URGED TO GIVE SUPPORT AT MATCH

## Back the campaign to kick out racism

Leicester City Football Club is at the forefront of work fighting racism.

The club is keen to highlight at the weekend that racism is not just a problem in the past but a real and ongoing issue. The club has a long history of fighting racism and has been at the forefront of the campaign to kick out racism from football.

It was the first time the club has presented a racism awareness campaign to its fans. The club has a long history of fighting racism and has been at the forefront of the campaign to kick out racism from football.

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34. Noticeably, 3 of the 8 pages devoted to race equality in the FA's *Football for All* report deal with spectator issues.

mountain to climb in terms of public perceptions but it is thinking long-term and its very willingness to take its problems on is winning friends. But there are few successes to show yet, nor at Leicester either, where one of the most active and influential club campaigns, Foxes Against Racism (FAR), operates. FAR has helped the club research the ethnic population at specific games. In a city where the ethnic population has reached nearly 40% of the total<sup>35</sup>, less than 2% of the 30,000-plus home crowd are from this community: fewer than 600 out of an ethnic minority population of over 100,000. The percentage is edging slowly upwards; the club has set itself an initial target over 5 years and the club's plans for reaching it are imaginative and energetic. Again the club is thinking long-term. Football is not alone with its challenge. In both Leicester and Bradford, the local rugby clubs are not doing much better than the football clubs, though noticeably, in Bradford, the Bulls have a higher profile in the city and espouse a longer-term strategy than the FC. In Leicester, another FAR initiative has prompted collaboration with the local rugby and cricket clubs to compare practice and, more importantly, to combine efforts and set a standard for sport. The IFC believes that [a collaborative approach of this kind will pay dividends and help football ameliorate an image that is often arrogant and elitist](#). It also urges the authorities to facilitate the comparing of strategies and successes between clubs that operate in areas with a high ethnic population. Rotherham is involved with local women's Asian football; Oldham has established its own charity, with local partners, for Unity in the Community; Southend has helped form Southend Wanderers FC from asylum seekers and ethnic minorities. It is not inconceivable that [some of these FL club examples of enterprise might be of interest to FAPL clubs. At present there seems to be little co-ordination of best practice from the centre](#).

In all of this, there is a residual feeling that the breakthrough will come and that role models could be key: if only an Asian player could be seen lifting one of the major club trophies; if only more black and Asian referees stayed the course and

didn't find racial comments just one set of abuse too much on top of the referee's usual quota; if only there were a black or Asian Chairman at a FAPL club.

It is in football's hands.

## Education

The IFC found, during its discussions, that there was no common understanding of the term "racism". When the Commission asked if football is institutionally racist, immediate denials faltered when the definition of institutional racism used in the Macpherson Report was offered:

*"Institutional racism" consists of the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people<sup>36</sup>.*

It is that word "unwitting" that makes the difference, the pause for thought. Several of those to whom the Commission talked concluded that, within the Macpherson definition, parts of football could be institutionally racist. This suggests a serious need for education, for [a common understanding in football, - from those who referee or sit on disciplinary committees at county level, through to those who sit on the FL and FAPL Boards and the members of the FA Council](#). The Commission was impressed by the programme of workshops in the West Riding, initially focusing on players, coaches and officials. It also liked Leeds' provision of equity and diversity training to five key influencers, including the Chairman, the manager, a player from the academy and a member of the cleaning staff. Both these initiatives were encouraged and facilitated from the centre, through KIO in the case of Leeds, and the FA Equity Unit in the

[a collaborative approach will pay dividends and help football ameliorate an image that is often arrogant and elitist](#)

35. 2001 census

36. The Stephen Lawrence inquiry: Report of an inquiry by Sir William Macpherson of Cluny, February 1999



case of the CFA. The IFC is encouraged that firm plans are in place for extending them. The FA's strategy intends to provide a "training framework". The IFC suggests that *the FAPL and FL should be involved in this programme; that its purpose and explicit desired outcomes should be agreed and communicated; and that FAPL and FL plans and guidance should incorporate training requirements.* The authorities additionally have a role in questioning and discussing strategies that perhaps need modernising. Banning spectators for racist offences is by no means generally accepted as an appropriate solution. In Germany, for example, bans are discouraged because the behaviour and ignorance simply goes elsewhere. A policy of educating the offenders is preferred. Elsewhere in Europe, fan coaching programmes are not necessarily about football skills, but about behaviours.

The authorities also have a responsibility to influence clubs' contribution to local programmes of education. The IFC notes that a FTF recommendation was that clubs should purchase multiple copies of the Show Racism the Red Card video and accompanying notes to give to local schools. It is disappointing that very, very few did so.

## Results

The IFC suggests that *the football authorities need to place a much firmer emphasis on results. Some good initiatives are getting swamped, lost in too many P's: plans, presentation, packaging, PR, propaganda.*

The Sports Equity Strategy is a magnificent plan but it is short on defined end-products. Its targets are mostly about process ("develop links", "promote this..", "continue to ..", "review, establish, support, ..."). The *Football for All* report lacks specific aims or targets, the more disappointingly in comparison with the FA's separate Charter Report, which sets aims but excludes racism. *The IFC would prefer to see more purposive intentions, with the focus less on developing plans and more on the desired outcomes.* The FA's plan is spawning similar plans. CFA plans for equity and ethnicity do list objectives, tactics and performance indicators but these too are

expressed in terms of process, with objectives such as "To develop a programme", tactics such as "to run a course" and PIs such as "two courses to be held". The intended results are obscured. The plans are long: nearly 30 pages and over 100 targets in the FA strategy; over 100 pages of football development planning in three CFA plans the IFC looked at.

A more positive "P" is professionalism. The IFC is impressed by the professional quality of FA materials but at the same time wonders if all the presentation and packaging is strictly necessary. The FA presented a massive collection of evidence to Sporting Equals to achieve the racial equality preliminary standard, accompanied by a splendid A3 full-colour pack, complete with CD<sup>37</sup>: impressive but a questionable use of resources. The presentations made by the FA at a conference convened by the Martin Shaw King Trust<sup>38</sup>, were slick, smart and again very professional. But mistrust of "FA propaganda" was amongst the feedback the IFC picked up.

The FA's willingness to consult, to face shortcomings frankly, and to hear unwelcome criticism is refreshing and admirable. Its conference, *Football for All*, in 2003 drew a large target audience of informed and committed practitioners that delivered some hard messages; follow-up contact has been comprehensive. Action must, in 2004, result.

All this is preferable to the laissez-faire attitude found elsewhere. The IFC's concern is that energies and resources should primarily concentrate on action and evaluation. Heavy administrative requirements can often be deterrents, or convenient bunkers.

In many of the discussions the IFC conducted, a call was made for *clear targets expressed in terms of results, and a mechanism for monitoring them independently. A sense of purpose and the regular sight of results and impact will motivate and convince.*

*A sense of purpose and the regular sight of results and impact will motivate and convince.*

37. *Achieving Racial Equality: A Standard For Sport. The Football Association's submission to Sporting Equals as evidence to achieve the Preliminary Standard, January, 2003*

38. *Connecting Communities, Improving Representation*, Highbury Stadium, October 2003

## Perceptions

The football authorities, for all the progress and effort they have made, face a serious image problem. The IFC has regularly heard these opinions:

- the football authorities do not really care
- football is institutionally racist
- the FA is remote, inaccessible and uninterested
- complaints processes are impenetrable and slow-moving
- there is a general failure to communicate
- ethnic minorities are not wanted in football
- equal opportunity exists only in theory
- discipline is biased and sanctions only selectively applied
- you have to be white, male and elderly to sit on decision-making bodies

The IFC suggests that *the FA in particular must raise its profile*, in ways suggested in this report, and put a much stronger emphasis on action and outcomes, as opposed to plans and intentions. Whilst football is steadily beginning to reach more of its ethnic community and to contribute to race equality, there is a long way to go before belief and trust are won.<sup>39</sup>

Countering this, the IFC found widespread appreciation of *football's success in reducing racist behaviour; and respect for the Premier League's capacity to organise and influence club conduct positively.*

However, if the authorities want to assess their performance in a year's time, a check on perceptions against this list could be a revelatory exercise. Perceptions matter.

39. Without giving the source, the IFC put to its seminar participants three statements in the FA's submission to Sporting Equals, asking if they agreed with them: "equality underpins all FA policy and thinking; ethics and sports equity are now at the heart of all FA developments; the FA is leading the way in changing attitudes". Only one statement was believed (by just 2 out of around 30 delegates). At least one of these statements is given again in *Football for All*, p. 19.

40. *Part of the Game? – An Examination of Racism in Grass Roots Football*, Centre for Leisure and Sports Research, Leeds Metropolitan University, September 2000

41. *The New Football Communities: a survey of professional football clubs on issues of community, ethnicity and social inclusion*, Stephen Bradbury, Sir Norman Chester Centre for Football Research, University of Leicester, 2000

42. Letter from the CRE to the IFC, November 2003

## The pace of change

Football has been slow to change and dilatory in building on its successes. The transformation in opportunity for black players has not translated into opportunity and attitude-change elsewhere. Not much has been done to implement the FTF Report. Serious research findings, such as *Part of the Game*<sup>40</sup> and *The New Football Communities*<sup>41</sup> have not evidently been used and acted upon. Over 12 months have passed since the Board approved the FA strategy but it has yet to make an impact and targets are already slipping. Where results are coming through they are excellent – but it is taking too long. In part, this may be due to inadequate resourcing. The IFC has been very impressed by the work and commitment of the Equity Unit but has the impression that it is under-staffed. Since achieving the Sporting Equals preliminary standard, not much progress has been made towards the intermediate standard. The Premier League and the Football League are watching KIO, but have yet to make their own moves. Alongside this indecision, a general lack of information in some areas inhibits awareness and corrective action. Lack of data on the ethnic profile of FC employees in all categories has prompted initiatives from the Professional Footballers' Association (PFA) and the Commission for Racial Equality (CRE). The CRE began an industry-wide survey in October 2003, seeking information from clubs and governing bodies about their approach to racism. Its findings are expected early in 2004 and will provide a goal-scoring opportunity that the football authorities would be wise to take.

*It is disappointing that, given the disproportionate number of black faces on the pitch, so few are seen in the dug out or around the board room table. This is why we are now taking steps to ascertain what the industry may need to do to promote race equality and eliminate racism and racial discrimination where it exists.*<sup>42</sup>

It is such a pity that the CRE felt compelled to take this action. It should not have been necessary. Unfortunately, it is.

## Summary conclusion

Football has achieved a great deal, notably the integration of black players and successful spectator education. There is no room for complacency, especially as the slow pace of change is damaging perceptions of the game, and of the will of the governing bodies to act. Too little is being delivered, and too slowly. The Premier League and the Football League must combine with the FA to show unity of purpose and take incisive action in 2004 that will deliver radical and demonstrable change. English football has the potential to become a powerful international exemplar of a business delivering and manifesting racial integration at all levels.

It can do it.

Will it?

## The game 'is archaic'

feels it is not an intentional form of racism.

"Professional football clubs have always stood on a battle floor method," said Gurney. "It's who you know and which friends you have in the game. It's the way it has always been done. I don't think they are not thinking we are going to stop racism participating but the effects of what they do result in that."

Paul Davis has been in touch with the FA. If Gurney's letter specifically requested that they do not become involved in anything, his complaint against Arsenal.

"The former player told Gurney he wanted to 'deal with the main

ter in his own way". However, his is not the first allegation of institutionalised racism at a club. "We've had a lot of complaints and finding, among black, former players that they are qualified experienced but denied any link, in the past. Our former vice is that, as senior employees, the big clubs should comply with legislation for anti-discrimination and retrospective pay protection."

"The fact all that happened that it is Arsenal at the centre of this allegations, because all clubs operate on this basis," he said. "When you look at the details of this case, there is an indication widespread in the last 10 years."

THIS CHAIRMAN of Black Traction Out of Football maintained yesterday that the game still operates an archaic system which continues to discriminate on grounds of colour and race, brought over a legal framework long since adopted in other industries.

Larry Seymour, chairman who fronts the public campaign to knock racism out of the game, was "overwhelmed" by how Wright's claims that there is a glass ceiling for black players who move into administrative roles in the game, although he

## Recommendations

- There should be radical restructuring of FA Council and committees, with co-options and appointments from ethnic minorities to 6 committees and 3 places on Council, and to the FAPL and FL Boards during 2004. Wider targets should be put in place for the triennium to 2007.
- The FAPL and FL must state their own racial integration strategies in brief form before the end of the 2003/04 season, with measurable objectives and timescales for delivery (starting in 2004). The FA should focus on a significant – but reasonable and achievable – number of measurable results each year. An independent process must be introduced for monitoring and reporting achievement.
- Relevant football rules should be reviewed, and sanctions standardised and strictly enforced.
- A joint programme of mandatory education and training, to include senior executives and coaching staff, must be devised and implemented by the three football authorities, with the aim of achieving appropriate and relevant diversity awareness and understanding.
- The resourcing of equity work should be reviewed and enhanced, at the centre and in the counties; commitment must explicitly be given to the long-term funding of anti-racism and pro-diversity initiatives in football.
- The FAPL and FL should scrutinise employment practices at clubs for compliance with EO policy across all vacancies.
- There must be co-ordination of best practice and ideas for widening the game's support amongst ethnic minorities, especially between clubs facing particular challenges, and with other sports.

## CUSTOMER CONCERNS

During 2003 the IFC addressed four particular areas in which issues had been frequently been brought to the attention of the Commission. These were: community work; neighbourhoods; access for disabled supporters; match rescheduling.

### Community work

*everyone wins*

In 2002 and 2003 members of the Commission visited a wide range of community schemes and explored community projects in which football clubs are engaged in addition to the core national Football in the Community scheme. It additionally consulted relevant government departments and agencies, and partners with which football works.

The IFC's main findings are:

- the achievements of football's community work are often significant
- resources are a challenge for many clubs; the activity often becomes vulnerable when clubs hit financial difficulties
- the public relations side of community work is under-exploited. The current structures tend to mask impact and inhibit understanding of common goals and purposes inside and outside the game
- welcome initiatives have been taken to evaluate FITC and programmes outside the national scheme. Given the cumulative investment, particularly from public funds, evaluation probably needs to be taken further. Caution is needed in claiming what football can and does achieve, however

The work that is done at football clubs under the general banner of "football in the community" is impressive. Although "Football in the Community" is a national scheme often used as a general shorthand for all this work, community outreach is actually an extended and growing activity across football, which comprises many different types of programme activity which clubs variously include in their community work. These include:

- Activity that operates within or in conjunction with the formal Football in the Community programme organised under the auspices of the Footballers' Further Education and Voluntary Training Society (FFE & VTS)<sup>43</sup>. This is funded by the FA, the Premier League and the PFA. Its headquarters are in Manchester, which runs the scheme's payroll, administrative support and national sponsorship. Otherwise individual schemes are self-funded; football clubs usually donate facilities. Its stated aims are to encourage interest in and support for football and provide links with the community.<sup>44</sup> Reference to Football in the Community in this report refers to this nationwide scheme.

43. A review of FFE & VTS, *Review of Name, Role, Strategic Governance, Financial Management, Memorandum and Articles of Association*, KPMG, August 2002, suggested the society should be retitled the Footballers Education Society (FES), which is used henceforth in this Report.

44. FITC stated aims given in a presentation to the IFC in June 2003 were: to encourage people to play and watch football; to provide links with the community; to encourage people to support their local club; to maximise community facilities and community usage of football clubs.

- Other coaching schemes or activities to encourage wider access to the playing of football.
- Learning Centres. These are generally run in conjunction with local authorities and a range of funding partners and sponsors to deliver educational coursework within the school curriculum, and a range of skills-enhancement courses and activities to other parts of the local community. The centres are based at football clubs, which provide facilities, infrastructural support and some indirect resourcing. Other funding is raised through sponsors and partners. Football provides a context and is a source of motivation but is not a subject of study. The terms Study Support Centre (SSC) and Learning Centre are sometimes used interchangeably.
- Study support schemes, such as the Playing for Success (PFS) programme which operates under the auspices of the Department for Education and Skills (DfES) and seeks to use the environment of sports, including football, to motivate children and thereby improve numeracy and literacy. The DfES works in partnership with many football clubs, which provide facilities and their brand. In many cases, PFS operates in conjunction with FITC.
- Club programmes that may operate within or outside FITC, generally on a multi-agency basis, often within government or local authority agendas, but including programmes that work with local organisations. These programmes largely depend on grants, project funding and local fund-raising. Football clubs provide their brand and infrastructural support.

The above is only a snapshot of a complex range of activities and does not claim to be comprehensive. Having looked at examples of the various activities since mid-2002, the IFC is not sure that the different strands of activity are distinguished and understood by those not involved in this community work - both inside and outside football; nor that distinct - or collective - aims are clear and appreciated. The football authorities may wish to consider introducing a new generic title for community work; it is perhaps misleading to use the name of one scheme as the parent label. The Commission notes that Charlton, for example, has already adopted this approach, referring to its combined and multi-part programme as "Charlton Athletic Community".

45. The FA Premier League Annual Charter Reports Season 2002/03

The extent of the community work conducted by clubs in the Premier League is clear from the clubs' reports on it to the Premier League and reproduced in the FAPL Annual Charters Report<sup>45</sup>. These comprise the largest part of most reports and are comprehensive. The Commission is aware of no other source that provides a full overview of all that FAPL and FAPL clubs are doing, across the whole spectrum of community activity. An indication of the range of initiatives, partnerships and good causes covered is in fig. 10. The Charter Reports immediately reinforce the point made above: the clubs report under the heading "Football in the Community" which, in the Premier League, can sometimes form a relatively small part of the overall programme.

### FAPL club community schemes, good causes and partnerships

Barclaycard Free Kicks  
BTEC Sport  
Club Charitable Trust  
IT Courses for Adults  
Disability football  
Duke of Edinburgh Award Scheme  
FITC  
Football Aid  
Football For All  
GMTV Get Up and Give Campaign  
Healthy Living Programme  
Learning Centres  
Learning Through Football  
Outward Bound Trust  
Player appearances  
Playing for Success  
Premier League Reading Stars  
Princes Trust  
Study Support Centres  
Support to charities  
Sweeperzone (Keep Britain Tidy)  
Thames Gateway Youth Football Project  
Training Ground visits  
Womens Football

fig. 10 source: The FA Premier League Annual Charter Reports Season 2002/03





Many of the Reports give detailed statistical information on throughputs (such as the number of children passing through a Learning Centre or SSC) and interesting detail on many of the activities within individual schemes (such as the kind of training that is provided; which players visited schools and hospitals). Disappointingly, there is very little reference to outcomes. The reporting would be greatly strengthened if, in the club Charter or at the beginning of each different type of activity, there were a clear statement of purpose against which results could subsequently be set. From visiting a large number of programmes, the IFC has no doubt that these schemes are achieving a great deal but this cannot be judged from the current reporting process. However, results have to be weighed carefully. Some results are difficult to quantify. And it would be unwise to try to put a social value on investment. Even more important, aims and aspirations must be couched realistically. Football cannot solve youth offending for example. But it can contribute to changing attitudes and identifying alternative behaviours. Appreciating clubs' actual contribution to success in community work is also hampered by the fact that in the current Charter Reports it is difficult to disentangle club and FAPL-controlled schemes from sponsors' schemes, for example. With improved presentation, the IFC suggests that Charter Reports and FL community reporting could form the basis of an independent publication that could reach a wider public audience and that could be a powerful tool in demonstrating football's wider social purpose.<sup>46</sup> The Commission also believes that, important though it is, community work should not dominate Charter reporting, especially as it is not a direct customer issue in the way that ticket prices and disabled facilities are. To separate out community work and charter work would be of benefit to both exercises.

