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THE INDEPENDENT **FOOTBALL** COMMISSION

ANNUAL REPORT

2005





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Chairman's Foreword

Welcome to this, the fourth Annual Report of the Independent Football Commission (IFC) and the first since the mandate of the Commission was renewed on an indefinite basis. It has been an eventful year, in which there were both board and personnel changes.



This year saw the completion of an extended enquiry into the important issue of Child Protection in football. We published in August 2005 what has been acknowledged as a thorough analysis of a challenging topic. The IFC Report on Child Protection attracted considerable media attention, not all of which recorded that the IFC gave a ringing endorsement to the progress football had made in protecting children while in the care of clubs, coaches and authorities. This Annual Report discusses both the positive reaction to our recommendations and the developments since our Child Protection Report was published.

For English football as a whole, the year will be mainly remembered for the publication of the Burns Report on the structure, management and role of the Football Association (FA). The decision to invite Lord Burns to review English football's supreme governing body reflected not just well publicised recent

personnel difficulties, but also long standing concerns that the Football Association needed a major overhaul to ensure that it was "fit for purpose" for the 21st Century. We believe that Lord Burns has produced a blend of radicalism and conservatism, in the belief that this will enhance the chances of the outcomes he recommends being accepted. While acknowledging the need to reflect in some depth on the changes proposed, the IFC urges the FA to act with some expedition, not least to rebut the accusations that "Burns has been kicked into the long grass". Moreover, the role and remit of the IFC itself might well be affected, not least by the creation of a semi-autonomous and powerful Regulation and Compliance Unit. We have proposed that the Terms of Reference of the Commission are in need of review, but have been informed that this must await the implementation of such parts of the Burns Review which are eventually accepted by the FA Council.

*Welcome to this,
the fourth Annual
Report of the
Independent
Football
Commission*

Our Report reflects the regular work of the Commission in the areas of finance, equal opportunities, community, charters and complaints. We also commenced two new studies which will continue into 2006. At the invitation and with the agreement of the governing bodies, the IFC embarked on an enquiry into the experience of English supporters when travelling abroad to watch matches in European competitions. There has long been concern about how English supporters are treated in Europe and whether the clubs and authorities, including British Government agencies, could do more to ensure a peaceful and enjoyable experience. We summarise what we have done so far in a project on which we expect to report in the summer.

A similar timescale is envisaged for the IFC enquiry into Agents, a subject for review which was identified by the IFC in last year's Annual Report. We rehearse some of the issues which have caused

public concern and will hope to complement and supplement the FA Premier League's own enquiry which was announced soon after our own work had begun.

I am conscious that we owe a great debt to our small but hard working office team based in Stockton on Tees and I thank them for bringing the work of the Commission to fruition. This year again I have received invaluable support from my fellow Commissioners, for which many thanks.



PROFESSOR DEREK FRASER

CHAIRMAN

Executive Summary

The Report opens with a summary of the responses of the football authorities to the three reports produced in 2004. Most of the recommendations were accepted.




Chapter 2 on **Governance and Finance** reviews the Burns recommendations on the structure and role of the Football Association. The IFC notes that some view this as a missed opportunity. The FA has set up four working groups to explore the implications of the Burns Report. The IFC recommends that the FA moves quickly to implement the main findings. This chapter then welcomes the FA Guide to Good Governance, the product of the Financial Advisory Committee, whose work is summarised.

Racism and Equal Opportunities traces the activities of the football authorities since the major review undertaken by the IFC in 2003. The developing Race Equality Strategies are reviewed, which are being produced in response to the Commission for Racial Equality. The IFC will continue its policy of active monitoring of equal opportunity matters, while recognising that the prime responsibility rests with the CRE as the statutory body.

Chapter 4 on **Community** again identifies what the IFC has found is very worthwhile community activity by all three football bodies and their member clubs. It is pleasing to note that the authorities have responded to the IFC's suggestion that more publicity should be given to this important aspect of football's wider social role.

The **Child Protection** Report of 2005 was the result of an extended enquiry into this challenging issue. The IFC now summarises the response to what was a well received report. This chapter explains, following further discussion particularly with the FA, how the authorities are taking forward IFC suggestions. We particularly welcome the creation of a forum involving all parties who have a role in protecting children while playing football.



Chapter 6 covers our regular core business of **Charters**, which have again been developed in the light of IFC advice. The Charters of the various authorities and their clubs are reviewed and suggestions made for further improvements. In particular, we would welcome further discussion with the authorities on who is the main audience for the Charters. While the annual Charter Reports are vital to the IFC in fulfilling its remit, the IFC is not the sole recipient or reason for the Charter movement. We look forward to discussions on how Charters can be made even more valuable for the supporters themselves.

We have had relatively few **Complaints** this year and those which have been adjudicated are reviewed along with the issues raised by supporters with the IFC. It is necessary to draw attention to the fact that for the first time an adjudication was not implemented by the club involved. While we have always acknowledged that

football's complaints procedure involves non-binding arbitration by the IFC, it is nonetheless disappointing that an agreed appeals stage has inevitably been somewhat weakened by this case.

There are two projects on **Agents** and the **European Experience** which were begun this year, but will continue into 2006. Extensive public concern over the role of agents makes this a very timely enquiry by the IFC and our work will complement that of the enquiry initiated by the FA Premier League. With the agreement of the football authorities the IFC has begun an enquiry into the experience of English supporters, when travelling abroad to watch matches in European competitions. The IFC has already met with six of the clubs involved this year and IFC representatives have attended several planning meetings and games in Europe. The final outcome of this enquiry will be published in the summer.

The Independent **Football** Commission

Members of the Commission



Professor Derek Fraser, Chairman

Until his recent retirement Professor Fraser was Vice-Chancellor of the University of Teesside, a post he held for over 10 years. In February 2005 he was appointed Chair of Standards Verification UK. Other external experience includes board membership of ONE North East, Tees Valley Training and Enterprise Council, and Chairmanship of the Department for Education and Skills Steering Group on Graduate Apprenticeships. He has been watching football since 1947 and his first love was Birmingham City. Career and location moves have 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.



Alan Watson, Deputy Chair

Alan Watson is a self-confessed "football nut" and has a life long affiliation with Newcastle United. He has been active in grassroots football through a long playing career, coaching, refereeing and running youth teams. Until his retirement in 2003, he was Deputy Parliamentary Ombudsman, in recognition of which he has received a CBE. He has extensive experience in customer care, codes of conduct and complaints resolution.



Clive Betts MP, Commissioner

Clive Betts has been a Member of Parliament since 1992. He was a Government Whip 1997-2001. He is Treasurer of the Parliamentary All Party Group on Football and Chairman of the All Party Football Club. 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.



Brian Lomax, Commissioner

Brian Lomax is the chair of Supporters Direct, where he served as Managing Director over a four-year period. He had previously worked in the Probation Service, and as Chief Executive of a charitable Housing Trust. In 1992 he was a founder member, and first Chairman, at Northampton Town, the first Supporters' Trust, subsequently becoming the first democratically elected Director to serve on the Board of an English football club. Both posts were held for seven years. He retains affection for his home-town team, Altrincham, but his loyalties as a supporter rest primarily with Northampton.



John Simpson, Commissioner

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.