The IFC does not ignore the community work conducted at Football League clubs. Its focus on the Premiership in the preceding paragraphs is simply because the Premier League presented a body of information and evidence about its clubs' community programmes in its 2003 Charter Report. This happened not to be a focus for the Football League's reporting this year (see pages 66 - 69). The IFC highly regards the community work of FL clubs and believes it would strengthen the message of an independent report on football's

contribution to the community if it were the product of collaboration between the Premier League and the Football League and covered the whole of professional football.

In general, the Commission feels that this aspect of the football industry is under-exploited as a promotional tool that can redress some of the negative public perceptions from which the sport suffers. The IFC expresses this belief cautiously as it does not intend to suggest that community work should be turned into a propaganda exercise of any kind, or to encourage inflation of the role football plays in a very large arena. However, the game does at present seem unnecessarily to obscure what it is doing. With a bit of digging, it can be found. The attractive annual reporting of individual Learning Centres is one source. LEA and other authorities' evaluations are another. Partners' websites are another. But, curiously, club websites are not. Links from club websites to Business in the Community (BITC), for example, and the Playing for Success pages of the DfES website<sup>47</sup> might be considered. The latter are instructive in clearly evaluating PFS and including mini case studies illustrating outcomes and achievements. Club sites are not friendly on community – understandably as most of the users are after team news, results, fixture lists and so on. But the IFC believes that there is an argument for sharing the good news on community work elsewhere, not neglecting it. The united efforts of football will be needed to counter negative perceptions, public cynicism, and funders' hesitation to put money into a sport that seems to have excessive wealth, or is preceded by rumours of yobbishness and serious anti-social behaviour by players.

On the ground, too, the whole can be obscured by the parts. It is not unknown for a club's total community work to operate under three or four leaders, reporting separately, or for staff in separate bits of the programme to have no evident picture of the whole. This may have an impact on motivation and the larger identity of community work. The IFC also found that senior management does not always have a clear oversight of the community programme, particularly at the bigger clubs. The IFC suggests that the football authorities should encourage senior management and Board interest in community work, which it sees as of strategic importance to football in its potential for softening and dignifying its public face, and in terms of the

46. The IFC received from the Premier League, in December 2003, copies of a promotional brochure about FAPL community work, *The Power of Football*. The IFC did not have opportunity, prior to the printing of this Report, to ascertain the intended readership and purpose. The brochure might, however, provide a starting point for more comprehensive, collaborative and inventive PR.  
47. [www.dfes.gov.uk/playingforsuccess](http://www.dfes.gov.uk/playingforsuccess)

sizeable budgets involved collectively from sponsors, partners, agencies such as the Football Foundation and government departments.

Despite all that is and can be achieved, it is clear that community work is a struggle for some clubs. When clubs hit financial difficulties, the community work can be the first thing to go. FITC sometimes operates on the fringe of the club, like a poor relation. The IFC encountered some dedicated FITC staff who did not recognise the club's entry in its Charter Report about the club's community work; others had supplied detailed information but didn't know what use had been made of it.

Core funding for FITC comes from the Manchester HQ in the form of a £6,000 grant to each programme. Whilst recognising the democratic virtues of this practice, the Commission wonders if it best serves the overall endeavour. The grant is perhaps less needed or justified at big clubs, whilst a larger grant could mean programme survival at some FL clubs. The flat grant also restricts opportunity to meet individual short-term needs when, for example, new projects need start-up help. The Commission understands that FITC has made some small adjustments to the flat grant system, but suggests that the FA and Premier League formally discuss [a review of funding distribution and disbursement methodology](#) with the FES Board.

Almost everyone working on community programmes whom the IFC met valued networking opportunities that let them share ideas with colleagues at other clubs. There are two or three mechanisms for this: the FITC network operates through regional meetings co-ordinated by the Regional Directors deployed from the Manchester headquarters; FAPL has recently initiated meetings for its clubs' community managers; there is a bit of informal sharing of experience between clubs with similar sized schemes and ambitions. Some cross-fertilisation between these gatherings would be interesting perhaps, especially if FAPL and FL clubs could share joint occasions; they could identify where success formulas might be replicated, and help skills development, for example. The different components of community work demand different skills; qualified coaches in FITC have little experience of fund-raising; professionals with a background in social work and education may not necessarily have skills in marketing and PR

that community work needs, but do have the knowledge to nourish it. There will be sensitive areas when it comes to matters such as fund-raising, which is an increasingly competitive business, but this is manageable. The Commission notes that national sponsorship obtained through the Manchester Headquarters has worked well for FITC in all divisions.

The IFC recommended in its 2002 Annual Report that:

*the introduction of formal evaluation of football in the community should be explored.*

The Commission was glad to encounter a number of such initiatives during 2003, including evaluation by the Football Foundation of its first twenty projects; a review of *Football and its Communities* commissioned by the Football Foundation; a comprehensive review of the achievements of FITC conducted by Manchester Metropolitan University (MMU)<sup>48</sup>; a review of FFE & VTS by KPMG; and an examination of the success of its community work commissioned by Leyton Orient. which, uniquely, operates wholly independently. The MMU report on FITC generally found it to be highly regarded by sponsors and stakeholders but expressed concerns that it is under-resourced and that its impact, in consequence, may be under-valued. The report does not focus strongly on impact although it throws up some interesting light on evaluation from its survey<sup>49</sup> of club FITC programmes. For example 44% of the clubs use verbal feedback to evaluate their success; 31% use throughput (e.g number of attendees on a course); only 15% collect written evidence. The report notes that

*most of the evidence of the impact that schemes are having on communities is occurring through 'word of mouth' ... some clubs are becoming more aware of the need to keep written accounts of achievements, record statistics and think about how the evidence of impact can be quantified.*<sup>50</sup>

This illustrates the weaknesses in current assessment methodologies. [The cumulative direct and indirect investment in community work in the football business is enormous. But measurement of its impact is either anecdotal or diffuse.](#)

48. *Football in the Community: Resources and Opportunities*, Brendon McGuire and Rick Fenoglio, October 2003

49. The survey questionnaire was sent to all 92 clubs in the FAPL and FL and was returned by 85 Senior Officers from FITC – an exceptionally high percentage.

50. *ibid*

DfES analyses PFS; the Home Office measures the success of, for example, Positive Futures projects; the Football Foundation conducts assessments of projects it funds; and there is club-collected feedback. But these are not systematically married. The IFC was unable to obtain information from the Department for Culture, Media and Sport (DCMS) about how it evaluates the success of its investment through Sportmatch (in which football is by far the biggest beneficiary), nor could it form an assessment of its own of the cumulative impact of football's community work from Charter Reports (see above). In short, **football is at best selling itself short; at worst failing to apply normal business appraisal to this major industry.** The sort of questions that investors and executive management might be expected to pose include:

- what are we aiming to achieve?
- how well are we known for this activity?
- how well are we regarded for this activity?
- do we have the right products?
- do we have the right technical skills?
- do we have funds to invest if required (e.g. for long-term sustainability)?
- where should we be investing?
- can we adapt to change?

The reviews conducted in 2003 might collectively be put to constructive use at a strategic level, led by the football authorities.

The Commission believes that evaluation can be put to strategic use in focusing football on what its community work is for and what it is trying to achieve. Some of it, including FITC, has a valid football purpose. However, the football purpose is secondary in many of the programmes now contributing to government agendas, such as PFS, healthy living agendas important to the Department of Health, programmes tackling youth offending and drug-taking led by the Home Office. The subscription of growing numbers of club schemes to these wider social agendas is notable. The contributions of clubs such as Charlton, Brentford, Leyton Orient, Leeds and Arsenal are amongst those that have been praised to the IFC. Football's serious participation is relatively recent and there are still areas where the sport could contribute more, and where greater receptivity is called for in the case of local projects that do not sit obviously alongside the core objectives of the local

club. Football has sometimes seemed slow to engage with the Home Office Positive Futures projects, for example, though there are several in which clubs are successful strategic partners, and some major success stories – at Charlton, for example. The Football Foundation ring-fenced £1m in 2003 for funding these projects, which has had good take-up, although there have been problems in getting a wide base of support for broader estate-based work. Traditionally, football has not seen a role for the game in helping to meet major social challenges. This is changing. The IFC believes football can only gain from greater commitment. This work is an area where everyone wins: certainly football can do itself a great deal of good.

## Summary conclusion

Community work is currently under-recognised as a positive contribution on the part of football to helping address important social issues. Steps are needed to clarify the activity focus and output, and to create more dynamic and practical funding and management structures. A collaborative, carefully produced and targeted promotional exercise to publicise football's achievements could be valuable but would have to be handled sensitively. The strategic importance of the community programmes is not wholly being realised.

## Recommendations

- Community work should be reported and given high profile outside the Charter process and cover the aims and achievements of the whole of football. The FAPL and FL to explore possibilities before the 2003/04 reporting season.
- The Premier League and Football League should encourage senior management and board recognition of the strategic importance of community work.
- The FA and FAPL should suggest a review of FITC funding distribution and methodology to FES.

**Aims and aspirations must be couched realistically. Football cannot solve youth offending for example. But it can contribute to changing attitudes and identifying alternative behaviours.**



# Neighbourhoods

## *keeping the doorstep clean*

In 2003 the Commission extended its interest in community work specifically to include football's relationship with its immediate neighbours in the community. This included dialogue with local authorities, representatives of residents' groups and the Federation of Stadium Communities (FSC).

The IFC's main findings are:

- clubs sometimes overlook relations with their immediate neighbourhoods. This contributes to misgivings that in general football stadia are not good neighbours
- a number of clubs are succeeding in building an harmonious and mutually supportive rapport with local residents; wide dissemination of best practice would be beneficial
- to improve relations and demonstrate consideration, clubs need to focus on providing timely information and building effective and appropriate communication methods

As indicated at the beginning of this section, the terms used in connection with football clubs and their communities can be confusing. Outside football, "community" means those living in a particular area. In football, it tends to mean those parts of the community with which clubs are involved either in the context of its business of organising and playing professional football, or those with which the club works on community projects. Neither necessarily embraces the residents who live in the immediate vicinity of football grounds. The IFC for present purposes is using the term "neighbourhoods" to refer to this group.

The Federation of Stadium Communities was formed in 1991 by delegates from inner city groups and residents' associations throughout the UK. It offers this group a voice. The fact that the FSC came into being and continues, indicates a problem needing a solution. The FSC now has 230 member organisations. Those with whom the IFC has spoken identify many problems neighbourhoods face, such as:

- poor information supply from clubs to neighbourhoods;
- problems with matchday parking, litter, traffic management and other nuisances;
- lack of appropriate consultation in the case of stadia developments;
- exclusion from clubs' community activities;
- insensitivity to neighbourhood anxieties.

The IFC has gained the impression that much of the grief is unwittingly inflicted by clubs, which sometimes don't know or forget about neighbourhood needs. Problems do not exist at all clubs. Some, such as Charlton and Chelsea, either formally recognise neighbourhood relations within their community work or in their consultation processes. On the other hand, many stadia now are outside cities, and residential issues are often minimal. However, where there are problems they are often large, especially in the eyes of the neighbourhoods. Many football stadia still exist where they were born, at the heart of the working class areas from which football drew its life blood in the late nineteenth and early twentieth centuries. From the terraces of grounds such as Bramall Lane, Anfield, Highbury, Meadow Lane, The Valley, Hillsborough, Prenton Park, Vetch Field ..... you can see the houses crouching behind the ground perimeters – or in some cases not see them, having walked past them on the way in, because stands have been developed to new heights, or higher fences have gone up. It being easy to miss them from inside the ground, unfortunately, some clubs do just that.

It is evidently in a club's interests to live harmoniously with its neighbours. The image of football is not helped by residents' impressions that the club on their doorstep simply rides roughshod. Furthermore, *when clubs need their neighbours' goodwill – increasingly these days this moment arrives when planning permission is needed for stadium development - it will not be there if the relationship has not been nurtured over time.* Fouling one's own doorstep is not sensible.

The following are instances that have been drawn to the IFC's attention as aggravating neighbourhood relations.

- Failing to provide appropriate information about rescheduled matches. Clubs have assured the Commission that such information goes in matchday programmes, on the club's website, on local sports radio etc., etc. Elderly neighbours who do not support football may miss all these. Genuine distress has been caused when, for example, family occasions such as weddings are planned months in advance and then coincide with a rescheduled match when the day comes. Some clubs with which the IFC raised the question of fixture information specifically for neighbourhoods acknowledged they had never thought about it. Others remembered it was something the club used to do but weren't sure whether it still did.
- No advance warning about arrangements for outside broadcasting. On matchdays the TV presence has little impact and is contained within the ground. However, enormous outside broadcasting vehicles often arrive the day before a match. Whilst they negotiate narrow streets of housing they can block the way for some time. Responsibility for giving advance warning and apology seems to fall in a gap between the club and the television company.
- A related issue is interference with residents' television signals on account of TV equipment in the ground. The Commission raised this with Sky who had been aware of the problem, promised to look into it again and came back quickly with solutions. Residents rarely make their complaints to the television companies, however; the nuisance as far as they are concerned is the club. Such complaints, which probably fall outside the customer care categories, must be captured and handled in conjunction with the TV companies that football contracts.
- The neighbourhood gaining no direct benefit itself from the club. Learning centres and social inclusion projects do not necessarily target or assist a middle class and perhaps elderly population living next to the ground. Even FITC

courses can leapfrog them as they head for areas with social needs or outer city areas where FITC paying customers can be found.

- Insufficient consultation at the planning stage of stadium development or relocation. This is particularly sensitive when a club is moving into a new area where there will be residents who have not grown up with football. Real fears exist about hooligans, re-routing traffic, threats to local trade, danger for ethnic minorities whose cultures sit uneasily against a football invasion of predominantly white males<sup>51</sup>.
- Clubs moving out and leaving a site behind which drifts into anti-social dereliction. This may not be the club's fault nor in its control, but its responsibility is felt, whether or not the state of neglect actually occurs.

There are some examples of excellent practice on the part of clubs. Blackpool has repaired once poor neighbourhood relations by working through a multi-agency group that includes the Council, the police, local churches and schools, housing associations and other stakeholders - all of which have a vested interest in building good relations. Small matters have made a difference: opening street access for disabled residents through a car park adjacent to the FC on non-matchdays; letterbox drops to supply crucial information to the neighbours. The club has managed its stadium development amicably.

On planning the move to its new stadium, Southampton built a close working relationship with the City Council to turn initially negative attitudes into realisation that there are advantages in living near a football club that is going to regenerate the area. The new stadium is now seen as much as a community amenity as a football venue. A Stadium Monitoring Group formed ahead of planning permission; a visitors' site during the construction work; a regular Residents Newsletter; and investment by the club in local causes often unconnected with football in any way, have all been features. The club has also repaired negative perceptions of its interest in racial tolerance, working with the city's Social Cohesion Unit to promote diversity. While there is more progress to be made, local residents - which include one of the biggest ethnic minority populations in the city<sup>52</sup> - now seem comfortable with their new neighbour.

51. See page 33

52. The city has an 8% ethnic minority population, including 14 faiths and 40 different languages (2001 census).



Sheffield United has worked closely with the FSC on several neighbourhood initiatives, notably in helping raise funds for, and establishing, a Business Enterprise Centre at Bramall Lane. This provides low-cost accommodation and administrative support for small businesses in the area. Nearby is the Sharrow Community Centre, beneath the Bramall Lane stands, for use by residents and community groups, at minimal cost.

Similar initiatives to clean up a club's doorstep are found at other clubs – but not all. Supporters' interests and the wider definition of "customer" take priority, with the argument that they far outnumber residents. No one expects a club to relegate supporter interests. *It is not that football supporters' needs are less important than the neighbourhood, but they are different; it is in interests of the Premier League and the Football League, on behalf of football's wider reputation, to check that they are reconciled.*

The IFC is encouraged that consultation with residents is coming into normal club operations, and is mentioned in some Charter Reports. The IFC also found several clubs where there is a member of staff whose job includes designated responsibility for neighbourhood relations, and recommends the practice. Whilst neighbourhood concerns range across a variety of issues, *it is helpful for residents to have one point at the club which they can contact*; they are largely not football fans and frustrating attempts to find their way around a club by phone can dent relations at an early stage.

This Report gives three examples of good – or retrieved – neighbourhood relationships that it has examined. There is also a number that are tense, especially where ground development is pending, and in the London area with its vast numbers of League and non-league clubs<sup>53</sup>. The Commission suggests that *to help clubs and their neighbourhoods, the Football League and the Premier League might jointly establish a central databank of club experience on which others can draw*. The FSC, with which the Premier League, unlike the League, has had little or no contact, may be able to help. The IFC suggests that *a meeting between the FAPL and the FSC could be productive*.

53. The London Assembly conducted an investigation into London's football stadiums in June 2003, *Away from Home*, though the remit did not extend to all non-League clubs.

## Summary conclusion

Neighbourhoods are a distinct and individual part of the football community, and neighbourhood relations merit focused attention at both club and league level. Mismanagement can result in negativity that can take years to repair. Football must recognise that neighbours are not football "customers" and that "football" methods of communication, PR and consultation are not suitable. The football authorities can help to build the expertise and understanding necessary in an era of on-going stadium development.

## Recommendations

- Clubs should be asked to designate a staff member responsible for neighbourhood relations.
- The Football League and the Premier League should create a best practice resource on which clubs from all divisions can draw.
- The Premier League should meet with the FSC to explore mutual concerns.

## Facilities for disabled supporters *the right to choose*

In 2003 the IFC focused on progress in implementing the 1998 Football Task Force recommendations. It also gave some preliminary consideration to steps that have been taken to improve the game's knowledge and understanding of the 1995 Disability Discrimination Act (DDA).

The IFC's main findings are:

- The recommendations of the Football Task Force have been overtaken by priorities associated with implementation of new requirements under the DDA from October 2004
- While many clubs have improved and continue to improve the facilities provided for disabled supporters, standards of service and practice vary
- Disabled supporters retain some serious concerns that require urgent attention

The impression the IFC gained from meetings on disabled access was that not a great deal was done for two or three years following the publication of the Task Force Report. Recently, however, there have been many welcome initiatives. These include:

- Charter reporting from FAPL clubs and the governing bodies on disabled facilities and initiatives to improve access. The FA reported separately in 2003 on *Football for All*, covering race equality and disability. Most Club Charters since 2001 indicate provisions made for disabled supporters.
- The establishment of the FA Disabled Supporters Group (FADSG) in 1997/98, facilitating consultation between the governing bodies, NADS, the Football Conference, the Football Licensing Authority (FLA) and DCMS.
- The publication of *Accessible Stadia*,<sup>54</sup> funded by the Football Stadia Improvement Fund (FSIF) with the involvement of the FLA, NADS, the FAPL, the FA, the FL, DCMS and Sport England.
- A management guide, *Meeting the Requirements of the Disability Discrimination Act*<sup>55</sup>, prepared for the FAPL in 2003 and distributed to its clubs.
- Plans to issue guidance in 2004 to CFAs and feeder leagues on DDA responsibilities.
- Disability training for stewards within new diversity awareness training, and DDA training at some clubs.
- A pilot study at Aston Villa to identify what was required at a football club to meet DDA requirements.
- Changes to the raised platform areas and improvements to hearing sets at the Millennium Stadium.

These initiatives indicate the growing and urgent attention being given to disabled facilities in football, in part due to the further requirements the DDA will impose from 2004, over and above the duties that have been a legal requirement since 1996. The IFC accepts that in many ways the DDA has overtaken events and is now more pressing and current than FTF implementation. Nonetheless the FTF recommendations should not be ignored, as they identified key needs and prompted some important evaluation of existing, inadequate provisions. Since 1998, however, progress on implementation has been good at some clubs but slow at others.

This unevenness, coupled with new priorities, and the absence of any central inventory of FTF implementation, makes it difficult to determine to what extent the recommendations, accepted by the football authorities in 1999, have been fully delivered. This was felt by NADS, whose representatives at the FADSG suggested, during 2003, that the group should work its way through the FTF recommendations to check on implementation. This was agreed but progress has been slow and NADS' impression, shared with the IFC, is that it is going to be difficult to reach a conclusion.

Number of DSAs and named disability contacts

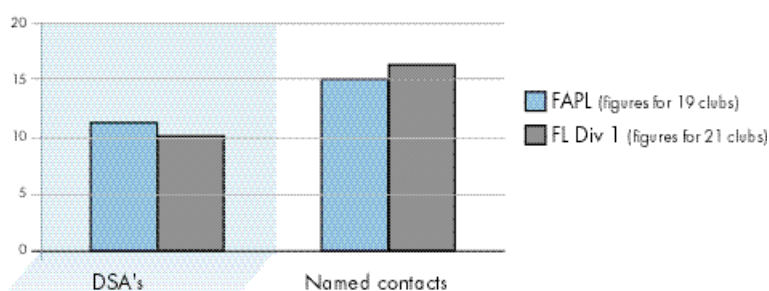


fig. 11 source: *Access to Football Grounds*

54. *Accessible Stadia: a good practice guide to the design of facilities to meet the needs of disabled spectators and other users*, Sports Grounds and Stadia Guide No. 1, 2003

55. *Meeting the Requirements of the Disability Discrimination Act, (1995)*, Richard Woods

There are certainly perceptions that there have been some failures against the FTF list. Not all clubs, judging by Charters and the useful *Access to Football Grounds* published in 2003<sup>56</sup>, are able to provide a named contact person for the disabled, and an e-mail address - and not all have a DSA that might be an alternative source of information (see fig 11); the IFC has not found evidence of annual visits by "hit squads" to all 92 football grounds; the ability for home and away supporters to sit amongst fellow supporters at all grounds is not universal; charging policies have not been standardised. In addition, government guidance (the Green Guide)<sup>57</sup> on the number of wheelchair spaces, a FTF recommendation accepted by the football authorities, is met by few clubs, though many have increased their wheelchair capacity. Figure 12 compares the provision made by clubs that were in the FAPL when the FTF reported, and their provision in the 2001/02 season.<sup>58</sup>

### Change in provision of wheelchair spaces 97/98 - 01/02

Club	Capacity 97/98	Spaces 97/98	% of capacity 97/98	Capacity 01/02	Spaces 01/02	% of capacity 01/02	Green Guide recommended spaces
Arsenal	38,548	102	0.26	38,584	102	0.26	204
Aston Villa	39,339	41	0.10	42,719	94	0.22	214
Barnsley	18,750	65	0.35	23,009	107	0.47	159
Blackburn Rovers	31,367	280	0.89	31,367	300	0.96	183
Chelsea	31,000	40	0.13	42,449	106	0.25	214
Coventry City	23,662	70	0.30	23,673	65	0.27	159
Crystal Palace	26,309	48	0.18	26,257	54	0.21	168
Derby County	30,339	140	0.46	33,258	197	0.59	189
Everton	40,177	61	0.15	40,260	100	0.25	210
Leeds United	40,209	101	0.25	40,024	118	0.29	210
Leicester City	21,500	75	0.35	32,500	180	0.55	186
Liverpool	35,561	44	0.12	45,362	80	0.18	220
Manchester United	55,500	70	0.13	67,700	104	0.15	264
Newcastle United	36,610	95	0.26	52,193	178	0.34	234
Sheffield Wednesday	39,859	88	0.22	39,812	88	0.22	207
Southampton	15,250	18	0.12	32,351	176	0.54	186
Tottenham Hotspur	26,000	33	0.13	36,240	48	0.13	198
West Ham United	26,000	112	0.43	35,495	98	0.28	195
Wimbledon (shared ground)	26,309	48	0.18	26,257	54	0.21	168

fig. 12 sources: *Improving Facilities for Disabled Supporters*, FTF 1998, and *Access to Football Grounds*

56. *Access to Football Grounds: Premiership and First Division – a guide for those who have problems getting around*, by James Thomas and Gordon Couch, The Chameleon Press Ltd, 190 pages, pub. PHSP, March 2003. The guide covers all the grounds of the FAPL and FL Division 1. See also [www.accessproject-phsp.org](http://www.accessproject-phsp.org)

57. *The Guide to Safety at Sports Grounds*, 1997, The Stationery Office

58. There is some understandable concern at compliant clubs about the amount of disabled seating required; up to half can regularly remain empty.

## Disability won't keep us away from the Boro

Helping hundreds of disabled supporters stay on the ball is all in a days work for Boro fan Paddy Cronberry. MARIE TURBILL hears why.

### DAD-OF-FOUR Paddy Cronberry loves his football.

The Boro and Republic of Ireland are his teams and have been since he was a child. He was bitten by the football bug at the tender age of eight and it was going to his first match that did it. "There's nothing at Ayresome Park in 1960 like now is it," he remembers. "That was it, Paddy was hooked and 44 years later still is. The nearest ticket would take us to get to an away match for the first time. Since we've been to the stadium for the Leicester v Boro match with several members of the Boro family, I've been hooked."



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However, the IFC believes the football authorities have a reasonably good story to tell and that the forward focus on particular on-going issues, alongside the new energy that has been brought to disabled issues, means that the spirit of most, if not all, of the FTF findings will prove to have been addressed. The IFC suggests that the FTF chapter should now be closed, but that during 2004, out of respect for disabled supporters, **the football authorities should produce brief reports summarising action taken to implement FTF recommendations, and explaining, if necessary, why some action has not been taken.**

A number of good initiatives have been taken at club level and by the FA with regard to the FA Cup Final and England games. Some of these have been experimental; some have the potential for development; all indicate a growing awareness (see fig.13).

There are, however, a number of on-going issues which have been regularly raised by NADS and by individual DSAs which the Commission suggests should now be given priority. The main ones are as follows.

**Standardised ticketing policy.** This was a Task Force recommendation. The preference of NADS and DSAs the IFC has met is for clubs to charge the full ticket price to the disabled supporter but to give free entry to helpers. This is far from standard practice. Fig.14 illustrates this, and the range of practice for wheelchair users. Within discounted prices there are further variations. Charters do not present information on disabled ticket prices in standard format; many FL clubs do not include disabled ticketing information in their charters at all. In

## Good practice examples

Innovative publications, in particular the FA's *Access England* and *Access FA Cup*, containing news and information for disabled supporters

Matchday programmes in braille on a pilot basis at Leeds, for example, and England games

Large-print websites cross-referenced from the home page on sites such as West Ham's, Manchester United's and Leeds United's

Large-print team sheets at Arsenal and audio matchday programmes. The FA is also exploring audio possibilities on the web for England games

Disability audits at Bolton, Manchester City and Newcastle

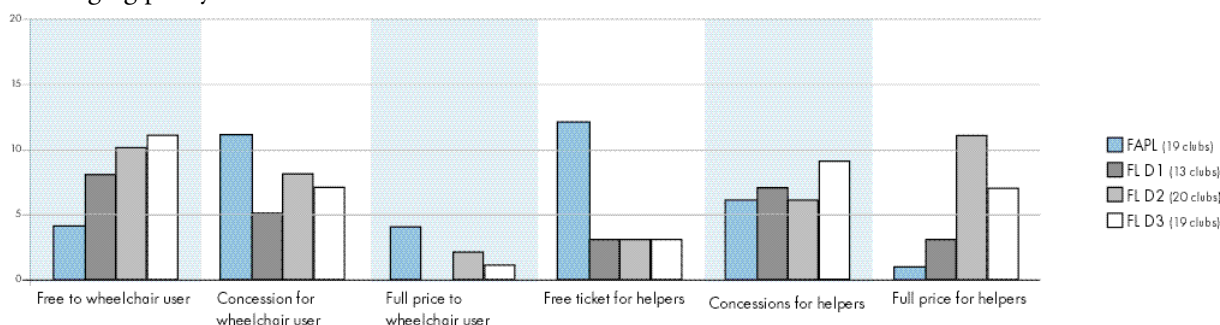
Matchday lounges for the disabled at Leeds and Manchester United

fig. 13 sources: IFC visits; EAPL Charter Reports; Football for All

order to give disabled supporters the same ready access to ticket information at any club, the IFC suggests that **all clubs should be required to include disabled ticketing information in the Club Charter, alongside other pricing information**, and that the FL and FAPL should encourage a standard policy and monitor it.

**Ticket distribution procedures.** This was also a FTF recommendation. The IFC has established that procedures vary from club to club but that the preferences of DSAs also vary. The FA has taken disabled ticketing in-house for England games and feels the system now works better. The Commission believes club practice merits wider consultation with disabled supporters (see pages 53-54); it may be that, as long as the football authorities are satisfied that customer needs are being satisfactorily met, this area may be left to clubs' discretion, provided it is properly organised.

## Charging policy for wheelchair users



NB. All clubs offer a concession of some kind to wheelchair users and their helpers; clubs also offer a range of concessions to the ambulant and disabled, and to the visually impaired supporter

fig. 14 source: Club Charters

**Seating provision at away games.** The IFC raised this in its 2002 Annual Report, and makes the point again:

*... sometimes facilities for disabled supporters are in home supporter areas, resulting in disabled fans and their carers sitting in unwelcome minority in crowded home stands ... in some circumstances the experience can be terrifying.*<sup>59</sup>

The IFC has discussed this with several clubs and with the FAPL and FL. That the problem continues is acknowledged, also the difficulty for some clubs to resolve it. Nonetheless, the Commission again urges the football authorities to raise this issue with relevant clubs and agree ways of addressing the problem.

**Parking.** The FTF asked for disabled parking “where possible”. There have been improvements at many clubs. However, problems remain in terms of the numbers of spaces, the number of spaces for away supporters, and transport from disabled parking bays to the relevant entrance: this last point has been addressed imaginatively by Derby County which provides golf buggies on match days from the car park to the stands. The general issue surfaced during the exercise to validate Charter Reports conducted in 2003 (see page 73 ) with the suggestion that it would be an improvement if clubs were to focus on *the process of attending a match*, not just the facilities.

**Named contacts for disabled supporters.** This too was a Task Force recommendation and steps have been taken to implement it. Most Charters give details of the club contact – but not all (see fig 11, on page 50). This should be straightforward for the FL and FAPL to rectify and the Commission suggests they do so in 2004 – and take the matter further, *to consider with clubs what appropriate level of service named contacts should provide*. This will be more challenging. Naming someone in the Ticket Office is not necessarily enough, as disabled needs go beyond ticketing. Few clubs designate a full-time or majority-time post to disabled supporters, presumably on grounds of cost – Derby County and Charlton Athletic are examples of exceptions. An agreed list of basic services and information requirements might be

agreed with NADS and DSAs, and a requirement that all named contacts are trained to understand disabled supporters’ needs.

**Attitudes.** Stewards’ training seems to be working well in raising awareness. DSAs consulted by the IFC recognised improvements. Their concern, however, is that the disabled should be treated as ordinary supporters: not patronised; not regarded as fragile; not exempt from rules and codes of behaviour that apply to other fans. Extended diversity awareness training, and the opportunity to share and discuss experience, will contribute to the cultural change needed.

**Sightlines.** This is the biggest issue for NADS. The football authorities are aware of the size of the problem; the FA is taking professional advice and consulting widely with regard to the Wembley project, as are clubs such as Liverpool which are planning new stadia. Some clubs – Manchester City, Newcastle, for example, – now have first class viewing facilities. But wholly unobstructed sightlines throughout a match are difficult to guarantee: in some cases just one person standing can ruin a match or a moment for a disabled fan. Ultimately, the IFC recognises that costs come into the equation for many clubs. Improving existing facilities is expensive; solving the problem by creating empty rows in front of disabled seating carries a cost. *The bottom line for the football authorities is to satisfy themselves that disabled supporters’ rights are not ignored, and to recognise that this isn’t possible without some cost, management input and staff training.* Accessible Stadia is exceptionally clear on viewing facilities<sup>60</sup>; the Commission hopes that it will receive the widest distribution.

**Consultation and information-sharing.** The FA is planning seminars for early 2004 to disseminate the two new guides<sup>61</sup> and to help clubs understand DDA implications. The Commission welcomes this and hopes that the occasions will be used to address the issues raised above and to develop a service standard (though care will be needed to avoid multiple standards as some clubs are already exploring BSI accreditation). Sharing ideas will help in many areas. The Commission was unable to find much evidence of formal or informal networking; this may mean that particular expertise and experience is not being fully exploited. The IFC also suggests that the football authorities should engage in wider consultation. Whilst communication with NADS is regular and comprehensive,

59. The IFC Annual Report 2002, p. 38

60. Accessible Stadia, p. 36 ff

61. Accessible Stadia and Meeting the Requirements of the DDA



not all DSAs are NADS-affiliated: NADS estimates it has 46 members. An annual meeting with all DSA Chairs, hosted by the FA, might be considered. Finally, NADS produced some years ago a comprehensive *Guide to Grounds*. This is now out of date and out of print. The IFC understands that discussions have been held with the FA about assistance with a new edition. This would be very useful, especially if it can be produced in loose-leaf format for regular updating. It is hoped the FA will actively take this forward.

It has been put to the IFC that the slow take-up of the FTF recommendations and the levels of inconsistent practice and misunderstanding that spoil disabled supporters' full enjoyment of the game may be simply a question of profile. Certainly *disability awareness has received nothing like the profile given to racism, for example – but the issue of discrimination is basically the same*. Whilst there are regular anti-racism activities, KIO weeks and extensive club involvement in the annual *Football Against Racism* week, the IFC could find only one club (Charlton) conducting a Disability Awareness day.

In *Football for All*, the FA quotes Sir Bert Massie from the Disability Rights Commission:

*Going to a football match is something that most non-disabled supporters take for granted; disabled supporters need to be able to have the same ease of choice ...*

*Choice is one of the basic rights that the game owes all football fans: the right to safety; the right to be informed; the right to have their views heard; the right to choose*. This last is the one that, for disabled supporters, football seems most at risk of forgetting.

*Disability awareness has received nothing like the profile given to racism, for example – but the issue of discrimination is basically the same.*

## Summary conclusion

There is still work to be done; the IFC has highlighted areas for attention. The progress made at many levels of the game is commendable – including grassroots football where the FA reports a number of initiatives.<sup>62</sup> DDA requirements will sharpen the focus on access for disabled supporters in 2004. The immediate imperatives are to improve understanding of disability needs; to give importance to management input and staff training programmes; to rationalise ticketing practice and policy; to improve the flow of information – both to reassure disabled supporters that on difficult issues such as sightlines they are being heard, and to help clubs benefit from each other's experience.

## Recommendations

- The governing bodies should issue brief implementation reports on FTF implementation by September 2004, to be made available to all clubs and also specifically to NADS and DSAs.
- FTF recommendations on naming a contact for disabled supporters and an e-mail address; the ability for home and away supporters to sit amongst fellow supporters; and the standardisation of charging policies should become Charter requirements from 2004. Agreement should be reached on the level of service named contacts will be expected to provide.
- The football authorities should engage in facilitating networking, and engaging wider consultation, to include all DSAs and not just NADS members.
- The football authorities should consider, in consultation with clubs, how to raise the profile of disability awareness.

<sup>62</sup>. Listed in *Football for All*, pp 11-15

## Match rescheduling

### *the changing character of football*

During 2003 the Commission consulted extensively, and took delivery of a wide range of views, including those of supporters' groups, club officials, television companies, the Home Office, the FLA, the Association of Chief Police Officers (ACPO) and the governing bodies. To inform its findings, the IFC commissioned a poll of supporters' views.

The IFC's main findings are:

- The amount of match rescheduling is growing but does not have a negative impact on supporters' match attendance or attitude towards their club
- The impact of rescheduling is more serious with regard to infrastructural arrangements and costs
- There could be benefit in co-ordinating best practice and experience in managing high-risk matches

Match rescheduling is perhaps the most recurrent issue raised with the IFC, particularly by supporters' groups. The incidence of rescheduling is high, especially in the Premier League; the number of matches held at the "traditional" kick-off time of 3 p.m. on a Saturday has declined sharply in recent years. However, the pattern of football-watching has also changed: family stands are found at most grounds and are well-used; a new audience for televised live football has grown at pubs and clubs; pay-per-view (PPV) has changed people's habits; access to football on the internet is also growing rapidly – from 73% of fans in 2002 to 82% in 2003, according to the latest Premier League fan survey. In view of this, it is likely that preferences and expectations will be changing.

### Causes of match rescheduling

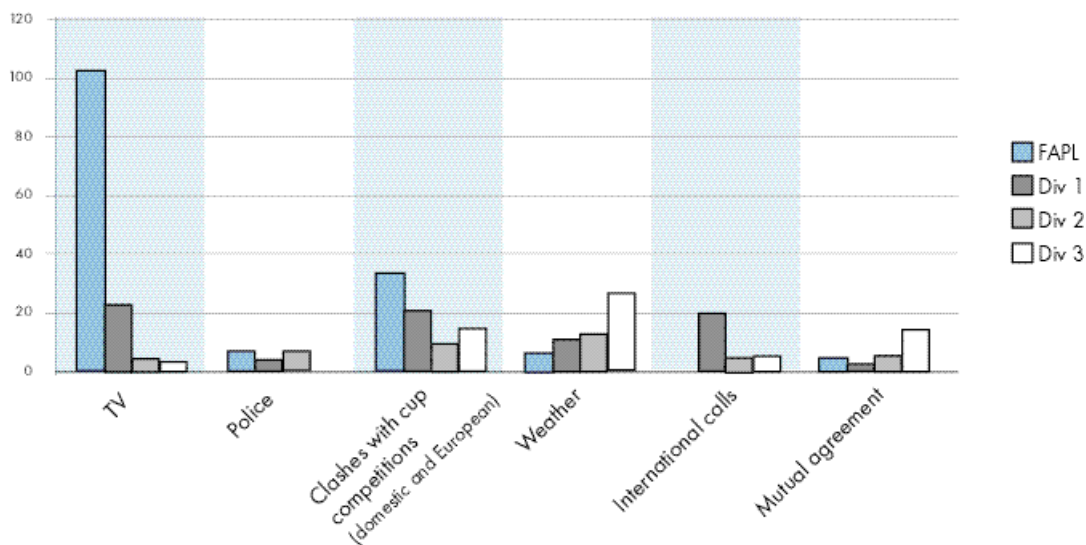


fig. 15 source: information supplied by the FAPL and FL

The IFC identified six broad drivers behind match rescheduling: television; police (public order and safety requirements); clashes with cup competitions; weather; international calls; mutual agreement between clubs. Based on information supplied by the Premier League and the Football League, fig. 15 represents the incidence of rescheduling in the 2002/03 season. It is clear that TV is the biggest driver in the Premier League and Division 1.

To investigate the impact of rescheduling on supporters, to identify impacts, and to understand supporter attitudes to rescheduling, the IFC commissioned a poll. Surveying took place in street interviews in five towns or cities, home to football clubs (3 FAPL, 2 FL Div 1) that represented a cross-section of clubs experiencing high, level and low incidences of rescheduling. Clubs chosen were in the north, the Midlands, the east and the London area. 1151 supporters were interviewed; characteristics of the sample were in line with the general profile of football supporters in terms of gender, age and social grade. The interviews took place on a matchday, but not wholly at or near the stadium, in order that non-match-going fans would be represented.

The key findings were as follows:

- 63% of the sample never had a match that they were planning to attend rescheduled
- only 15% of the total sample missed a game because of rescheduling
- the 15% missed just under 2 games on average because of rescheduling
- 75% of the sample said they had not been inconvenienced by rescheduling
- 86% of the sample said they did not incur additional expense as a consequence of rescheduling
- 95% of STHs said that rescheduling made no difference to the likelihood of their buying a season ticket
- less than 10% of the sample said that rescheduling made them more negative about football

Additionally,

- there was no correlation between the actual number of games rescheduled per club and the response of supporters
- rescheduling has minimal impact on people's football-viewing habits; 4% of the sample said that rescheduling might make them more likely to watch a game at the pub; none of the other alternatives<sup>63</sup> scored more than 3%.