Nicola Waldman, Commissioner

Nicola is a partner at Central London law firm Cumberland Ellis. She is head of the Private Client department, specialising in wills and tax planning, estate and trust matters and she also advises various charities. She is a member of the Executive Board and is also the Staff Partner. As a football addict, she is happy watching most football matches, but her heart belongs to the Gunners. Her best football moment (so far) was the final whistle at the last game of the season, when Arsenal completed an undefeated season in the League.

IFC staff

Graham Courtney, Chief Officer (from November 2005)

Chris Gamble, Company Secretary (to August 2005)

Claire Risker, Office Manager and Company Secretary

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2005 Recommendations

GOVERNANCE AND FINANCE

The IFC **recommends** that the decisions of the FA on the Burns Review are made as soon as possible and that the changes to be implemented are processed within as short a timetable as possible.

The IFC **recommends** that early attention is given to the Terms of Reference of the Commission, particularly in relation to the potential role of the semi-autonomous Regulation and Compliance Unit recommended by Lord Burns.

The IFC **recommends** that the football authorities publicise examples of governance improvements made as a result of the advice given in the FA Governance Guide.

RACISM

The IFC **recommends** that, within the developing Race Equality Action Plans, the authorities encourage clubs to make more positive attempts to augment ethnic minority attendance at matches.

COMMUNITY

As often before, the IFC would **recommend** greater collaboration between the three football authorities in addressing common themes and common purposes in their community programmes.

The IFC **recommends** that still more publicity should be given by the football authorities to their Community Programmes and Initiatives.

CHARTERS

The IFC **recommends** that immediate steps should be taken to simplify the reporting process by both FA Premier League and Football League clubs.

The governing bodies should ensure that their charter reports suitably reflect the work carried out during the appropriate season and that only the clubs in their leagues during that season are included.

Charters themselves should be reflective of individual clubs' needs. However, all should contain reference to tickets and the clubs' complaints procedures.

2004 Progress Report

Unusually in 2004, the IFC produced three published reports. In addition to the Annual Report 2004, we published "Self-Regulation" in May 2004, which drew on the regulatory experiences both within and outside football. In September 2004, we published a dedicated report on the arrangements for Euro 2004 in Portugal. The 2004 Annual Report brought together the various recommendations of the two earlier reports as well as the commentary and recommendations emerging from the years more general activities. The IFC is pleased to report that the three football authorities took the Reports very seriously and produced detailed oral and written responses to the recommendations. A summary of the response of the three football authorities to the 2004 Reports is provided in tabular form in Appendix 1.

The authorities acknowledged that we have not yet had a full dialogue over the proposals and discussion in the Self-Regulation Report. However, the authorities have made the decision to extend the life of the IFC and see that as a response to the Self-Regulation Report. Elsewhere in this Report, we discuss the need to continue the dialogue over revised Terms of Reference, which may be affected by the full or partial implementation of the Burns Review. The

IFC have been very positive about the arrangements for Euro 2004 and the FA broadly welcomed the conclusions of the IFC's scrutiny of that competition. The FA accepted both the spirit and the detail of the proposed improvements and there is a general willingness to take the lessons learned forward through to the World Cup in Germany 2006. Other matters relate to the Burns Review, which is discussed elsewhere in this report. The IFC notes that there is a broad welcome for the provision of comparative data which will assist clubs in management and is disappointed that the Football League continues to argue that though it produces benchmarking data, this will not be published. The IFC sees this as a missed opportunity to demonstrate to the wider football public that the authorities are taking seriously the improvements in governance and management within football. In the commentary on ground regulations, it is acknowledged that this issue poses both strategic and legal difficulties and this is a matter of continued concern for the Financial Advisory Committee (FAC). The IFC welcomes the fact that the commentary on the improvement in the Charter process have been taken forward by the authorities.

Governance and Finance

The Burns Review

Undoubtedly, the main focus of interest in the field of governance during 2005 was the Structural Review of the FA conducted by Lord Burns. Lord Burns produced a consultation document in the spring to which there were over 200 responses and in the early summer he produced some interim suggestions on which further opinion was sought. During the course of the Review, the IFC met with Lord Burns on two separate occasions to discuss the experience the Commission had had during its four years of existence. The IFC submitted two sets of evidence to the Review. The first was in response to the initial consultation in which our main hope was that the Burns Review would clarify the relationship and relative powers between the FA, the FAPL, the Football League and the wider national game. The second evidence submitted was at the request of Lord Burns himself, which concerned the possible creation of a representative forum to deal with the concerns of supporters.

In August 2005, Lord Burns produced his final report which was widely commented upon both by stakeholders and the media. The Report was a mixture of some radical ideas and a rather conservative approach to the transitional changes necessary. The more radical ideas included the reduction in the powers of the professional game on a new Executive Board in which

independent directors would hold a balance, the creation of two separate entities for the professional and wider national game, the creation of a semi-autonomous Regulatory and Compliance Unit and a broader representation in the over-arching Council of the FA which was designated as in future to be the Football Parliament. On the other hand, some found it disappointing that the changes in the reputedly over-large Council would take some time to bear fruit, because Burns suggested that nobody on the current Council would lose their post but merely the Council would be expanded during a transitional phase. Some have been highly critical of the Review. For example, the Birkbeck Football Governance Research Centre has described the Review as “a missed opportunity”.^[1] This is not surprising since members of the Birkbeck Unit had produced a more radical blue-print under The Sports Nexus banner.^[2] Some fans also expressed disappointment that the changes were not to be more far reaching. However, there was broad support for the widening representation at the top level of the FA which would in future include players, supporters, managers and other stakeholders.

Whatever opinion people have of the Review, it remains very important that the FA should proceed with due speed to implement whatever changes are deemed

acceptable. It was always going to be unlikely that the FA could swallow the Burns Review in one stage. Quite sensibly, the FA decided to set up four working groups to reflect on the detailed implementation required for the various aspects of the proposals. Some have seen this as a delaying tactic, which the FA strenuously deny, arguing that good progress has been made since the publication of the Report and the proposals will be ready to go to the summer Council of the FA in 2006. The Minister for Sport, Mr Richard Caborn, is on record as preferring a shorter timetable and has expressed the hope that the changes to be implemented would be in place before the 2006 World Cup.

Whilst acknowledging that the substantial changes recommended by Burns will require significant reform in both the structure and practice of the FA, the IFC strongly believes that, in the interest of public confidence, the process of consideration should be expedited. The IFC therefore **recommends** that the decisions of the FA on the Burns Review are made as soon as possible and that the changes to be implemented are processed within as short a timetable as possible.

In so far as the changes relating to regulation and compliance might well affect the role and remit of the IFC itself,

[1] Source: Birkbeck Football Research Centre: “*The State of the Game: The Corporate Governance of Football Clubs 2005*”

[2] Jonathan Michie and Professor Christine Oughton, *The FA: Fit for Purpose?* (July 2005)

the Commission requests that early attention is given to the Terms of Reference of the IFC. The Terms of Reference have not been changed since the creation of the IFC in the summer of 2001 and parts of the Terms of Reference are quite clearly now anachronistic, referring for example, to issues that are no longer current. The IFC has proposed revised Terms of Reference to the football authorities, who have responded that any revision to the Terms of Reference and remit of the IFC must await the outcome of the Burns Review and the implementation of any changes therefrom. The IFC **recommends** that early attention is given to the Terms of Reference of the Commission, particularly in relation to the potential role of the semi-autonomous Regulation and Compliance Unit recommended by Lord Burns.