The Commission concludes that **match rescheduling does not have a significant negative impact on the football-going public.**

However, the survey did reveal some interesting perceptions that the football authorities should consider. TV was seen as the cause of rescheduling by the biggest percentage of the sample, followed by the weather, and then international games; the last two in actual fact have a tiny effect on rescheduling in the top two divisions (see fig. 16). Perceptions of the notice given of match rescheduling showed that over 50% of the sample felt two weeks or less notice is given of rescheduling; between 10 days and eight weeks seems to be the general practice<sup>64</sup>. If there is a lesson to be drawn for clubs and the governing bodies, it is perhaps one about communications.

The issue of consultation and communication came up repeatedly during the IFC's discussions on rescheduling. Almost by definition, matches that are rescheduled are high risk. If they have been rescheduled by TV companies it will mostly be because they are "must see" matches - promotion or relegation games; league deciders; top of the Premiership ties; high profile European clashes - that are going to attract very big crowds. If rescheduling is requested by the police, it will be because they have concerns about public safety and disorder and because large crowds, again, are likely to be anticipated. While exploring neighbourhood issues, the IFC heard of resentment that when big crowds are expected, cones and tape blocking off the streets is often the first indication the residents get of possible trouble ahead. While it is the police who probably initiate the precautionary but unwelcome measures, it is the club that will be perceived as responsible and should take the initiative for managing the necessary communications.

**match rescheduling does not have a significant negative impact on the football-going public.**

63. Watching on terrestrial TV, watching on satellite, watching on PPV, listening on the radio, reading about the match

64. 10 days notice is the minimum police requirement normally. Rules regarding fixture rearrangements are in the 2003/04 FAPL and FL Handbooks (pp. 31 and 138 respectively).

## Perceived causes of match rescheduling

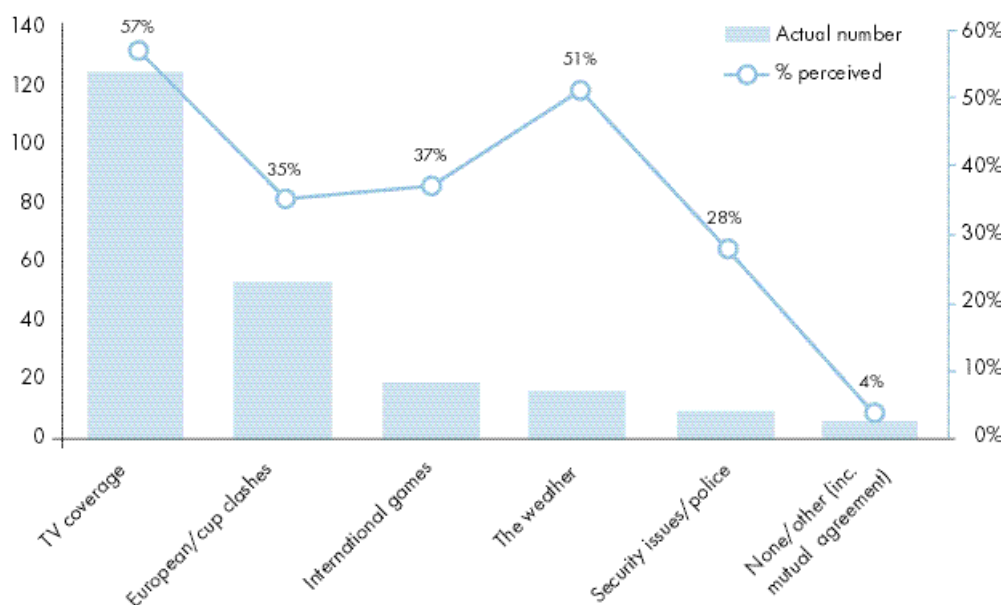


fig. 16 source: Independent Football Commission/The Future Foundation

Because of the high-risk nature of rescheduled games, their policing is an integral consideration. The policing of individual matches is handled at local level, between the police, the club, club safety officers, ground commanders etc. A body of experience builds from these occasions. In discussions with the Home Office, ACPO, the DCMS and others, the IFC was unable to find any system for collecting this experience in the form of information that can be drawn on for the future, or channelled to provide central guidance. The IFC understands that some dissemination of best practice occurs through ACPO. It suggests that [the governing bodies may wish to discuss with the Home Office and ACPO means of creating a regular feedback mechanism from high-risk matches to a central point.](#)

The amount of notice of rescheduling is evidently a source of chagrin to the police. Whilst there are established systems in place for taking opinion from all parties – including the police – ahead of the season and before the fixture list is published, dissatisfaction with the process and timeliness of consultation is still felt. A clearer understanding of respective priorities could perhaps be achieved were the governing bodies to convene a forum in which they could be aired. [Introducing the television companies into the dialogue could be beneficial.](#)

The absolute costs of policing football falls outside the remit of the IFC, as do current discussions on the scope of cost-recovery. However, the Commission would draw to the attention of the governing bodies that this is an issue raised regularly with the IFC in the context of club finance (unpaid police charges); public (the tax-payer who effectively subsidises police costs in the absence of cost-recovery), and press perceptions; and supporter experience of heavily-policed matches. Because of the high-risk nature of many rescheduled matches, there is a correlation between rescheduling and high police costs. Especially if discussion of legislative change seems likely to reach the public domain in 2004, [football's interests would be served by the governing bodies collectively agreeing a strategy for managing the public relations aspects of this issue.](#)

The Commission found that administrative arrangements for match rescheduling are in place and appropriate. Its only area of concern in this respect is that there appears to be little or no contingency planning at the FA for rescheduled internationals played at home. The international calendar is fixed well in advance and fixture clashes will be an unlikely source of rescheduling. However, other reasons ranging from the weather through to civil disturbance and terrorist attacks cannot be ruled out as possible imperatives for rescheduling. While there is no

national stadium, the implications are complex. There could be no guarantee that a rescheduled match could be played at the originally-scheduled stadium; the relocated match may have to be played at a smaller stadium, with implications for ticketing and refunds, and those who bought tickets for the original match may not be able to travel to the new location. These circumstances may not seem probable, but would only have to happen once without planning in place for their management to be difficult.

Finally, returning to the IFC poll, the Commission was delighted and heartened to find [significantly positive opinion regarding the changing character of football and the way the game itself is run.](#)<sup>65</sup>

- 60% of the sample thought that the game of football is either well run or quite well run; only 3% thought it very badly run
- clubs were thought to treat supporters the best, but 50% of the sample felt the football leagues treat supporters well or very well and 49 % thought the FA does
- 61% of the sample thought that the types of people attending the game is changing, with large percentages believing that this is because grounds are now more family friendly (see fig 17)
- 54% of the sample felt positively about the changing composition of football crowds.

football's interests would be served by the governing bodies collectively agreeing a strategy for managing the public relations aspects of police costs

DAILY MIRROR, Friday, April 4, 2003



Perceived reasons for changes in the composition of football crowds

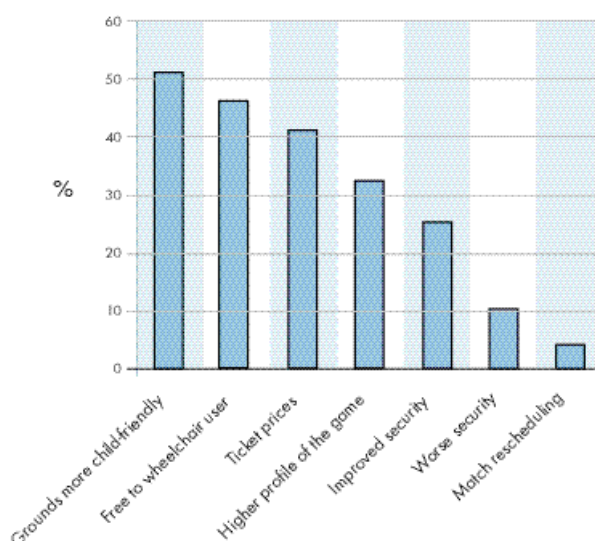


fig. 17 source: Independent Football Commission/The Future Foundation

65. This contrasts favourably with the negative perceptions of how football is run as a business (see page 22)



## Summary conclusion

The football authorities should be reassured that match rescheduling is not having a negative impact on supporters in general, despite the particular unhappiness felt by members of supporters' groups. However, there are other effects to do with policing and neighbourhood relations that merit attention. Football is beginning to succeed in creating a positive impression with supporters about the game and the environment in which the game is played, that now opens it to wider audiences.

## Recommendations

- Clubs should be required to include local residents when notifying and publicising match rescheduling.
- The football authorities should initiate discussions with stakeholders about capturing and using best practice in the management of high-risk matches, and about improving consultation processes involved in match rescheduling.
- The FA should address contingency planning for rescheduling England games.

## CHARTERS AND CHARTER REPORTING

*satisfied customers come back for more*

During 2003 the IFC gave priority to facilitating and initiating the validation of Charter Reports. It also discussed the Charter process with clubs and with the governing bodies, with particular reference to the administration and the dissemination of Charter material.

The IFC's main findings are:

- good progress has been made at all levels in recent years to focus on customer care issues, improve customer care, and make the Charter process a working and effective tool for improvements, though standards vary
- the governing bodies have encouraged and helped to disseminate good practice, and are successfully widening the experience and understanding of those responsible for customer care at their clubs
- the validation process is key to demonstrating transparency and assisting continuous improvement in both process and delivery
- charters and reports still need to be better communicated to supporters
- administration of the charters and reporting process is onerous for clubs, which may, in consequence, not always give the exercise the time and attention it merits
- the focus on customer care that is fundamental to creating a charter is vital to the long-term sustainability of football clubs

### The charter process

The FAPL and FL Annual Reports on Charters are impressive documents. The body of evidence that they individually and cumulatively present shows football listening to its paying customers, and caring about their football experience, their comfort and their safety. All Premiership clubs have an officer on their staff dedicated to customer care and charter issues. Football League clubs, with fewer resources, nonetheless identify someone who, within their job at the club, carries responsibility for these matters; a few clubs, mainly those that have been in the Premier League, retain dedicated posts. This in itself makes a statement about the game's properly valuing its supporters as customers, and identifies recent years as the turning point when football parted company with traditions that treated supporters as a herd of cash cows. *Considerable credit is due to the governing bodies for insisting on a new era. Perhaps greater credit is due to the customer services contacts who care for these changes on the ground.* The IFC recognises that their task is not always easy, that at many clubs other concerns seem more pressing: financial viability; survival; promotion; winning the next game.

The IFC would, however, underline that these priorities are inextricably linked to customer care: satisfied customers come back for more. It therefore strongly commends the support the governing bodies try to give, and hopes that it will be replicated in boardrooms at all levels.

In stressing the value of all that has been achieved, the IFC is concerned that the process of delivering the Charter exercise is onerous, and becoming administratively more demanding. It notes that the Football League Annual Report has grown from 66 pages in 2002 to 234 pages in 2003. The Premier League Annual Report has grown from 340 pages to 491. The quality of reporting is high and the content is interesting. Nonetheless, the Commission notices that within the Football League, several clubs could not complete their Report, either for lack of data or lack of time. Others apologise for not being able to give charter work the expected level of attention. The approach the Football League has adopted to charter reporting takes cognizance of the difficulties its clubs face. The Commission believes the League has taken an appropriate decision in expecting FL clubs to report on no more than three issues a year. Some clubs evidently feel this formula carries a risk that other areas in which they are achieving might be overlooked (noticeably, additional extended reporting sneaks in on occasion) but the IFC believes the League is right to insist on focus and brevity and to keep the exercise as light as possible. The Premier League, on the other hand, asks its clubs to report on all Charter issues. The average Premier League club Charter Report is over 16 pages long. A substantial proportion – on average over 7 pages – of each Report is devoted to the club's community work. This is an important area but the IFC wonders whether appreciation of it is best served within the Charter process and whether this bulk reporting perhaps detracts from key messages directly to customers. This is discussed in more detail on page 44.

Short reports are easier for clubs to produce and, as important, easier to read and assimilate. This brings the Commission to its key question on the Charter process: *who are the Charter Reports written for?* The IFC strongly emphasises that these reports should not be seen as an exercise for the IFC. While the Commission is very ready to provide external, independent assessment of the charters exercise and make suggestions that

will contribute to improvements, it should not be considered the principal audience. Nor, we believe, should the governing bodies, although they have a vital role to play in ensuring that reporting takes place and is appropriate and correct. The IFC made the point in its 2002 Annual Report and makes it again now:

*It is essential that, for the charters to have value within the football business, they reach and address supporters, and other stakeholders, and demonstrate to them each club's intention to respond to their customers' needs and to show that they are doing so.*

The Commission has repeated this point to the governing bodies during 2003 and was particularly delighted with the change of direction taken by the FA in addressing its 2003 Charter Report explicitly to the fans, and making it a lively and attractive product (see page 71). It is not clear to whom the FAPL and FL Reports are addressed. They are in less friendly form than the FA's and are a demanding read. The IFC, at time of writing (December 2003), has been able to locate the FAPL Charter Report but not the FL Report on the respective websites. The Commission doubts, however, that many supporters would be prepared to download and read these large documents. During discussion on Charter Reports with clubs, the IFC found few clubs that regarded dissemination beyond the governing body as part of the process. However, credit is due to clubs such as Middlesbrough and Ipswich which have used their matchday programmes to provide a short and lively bulletin on their Charter or Charter Report, and to inform readers where they can find the full version.

Overall, Charter awareness still seems low. The IFC appreciates the difficulties of stimulating supporter interest, and suggests that it might help clubs to *focus less on whether supporters know about the charter and more on what supporters want to know.* The matchday programme is an obvious vehicle for communication. Some clubs have said to the IFC that they use the programme to publicise the Charter at the beginning of the season. This is probably not enough. The bulletin approach mentioned above is a promising alternative. More regular advertisement of the Club Charter's existence is another. In a random survey of 20 matchday programmes produced in 2003 and including all divisions, cup ties and England games,

the IFC found only five programmes (including two international games) carrying a mention of the Charter, and only two mentioning the Charter Report (see also fig. 24 on page 77). This is a slight improvement on last year,<sup>66</sup> but hardly impressive. However, on 10 occasions in 2003, the IFC asked club officials for a copy of the Club Charter at matches it attended in an official capacity (listed in Annexe E). Enquiries were generally made in two or three locations e.g. main reception, ticket office, club shop. At only one club (in the Football League) were we able actually to obtain a Charter on the day. At a further five clubs we were offered a copy of the Charter by post; at another an offer was made to print out a copy if we were prepared to wait. On three occasions none of the staff we approached knew anything about the Club Charter. These statistics compare unfavourably with 2002 where, at 7 out of 16 matches, the IFC was able to obtain a Charter<sup>67</sup>. *At the very least, the Commission feels that the governing bodies should insist that staff on duty on matchdays are made aware of the Club Charter and those of the governing bodies, and briefed on how to obtain a copy for supporters when they are most likely to be at a football ground i.e. on match days; and also that the purpose and availability of the Charter Report should be understood and publicised.*

The IFC maintains its view, expressed in its 2002 Report, that:

*There should be a clear link between the charter and the charter report which together should represent a dynamic commitment to change .*

This means that the governing bodies should require clubs to:

- set out explicitly in their charters what they intend to do to improve customer care;
- do it;
- report back to the customers on progress.

The IFC suggests that, ideally, *the charter process should take the form of an evolving action plan, that identifies three or four priorities - no more than this - for improving service, and reports annually on progress.*

The IFC is encouraged by the initiative taken by the Football League in asking clubs to identify three commitments (or "promises") for the 2003/04 season and hopes to see progress reports next year (see page 66). It suggests that *the FAPL should examine a similar approach with its clubs, using the Charter, or a supplementary publication in user-friendly form, to identify charter-related targets and using the Charter Report as a vehicle for a summary of progress.* These Reports should then be made widely available. This approach will simplify processes, whilst retaining the basic Charter document which clubs have developed; it will provide opportunity to distribute a club's key Charter purpose in a form that is topical, easy and cost-effective to distribute, and likely to be read; it should produce reports that are of direct interest to supporters and can be made readily and attractively accessible; it should be possible for all clubs to report soon after the end of the season, enabling governing body reporting to complete in September and thus remain in touch with the season of activity which is its subject.

## Best practice

The FA Premier League established regular seminars for customer contacts at FAPL clubs in 2001. The IFC has observed that club staff value these seminars for opportunity to share experience and ideas with colleagues, and also to benefit from the advice and expertise of individuals outside the football business who are invited by the Premier League to address the group. Staff at clubs in Division 1 who have been in the Premiership also speak highly of these opportunities. The IFC recommended in 2002 that the Football League should adopt a similar practice and welcomed the Football League's introduction of customer care contact seminars in 2003, and the opportunity to join these seminars. It was disappointing that both seminars that were held attracted a low turnout, but it would seem that this had much to do with the timing of the events, which coincided with the end-of-season leave period. The IFC understands that the Football League intends to continue the seminars in 2004, but will hold them at a different time. An advantage of the low turnout was that the numbers were similar to FAPL meetings and allowed for easy discussion and networking. While costs are clearly a consideration, the Commission hopes that the Football League will give consideration to extending these meetings to three per annum

*the charter process should take the form of an evolving action plan, that identifies three or four priorities for improving service, and reports annually on progress*

66. See IFC Annual Report 2002, page 28  
67. *ibid.*

across the 72 clubs, so that higher attendance will not push numbers much above 20: this is probably the comfortable maximum for effective networking. It also hopes that clubs will release staff to attend these seminars and that support and interest will be shown at senior management and board level.

The Commission also suggests that [the Football League and the Premier League consider exchanging best practice and ideas between the two leagues from time to time](#). While it is clear that there will be different priorities and working methods between them, nonetheless there are significant examples of best practice in the League from which Premiership clubs could benefit, whilst the greater experience of Premiership clubs would be of undoubted benefit to League clubs. Moreover, the IFC believes that [there should be a standard of customer care in football applicable from the top of the Premiership to the bottom of Division 3](#).<sup>68</sup> The business of football is a strong enough common denominator to open the exchange of ideas across all divisions. In other parts of this Report, the IFC suggests similar cross-fertilisation in other areas. The Commission believes that from such sharing of best practice, clubs will gain an understanding of who is doing what well, without the discomfort of published “league tables” which can demotivate those less successful in achieving excellence.

An interesting point that emerged from the League seminars was that it is not always clear who precisely is the principal contact for customer care at any one club. The Football League undertook to rectify this. In the Football League Handbook for 2003/04, staff responsible for customer care are beginning to be identified on club pages. This Handbook receives a wide distribution, not only to all clubs but to sports bodies, sponsors and libraries. Via clubs, it may also reach supporters’ groups, and is also available on request from the FL. The IFC suggests that [the Premier League should follow the FL’s example](#). Whilst FAPL Club Charters tend, in the main, to identify their customer services contact, the IFC finds that few of them are named in the FAPL Handbook, or, in some cases, they are named under their primary designation (such as Club Secretary) which does not necessarily suggest that they are the person to contact on customer care issues. [Publicising the customer contact specifically and widely is an integral part of customer care](#).

68. In recommending this, the IFC also urges caution against proliferating standards and quality systems and assurance

Finally, a further argument for reducing the bulk of the Annual Reports on Charters is that although they are distributed to all clubs, it is a daunting task to climb inside the detail. [A summary, club version, might be valuable to encourage clubs to consult the Reports and learn from them](#).

## FA Premier League Club Charters and Reports

FAPL Club Charters are reproduced in full in the FAPL Annual Charter Report. In 2003, the Charters and Reports were produced side by side, as in the previous year, but with the added benefit of matching the structure of the Charter Report to the Charter. This helps to link them. There remain two centrally important areas, however, that are covered in the Charter Reports, but not – or only in passing – in the Charters:

- **racism**
- **disability.**

The IFC believes that this convention dates back to the Football Task Force which, in 1998, issued full reports and recommendations on these two issues, which were accepted by the football authorities. They undertook to report on implementation of these recommendations subsequently, and have done so. Progress and achievements are discussed elsewhere in this Report (see pages 32 ff and 49 ff). The IFC strongly believes that [these issues are fundamental to the concept of customer service and should be included in Charters](#) in the form of a clear commitment to action that will demonstrate a club’s intolerance of discrimination, and its determination to create safe and welcoming environments for everyone, in the name of a game that it wishes everyone to enjoy. That clubs are doing some fine work on this is not in dispute. But the match-going public deserves to be assured that its club takes a firm position on these issues and has policies to back it and objectives it is set upon achieving. [Discrimination does not belong on a separate agenda. Combating it must be a Charter commitment](#).

[there should be a standard of customer care in football applicable from the top of the Premiership to the bottom of Division 3](#)



## Charter presentation

The Commission observes that most Club Charters are unchanged or modified only marginally. With the exception of the point made above, the Commission believes this is appropriate, although it would expect Charters to be regularly reviewed with a maximum shelf-life of perhaps 3 years before reissue (to take account of the changing nature of the business and the need for an evolving action plan). In this context, it would be helpful if charters carried an issue or version date.

The FAPL report presents the Charters in uniform format. While this carries some advantages, the Commission regrets that – along with other readers – it is denied the opportunity to appreciate the individual nature of the charters, and particular successes in creating fan-friendly versions.

This Report comments on page 61 about the increasing length of charter documentation. It would like the FAPL to encourage clubs to keep it simple: make sure the Charter is to the point, and to avoid using it as vehicle for narrative description of club activities. In several charters, sections on matters such as community activity and Learning Centres in particular, can be up to two pages long. This should be discouraged. The purpose of the Charter is to make clear and concise commitments to policies and targets on which it will report progress – separately.

Given that the genesis of the Club Charters is to raise the profile of customer care, the IFC feels that clubs who open their Charters with the section on Customer Services are placing the right emphasis. Clubs like Birmingham, Bolton and Blackburn give a customer-positive opening message, identifying who the customer contact person is, how to contact them, when they are available and what the customer has a right to expect in the way of a response. West Bromwich Albion provides another example of putting its opening emphasis on caring for its supporters and its community, striking an appropriate tone that uses terms such as “customers” and “supporters” in conjunction with words such as “courtesy” and “respect”.

In summary, the Commission suggests that the governing bodies should encourage their clubs to:

- date Charters so that it is clear they are live and current
- keep the Charters simple
- use the Charters for concise statements of policy and purpose
- make commitments to specific targets that will link to the Charter Report
- put the customer first.

## Charter Reports

The purpose of the Charter Report is to demonstrate that the standard of customer care outlined in the Charter has been delivered.

The Premier League evidently demands a high standard of reporting from its clubs. The information contained in the Reports is clear and comprehensive. Two years ago, examining a Club Charter Report for ticket price information would have thrown up little more than the general news that ticket prices ranged from £x to £z, and perhaps the number or percentage of tickets sold. Almost all the 2002/03 Reports present a clear statement of ticket prices, often in table form (which works well), that shows the prices charged for different categories of seating and game. These tables are most useful when they run across two seasons, so that price variation is evident. The IFC also liked the practice at Aston Villa, for example, of giving the average gate; again this could usefully indicate variations. Clubs are also rigorous in reporting on consultation, often giving dates of meetings and in some cases, Fulham for example, details of questionnaires and surveys. Community work and measures to increase racial tolerance are thoroughly reported. Cumulatively this represents valuable information and impressive evidence of policy-implementation with a genuine focus on delivery mechanisms. The IFC commends the achievement.

**Discrimination does not belong on a separate agenda. Combating it must be a Charter commitment.**

The Commission suggests there are **two key areas where improvements could be made:**

- **identifying the purpose of activity**
- **reporting on outcomes.**

In discussing consultation with stakeholders, community work, action on discrimination etc, the Report can only be meaningful if it is clear what the club is trying, realistically, to achieve. Otherwise there is no way of placing a value on what is reported. The statement of purpose properly belongs in the Charter, as it informs policy; a summary statement at the beginning of Charter Report sections would also be appropriate. At present, an indication of objectives is rarely found in either. The Charter tends to give a statement of activity ("The club consults its supporters...") – where the question begged is "why?". The Reports tend to describe the activity ("The club held x forums and met with its supporters' group on the following dates....") – begging the question "what for?". The Commission urges that these questions are addressed. There are occasional examples of clubs doing so. Birmingham's Charter, Charlton's, Fulham's and Everton's give good introductory statements about the purpose of their community work. It is more difficult to find clubs explaining why they are consulting their stakeholders in terms of what they intend to achieve.

The IFC believes that because there is insufficient focus on the purpose of much activity, **Charter Reports remain deficient in providing information on outcomes.** Practically all Charter Reports in the areas under discussion exclusively describe process and activity. In some cases this is frustrating, even irritating. A Club will say that it conducted a survey, for example; it will tell you when, and how many people responded; it may even tell you why it was conducting the exercise. But it doesn't tell you what happened as a result.

There are some good exceptions:

- Arsenal's Report on Consultation and Information includes action that has been taken as a result of e-mail polling;
- Fulham gives the agenda items and outcomes from its fans' forums;
- Manchester United gives the focus and some results of the Playing for Success initiative in its Learning Centre;
- Tottenham Hotspur explains action it took on the findings of a public catering survey.

The IFC hopes these can form the basis of wider practice.

Finally, the Commission has a brief comment on club reporting on Customer Service. Too often this section of the Report comes over as wholly negative, because it is devoted to complaints. The Commission suggests that **FAPL clubs have a great deal that is positive to report and that, whilst addressing complaints and learning from them is important, they should be placed in the wider context of improvements to service.**

**FAPL clubs have a great deal that is positive to report; whilst addressing complaints and learning from them is important, they should be placed in the wider context of improvements to service.**



The FA, Premier League Annual Charter Reports Season 2002/03

# Football League Club Charters and Reports

## Charters

The Football League Annual Report on Charters cannot include a copy of each club's Charter. With 72 clubs to cover, the resulting document would simply be too large. This means, however, that the IFC is dependent on receiving copy Charters directly from clubs or via the League, if it is to comment on them. While it has collected a large number over the last two years, it received few in 2003. It has no further comments to make since it last reported therefore, but draws to the FL's attention points made about racism and disability on page 63. It would welcome the Football League introducing a system whereby all FL clubs are asked to forward a copy of their Charter to the IFC when amendments or reissues occur.

## Charter Reports

As in the Premier League, the purpose of the Charter Report for FL clubs must be to demonstrate that the standard of customer care outlined in their Charter has been delivered.

Taking note of the IFC's recommendation in 2002 that progress reports should be made public, the League advised its clubs that it would not be editing their reports but would present them, as submitted, in the *Football League Annual Report on Customer Charters*, which is a publicly available document. While this approach has the advantage of openness and technically, as in the FAPL, makes the Report data available to supporters and other customers, in fact the football-watching public is perhaps not very likely to seek out the FL Report, or, if it is posted on the web, download it. The IFC hopes that the Football League will encourage clubs to post their Reports on their own websites, and make them available through other means. In this respect, the FL's introduction of the "three promises" this year lends itself to wide publication of club targets and a natural framework for

reporting back in 12 months time. Whereas a supporter's attention is not necessarily going to be captured by the full Charter text, an inexpensively-produced leaflet or credit-card sized slip committing the club to its "promises" could perhaps be included with all ticket sales, with summary progress reports published prominently at the stadium subsequently.

The Football League's approach is full of customer relations potential therefore, though at this stage adjustments to the formula are inevitably needed. It will be important, for example, to achieve common understanding of the League's exact requirements each year so that returns are made on the basis of a common and agreed understanding. The obvious mechanism for this is through discussion at the Charter seminars (see page 62). Noticeably, the clubs that attended the seminars in 2003 on the whole produced better Reports than those that did not. There could also be benefit in some standardisation of terms. For example the League interestingly asked clubs to differentiate between justifiable and non-justifiable complaints, perhaps with the intention of reaching a common definition. The returns will give the League some pause for thought. Whilst it seems reasonable enough to discount team performance and the selection of the manager as complaints that the customer service team can address, it is more surprising to find some clubs discounting subjects such as website, parking, stewarding, catering facilities, abusive language, ticket allocations, ticket prices, visitors' facilities, - and customers being mistaken in thinking the club at fault. All these are matters the customer service team can do something about. The Commission noted that one club that has been in serious financial difficulties included criticism of its financial management as justifiable. Fair enough?

Overall, the IFC is impressed by the effort that FL clubs make to deliver their Charter and to report back meaningfully. Only one club of the 72 failed to make a Charter Report at all. That was a club relegated from the Football League at the end of the 2002/03 season, amidst overwhelming financial difficulties. Whilst its failure to report can be explained, it is less easily justified. Its customers have as much - if not more - right as any other club's to information about its services, especially as a relegated club is likely to want some defecting customers back one day. The Commission is aware that the Football Conference

has introduced Charters for its clubs and trusts that clubs relegated from the Football League will conform whilst in the Conference, and that the Football League will make it clear that a Charter Report is mandatory on *all* clubs. There were also four clubs – including one now in the Premier League – whose returns the IFC would regard as unacceptable. It believes the Football League should make clear what it proposes to do about clubs that seemingly cannot be bothered with this important exercise. That said, the level and quality of charter and reporting has progressed enormously since 2001 and FL clubs are collectively to be congratulated.

In 2003, the League asked clubs to report on charter development, feedback and racism.

### Charter Development

This section gave clubs opportunity to report on new initiatives and change to customer care systems. The second part of this section, which probes interaction with supporters, was not wholly successful. Clubs have widely differing numbers of supporters groups and it is not clear what is achieved by listing them, especially as in some cases clubs gave nothing more than a list, despite the League having specifically asked for an outline of the club's interaction with the groups. In reporting on Charter consultation, most clubs, as in the Premier League, slipped easily into summarising activity (e.g. "the Charter was discussed at the monthly meetings") but tantalisingly few disclosed outcomes: Millwall, Rotherham, Cheltenham, Lincoln provide some examples of exceptions. In short, mostly it is difficult to tell whether the consultation was productive, useful, successful or not.

### Feedback

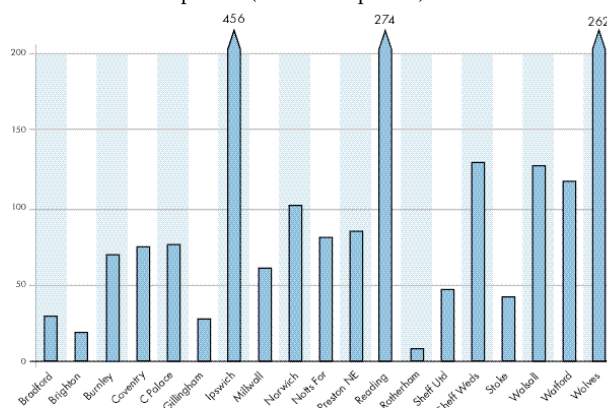
The IFC welcomed the League's extending its interest in feedback to the positive (praise) as well as negative (complaints). A few clubs, disappointingly, were unable to produce any evidence of praise; having been prodded to do so may help focus their attention on what they are achieving, as well as the failures, in future.

The feedback on complaints is interesting, with the potential to be put to extended and constructive use. However, fig. 18 illustrates some of the difficulties with the data, as well as some of the indicators. The number of complaints varies significantly from club to club. This is to be expected, but there is no way

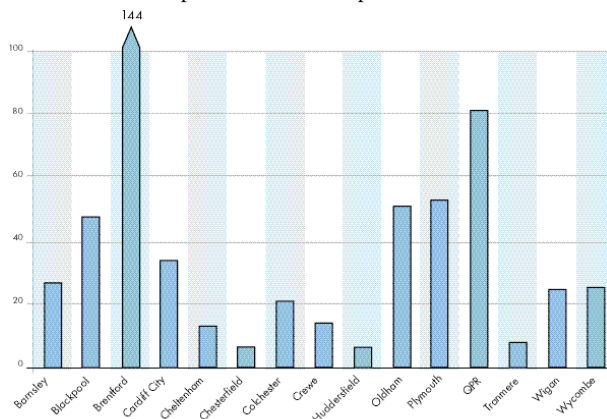
of knowing whether the variances are due to better complaint collection systems, better service, one-off failures or serious problems. There are no logical conclusions to make. However, the Football League should note that it would seem that 36% of clubs – over one-third of the Football League – could not report, either having no systems for gathering data on customer complaints or no systems for counting them by issue (see fig.19). In either case, the non-reporting clubs presumably are not informed enough to put things right.

### FL clubs: sources of complaints

#### Division 1 complaints (19 clubs reported)



#### Division 2 complaints (15 clubs reported)



#### Division 3 complaints (12 clubs reported)

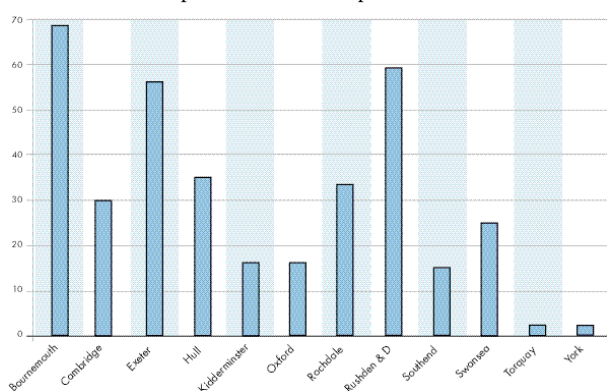


fig. 18 source: FL Annual Report on Customer Charters 2003



The IFC scrutinised complaint patterns. Without standard definitions and categories, it will not be easy for the Football League to reach soundly-based conclusions. However, the IFC analysis in fig. 20 takes not only the frequency of complaints but the spread across clubs. The two together start to give some idea of where clubs' main problems lie: ticketing, catering, stewarding, stadium facilities and merchandise being leading candidates. The Commission feels it would have been helpful to clubs for the Football League to have done some analysis of its own of the Charter Reports and indicated where it sees action points and what it, as the governing body, intends to do to help clubs put the reporting process and results to constructive use. This could be for discussion at the 2004 seminars.

#### % of FL clubs able to report on complaints

Div 1	79%
Div 2	62.5%
Div 3	50%
Overall	64%

fig. 19 source: FL Annual Report on Customer Charters 2003

#### Complaints by Category - All FL Divisions

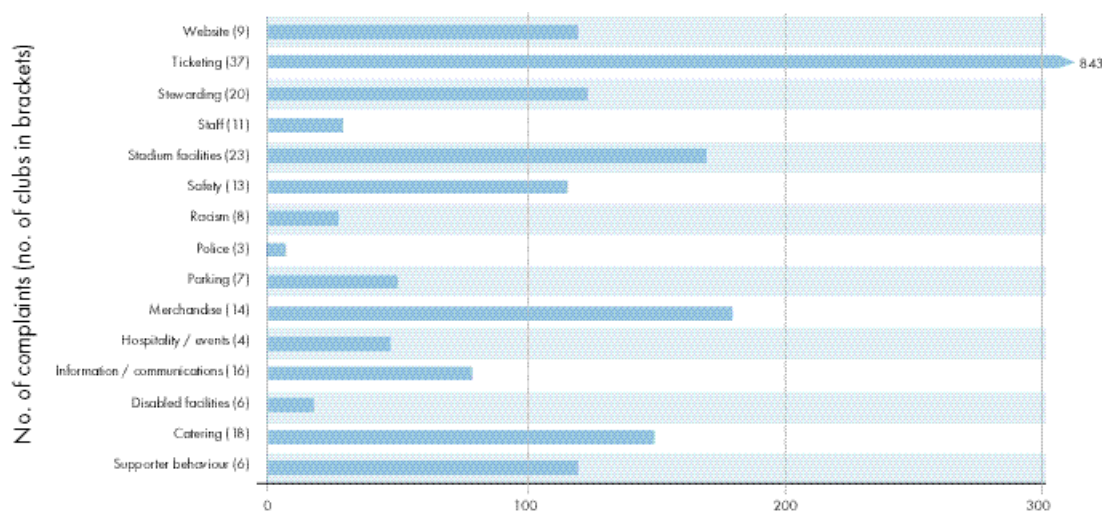
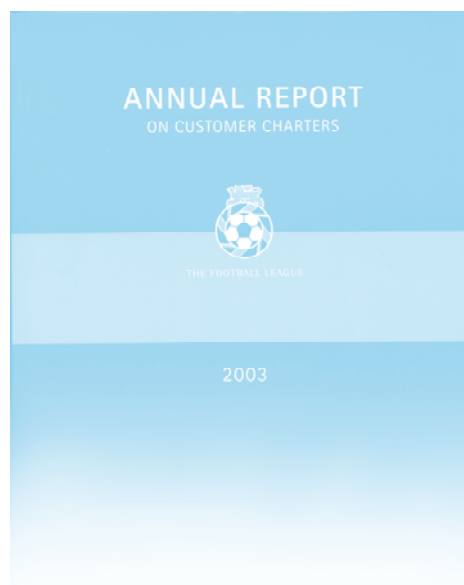


fig. 20 source: FL Annual Report on Customer Charters 2003





It would also be of interest to the public and to clubs to know how many complaints are unresolved and referred to the Football League. The Premier League Report includes a summary of complaints it receives from supporters (though without distinguishing those that are referred from clubs): this information would be improved by the categories being more clearly defined and remaining stable year on year. However, the FAPL approach may be one that the League wishes to consider and [dialogue between the Football League and the Premier League on the categorisation and definition of complaints would beneficially assist the presentation and interpretation of data for football generally](#). Nonetheless, the FL's data, raw as it is, provides some evident insights.

### Racism

Action on racism is discussed in the section on Racism in this Report, pages 32–41

### Promises

This is a bold initiative, as discussed above. The difficulty the League faces is shared with the Premier League: [promises must be measurable, realistic and timebound](#). In this first exercise, there are encouraging examples of clubs really grasping this initiative and recognising its use. Peterborough and Tranmere offer excellent examples, identifying gaps in their service and making three unequivocal statements of intent. Reading, Boston and Cambridge also provide some good examples of measurable targets. Elsewhere the promises are sometimes little more than perhaps unrealistic hopes ("to eliminate foul language"), generalities ("to do our best", "to act with integrity"), vague indicators of ideas ("increase standards of service", "encourage schools football"), or – pointlessly – a safety first approach that promises something that has already happened ("we have reduced the senior citizen age limit..."). These are almost wholly unmeasurable. The Football League will wish to provide guidance and scrutiny if the promises exercise is to be productively established. The IFC examined all the promises and extrapolated those areas that clubs most frequently cite: see fig.21.