While waiting for the outcome of the Burns Review, the FA has moved to fill a long identified gap in producing a useful guide to governance, ***Governance: A Guide for Football Clubs (The Football Association, December 2005)***. The IFC, among others, has previously identified the need for the football authorities to set the tone in terms of good governance both in identifying good practice and seeking to disseminate it across the game as a whole. The IFC therefore warmly welcomes the publication of this guide. The FA makes clear that the guide is not mandatory but it encourages the adoption of good governance procedures in the interest of each club and the game as a whole. The FA acknowledges that it is important in the interests of public confidence that football clubs are able to demonstrate accountability and transparency to engage the trust of all stakeholders in the game.

The guide seeks to identify best practice procedures and encourages clubs to assess their own governance arrangements against the benchmark of best practice. The FA hopes that the production of the guide will instigate improvements for the benefit of the clubs. The guide quotes examples in four broad areas, the role of the Executive Body, risk and control management, regulatory compliance and disclosing and reporting to stakeholders. It is set out in an unusual format in tabulated form and as a working manual rather than just a statement of the principles of good practice. The IFC will certainly wish to monitor clubs' practice in the future in the light of the guidance given in this governance guide. The IFC **recommends** that the football authorities publicise examples of governance improvements made as a result of the advice given in the FA Governance Guide.

Finance

The ***Governance: A Guide for Football Clubs*** was the work of the Financial Advisory Committee, chaired by Kate Barker, a former IFC Commissioner. Once the FAC was created in 2003, it was agreed that while the IFC would continue to have an important role in reviewing football finance, it would not seek to duplicate the work done by the FAC. The IFC and FAC are in regular touch and the Annual Report of the FAC is presented to the Commission. The 2005 FAC Annual Report reached the IFC just as this report was going to press. The FAC believes that its work in 2005 has largely been in the nature of consolidation rather than new initiatives, apart from the governance guide. There are aspirations to take the fit and proper persons test to a further stage once it has been well bedded down within football's administration. There is also on-going work on the ownership of grounds,

which inevitably involves complex legal and financial issues that are being explored. There has been progress on the issue of mutuals, where the matter now lies between Supporters' Direct and the Football League. The FAC has done some important work on the financial flows within the game and this was previously announced as an important project for the FAC's agenda. However, it has been decided that the results of this work will not be published in detail, which the IFC finds is a matter of regret. In the interests of public information, in a matter in which there is quite obviously widespread concern, the IFC believes it would be helpful to publish more than the summary of the results of the FAC's analysis of the financial flows. The IFC's view on this is similar to the comments made in Chapter 3 on the response to last year's report, where we similarly regretted the Football League's decision not to publish its benchmark data. Generally, the IFC takes the view that the more factual information about football's finances which are in the public domain, the better will be the public understanding of the serious financial challenges which all football clubs and administrators inevitably face.

In its own review of football finance, the IFC believes that, as last year, there are further signs of more prudence and professional financial management across all football clubs in the game. The IFC believes that the FAC concurs in this view. Concerns remain about debt finance and, for example, a recent newspaper report identified a significant number of loans made to football clubs by the Co-operative Bank, which were now a matter of concern. The PKF Survey quoted below states that "debt funding and the level of debt carried by clubs is a major concern for the future health of football."

Football finance both in England and abroad has been subject to much professional scrutiny by large firms of accountants and their surveys pick up some important trends. The annual Deloitte's survey^[3] highlighted the fact that the top clubs need to be less reliant on media income and many have been able to develop commercial revenues particularly associated with new stadia. The Deloitte's survey particularly identified the need for skilful and professional management in order to exploit the full

potential of a stadium and to generate the extra revenues necessary to supplement the finances of the club.

In another survey by PKF^[4], there was evidence of the greater financial prudence which the IFC itself has noticed. The survey revealed that a majority of clubs responding expected to reduce the payroll costs during the 2005-2006 season compared with the previous year. This is clearly an important and vital aspect of clubs' financial stability. Similarly, two-thirds of the clubs in the survey reported that they had not increased their bank loan facility during the past twelve months.

During its routine monitoring and club visits, the IFC continues to receive from all branches of the football family expressions of concern relating to football finance. During 2005, the most frequently mentioned issues were the following:-

- the distribution of football revenues and the growing gap between the richest and the poorest clubs;
- the role of agents and the allegation of agents fees representing a drain on football finances (see Chapter 8 for Agents);
- the role of benefactors and the impact they have upon clubs' long-term future, with the particular example of the Glazer family take-over of Manchester United;
- prices of tickets and the link between attendances and the times of kick-offs (which the IFC will be looking at in 2006: see Chapter 9);
- the relationship between price of admission and the long-term growth of the market, where the Football League initiative to attract a new generation of younger supporters is particularly welcome;
- player wages and the desirability of wage capping and performance related contracts.

The IFC will continue to monitor the financial management of clubs and the control and guidance exercised by the football authorities themselves.

[3] Source: Deloitte, *Football Money League 2005*

[4] Source: PKF, *Controlling Club Performance (2005)*

Racism and Equal Opportunities

In the IFC's 2003 Annual Report, some quite trenchant things were said about the related issues of racism, equal opportunities and diversity within football. Much of the media attention at that time and in the early part of 2004 derived from what the IFC was saying. We noted that, while much progress had been made in combating racism within football particularly at matches, there remained some concern expressed to the IFC that inadvertent racism might still exist. Additionally, we drew attention to the lack of progress of equal opportunity strategies in the employment both on and off the pitch at club and governing body level. We also drew attention to what many believe was the painfully slow rate of progress in football reflecting the diversity of modern British society. The IFC's comments were reinforced some six months later when the Commission for Racial Equality (CRE) produced a survey which in its initial statement derived from a perception that ethnic minorities were under-represented in both the coaching and administration of football clubs. The CRE particularly noted that there had been a blossoming of black players, both home-grown and from abroad, who were now familiar faces in the top professional clubs. Although it was common to recruit coaches and managers from among the former professional playing community, there were precious few black or other ethnic minority coaches and managers across the professional game. The CRE's

report (*Racial Equality in Football: A Survey, Commission for Racial Equality, October 2004*) reinforced the need for more positive and urgent action which had been recommended already by the IFC. The strategies that the football authorities were developing in response to the IFC 2003 recommendations were now adapted to respond to the promptings of the CRE.

The Commission for Racial Equality is a statutory body with extensive powers and it was quite clear that that institution would take precedence over the IFC as a non-statutory self-regulatory body within football. The IFC readily conceded that it would not wish to duplicate the work of the CRE, nor impose a dual burden of reporting upon football. As in the case of the FA's Financial Advisory Committee, the IFC decided to take a monitoring role, evaluating the response to the CRE's Report. In response to the IFC as identified in our 2004 Report, football has set up an All Agency Review Team which sought to develop a common programme of anti-racist, equal opportunities and diversity awareness strategies to be developed across the game as a whole. In the initial response to the CRE, there was an assumption, that a "one-size fits all" policy and strategy would be developed. Indeed the CRE was anxious for the various branches of football to move together in a uniform manner. However, the issues and logistics facing

the football authorities are quite different from each other and the CRE accepted, particularly as a result of prompting by the Football League which had some particular concerns, that it would be acceptable for each of the three authorities to develop an individualised strategy. This would relate to the overall All Agency Review Team approach, but would be variegated to reflect the particular needs of the individual governing bodies. The IFC has had discussions with the CRE about the possibility of collaborating together in this activity and each is aware of the other's locus and view in the equal opportunities and racist areas. In order to fulfil its remit of evaluating the governing bodies response to the concerns raised by both the IFC and the CRE in 2004, the three authorities have provided the IFC with copies of their emerging strategies eventually to be formally agreed with the CRE itself.

The FA Race Equality Action Plan sets out clearly a set of targets and time-frames which will be monitored over time relating to the action taken. The FA commits itself to have in place the resources necessary to deliver the CRE Action Plan. The plan itself comprises several discrete areas. These include the management of racial harassment, the representation at Board, Council and Committee, employment by the FA and County FA's, equal opportunities in relation to referees and

coaches, equal opportunities and the monitoring of data for England fans, participation at grassroots football level and the need to develop supplier chain policies in relation to equal opportunities and the promotion of racial equality. The FA also commits itself to education, training and the raising of awareness. It will provide workshops and programmes across football that will build race and equality training into on-going training programmes. It also commits itself, as an organisation, to achieve the various levels of both the Sporting Equals Race Equality Standard and Sport England's Equality Standard. This comprehensive plan which is still in draft form and awaiting formal agreement by the CRE is accompanied by a developing progress grid in which the actions and time-scales on each of the individual targets is being recorded. It appears to the IFC that the FA is taking its responsibilities to promote anti-racism and equal opportunities policies across football very seriously. The IFC commends the Football Association for the progress made.

Similarly, the FA Premier League has also made commendable progress in developing its own race equality action plan. It has also developed its strategy in the form of a tabulated grid and commits itself to having the resources necessary to deliver and to work with the All Agency Review Team sharing good practice across the sector. The Premier League commits itself to developing equal opportunities policies across its Boards and Committees, employment strategies and practices, its suppliers and in education and training. It also is

committed to the dissemination of good practice among its member clubs and to take action where short-comings are identified. The FA Premier League will also address the issues of match attendance and disseminate good practice policies and practical advice on issues of racial harassment at individual Premier League clubs. In its employment policies, it will focus on different levels of employment within the game including managers, administrators, coaches, trainers, football scouts, players and other categories of employees. This seems to be a very broad ranging review of employment policies across the full range of categories of staff. The Premier League itself will provide training and advice to its individual member clubs and the IFC has already heard from clubs who have experienced the equal opportunities and diversity training which the Premier League has provided for its members. The Premier League will encourage its own clubs to work towards the Kick It Out Racial Equality Standard. The Premier League Action Plan is also still in draft stage and is likely to be formally approved shortly by the CRE.

In the evidence supplied by the Football League to the IFC, the League's strategy is set out in a somewhat different form. Its paper, *The Football League: Race Equality in Football (December 2005)* comprises a three-page statement of beliefs, aspirations, objectives and practical plans which cover similar ground to that reviewed by the other two football authorities, but set out in a different form. The Football League sets out its guiding principle as that:

"racism in football is unacceptable, just as it is elsewhere in society. The League supports inclusion in professional football and combats racism by promoting equal opportunities in employment and by welcoming involvement by all members of society as fans, staff, players and officials."

The League has recently updated its equal opportunities policy which now includes specific reference to different types of discrimination and harassment. The League's employment policy is governed by an Equal Opportunities Strategy and diversity monitoring is now included for all new appointments. The League reserves its position about adopting policies of co-option or target setting for recruitment. Its action plan specifically refers to promoting enjoyment by all members of society during a match-day experience as well as developing stewards' qualifications and working closely with the Association of Chief Police Officers. The League points out that its 72 members are independent businesses, each having to make their decisions about recruitment, training and match experience. The League will provide advice to its members and spread good practice. However, the League does not believe that it is the body best placed to provide training to its member clubs on race and equality policies and objectives. It believes that each club should have to take whatever action it believes necessary according to its own needs, objectives and resources. The League firmly believes that football is a sport where people from diverse backgrounds can work, play and take enjoyment from the game and it believes that its own action

plan and diversity strategy will promote that objective. Like the other football governing bodies, the Football League is making good progress in developing its equal opportunity strategies, which it expects to be fully in place by June 2006.

The IFC understands that the CRE are in negotiation and discussion with the Football Foundation and the Professional Footballers' Association (PFA), which are both developing similar racial equality action plans, which will be approved by the CRE in due course.

There is the perception amongst the football authorities that the CRE's main focus of interest is in employment and that it would wish to see over time a greater ethnic diversity represented in all branches of employment within football. However, another important aspect of concern to both the CRE and football is racism in itself. All football stakeholders support not only the Kick It Out campaign generally, but also the specific Kick It Out Week of Action, which often attracts a great deal of media attention. However, it is broadly acknowledged that simply wearing an anti-racist T-shirt or prominently displaying anti-racist logos are not of themselves sufficient to combat racism both nationally and internationally. As the IFC has previously recommended, there needs to be firm action on the part of the football authorities in dealing with incidents of racial harassment of either players or supporters. It is worrying to note that black players continue to suffer verbal abuse in European and international matches. In response to this recent wave of such incidents, FIFA have now introduced increased penalties

against clubs whose supporters racially abuse players. This is to be welcomed as a strong sign that football's authorities wish to stamp out racism at every level. It is also noteworthy that the European Parliament has recently adopted a strategy for eliminating racism from football. Footballers should be able to practice their profession free of racial abuse, as any other profession expects.

The IFC will continue its policy of actively monitoring both the football authorities' on-going racial equity action plans and the actions taken by football authorities and clubs to continue to stamp out racism within football. In its attendance at matches, the IFC continues to note the small representation of ethnic minorities among supporters. It therefore, **recommends** that, within the developing Race Equality Action Plans, the authorities encourage clubs to make more positive attempts to augment ethnic minority attendance at matches.

Community

The IFC is pleased to note that the football authorities acknowledge the importance of football in the wider social and economic life of the community. The IFC has argued that football has a good track record in its community involvement and that more publicity should be given to this aspect of the football world. It is, therefore, pleasing that this message has been taken on board and the authorities are giving greater publicity to the important and valuable work done by football in the social life of their local communities.

Last year, the Premier League produced a separate Community Report and this has been repeated in 2004/05. The

Commission wishes to commend the FA Premier League for the excellent Report "Young people matter FA Premier League Community Report 2004/05". In this valuable Report, there is reference to the contribution football makes to "education, social inclusion and healthy living...we believe that football is an important and cohesive force with a role to play". The well-produced, colourful and interesting Report provides a range of examples of activities by Premier League clubs in such matters as social inclusion, diversity, disability, education with particular reference to reading, citizenship and women's football. The Premier League has also developed a BTEC in

Sport aimed at scholarship students at the football academies and they also have supported the Prince's Trust activities and a range of anti-crime initiatives.

At a recent conference, the Premier League was able to cite distinctive and special initiatives at each of the Premier League clubs and these are cited in box 1.