FL club "promises"

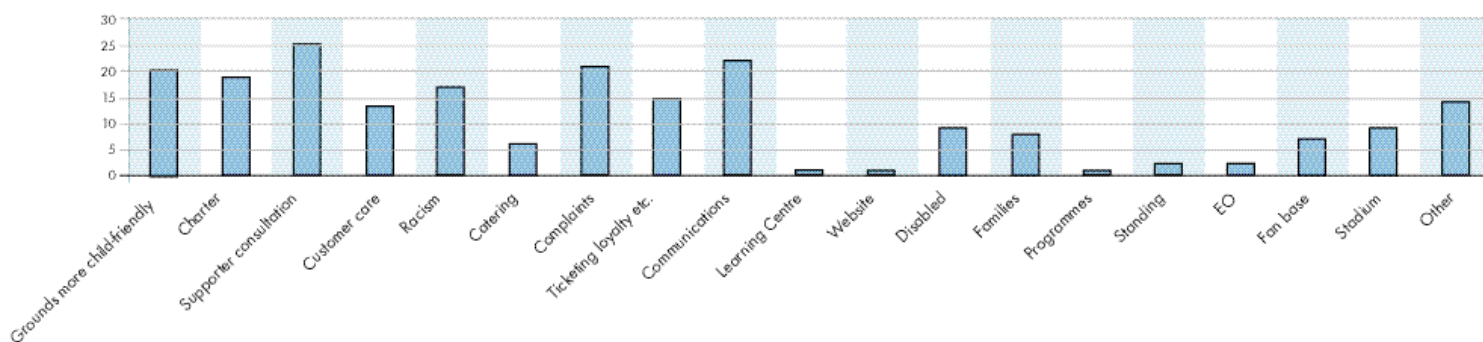


fig. 21 source: FL Annual Report on Customer Charters 2003

[promises must be measurable,  
realistic and timebound](#)

The League can thus see where clubs' attention is focused; it may be interested in comparing this information with complaints patterns. Again it would have been useful if the League had drawn some conclusions from the information it collected and included in its Report information on how, as the governing body, it intends to use it.

# The governing bodies' charters and reports

## Charters

The FAPL and FL Charters are largely unchanged. The IFC has just two areas of comment:

- availability
- content.

At the time of the IFC's 2002 Annual Report, the FA's Charter was available only on its website or in downloaded version. Early in 2003, the FA produced a fan-friendly version of its Charter. This is attractive, concise, and cleverly produced in convenient one-third A4 (A4 envelope) size. The model might be one for clubs to consider. It seems that the FA does not make its Charter available at FA-organised matches i.e. internationals and the FA Cup Final. When members of the IFC have tried to locate the FA's Charter on these occasions, they have failed. Information on how to obtain the Charter was provided at one international game, also on nicely-designed one-third A4 handouts. There seems no reason not to offer copies of the Charter on the spot. Its messages are worth communicating.

Regarding all three Charters, the IFC makes the point that it has made with regard to FAPL Club Charters (and by extension to FL Club Charters too): [policy statements on racism, disability and all forms of discrimination should be included. These are central issues on which the governing bodies should be taking a lead.](#) Many people who go to football matches are at risk of discrimination and have a right to know what the football authorities' position is on their situation. Discrimination is of concern to the rest of the football-going public as well, who are entitled to know what action the football authorities will take against those who exhibit it.

The FA and the Football League are both organisers of matches in their own right. This creates a direct line responsibility for the care of supporters. For this reason, the IFC continues to believe that, as it expressed in its previous Report, the Charters should contain specific commitments to

improvement in customer care. This extends to the Premier League too which, although it does not organise matches, must expect supporters, and other customers of the Premier League product, to be entitled to know what a governing body is trying specifically to achieve and how it will measure success. The IFC is encouraged that the FA has addressed this issue in its Charter Report (see below) but suggests that [a modification of the promotional FA Customer Charter flyers distributed at England games, to include the FA's key current "promises", might be introduced](#), with a view to reaching an infinitely larger audience than the Charter Report will. Similar versions of the FAPL and FL Charters should be available at FAPL and FL matches.

Finally, the Football League has modified the Customer Services section of its Charter to explain the complaints process, including the IFC's role. The Commission believes this is helpful and hopes the Premier League and the FA will follow suit.

## Charter reports

The Football League and FA Premier League Reports are reproduced at the front of their respective Annual Reports. The IFC is unaware of their existence in any other form except in web versions. The FA Charter exists as a stand-alone document, published separately and in different format from its Report. The IFC's recommendation that there should be a clear link between club Charters and Reports applies to the governing bodies too. The first must be a statement of policy and intent; the second should report on achievement.

The Premier League Report links least clearly. Unlike the FAPL Club Reports, it does not follow the format of its own Charter although the sections it covers are clearly headed and the Report is preceded by the Premier League's four priorities for the year - which rightly belong with the Charter. The Report does not follow these either, however. Though the Report contains extensive reporting on community work and racism, these are essentially a narrative and statistical account. Comments on page 65 of this Report on results and outcomes apply. The Premier League concludes its Report by flagging its forward priorities. This is a welcome innovation. The IFC suggests that, [expressed as results-based objectives, they would be better communicated as part of the Charter](#), either within it or separately, and linked to next year's Report.

The Football League Report provides three introductory pages on its role; the rest of the Report addresses customer service. The League links this latter part to its charter by reproducing headline aims from the Charter or elsewhere. This works well and, with some sharpening, the headings could translate readily into a summary Charter. *The IFC would like to see the League leading by example and issuing its own three promises.* As at club level, the League's report on customer service focuses on complaints. While this section is clear, the IFC suggests that *the League might usefully practise the recommendation it makes to its clubs, and highlight successes as well as perceptions of failure.* This part of the Report, in common with others, needs to focus on outcomes, not just process. This is more successfully achieved in the overview which introduces the Report. It provides an excellent summary of what the League has done to address major issues and seek resolution, providing a real idea of what the Football League is trying to do to govern the game. The League is clearer than the Premier League in this respect. *The IFC welcomes the League's report on its implementation of the IFC's recommendations and suggests this should be introduced by the other governing bodies.*

The FA has taken a radical new approach to its Customer Charter Report and produced an innovative and creative document which the IFC highly commends. The features that recommend it might form a useful general template, to meet the needs of charter reporting (see fig. 22).



## Charter Reports need to: The FA Charter Report :

encourage stakeholders to read the Report and take delivery of achievements	introduces colour pictures, and a bright, appealing cover. Colour is used throughout to highlight charts and key messages. The layout is well-spaced. The text is easy to follow, and short.
link to Charter issues and communicate results	uses design to pick up Charter features (e.g. on the front and back covers). The section headings generally replicate those in the Charter, which is reproduced at the end of the Report. Reporting picks up key issues, such as the subject of IFC criticisms, and explains succinctly what has been done to address them.
relate the Charter process to supporters' needs and experience	cleverly incorporates anecdotes in the form of mini case studies. It uses direct quotes from supporters and sources them. It gives prominence to matters that are supporters' main interests, e.g. FA competition venues, attendance and pricing; <i>englandfans</i> membership prices (through to 2004); the dates and mechanisms of supporter consultation.
provide an honest appraisal, successes and failures	takes on board the IFC's criticism of previous reporting for presenting unremitting good news, which was not only unconvincing but contributed to external, negative perceptions of FA "propaganda". This report is frank about major failings: the trouble at the Stadium of Light when England played Turkey; the administration of <i>englandfans</i> ; the early release of the new England home shirt and the OFT investigation. Successes are reported modestly but sufficiently to convey progress and improvement.
communicate with customers	is addressed to supporters. It uses personal pronouns ("we" and "you"). It tells supporters where feedback has communicated specific dissatisfaction, and what the FA is doing about it.
report outcomes and results, not just process and activity	moves clearly in this direction, although more is needed on the consequences of surveys and consultation generally.
include relevant customer information	devotes a page to straightforward facts on how to contact the FA; who to address; and football's complaints procedures.
report on aims and objectives	is frank about the difficulties of setting measurable targets but nonetheless introduces <i>Key Aims 2003-2004</i> in most sections, many of which are properly expressed in terms of results. While the IFC would like this to translate into a Charter supplement (see above), it commends this feature.
fit the purpose	strikes a good balance between professional presentation and valuing the intended readership, and cost-effective production. The IFC criticises the FA elsewhere in this report for overdoing packaging and presentation. Its Charter Report gets the balance right.

fig. 22

## Validation of Charter Reporting

In its 2002 Annual Report, the IFC proposed that

*The Charters exercise would be improved if an element of external validation were to be introduced.*<sup>69</sup>

The IFC believed that validation would further the credibility of the charter process, and introduce external help in improving methodologies and outputs. The IFC also put to the governing bodies that it would like to see the introduction of a standard for customer service in football.

The governing bodies asked the IFC to take this exercise forward. The Commission undertook to identify a suitable company for the task, and chose one from three it approached to conduct a pilot exercise. The pilot covered the Charter Reports for 2003 of each of the governing bodies. Additionally, the Premier League and the Football League asked a club from each division to volunteer for the pilot: Blackburn Rovers, Ipswich Town, AFC Bournemouth and Southend United generously took part.

The Charter Reports were assessed by the same company against identical criteria and using identical methodology. All the club representatives, and the governing bodies, were present at the pre-meeting to identify and agree the scope of the project, where the discussion was lively and uninhibited. It is hoped that a follow-up meeting will engage the same gathering. The Commission believes *it would be useful if the governing bodies were to distribute all four validation reports on clubs to each of them, and for this to contribute to the dissemination of best practice and ideas, without the constraints of divisional barriers.*

The assessment took place in two stages: a document review, followed by an on-site assessment. The latter took place over one day at each organisation; the assessors were accompanied by the relevant contact person in each case and other personnel were involved where the assessment covered their responsibilities.

The assessors reported that they were welcomed at all organisations and that the assessment process was completed with enthusiastic involvement, particularly by the clubs. In general, charter statements and reports were validated as suitable and correct, where they were measurable. A key problem, discussed above, is that many Charter aims and objectives are not expressed in ways that can be verified. Several areas for improvement were found in specific issues covered by the charters, and additionally some structural and general improvements to the customer service programme were identified, that will improve services to customers and offer business benefit to the organisations.

The main points from the pilot project are:

- Everyone had, in general, a clear idea of the **purpose of charters** and favourable perceptions of its benefit as a framework for clarifying policy, promoting customer service, communicating a known standard.
- Resources for additional or strengthened **customer service** are a real difficulty for some clubs, although they can be justified in terms of business benefit.
- Measures of **customer service performance** need to be comparable over time and between organisations. A significant benefit could be achieved by developing qualified performance measures that would reveal good practice and trends in customer issues. These would have to be consistent, objective and transparent.
- **“Measurable” objectives** ranged from clear targets through to aspirations. Clearer structuring of charters would help identify separate components (policy, aspiration, operational objective) so that progress can be measured and improvements achieved. Clubs in particular are sceptical about the value of unqualified performance measures such as simple numbers of complaints, especially when used to draw comparisons (see page 67). The FL’s three promises approach was commended, with the comment that the promises will need to be backed by action plans, however.

<sup>69</sup>. Page 32

- **Communicating the Charter** to customers is an on-going problem. There are some good ideas e.g. reporting on a specific issue (or one of the current promises) in the matchday programme from time to time. This approach could be developed. For example, the complaints procedure can be promoted by reporting on how it worked in a specific case. This approach can also be used to promote policies on racism and disability.
- Most organisations did not provide the **Charter Report** to customers.
- **Information for the Charter Report** is best collated during (rather than at the end of) the year. Not only does this spread the load but information can be used in real-time to provide feedback to management. Processes can be set up to produce information without extra administrative cost.
- In some cases but not all, the Charter Report and Charter aims and standards are communicated to **all employees**. It is essential that this happens; Staff Handbooks could be used, for example. There should also be regular progress reports.
- There is a wide range of **complaints procedures**. The Premier League has a highly developed and sophisticated system which was found to be excellent, though not necessarily appropriate at all clubs; elsewhere there are sometimes only limited procedures. In all cases the assessors found flaws in capturing complaints data. It was generally difficult to verify if response times for complaints were met, because procedures did not provide for it. More thought needs to be given to what complaints processes are to achieve.
- There was evidence that **EO and racism policies** are implemented in various ways, sometimes limited. In best practice cases, implementation was augmented by employee awareness training and briefing (to club and matchday staff).
- **Consultation with supporters** is an important part of market intelligence. The communication of action taken as a consequence of consultation can be deficient. Evidence of consultation was checked (via minutes of meetings, for example).
- The ability efficiently to provide **information to customers** on merchandise, ticketing etc was examined. Websites were a good source of information though discrepancies were

found between website and club site information (e.g. swing tickets on replica kits were seldom found in website shops). The enquiry service provided by the FA was commended.

- **Ticketing information** was generally found to be available and accessible. Good practice was represented by one club that publishes a brochure containing relevant information, and mails it to all members and STHs, with copies also available at the club shop and ticket office. The assessors were able to verify four principal ticketing policies<sup>70</sup>. That concession, membership and loyalty schemes operate and are clearly communicated was verified – including *englandfans* – and away supporter accommodation<sup>71</sup>.
- Reporting on **community work** is thorough and conveys its potential to mobilise and motivate through football. Reports are difficult to verify because they include sponsor activity. Evidence to substantiate reports was not found.
- Disabled facilities were checked, and facilities at customer service points, such as Reception. It would be an improvement if clubs were to focus on **the process of attending a match**, not just the facilities
- **Outcomes** are generally absent from Charter reporting.
- The FAPL and FL do not have systems for validating the **information provided by clubs**.

The IFC strongly recommends the extension of this exercise, and using it to develop a standard for customer service in football. The IFC's core budget does not allow it to lead the next stage itself, though it is willing to do so if funding is provided by the governing bodies.

70. Communicating ticketing policies and changes to them; season ticket payment by instalment; percentage of tickets allocated to non-STHs; policies on allocating cup and away match tickets

71. Comparable accommodation including toilet and catering facilities; that prices charged were not higher than to home supporters; the availability of concessions



## Summary conclusion

Considerable advances were made in improving the charters exercise in 2003. The three-way dialogue between governing bodies, clubs and customers still needs to be strengthened, but initiatives like the FA's new Charter Report and greater transparency generally will help develop positive relations with football's paying customers. The main areas for attention are: setting measurable objectives; reporting on outcomes; lightening administrative processes.

## Recommendations

- The pilot exercise on validating Charter Reports should be extended and incorporated into the football authorities' own processes. Validation should be used to move towards a standard for customer services in football: the FAPL to introduce this by 2005; the FL to start in 2006.
- Charters must be used to make clear commitments to customers on a rolling basis, expressed in timebound and measurable terms. They should include policies on combating discrimination. Methods of conveying these commitments directly to supporters and other customers should be explored and introduced from the beginning of the 2004/05 season.
- Charter Reports should be simplified and positive action taken to disseminate findings. The FA's Charter Report provides some useful ideas.
- The FAPL and FL must make their own role in the Charter process clear to clubs and define who the Reports should be addressing; why the governing bodies gather information from them; to what use it is put; and what benefit accrues to clubs.
- A summary of key points from Charter Reports should be produced for club use.



## ISSUES AND COMPLAINTS

The IFC offers opportunity for the football community formally to raise issues with the Commission via its website and through e-mail at [contact@theifc.co.uk](mailto:contact@theifc.co.uk). Additionally, on visits around the country, the Commission takes delivery of a very large number of issues that are raised with members informally. The IFC is a listening body and is constantly extending its knowledge and understanding of issues that concern not only supporters but the wider public. It is also glad, where appropriate, to follow up issues that are brought to its attention, usually by discussing them with the football authorities, or routing the issue to an individual or organisation that can help.

The IFC is the last point of appeal in football's formal complaints procedures. If a complainant does not feel satisfied with attempts made to resolve a complaint at club or governing body level, then ultimately it can be referred to the IFC for adjudication. The IFC's role is explained in its brochure *I'm Still Not Satisfied*, which is available at football clubs and from the IFC direct. *I'm Still Not Satisfied* is reproduced in Annexe H on page 94, and is available in standard or large print. The IFC would expect very few complaints *not* to be satisfactorily settled at the early stages of the complaints hierarchy and is glad to report, therefore, that since its establishment, only 12 complaints have come to it for adjudication.

Fig.23 indicates the subjects of issues and complaints with which the IFC has been involved in 2003. It should be noted that the Commission logs only those issues that are formally communicated through the website or by letter, fax or e-mail. Included in the issues is one that is still outstanding from 2002. Complaints reflect those that reached resolution in 2003 or are on-going. A summary of issues and complaints can be found in Annexes F and G, respectively.

Issues and complaints 2003

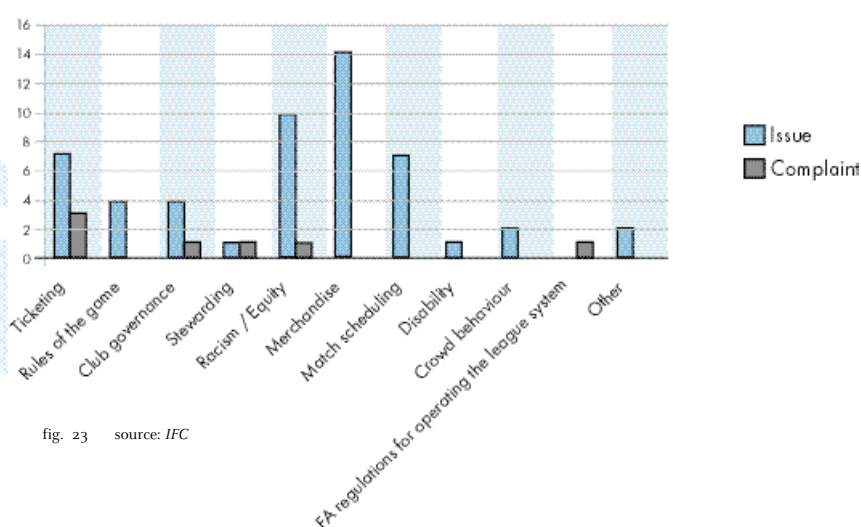


fig. 23 source: IFC

The Commission would like clubs to be more scrupulous in drawing their complaints procedures to the notice of the public.

The surge in the number of issues concerning merchandise is a reflection of angry reaction to the FA's early launch of the new England kit in April 2003 (see also page 84). The IFC has conveyed to the FA its concern that the launch of the new England kit was handled badly and has requested further clarification on current policy, which the Commission will examine to assess the fairness of the policy for the FA's customers.

Mostly, the football authorities now respond quickly to issues raised by the IFC and most issues have reached a resolution. Only three issues are on-going: two received in November or December 2003; one issue carried forward from 2002. The FA has assured the Commission that this latter issue will be resolved at its AGM in 2004; the IFC will retain a watching brief.

In general the IFC is pleased that complaints processes have been simplified during the course of the year (see page 80). However, the Commission would like clubs to be more scrupulous in drawing their complaints procedures to the notice of the public. Football supporters have traditionally been viewed as tolerant when it comes to the quality of service they can expect. With a welcome greater emphasis on customer care at clubs must come the acceptance found in other businesses that customers have a right to complain if standards of service fall below a reasonable standard, and have the right to be able to do so straightforwardly. As fig.24 illustrates, the IFC finds few matchday programmes contain advice about complaints procedures, and finds little information at obvious "customer" points at football grounds. A survey of 20 matchday programmes from 2003 conducted by the IFC revealed that only three contained reference to complaints or complaints procedures. As long as this is the case, clubs' comfort that they receive relatively few complaints is on shaky ground.

The IFC made this point strongly in 2002 and though it recognises some general improvements in 2003, it repeats it here:

*Reflecting its expressed commitment to continue to improve customer service, football needs to give unambiguous*

*information to its paying customers that reassures them that they have the right to complain, to expect redress where appropriate, and to have their complaint handled efficiently and courteously. This is not to suggest that complaints should be encouraged but the present confusing and unwieldy process acts as a deterrent that could obscure the governing bodies' picture of their customers' concerns, and also give a negative message about customer relations.<sup>72</sup>*

The FA and the FAPL have established sophisticated procedures for handling complaints, issues and enquiries. The FAPL initiated external examination of its systems in 2003. All three governing bodies have a record of responding promptly to contact that is made with them, and meeting the target response times that they set. Some questions arise about capturing complaints data (see page 73), but generally the level of service is good. The IFC notes, however, that although the FA produced a smart and attractive set of customer information cards in 2003, none covered complaints processes, and the Commission wonders which of the cards would be sent out if someone simply asked how to lodge a formal complaint. An extra paragraph on the Customer Relations Unit card might be a good idea!