This is an impressive list which illustrates the broad and diverse range of activities that Premier League clubs are promoting. These activities are a valuable antidote to the adverse publicity which is sometimes given to the activities of individual footballers.

Chelsea	Anti-bullying	Charlton Athletic	Reducing rail vandalism with Network Rail
Arsenal	Educational outreach	Birmingham City	Working with the Police to reduce crime
Manchester United	Reading (particularly supported by Ryan Giggs)	Fulham	Estates based learning scheme
Everton	Young people working within old peoples homes	Newcastle United	Adult learning
Liverpool	Crime reduction	Blackburn Rovers	Religious toleration
Bolton Wanderers	Work experience	Portsmouth	Good behaviour in schools
Middlesbrough	Drug misuse	West Bromwich Albion	Urban programme
Manchester City	Healthy living	Crystal Palace	The Prince's Trust
Tottenham Hotspur	Disability engagement and learning	Norwich City	Volunteer programmes
Aston Villa	Positive Futures and social integration	Southampton	Common programmes against racism

One of the community initiatives launched during the year was the **Health Partnership** with the Department for Health. At the launch in May 2005, the Minister for Public Health, Caroline Flint, confirmed that there was a valuable contribution that the football profession was making to improving the health of the nation. She reported that football clubs are "achieving real success in local communities to improve understanding of healthy choices and increased access to health services". The publicity associated to the launch was able to quote interesting examples of football clubs promoting healthy living such as the initiative at Middlesbrough with young children, which was led by the Club Captain, Gareth Southgate. The document "**Football and Health**" and the associated initiative was sponsored by the FA, the FA Premier League, the PFA, the Football Foundation, the DCMS, Sport England and the NHS.

It was noticeable that the Football League chose not to participate in this initiative and were pursuing their own separate health activities. In fact, within the publicity for the Health Partnership there were very good examples quoted from Football League clubs that had been involved in health initiatives. These included Leyton Orient with its Primary Care Trust and GP's on site, the Brentford Health Centre, the sponsorship of the Preston North End captain by a local Primary Care Trust to promote health awareness, the Hull City initiative of Dads Against Drugs and the promotion by Southend United of men's sexual health. The Football League has also been developing community initiatives as part of its new branding exercise with the sponsorship of Coca Cola and the renaming of the leagues within the Football League competitions. The IFC would also wish to commend the

Football League for its range of newsletters under the title "**Real Football**", the first of which appeared in November 2005. In the **Youth Development Newsletter**, the Football League draws attention to the importance of the academies not only in developing home grown local talent which then feed into the first teams of the various clubs, but also the importance of producing well-rounded individuals as well as encouraging football talent. For example, the feature on Huddersfield Town's well-run academy pointed out that the education and welfare programmes sit alongside football and that was an important part of the youth set-up in all the Football League clubs. It was also welcome to see that the Football League is launching a set of awards aimed at honouring the best apprentice players at its various clubs. This would give further encouragement to this important aspect of youth development. The funding of the Youth Development Programme is under review and the IFC would certainly endorse the Football League's view that this has been a very important social and educational as well as football initiative in local communities. As the Football League Newsletter suggests, "the youth funding programme has been a prime example of how a public private partnership can work in sport".

The **Real Football in the Community Newsletter** focuses on the excellent work being done by the Football League clubs in their local communities. The Football League asserts that their clubs are "at the very heart of these communities and many are the single biggest community activity". Through innovative Football in the Community programmes, League clubs use the game's appeal "to make a positive contribution to the lives of hundreds of thousands of people throughout England

and Wales". The League's publicity is able to cite excellent and innovative programmes at Norwich City in raising disability awareness and the provision for disabled supporters as well as disabled players, an aspect also developed by a new initiative at Oldham Athletic with the support of the local authority. Reading have developed an education programme at the ground relating to the awareness of fire safety and an exciting and innovative education initiative has been launched at Plymouth Argyle with their Pilgrim Centre funded by the government's "**Playing for Success**" initiative which has developed a new after-school centre at the club. It is also interesting to note that clubs that are rivals on the pitch are nevertheless able to collaborate in the interest of their local education service and communities and such an example is a new education centre being developed by Bristol City and Bristol Rovers. The IFC welcomes the greater concentration in League publicity on the valuable work done by their clubs in promoting social inclusion, education,

disability awareness and other important social concerns using the power of football to dispense very positive social messages.

The Football Association also puts great stress on its contribution to wider public affairs and describes in its Annual Review 2004 the role of the FA as “a power for good”. The FA has been working with a number of government departments in promoting initiatives, such as increasing public physical activity and therefore tackling obesity and related illness, a range of educational initiatives including the production of educational resources and the role of football schemes for community engagement and improvement. The Football Association has also organised a number of very interesting and valuable conferences under the banner of “The Power of Football” and these have been an important opportunity to showcase the valuable, broader social role which football has both adopted and actively implemented.

Historically, there has been for over 20 years a national scheme called Football in the Community and it is important there is clarity of the role and purpose in the various initiatives which are now being developed. Clubs and organisations often use the term “football in the community”, whether or not this is part of the official Football in the Community scheme. After a strategic review in February 2005, the Football in the Community programme has focused more on providing training and professional development for Football

Community Officers and similar professionals. While welcoming the flowering of community initiatives, the IFC would counsel that there is not wasteful and inefficient either competition or duplication between these initiatives. It would also welcome a clearer definition of the way in which the individual club initiatives integrate with the Football in the Community scheme as a whole. As elsewhere, there is a need to co-ordinate better the range and diversity of programmes which are promoted by football generally. As often before, the IFC would **recommend** greater collaboration between the three football authorities in addressing common themes and common purposes in their community programmes.

The IFC is encouraged by both the community initiatives which have been taken and the more effective publicity devoted to them. Nevertheless, the IFC **recommends** that still more publicity should be given by the football authorities to their Community Programmes and Initiatives.

Child Protection Report: Where Are We Now?

In August 2005, following a wide ranging 18 month enquiry, the IFC produced a Report on Child Protection in Football. The inquiry arose out of concerns about how well the football authorities were dealing with this challenging and difficult issue. This was brought into focus by the comments of Sir Trevor Brooking who concluded that for the full potential of English football to be exploited, attention must be devoted to ever-younger children, with major initiatives at the primary school level.

Bearing in mind that, according to latest FA statistics, around 4 million children throughout England are currently playing football, shows we are dealing with a massive undertaking here.

Obviously, the vast majority of people involved in football do so outside the professional game. Most of the organising and administration is done by an army of volunteers, estimated to number around 250,000.

The IFC's investigation into Child Protection in Football grew out of the increasing awareness of child protection issues and growing parental interest in the

precautions that organisations should take when entrusted with their son or daughter. Football as a whole has a duty to ensure that children are given the highest standards of care and protection. Parents and guardians have a right to expect this.

The overriding question for football when considering child protection is whether its policies, rules, action plans, training and preventative measures, ensure that when a young person is in the care of football, they are as safe as possible. This is irrespective of whether they are playing or being coached at one of the smallest of the FA's 44,000 affiliated clubs, or at the academy of one of the biggest. The principles are the same.

Football is taking child protection seriously, but it is an expanding brief. More and more football clubs are looking to younger and younger children for their future supply of talent. More attention than ever seems to be focussed upon these youngsters.

With all of this in mind, the IFC made recommendations aimed at all levels of football.

Before looking at those practical recommendations for improvement however, the IFC would like to emphasise the excellent work that is being done by the FA and the other authorities in this difficult field. Progress is being made in many areas. Those people working in Child Protection should be congratulated for making this sensitive issue a fundamental part of everyday life within the professional and grassroots game.

So, what has happened to the IFC recommendations? There were 23 of them and they can be roughly grouped into four main categories:-

- a need for consolidation; allowing new ideas to be absorbed;
- to look at resources and assure levels of professionalism;
- managerial support;
- working together.

All three football authorities welcomed the IFC Report and responded positively to it, with the FA providing a detailed commentary on each of the recommendations. Their responses are summarised in Appendix B.

To monitor the FA's action and proposals on the recommendations contained within the Report on Child Protection in Football, the IFC held meetings with their specialist child protection staff.

The Commission recognised that the FA was sometimes being frustrated in the way it both passes on and gleans information from other bodies. With this in mind, the IFC welcomes the creation of a Child Protection Forum. The forum shall initially meet to decide its parameters and establish clear terms of reference and then the intention is that it shall meet on a quarterly basis, although if any new issues arise it could meet on an emergency basis. The FA Premier League, the Football League, the PFA, Football in the Community and the NSPCC have all been invited to participate. There is huge strength to be gained from working together and pooling information and this is something the IFC has frequently called for.

The first Child Protection Forum met in February 2006 and a second meeting is scheduled for early April 2006. Sub groups will be established to consider specific recommendations from the IFC Report and they intend to meet on a needs led basis. These sub groups will allow efficient sourcing of information and provide a rapid turnaround of this important material.

As the IFC has pointed out, there is a sense of overburden amongst some of the lower leagues and within grassroots football. The members of the Child Protection Forum should not be seen as the only people who matter. They will need help. Consequently, the formation of sub-groups should allow a more even spread of workload and maintain efficiency.

The FA will be working with the Football League to deliver a series of seminars throughout February and March 2006. The club secretaries in all clubs will be invited to attend in order to raise the need for a holistic approach to safeguarding within clubs. The FA recognises the good work currently being carried out within the Youth Development programmes, but recognises the need to highlight concerns about the lack of pro-activity and general awareness of the potential risks in many of the clubs activities outside of the programme for excellence.

All County Football Associations have appointed a Child Protection Officer. Currently all clubs at all levels are being encouraged to ensure that someone is clearly identified as the person who is willing to take on board a lead responsibility regarding Child Protection matters.

The FA also recognises the need to ensure that everybody at all levels of football is reached. It is relatively easy to deal with the professional clubs because they have full time staff and are few in number. In contrast, the FA has 44,000 affiliated members and all of them need to be aware of Child Protection. This will place an increased workload upon the FA staff currently dealing with all areas of Child Protection. The FA has, ironically, been a

victim of its own success. Such has been the level of interest in their Child Protection work that they continue to be contacted on a frequent basis by clubs, leagues and the general public seeking advice and guidance.

The obvious danger here is that the level of expectation affects the quality of service. There is little point in encouraging clubs to be aware of their obligations and urging them to contact the FA with any concerns if they are not to receive a full, detailed and accurate response. With this in mind, the IFC is pleased to note that the FA intends to increase the size of the Child Protection Department to cope with the extra workload by appointing two additional posts within the FA Case Management Team.

The IFC is also pleased to note that Child Protection is not being seen as something extra or something that clubs should now be looking at as an individual entity. They continue to encourage the principle that Child Protection should be seen as an integral part of a club's Best Practice policy as embraced by the FA Charter Standard kite mark scheme. It is to be hoped that after an initial bedding-in process, more and more clubs will concentrate on Child Protection as a matter of course and the current requests for information and help will decrease in the longer term. The FA recognises however that this transition from awareness raising to pro-activity will take some time and needs to be facilitated with the correct guidance and support. Ultimately, it is anticipated that clubs and associations will be further empowered to deal with many, if not most, of the poor practice concerns that are currently being referred to the FA. In other words, they take matters into their own hands.

The FA recognises that whilst it has built up a well informed designated person structure and extensive FA accredited tutor workforce, it is essential that regular forums and seminars are provided to keep these individuals up to date and appropriately supported. The FA's development staff and voluntary designated person structures information exchange can be facilitated in part by the County Football Associations Regional County Support Groups. In addition the highly successful County Advisory Group (CAG) plays a key role in ensuring the FA Child Protection Department are aware of implementation issues faced by grassroots football and help shape the most effective ways to disseminate information and they recognise that this is very much a two way process.

This is evidenced by the recent progress with the County Administration System (CAS) via which key communications relating to recruitment, suspensions and the further development of the designated person structure can be held and shared appropriately. The CAG has been instrumental in assisting the development of this information exchange system via CAS.

The FA also recognises that the Child Protection Officer at county level is going to have more to do and in order to progress it is inevitable that workloads will increase. The roll out of CRB checks across football and the appointment of Club Welfare Officers will initially place greater demand upon the CFA's and in turn the CFA's CPO. However, it is anticipated that the longer term result will be that greater pro-activity will result and therein less poor practice referrals to the FA. Child Protection should be part of any club's Code of Conduct: it is common sense really.

The IFC applauds the fact that the FA is speaking to the people who are most affected by all of this: the children. "We are listening to the children", is a commonly used phrase. The FA continues to work closely with the NSPCC. In order to ensure that they provide relevant information on safeguarding to under-18's in a format that is accessible to them, a focus group has been developed in partnership with the NSPCC. A group has developed an interactive workshop which will be run for young people by young people to establish what they currently know, feel they need to know and how they wish to share the information. Part of this information gathering will involve the running of a football festival as well as going into schools to deliver workshops. It will be fascinating to see where the children place the greatest emphasis and it would be wrong to assume that adults know everything. They frequently miss the obvious!

The FA appreciates that the last few years have seen a tremendous amount of work done in the area of Child Protection. Every football club has had to be made aware of new rules and regulations. Many clubs, staffed by volunteers, have had to take a lot on board. The FA now intends to implement the IFC recommendation that consolidation is the key focus, to let everything settle and to take stock. This should not be seen as a reduction in the level of priority, but rather to let everyone reflect on precisely what else needs to be done. Education will continue, as will studies to assure that clubs and associations are complying.

The FA is confident that the Child Protection Forum will ensure that clubs share current best practice and support each other in dealing with child protection issues relating to ball boys/girls and mascots. The FA proposes a similar situation with regard to stewards and security officers. The general feeling is that there has to be some point when the FA shows confidence in the people who look after these children. It is also a fact of life that the FA cannot hope to control everything and that the clubs should be allowed to operate commonsense in this matter. The IFC accepts this point whilst encouraging continued awareness and monitoring of the situation.

The FA confirmed that they are working on new guidelines regarding the use of photographic images. These have been shared with the other football agencies and a collective approach will be taken to finalise the guidance to be shared across football.

The IFC is pleased to note that the PFA is being invited to the Child Protection Forums. The FA is hopeful that more professional players can be made aware of Child Protection regulations. Certain clubs were mentioned as being very good in involving players at all levels in this education process, especially Norwich City and Liverpool who were held as being excellent examples. This places emphasis on the PFA to help the FA. The PFA has a lot of influence and many of the players are seen as role models.