### Survey of matchday programmes 2003

Match	Month	Charter mention	Charter Report mention	Ref. to complaints/ comments	Ref. to complaints procedures
FL Div 1	Jan	YES	NO	NO	NO
FA Cup 5R	Feb	NO	NO	NO	NO
FL Div 3	March	NO	NO	NO	NO
FL Div 1	March	NO	NO	NO	NO
FL Div 3	March	NO	NO	NO	NO
FL Div 1	April	YES	NO	NO	NO
FL Div 2	April	NO	NO	NO	NO
FAPL	April	NO	NO	NO	NO
FAPL	April	NO	NO	NO	NO
FL Div 3	April	NO	NO	NO	NO
FL Div 3	May	NO	NO	NO	NO
FL Div 3	May	NO	NO	NO	NO
International	June	YES	YES	YES	YES
FAPL	August	NO	NO	NO	NO
FL Div 2	August	NO	NO	YES	YES
International	Sept	YES	NO	NO	NO
FAPL	Oct	YES	YES	YES	NO
FAPL	Oct	NO	NO	NO	NO
FAPL	Nov	NO	NO	NO	NO
FAPL	Nov	NO	NO	NO	NO

72. IFC Annual Report 2002, p. 23

fig. 24 source: matchday programmes

# Annexes



## IFC TERMS OF REFERENCE

1. To review and report on the promotion by the FA, The FA Premier League and The Football League ("the governing bodies") of best practice in commercial and financial matters within professional football, particularly with regard to customer service. In particular to review and report on:-

- the establishment of a Code of Best Practice, customer charters and customer relations unit by each of the governing bodies, and by individual clubs
- the governing bodies' establishment of a complaints resolution hierarchy based on the Code of Best Practice, with the Independent Football Commission as the final step in that hierarchy; and
- the establishment of a Financial Advisory Unit by the Football Association which will review and monitor aspects of clubs' financial performances and promotes best practice.

In this, the IFC is to have particular regard to:-

- Ticket prices
- Accessibility to matches
- Merchandise; and
- Supporter and other stakeholder involvement.

2. To review the rules and regulations of the governing bodies relating to financial and business matters within their competitions, and the Code of Best Practice, and to recommend changes where appropriate.

3. To review and report on the adoption and/or promotion (as appropriate) by the governing bodies of the customer service related recommendations in the Football Task Force Reports 1-3.

4. To publish their findings by way of an annual public report.

## IMPLEMENTATION OF 2002 RECOMMENDATIONS

### COMPLAINTS

Recommendation Number	Recommendation (principal recommendations are shown in bold)	Accepted	Notes on implementation
1.	<b>The governing bodies should oversee the simplifying of complaints procedures</b>	YES	The FA is now out of the club complaints loop. The IFC issued a new version of <i>I'm Still Not Satisfied</i> for the start of the 2003/04 season. Revised procedures have been posted on the IFC website.
2.	<b>Appropriate target timescales for dealing satisfactorily with customer complaints, at all levels, should be publicised and performance reviewed by the IFC in 2003</b>	YES	Response times for complaints are clear in the case of the governing bodies, though how they are publicised is less clear. The 2003 FAPL Charter gives a target of 14 days for "customer contacts". FAPL commissioned external validation of performance in 2003; results are reported in its Charter Report and show 91% achievement. The distribution of the Charter Report and these findings is not known. The FL Charter Report is clear on timescales (28 days and progress report) but distribution of the Charter and Report beyond FL clubs is not known. The FA Charter is also clear on target response times. Club Charters give target response times either for any communication and/or complaints. Target response times vary. Charters, as far as we know, are not successfully disseminated and Charter Reports not at all, so publicity is probably weak. Surveys of random match programmes suggest complaints processes continue to be seldom flagged up (see page 77).
3.	<b>When time limits for dealing with complaints are exceeded, the complaint should normally move immediately to the next stage in the hierarchy</b>	YES	The governing bodies accepted this recommendation with some reservations. It was agreed that after 28 days, subject to particular circumstances agreed with the IFC, the complainant will be advised that he/she has the option of referring to the IFC. The particular circumstance has not yet arisen.
4.	The governing bodies should require clubs to publish in their charters, on websites and from time to time in matchday programmes, details of their complaints process	YES	The IFC is told this happens and has direct evidence of this message going to clubs from the FL. Club implementation is not clear regarding websites and programmes. FAPL clubs include complaints processes in their charters. The IFC does not have copies of all the latest FL charters. An IFC sample check of 20 matchday programmes suggested that charters and complaints processes are infrequently advertised (see pages 61- 2 and 77).
5.	On a complaint being referred to the IFC, all documentation relating to it should be promptly released to the IFC	YES (FL); IN PRINCIPLE (FAPL and FA)	Not tested.

## CHARTERS

Recommendation Number	Recommendation (principal recommendations are shown in bold)	Accepted	Notes on implementation
6.	<b>New and innovative initiatives should be introduced for familiarising supporters with the purpose and consequence of charters, success to be evaluated through independent surveys in 2003</b>	YES (FL and FA); NO (FAPL)	The governing bodies demurred on this one, finally asking the IFC to come up with ideas as they had none. Suggestions formed part of an IFC presentation to two seminars for club charter contacts held by the Football League, where clubs discussed best practice. Copies of the IFC presentation were sent to the Premier League. There has been no follow up. The IFC found little evidence of efforts to publicise charters better through matchday programmes (see page 61). It is noted that the FAPL makes a clear commitment in its 2003 Charter Report to monitor the extent to which Charters are promoted and publicised, in 2004
7.	<b>Charters should include clear, measurable improvement targets for each year, and progress reports should be made public</b>	PARTLY	This was not accepted by the Premier League which argued that it was not cost effective for clubs to reproduce their charters annually. They did not accept the idea of separate pledge cards or statements in matchday programmes. The Football League took this recommendation seriously, however, and required all clubs this year to make three "promises" in their Charter Report and to make these promises known to fans. The FL Charter Report contains the promises from each club, signed off by someone of suitable authority in the club. Clubs are required to report on delivery of their promises next season. This is welcome - even if some of the promises are a bit general: opportunity rests with the FL next year to home in on "measurable". The FA includes specific aims in its 2003 FA Charter Report (dissemination not known).
8.	<b>There should be external and independent validation of specific charter issues, a first validation exercise to be complete before the start of the 2003/04 season. The IFC will monitor progress</b>	YES	A validation exercise went ahead in 2003, led and funded by the IFC, against the 2003 Charter Reports. It included all three governing bodies and a club from each division. All were fully co-operative. It completed on October 30 2003. Informal feedback was positive.
9.	The FL should follow the example of the FAPL in building an active network of customer relations contacts that meet regularly and are guided by the FL in disseminating best practice. This to start in the first quarter of 2003	YES	Two seminars took place; one for northern, one for southern clubs. The IFC attended both. The FL led them well. Poor attendance was a disappointment. It was suggested that the timing was wrong (May). Feedback from those who did attend was positive.

## IMPLEMENTATION OF 2002 RECOMMENDATIONS

### TICKETING

Recommendation Number	Recommendation (principal recommendations are shown in bold)	Accepted	Notes on implementation
10.	FA Premier League rules J 7.1 and 9 and Football League rules 31.2.1, 31.2.5 and 31.2.6 should be tightened; in particular "comparable accommodation" should be redefined so that it can be readily monitored. Penalties should be imposed for infringement of these rules	NO	No changes were made. The FL and FAPL felt change was too difficult because of complexities at club level. The FL has reported on a small number of clubs in breach of the existing rules in 2002/03 and that relevant club ticketing policies have been altered.
11.	Seat prices, including concessions, should be displayed at all points of sale and within football grounds. Concession schemes should be simplified, presented consistently at club level, and it should be clear which are applied equally to home and away supporters	NO	The governing bodies did not accept the recommendation, arguing that part 2 ran contrary to FTF recommendations and, in the case of the FL, part 1 was not practical.
12.	The Football League and the Football Association should review, co-ordinate and consistently apply their refund policies for matches they host	YES	The Football League made contact with the FA in the early part of the year to compare notes on possible changes to e.g. banding at the Millennium Stadium; the FA has reported that it has reviewed funding policies with the FL. The FA and FL contend that when they make refunds in special cases, this is outside the refund policy and is a question of responding to particular and individual situations and cases.
13.	The football authorities should commission independent research into complaints about away ticketing and agree strategies with clubs for acting on the findings. This work to be featured in the FL and FAPL Annual Reports on Charters in 2003	NO	Both the FL and FAPL declared this unnecessary because there are few complaints about away ticketing. The IFC does not know what research the governing bodies conduct but the FL reports that it scrutinises Ground Registration Forms each season to check pricing policy and that it contacts clubs in the case of anomalies between home and away prices.

## FAU

Recommendation Number	Recommendation (principal recommendations are shown in bold)	Accepted	Notes on implementation
14.	Explicit aims should be set out for the FAU's work, against which progress could be judged (recognising the limitation that clubs may go backwards in this regard as well as forward, especially if their circumstances change)	YES IN PRINCIPLE	The FA accepted this recommendation. Implementation is expected to go forward through the newly-constituted FAC. See also recommendation 15, below
15.	The FAU should produce an Annual Report and there should be a clear reporting line from the FAU to a properly constituted Advisory and Compliance Committee, or similar body	YES	In 2003, the FA appointed a Chair (Kate Barker from the IFC) to the Advisory and Compliance Committee, rechristened the Financial Advisory Committee. It met for the first time in September 2003. The IFC Chairman attended its meeting in November. The IFC is told that the FAU has produced an Annual Report for the FAC and that the FAC will report on it to the IFC. The FAC's Terms of Reference are in the 2003/04 FA Handbook.
16.	Consideration should be given to classifying the clubs according to financial strength and visiting the weaker ones more frequently	PARTLY	The FAU says it does this, on the basis of financial information submitted by clubs. The FAU has agreed with leagues that clubs will be subject to at least one review in a 3 to 5 year cycle. Going further may be a resource issue for the FAU.
17.	A time limit should be suggested for clubs to respond to FAU reports, with peer pressure from the rest of the relevant league used to encourage meeting this time limit	N/A	The FA advises that current practice covers this. Clubs are asked to respond in 14 days. If a satisfactory response is not received in 28 days then action is escalated to the relevant league. It may be that this will be examined by the FAC
18.	There should be a review of how clubs could provide more regular and timely information to the FAU, and through it to the relevant league, recognising the issues of confidentiality and of ensuring this is not too great an administrative burden	YES	The FAU's aim is for clubs to forward to their league up to date management accounts and a financial forecast for the coming season. This has been piloted in the Southern League, and is practised in the FL, Conference and Northern Premier League. It is not clear if the FAU aim extends to FAPL. Full implementation will require rule changes
19.	In new or revised guidance booklets, sections applicable to clubs at different levels of financial sophistication might usefully be introduced	YES IN PRINCIPLE	The FAU has noted the recommendation and indicated that it will be considered when new or revised guidance is in preparation.



## IMPLEMENTATION OF 2002 RECOMMENDATIONS

### MERCHANDISING

Recommendation Number	Recommendation (principal recommendations are shown in bold)	Accepted	Notes on implementation
20.	Clubs should be required to include the expiry date on swing tickets, where this does not already happen, and that this information should also be displayed at sales points, including franchised outlets	NO	The governing bodies did not accept the recommendation, arguing that kit cycles were dependent on factors outside the clubs' control, such as changes of sponsor, - this despite FAPL rule J10.2. The FA set a poor example during the year by issuing the new England strip ahead of the published expiry date. It has declared its intention to drop specific expiry dates and simply indicate the year when the kit will expire, to give the FA flexibility. The FL reports that FL clubs now indicate when a particular item will be changed. Random testing proves this not to be uniformly the case. The FL reports it has received no complaints on merchandising. Many FAPL clubs do not include expiry dates, according to Charter Reports and sample testing. Launch and/or season dates are generally given. Whilst merchandising is not a big issue with supporters, it should be noted that the IFC received a number of complaints about the new England kit launch (see page 77); and that complaints about merchandise feature prominently in FL club reports on complaints (see page 68).

### FOOTBALL IN THE COMMUNITY

21.	The introduction of formal evaluation should be explored	YES	This was already in planning by FFE&VTS and the Football Foundation. The IFC has been in touch with those conducting evaluations.
22.	The FA commitment to take a lead in positive action against racism should be publicly stated in its Charter, with specific targets at domestic and European levels	NO	The FA has argued that racism is not a Charter issue. It reports on racism separately as a response to FTF recommendations; it is not clear how widely this is disseminated. The FA has produced and promoted its <i>Ethics and Sports Equity Strategy</i> which makes commitments to setting targets to combat racial and other discrimination. The strategy has not been published; the IFC understands that publication incorporating a progress report and forward planning is intended in early 2004. The FA's 2001/02 Charter (which excludes racism) remains the current version. The IFC has expressed its disappointment at this exclusion to the FA, especially as the published version of the Charter released in 2003 is attractive and supporter-friendly and would provide an appropriate vehicle for clear commitments in this very important area. The FA does not agree.

## SUMMARY SCOPE OF IFC WORK IN 2003

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The IFC informs the governing bodies of the work it intends to pursue during the year, in the form of scoping documents. Those produced in 2003 are summarised below.

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### The crisis in club finances

The Commission will make case studies on up to six clubs, and seek to identify common factors and patterns of emerging difficulties, and identify particular areas where regulatory change may contribute to future prevention.

The following issues and questions will be addressed:

- the role of the collapse of ITV Digital; was it a symptom or cause of the difficulties?
- the impact of relegation, particularly from the Premier League
- the issue of players' salaries and the ratio between costs and income
- the experience of clubs in administration
- the appropriateness and effectiveness of rules
- the role of supporters' groups and Supporters Trusts
- the consequences of high risk transfer and salary initiatives
- the role and disposition of club assets especially the ground.

The work will *exclude*: financial details of transfer of ownership and clubs which agreed voluntary agreements with creditors without going into administration.

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### Governance

The report will focus on the governance of football clubs, that is to say the system by which the clubs, as companies, are directed and controlled.

The IFC will seek to satisfy itself on some or all of the following issues:

- that football clubs are following generally accepted good practice for the governance of companies
- whether the football authorities should introduce certain minimum standards for directors of clubs participating in their competitions
- whether, whilst seeking to preserve and enhance the shareholders' investment, directors of football clubs are properly addressing other relationships key to their success
- whether shareholders of football clubs enjoy the same rights and voice as shareholders of other similarly sized companies
- that directors act in good faith in the interests of the football club and at all times comply with their obligations under the Companies Act
- that a club's principal assets, particularly its ground, are safeguarded
- whether the interests of all stakeholders are properly protected when changes of ownership take place
- whether the rules of the football authorities are adequate to prevent abuse by unscrupulous investors in football clubs.

The work will *exclude*: football club finances; distribution of TV monies; the FAU; the FA's Compliance Unit (if covered by work on the FAU).

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### The work of the Financial Advisory Unit

Having focused on the work of the FAU in 2002, the IFC plans in 2003 to:

- follow up on the recommendations of the IFC's 2002 Annual Report
- consider the financial regulations for clubs and look at how compliance issues are tackled.

## SUMMARY SCOPE OF IFC WORK IN 2003

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The IFC will therefore look at the following with regard to the FAU:

- the FAU's progress in continuing to work through the first 5 year cycle of visits to all clubs
- whether there is a clear reporting line for the FAU, with clarity about its objectives and performance
- the response to other recommendations from the IFC's report.

In addition, the work on finance will be extended to consider:

- to what extent financial regulation for football clubs does, and should, differ from that applicable to any other business
- the role and efficacy of the FA's Compliance Unit with regard to financial matters
- how the introduction of UEFA licensing will affect the clubs to which it applies.

The work will *exclude*: governance issues and clubs in financial difficulties (though there may be some overlap); merchandising; ticket prices; distribution of football revenues between leagues.

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### Community work

The work the IFC will do in 2003 will build on preliminary findings from 2002. The principal focus will be on:

- aims and achievements
- the relationship between football's community work and local/national schemes
- evaluation, impact, reporting.

In particular, the following issues will be explored:

- the football authorities' involvement in and commitment to community programmes
- how objectives are set and how their achievement is monitored and reported

- best practice and the use made of it
- the value added to communities and local and government agendas by FITC activity
- funding: sources, distribution, use
- resourcing: staffing, premises etc.
- the perception of target beneficiaries and partners of the value of football's contribution to the community.

The work will *exclude*: analysis of particular community issues such as youth offending and racism (though there may be some interaction with parallel work on racism); valuations or comparative valuations; national surveying.

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### Neighbourhoods

The IFC will examine football clubs' relations with residents living close to stadia and how best practice can be replicated.

The following issues will be addressed:

- the resolution of neighbourhood issues
- interaction with stakeholders: local Councils, residents' groups, police, lobby and advice groups such as the FSC
- common problems that have a negative effect on neighbourhood relations
- the priority given to neighbourhood issues
- communications
- the role of the football authorities in monitoring and disseminating good practice.

The work will *exclude*: case studies; national surveying; the legislative context of stadia development.

## SUMMARY SCOPE OF IFC WORK IN 2003

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### Facilities for the disabled

The work the IFC will do in 2003 will fall under three headings:

- review and report of progress by the governing bodies on Task Force recommendations
- what the governing bodies have done to encourage and disseminate best or innovative practice
- follow up to the IFC's comments on the proper segregation of disabled supporters at away games (IFC Annual Report 2002).

Issues to be addressed will include:

- the process by which the governing bodies encourage clubs to implement FTF recommendations
- the effectiveness of charters and charter reports in encouraging the implementation of FTF recommendations
- whether there are any effective sanctions, which the governing bodies can use to encourage implementation of recommendations
- DSAs
- ticketing and accommodation for disabled supporters
- communications with disabled supporters.

The work will *exclude*: wider review of FTF recommendations (e.g. new stadia, including Wembley, and improvements to facilities at existing stadia); review of FTF recommendations addressed to bodies other than the governing bodies.

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### Match rescheduling

In this work, the IFC will examine another aspect of ticketing, following on from its investigations into away ticketing in 2002. The IFC has chosen to examine this area in response to the numerous times the issue has been raised with the Commission. Additionally, the IFC will undertake some preliminary work on the policing of football matches, again in response to requests that it should examine practice in this area.

The IFC will seek to satisfy itself:

- that match rescheduling is reasonable and driven by legitimate causes
- that the governing bodies ensure that supporters' needs and concerns are understood and are adequately and properly taken into account
- that appropriate and reasonable policies exist and are consistently applied
- that football is customer-sensitive in communicating the rescheduling of matches
- that any attendant costs of match rescheduling do not inflate prices
- how policing costs relate to rescheduling and impact on club finances
- how security requirements imposed by the police and/or local authorities affect supporters.

Issues to be addressed include:

- the main grievances concerning rescheduling
- what mutual recognition there is of the needs of supporters and match organisers
- any laws/regulations binding on the governing bodies
- perceptions that rescheduling is driven by TV rights and demands
- patterns of charges levied by police and local authorities on football clubs
- neighbourhood issues and how they are addressed.

The work will *exclude*: ticket prices; absolute costs relating to rescheduling; practical security and policing issues inside football grounds; actual fixture arrangements.

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### Charters

The IFC's work in this area will depend on the nature and timing of Annual Reports on charters produced by the governing bodies. During the year the Commission will focus on assisting and encouraging validation of charter reports, as recommended in its 2002 Annual Report, and will continue with sample monitoring of club practice stated in club charters.