Professional clubs have academies and youth development programmes or offer courses through the Football in the Community programme. The latter estimates that nearly a million people, mostly under the age of 18, are involved in

their programme every year. In many of these cases, the youngsters are likely to have some sort of contact with professional players. It is to be hoped that the PFA will encourage those players to support Child Protection initiatives.

Safeguarding the estimated 4 million children involved in football, is a monumental task. It was with this in mind, that the IFC undertook to study football's policies, action plans, rules and preventative measures, and evaluate whether all of these young people who are in the care of football, are as safe as football can possibly make them.

The IFC applauds the work being done by the FA and the other football authorities. The IFC will also play its part. For example, the IFC Chairman spoke at the annual conference of the FAPL Child Protection officers. The FAPL is rightly proud of the arrangements it has made which are models of good practice. It has expressed the concern that there is a risk of dilution in working collaboratively with the other bodies. The IFC does not feel that this concern is justified.

Child Protection is something that the IFC will continue to monitor. High standards have been set and they must be maintained. To this end, the IFC will continue to have regular meetings with specialist FA, FAPL and Football League officers.

A further update will appear in subsequent IFC Annual Reports.

Charters

In March 2000, the governing bodies of football committed to introducing Customer Charters and later that year, rule changes were introduced requiring all clubs to produce a Charter. During the 2000/01 season the three governing bodies issued their own Charters. Since then, the IFC has received reports on an annual basis from the three governing bodies relating to their Charters. In addition, the FA Premier League and the Football League also report on their respective clubs and the work the clubs have carried out during the past year. The clubs report on a wide variety of topics such as ticketing, merchandising, facilities for disabled supporters and community initiatives.

The Football Association Charter

In 2004, the FA merged its Customer Charter and Charter Report into one document. Whilst last year's report was an A4 sized publication, this year it has been reduced to a much easier to manage A5 sized booklet. This, in the IFC's opinion, makes the Charter more appealing and it is much more likely to be read.

The FA, by its own admission, acknowledged in its Customer Charter 2003/04 that not enough people were aware of their Charter. In order to rectify this and to promote Charter awareness, the FA has worked hard to ensure supporters know of its existence. One of the ways used was to send a copy to all members of *englandfans*. In all match-day

programmes for England games, there has been a small (and it has to be said, easily missed) advertisement to fans explaining how they can obtain a copy.

The FA's Customer Charter 2006 explains, in easy to read and understand language, how their Customer Charter benefits the supporters. Each of the headings/subjects is followed by their "Commitments for 2006". The Football Association has consulted widely with supporters and supporters groups in order to develop issues and topics within their Charter.

The Charter also highlights the FA's *Football for All* programme which promotes and ensures that everyone who wants to be involved in football has the chance of doing so. It aims to remove all barriers preventing people from participating in football at all levels.

The FA informed the IFC that it was going to make their Charter available to County Football Associations in order to ensure that their Charter commitments were known to everyone right down to the grassroots of football. In addition, the IFC has been particularly pleased to receive a copy of the County Football Association Customer Services and Policy Status Report which notes the work achieved to date in producing their own Charter. The general feedback from County Football Associations is that most of them already have informal procedures in place and five

County Football Associations currently have committed to or have published a Customer Charter.

It is encouraging to see that the FA is committed to increasing the flow of information to its customers and they have added to the number of staff in their Customer Relations Unit making it easier to obtain information. There is also an assurance that senior members of staff within all departments will be kept fully informed regarding suggestions, comments and opinions. As is the case in any level of customer service, there is no better way to receive or glean information than by face to face contact. With this in mind, the Football Association intends to stage a number of forums across the country.

Ticketing is an area that always seems to cause problems within football, no matter what the level. England games are generally sold out and, until Wembley has been completed, various venues are being used around the country. The Football Association says it will be launching a new system whereby ticket sales will be more efficient and, for the first time, available via their website - www.thefa.com. There is also a desire to make the sales of tickets completely transparent. The IFC applauds anything that makes fans feel as though they are being fairly treated, receiving a fair allocation of tickets and paying a fair price.

Finally, it would be helpful if the FA explained what role the IFC plays in the complaints procedure. An address is given at the back of their leaflet but no explanation as to why it is there. They outline their commitment to customers and explain how they will be fair, effective and committed to looking into any complaint, but there is no mention of what a customer should do if they remain unsatisfied.

The FA Premier League

The FA Premier League has continued to report on its own Charter and Club Charter Reports in a separate format. The FA Premier League Club Charter Report remains quite bulky. However, the information contained in the Charter Reports from all clubs is thorough. The IFC feels that whilst some of the Charter Reports could be likened to a club brochure, they form valuable inside knowledge of the work the clubs are doing, some of which supporters might not be aware of.

In the IFC Annual Report 2004, it was recommended that charter reporting must be simplified and the IFC and FA Premier League are in the process of discussing the best ways to take this recommendation forward.

A continuing problem with all charters over recent years has been their size. Some clubs manage to keep their charter report down to a reasonable 10 pages whereas others have produced a weighty tome extending to 24 glossy pages with photographs. This can be partly explained by some clubs not knowing what is expected of the charter. It is suspected that rather than risk omitting something, they always include everything. In certain respects, this makes for a very readable document but it does not fit in with the remit of a charter.

It would also be hoped that staff of all clubs receive a copy of their club charter. If someone is spending a lot of time putting it together and liaising with senior officials as to what should be included and therefore promised to the fans (customers), then it would seem sensible that everyone within the club is made aware of these promises.

It would also make life simpler if clubs followed a series of paragraphs in the annual club charter report, and then had a corresponding document 12 months later that outlines whether their charter promises had been met or failed. In practice, they read as two separate documents.

There is also the problem in being able to verify what clubs tell us in their charter report. Some, for example, express a

desire to respond to queries or complaints within a set time scale. Some clubs achieve this and others don't. There seems little point of setting a time limit if there is no way of measuring whether that limit has worked. Aston Villa Football Club has a policy of replying to complaints within 14 days. They usefully provide a chart that shows whether this limit is being achieved. They also compare the current year and previous year's figures. It is refreshing to note that, while the number of complaints has risen (359 in 03/04 to 442 in 04/05) the time taken to respond to the majority of those complaints has fallen from 7 days to 6. The number of replies who fail to hit the 14 day limit has fallen from 35 in the 03/04 season, to just 7 in 04/05. Everton go one step further and show a breakdown of complaints on a monthly basis.

The sale of tickets is now much easier to follow in most reports. Clubs identify prices, what sort of percentage is made available to home and away fans, and how many are reserved for season ticket holders.

Naturally, if a supporter does have a complaint, it is important that that person knows precisely whom he/she should contact. Football clubs have a plethora of departments. Fans may find this confusing if they have a complaint. They simply do not know which department to contact. They will generally contact the main reception number and hope that the person who answers will be able to point them in the right direction. This places a lot of emphasis on the receptionist. To make things easier for everyone, it would be better if clubs had a Customer Relations contact number or address. Some clubs do this. Birmingham City for

example, begin their report by introducing their Customer Service contact, providing name and contact details. The IFC welcome this because, whether we like it or not, the vast majority of supporters will only reach for their club's charter when they have a problem or complaint. The last thing a frustrated fan needs is to be forced to wade through a hefty document trying to find a telephone number or name. If a problem can be resolved quickly and efficiently, there is more chance of the fan feeling satisfied and valued.