## MEETINGS, VISITS AND CONSULTATIONS, 2003

All Party Group on Football	Football Licensing Authority
Asian Football League	Football Supporters Federation
Barnsley FC	Football Supporters Federation Fans Parliament
Barnsley FC Anti-racism week	Football Unites, Racism Divides
Baseline Youth Inclusion Project	Foxes against Racism
BBC 2003 Sports Summit	Gillingham FC
Birkbeck, University of London	Greenwich Borough Council
Blackpool FC	Hampshire County Football Association
Blackpool FC Stadium Monitoring Group	H M Customs and Excise
Bolton Wanderers FC	Home Office, Football Disorder Unit
Bradford Bulls Rugby League Club	Home Office, Positive Futures Drug Strategy Directorate
Bradford City FC	Inland Revenue
BSkyB	Ipswich Town FC
BURA Conference, Milton Keynes	Isthmian League
Charlton Athletic FC	Jockey Club
Cleveland Police	Kick it Out
Core Cities Group	Kingston University
Darlington FC	Kroll Buchler and Phillips
Deloitte and Touche Sport	Leeds Business School
Department for Culture, Media and Sport	Leeds Metropolitan University
Department for Education and Skills	Leeds United Disabled Organisation
Derby County FC	Leeds United FC
Deutsche Fußball Liga	Leeds University
European Football Finance Forum	Leicester City FC
FA Premier League	Leyton Orient FC
Federation of Stadium Communities	London Assembly Football Forum
Financial Advisory Committee	Manchester City FC
Financial Advisory Unit seminar	Manchester Metropolitan University
Financial Services Authority	Martin Shaw King Trust conference - <i>Connecting Communities, Improving Representation</i>
Football Against Racism in Europe launch, Newcastle	McCormick's Solicitors
Football Association	Member of Parliament for Stoke-on-Trent North
Football Foundation	National Association of Disabled Supporters
Football in the Community	Newcastle United FC
Football League	Newcastle United FC Fans Liaison Committee
Football League Charters Seminars	



Norwich City FC  
 Plymouth Argyle FC  
 Poppleton and Appleby  
 Port Vale FC  
 Premier Management  
 Professional Footballers' Association  
 Robson Rhodes  
 Schechter and Co Ltd.  
 Scottish Football Association  
 Sheffield Hallam University  
 Sheffield United FC  
 Sheffield United Business Enterprise Centre

Southampton City Council  
 Southampton FC  
 Southern Football League  
 Sporting Equals  
 Staffordshire Police (ACPO)  
 Stirling University  
 Supporters Direct  
 Supporters Direct, Scotland  
 UK Disability Sport conference  
 Watford FC  
 West Riding County Football Association  
 York City FC

The IFC held Board meetings at the following clubs during 2003: Barnsley, Bolton Wanderers, Darlington, Manchester City and Southampton. The Commission thanks them all for their welcome and hospitality.

#### Organisations represented at the IFC Racism Seminar, 17 September 2003

Asia Europe Football  
 Asian Football League  
 Bradford City Council  
 Derby Gold  
 Football Foundation  
 Football Unites, Racism Divides  
 Foxes against Racism  
 Khalsa Football Federation  
 Kick it Out  
 London Tigers  
 Luton United Football Club

Martin Shaw King Trust  
 NACRO National Football Development Project  
 Normington Sports Association  
 Professional Footballers' Association  
 Republica Internationale  
 Show Racism the Red Card  
 Sikh Temple  
 Southampton City Council Social Cohesion Team  
 SPACE Project  
 Sport England  
 Sporting Bengal  
 West Riding County Football Association

#### Individual journalists were consulted during 2003 from

*Daily Express*  
*Daily Mail*  
*Daily Mirror*  
*Daily Star*  
 The Football Writers Association  
*The Guardian*

*The Independent*  
*News of the World*  
*The People*  
*The Sunday Times*  
*The Daily Telegraph*  
*The Times*  
*The Voice*

## FOOTBALL MATCHES ATTENDED BY THE IFC, 2003

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### 2002/03 Season

Bradford City v. Millwall (Division 1)

Bury v. AFC Bournemouth (Division 3 Play Off First Round)\*

Cambridge United v. Boston United (Division 2)

Cardiff City v. Queens Park Rangers (Division 2)

England v. Slovakia (Euro 2004 Qualifier)

Liverpool v. Manchester United (Worthington Cup Final)\*

Plymouth Argyle v. Tranmere Rovers (Division 2)

York City v. AFC Bournemouth (Division 3)

### 2003/04 Season

England v. Liechtenstein (International friendly)\*

Leeds United v. Newcastle United (FAPL)

Leyton Orient v. Hull City (Division 3)

Luton Town v. Wrexham (Division 2)

Manchester City v. Leicester City (FAPL)

\* complimentary tickets provided

Additionally, members and staff of the Commission have attended over 300 matches in their personal capacity.

## ISSUES RAISED WITH THE IFC

Category	Subject	Governing body
Ticketing	Ticket prices	N/A
	Away ticketing(2)	FAPL, FL
	Prices and safety at an England game	FA
	Seat allocation	FL
	Away ticket allocations and prices (2)	FAPL
Club governance	Control of club assets (3)	FL
	Football Conference	FA
Racism/Equity	Club observance of EO policies (7)	FAPL
	FA disciplinary action on racism	FA
	Racism at FAPL clubs	FAPL
	Asian football	N/A
Rules of the game	Refereeing standards (3)	FL
	Legibility of numbers	FAPL
Merchandise	Launch of new England kit (13)	FA
	Launch of new club kit	FAPL
Stewarding	Stewards' behaviour	FL
Match scheduling	Internet broadcasting of England games	FA
	Campaign about kick-off times	N/A
	Rescheduling (general) (5)	N/A
Crowd behaviour	Player swearing at fans	FAPL
	Pitch invasion	FAPL
Disability	Sightlines	FL
Other	Employment dispute	FL
	Coaching award	FA

## COMPLAINTS INVOLVING THE IFC IN 2003: SUMMARY FINDINGS

Subject of complaint	Summary	IFC findings / state of play
The process by which the decision was reached to permit Wimbledon FC to relocate to Milton Keynes	The complaint was raised by the Wimbledon Independent Supporters Association (WISA) on 22 June 2002. The IFC discussed the issues with the CEOs of the FL and the FA on 2 July. The IFC formally referred the complaint to the FL, on behalf of WISA, on 9 July, as the FL had not had opportunity to address this specific complaint. The IFC received a copy of the FL's response at the beginning of September 2002, and referred the complaint to the FA on 10 September, at the request of WISA, as the latter was not satisfied with the FL's response. The IFC, on behalf of WISA, pursued the FA for a response in the following months. The FA explained its position in a letter to the IFC in January 2003. On 9 March WISA formally asked the IFC to adjudicate the complaint as it was not satisfied with the FA's response.	An IFC panel of three issued its adjudication on 31 March 2003. By way of preface it commented that the delays of 2 months and 4 months by the FL and the FA respectively in responding to WISA were too long. The IFC recommended that each stage in the complaints process must be completed within a reasonable timetable and that if the timetable is not met the complaint should move automatically to the next stage. The IFC further recommended that the governing bodies should respond in writing to a complaint within two weeks even if the complaint could not be resolved immediately. The IFC found that the FL and FA were correct in deeming the decision of the Commission of Inquiry (to permit relocation) final and binding upon the parties. It recommended that in future the FA should make known publicly, at the time of appointment, how and why members of such commissions are appointed and that this should be embodied in a change to FA rule K3(a). The IFC adjudicated that the FL acted reasonably in its handling of the issues and that the FA did not abdicate its responsibilities inasmuch as it did what was requested of it by the FL and was not required to act otherwise. The IFC welcomed the clear and unequivocal commitments by the FL and FA in correspondence with the IFC to effecting rule changes to prevent a similar situation to the Wimbledon decision arising in future. Since the adjudication was issued, the football authorities have accepted the IFC's recommendations regarding the simplification of complaints processes (see Annexe B). The FL has confirmed its intention to review its regulations once it has completed an exercise initiated in the second half of 2003 to collate information on the ownership of FL clubs' grounds (see page 23). The IFC has asked the FA about its current position on changes to rule K3(a). Any changes would need to be passed at the FA's AGM.
Exclusion of a supporter from a FL club	The complaint was received in October 2002, from the FA. The IFC sought, and received, background information from the FL and the FA. Supplementary information was sought from the complainant, who submitted full documentation in February 2003. The IFC sought further information from the club, which supplied it. The IFC visited the club in question in April and discussed the matter with the Chairman who confirmed that the supporter must meet four conditions for the ban to be lifted. The IFC invited further comment or information from the supporter, who indicated that he felt unable to compromise.	An IFC panel of two issued its adjudication in July. The IFC found that the FL had acted properly in trying to resolve the matter with the club and in concluding that there was nothing in its regulations to empower it to oblige the club to change its stance. The FA was unable to intervene in a dispute between a supporter and the owner of a club. The supporter accepted that the IFC similarly has no locus to change the owner's decision and confirmed that he is aware of the conditions he must meet for the exclusion to be lifted. The IFC urged both sides to find an acceptable solution. The IFC's understanding is that none has been found.

Subject of complaint	Summary	IFC findings / state of play
Price of FA Cup semi-final tickets at Old Trafford, 2002	The complaint was received in October 2002, forwarded by the FA. The complainant claimed his view was restricted and that his seat was thus overpriced. He complained to his club and to the FA. The FA revisited the stadium and concluded the complaint was not justified. On receipt of the complaint, the IFC obtained information from the FA and Manchester United on pricing plans for Old Trafford, and clarified the FA's position on similar complaints	An IFC panel of two issued its adjudication in January 2003. The IFC found that the FA's price banding of seats for the semi-final was the same as Manchester United's. It found that the complainant's club and the FA had followed their complaints procedures. It commended the FA for visiting Old Trafford to inspect the seat and view in question. It further found that there was some confusion about the despatch and receipt of correspondence between the complainant and the FA, and information passed to the club. The IFC adjudicated that the FA's decision to refuse the complainant a refund was correct. It recommended that as a matter of good practice all responses by the FL and FA to complaints originating from clubs should be copied to the club(s) in question. The FL subsequently confirmed that it follows this practice; the FA undertook to consider the recommendation.
Withdrawal of season ticket	The complainant loaned his season ticket book to a friend who became involved in an incident during the match and was ejected from the ground. The STH was banned for life. The complaint was considered by the club and the FAPL and reverted to the IFC in May 2003. The IFC subsequently entered into discussions with both the club and FAPL.	Informal intervention by the IFC led to the complaint being amicably resolved in August. The ban was reduced to a single season. The club agreed to review its procedures for withdrawing season tickets
Stewarding	A supporter complained that while attending a match he had been victimised by stewards who insisted that he should sit down during the game, but took no action against other supporters who were also standing. The supporter maintained that his enjoyment of the game had been spoiled and he sought an apology and compensation. The complaint was considered by the club, the Premier League and the FA before being formally referred to the IFC in May 2003. The IFC examined all the documentation and in particular the conclusions reached by the club and the FAPL.	An IFC panel of two issued its adjudication in June 2003. The IFC found that the complaint was not about safety requirements and stewards' responsibilities to uphold them but that the complainant had not been treated even-handedly. Both club and Premier League had acknowledged that the supporter's enjoyment of the game had been affected. The IFC adjudicated that the effect on the supporter should have been recognised and that the complaint should have been settled at an earlier stage. It recommended that the complainant should be given an unqualified apology and an appropriate measure of redress such as a complimentary ticket for a match of his choice. This recommendation was accepted.
Application of EO policy by FAPL club	The complaint was first raised as an issue in August 2003, concerning the process by which the club made staffing appointments. In October, at the request of the complainant and on receipt of a formal expression of complaint, the IFC forwarded it to the club, copying the FAPL. The club put its response to the complainant in November. He was not satisfied. At his request the IFC formally referred the complaint to the Premier League.	Ongoing
Standing at FL club	The complainant contacted the IFC in November 2003, at the suggestion of the FL which had investigated the complaint with the club. The complainant was not satisfied and sought a refund on safety grounds and the fact that the view of the game was impeded. The IFC asked the FL to consult the club again and to forward all correspondence to the IFC. This it did in December 2003.	Ongoing



## THE IFC'S ROLE IN THE COMPLAINTS PROCESS

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**I'M STILL NOT SATISFIED!!!!**

**You're not satisfied?**

**No**

**You've got a complaint about football?**

**Yes**

**Then this brochure helps  
explain what you can do about it.**

Right. From the beginning ... Is your complaint to do with a specific football club?

**Yes**

Have you already complained to the club?

**No**

Well, that's where to start. Take up your complaint with the club. You can also ask for a copy of their CHARTER. The club charter sets out all that the club undertakes to do for its paying customers and will tell you where to complain and how your complaint will be handled.

**OK. I've complained to the club. I'm still not satisfied.**

Did you put your complaint in writing – letter or e-mail for example?

**Yes**

Have you allowed the club a reasonable time to reply (2 weeks should be enough)?

**Yes**

If you got an acknowledgment promising an investigation or other action, you should expect the club to tell you when they will complete their enquiry. Have you allowed time for the club to deliver on its promise?

**Yes**

Then it's time to go to the football authorities. If your complaint is with a Premiership club, contact the FA Premier League. If your complaint is with a League club, contact the Football League. Ask to see the Premier League or Football League CHARTER – or look it up on their web site. That will tell you how your complaint will be handled – whether a club complaint, or one to do with a game or competition run directly by the Football League (such as the Football League play-offs or the Carling Cup Final). The addresses of the Premier League and the Football League, their web site addresses and the names of the people to contact are on the back of this leaflet.

**I've done all that. I'm still not satisfied.**

You're sure you've been reasonable? You've allowed time for the Football League or the Premier League to look into your complaint? You've considered their reply?

**Yes!**

Then forward your complaint to the Independent Football Commission (the IFC).

**Why don't I just go straight to the IFC in the first place?**

Well, you can. And at any stage you can inform us about your complaint. But remember, if your complaint is about a club, then in fairness we will need to go to the appropriate league for their comment and they, in turn, will need to contact the club. We will withhold your name if you ask us to.

**OK. But what if my complaint is about the Football League or the Premier League themselves? Or what if I want to complain about the FA or an England game?**

In all these cases, send your complaint to the FA.

**Does the FA have a charter?**

It certainly does. It's on their website, or you can ask the FA to send it to you. The charter tells you how and where to complain and what the FA will do. You can find full contact details overleaf.

**And what if I'm not satisfied with the response from the FA? I suppose I have to give up.**

No, don't do that. Tell the full story to us: The Independent Football Commission.

**Where exactly do you fit in to this complaints business then?**

We're here to help, to provide a point of appeal when all else has failed. The IFC is a completely independent body, established in 2002 with the backing of the FA, the Premier League, the Football League and the government. It monitors the performance of football's governing bodies, especially in how well they ensure that the needs of supporters and other customers are satisfied.

**What can you do for me?**

Tell us what has happened so far – whether it's a complaint about a club, or one of the governing bodies. Contact the IFC Company Secretary at the address overleaf. The Company Secretary will look at it and, if there's a case to be made, will set up an IFC panel to investigate action that's been taken (or not taken) by the club and the football authorities. The IFC will issue its findings on how the body that's been complained about should act. You will be kept informed and the IFC will monitor the action taken.

**You're sure it won't all be swept under the carpet?**

We're sure. Every case taken up by the IFC and the action taken will be summarised in an annual report which will be sent to the football authorities and to the government, and will be available to the general public.

**No hiding place, then?**

No – but the main point is: **are you satisfied?** You will tell us, won't you?

Full details and guidance on how the complaints process works are on the IFC website. Or send for a copy of the full Complaints Procedures from:

**The Independent Football Commission**  
**University of Teesside**  
**MIDDLESBROUGH TS1 3BA**

**Email:** [contact@theifc.co.uk](mailto:contact@theifc.co.uk)

**Fax:** 01642 342751

**Website:** [www.theifc.co.uk](http://www.theifc.co.uk)

Customer complaints about clubs in the FA Premier League should be sent to:

**Kathryn Robinson**  
**Head of Corporate and Community Affairs**  
**The FA Premier League**  
**11 Connaught Place**  
**LONDON W2 2ET**

**Email:** [contactus@premierleague.com](mailto:contactus@premierleague.com)

**Fax:** 020 7298 1650

**Website:** [www.premierleague.com](http://www.premierleague.com)

Customer complaints about clubs in the Football League, or about events organised by the Football League itself (such as the Carling Cup, or promotion play-offs) should be sent to:

**Rob McRobbie**  
**Head of Safety and Customer Services**  
**The Football League Operations Centre**  
**Navigation Way**  
**PRESTON PR2 2YF**

**Email:** [fl@football-league.co.uk](mailto:fl@football-league.co.uk)

**Fax:** 0870 442 1188

**Website:** [www.football-league.co.uk](http://www.football-league.co.uk)

Customer complaints about the Football League or the Premier League, or about events organised by the Football Association itself should be sent to:

**Jonathan Arana**  
**Senior Customer Relations Manager**  
**The Football Association**  
**25 Soho Square**  
**LONDON W1D 4FA**

**Email:** [customercharter@thefa.com](mailto:customercharter@thefa.com)

**Fax:** 020 7745 5707

**Website:** [www.thefa.org](http://www.thefa.org)

**PS: We can't do anything about the team's performance. Sorry!**

The full text of the IFC's complaints procedures can be found on the IFC website: [www.theifc.co.uk](http://www.theifc.co.uk). Click on complaints.

*I'm Still Not Satisfied* exists in brochure form and in a large print version for the visually impaired. Copies can be obtained from the IFC's Assistant Secretary at the following address:

The Independent Football Commission University of Middlesbrough MIDDLESBROUGH TS1 3BA

## IFC OUTLINE AGENDA 2004

Activities are expected to include review and examination of:

Charters	A standard for customer service in football
Finance	Work of the FAU Agents Distribution of revenue
Ticketing	englandfans
Racism and equity	Racism Disability Gender
Governance	Conflicts of interest Codes of conduct
Complaints	Issues raised with the IFC and complaints referred for adjudication
The self-regulatory process	



## ACKNOWLEDGMENTS

The IFC gratefully acknowledges the permission of the following newspapers, journals, organisations and individuals to feature excerpts from publications listed below on the pages indicated:

Throughout

*The FA Premier League Annual Charter Reports Season 2002/03*

*The FL Annual Report on Customer Charters, 2003*

*The FA Customer Charter Report 2002-2003*

page 14

*Government Task Force Commercial Report and Football Foundation: A Presentation on Two Key Issues, by the FA, FA Premier League and the Football League, March 2000*

pages 17, 23

Hope, Stephen: *The Ownership Structure of Nationwide League Football Clubs 2002-03*, Roehampton, University of Surrey, 2003

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*Deloitte and Touche Annual Review of Football Finance, 2003*, ed. Boon and Jones, July 2003

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*The Times*

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Higgs, Derek: *Review of the Role and Effectiveness of Non-Executive Directors*, DTI, 2003

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*The State of the Game, the Corporate Governance of Football*, Football Governance Research Centre, Birkbeck, University of London, 2002

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*The Guardian*, Jill Treanor

page 30

*UEFA Club Licensing System, 2002*

page 33

*Office for National Statistics, 1991 Census and 2001 Census*. Crown copyright 1993, 2003. Crown copyright material is reproduced with the permission of the Controller of HMSO.

page 33

*Football League Support Surveys 2001*, Sir Norman Chester Centre for Football Research, University of Leicester

page 33

*The FA Premier League National Fan Surveys 1995 and 2001*, Sir Norman Chester Centre for Football Research, University of Leicester

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*Leicester Mercury*

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Macpherson of Cluny, Sir William: *The Stephen Lawrence Enquiry*, February 1999

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*Football in the Community: Resources and Opportunities*, McGuire, Brendon and Fenoglio, Rick, Manchester Metropolitan University, October 2003

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*Charlton Athletic: Red, White and Black, 2003*

photography by Peter MacKenzie

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*Evening Gazette*, Middlesbrough

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*Match Rescheduling Survey*, Independent Football Commission/The Future Foundation, 2003

page 58

*Daily Mirror*



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The IFC office is open from 0930 – 1730, Monday to Friday

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