An interesting part of the Liverpool report is the section where they list the ten most commonly received complaints. The most popular grumble, as most clubs will also recognise, surrounds ticketing problems. This seems to be a familiar trait. The fact that the sixth most common complaint was regarding drinks being too hot in the catering bars, suggests that the other complaints were minor or few in number. However, it is to Liverpool's credit that they are willing to admit the main problems, and publicise them. Crucially, they also provide the answers/solutions to the problems.

Most clubs clearly state what they intend to do regarding replica shirts. This explains to fans when new shirts will be launched and the length of time those shirts will remain current.

It is also refreshing to see the amount of effort that clubs put in to assisting disabled fans and their carers.

The IFC also applauds clubs for their strong stance on racism. This features prominently in all Charter reports.

It is always helpful to supporters to be able to see what their club intends to do over the next 12 months. Several clubs provide a summary on the final page or a list of targets. Everton have their useful Toffee Targets that allows fans to glance over the previous season and judge whether changes have taken place.

The IFC welcome the way that the FA Premier League has developed its own Charter Report which has become more streamlined and user-friendly in recent years. The FA Premier League's Charter notes the eight commitments that have been worked on during the reporting period and explains what has been done to satisfy these commitments. The eight commitments covered Customer Service/Best Practice, Equity and Diversity and working with disabled supporters. By working with the Customer Services Network (CSN), of which the FA Premier League is a member, they have been able to run seminars for Club staff with the aim of helping them to improve the way they work with supporters.

The FA Premier League researches fans' opinions annually and publishes the results in the National Fans Survey Report. This gives a valuable insight into what supporters think about their clubs and what their clubs offer them. The IFC is disappointed to note that supporters were not questioned about their clubs' charter or commitments.

The Football League

The Football League Charter and Charter Reports have, as last year, been published as one document. The Football League together with their clubs, commit to making three "promises" to achieve during the year. The Customer Charter Report 2005 is a well produced publication which helpfully summarises the commitments for both 2004-5 and 2005-6.

From the club perspective, the "promises" for 2004/2005 season covered a number of wide-ranging topics which are split as shown below:

	Children/Family (including reduced/free tickets)	Consultation with supporter groups/fans	Customer Services, standards and relations	Disabled supporters (inc DDA)	Address complaints	Racism and Equity	Stadium and safety - issues/improvements	Community and education	Review or promote charter	Ticketing	Other	Total:
Championship	5	10	3	6	2	1	6	12	2	6	10	63 ^[5]
League 1	7	9	7	8	2	4	8	15	4	1	7	72
League 2	5	15	9	6	2	1	10	6	2	3	7	66 ^[6]
Totals	17	34	19	20	6	6	24	33	8	10	24	201

Only 12 out of 201 promises were either not kept or could not be fully achieved (less than 6%).

The IFC is disappointed to note that only 4% of clubs' promises referred to either reviewing or promoting their Charters.

Whilst only 3% of clubs made reference to their complaints process and almost 9.5% refer to improving customer services, standards and relations, it is pleasing to note that almost 17% of clubs are in active

communication/consultation with their supporters on an individual or group basis. Southend United have introduced Compliments and Complaints leaflets which are on display at their ground.

Like their clubs, the Football League also makes three promises for the year ahead. One of their promises was to make football more accessible to a wider range of people, particularly to children. This was achieved with the launch of their "Fans of the future" project. This initiative

aims to encourage the next generation of supporters to go along to their local football club to watch live football.

Forty clubs have introduced a "Kids Go Free" scheme. Of them 34 will operate it at all home League matches^[7]. Other incentives are ticket discounts, family tickets and free tickets for school groups.

[5] Three promoted clubs from the 2004/05 season not included, i.e. based on 21 remaining clubs in the Championship.

[6] Two promoted clubs from the 2004/05 season not included, i.e. based on 22 remaining clubs in League 2.

[7] Source: The Football League Charter Report 2005

General

The IFC remains concerned about who benefits from the Charter reporting exercise. It is pleasing to have Lord Mawhinney confirm that "since its inception, the IFC has helped raise the standards of customer service in football". Nevertheless, it must be borne in mind that ultimately, Charters are for the benefit of the supporters and members of the public from International to grassroots level of football and not for the benefit of the IFC. It is therefore important that the information contained in a Customer Charter remains to the point, focuses on topics which are relevant to each individual clubs'/governing bodies supporters and are not cumbersome in size, so as to be put off reading them. The FA Premier League Charter Report^[8] states "...that each Club should establish its own internal set of standards. Combining these standards with customer feedback results should ensure that the standards reflect the needs and expectations of each Clubs' own supporter base".

In this regard, the IFC would be particularly keen to learn how clubs make their fans aware of the charter. During our match day experiences where we attend games in all divisions, one of our exercises is to request a copy of the current Customer Charter. We usually attempt this exercise at the Ticket Office, club shop and the main reception area if it is accessible. The same two answers are generally received: either the person knows exactly what is being asked for and is able to provide a copy of the charter, or admits that they do not know what we are talking about!

Clubs providing a charter on request

(from IFC experience during 2005)

League	Matches	Charter provided
England international	1	0
FA Premier League	4	1
Championship	1	0
League 1	3	2
League 2	3	0
1 FA Cup 4th Round	1	0

In a similar vein, we also randomly ask supporters if they are aware of their Clubs' Charter. Whilst some supporters admit to knowing of the existence of a Charter, many more are still unaware that such a document exists.

The IFC applaud those clubs who go the extra mile to ensure their supporters are aware of their Customer Charter. Newcastle United attached a copy of their Customer Charter to their first home match-day programme of the 2004/05 season. Similarly, we are aware that Middlesbrough FC printed sections of their Charter Report over a period of weeks.

Further examples of good practice are Blackburn Rovers and Norwich City who have ensured that framed poster size copies of their Charters are put up in their concourse areas.

There is a lack of promotion or advertising of Club Charters in match-day programmes; more often than not they are not mentioned. Some clubs have taken the step of printing their complaints process in their programmes which the IFC welcomes. However, Customer Charters provide much more information than the complaints process.

[8] Source: The Football League Charter Report 2005

Charter Information Gathering 2005

(based on IFC match attendance during 2005)

Mention of club charter in 9 sample match-day programmes	1
Mention of the FA Charter in 1 international match-day programme	1
Mention of the Governing Bodies' Charter in 1 match-day programme	1

The clubs and the authorities are to be congratulated for providing another extensive run down of what is, in effect, a yearly insight into the state of football at club level and how it is providing a service for its customers: the fans.

Without doubt, for many clubs, especially the smaller ones, the provision of a charter and then reporting on it, is a time absorbing task. For many clubs, it will remove a key member of staff from circulation for a considerable period. However, while remembering the key feature of the charter is to show fans what has happened at their club over the past 12 months, and what will happen over the following year, it has developed into a much bigger exercise.

While this latter point is above and beyond what the IFC requires, it actually provides a detailed look at football in general. Many

clubs will benefit from reading about what other clubs are doing. For this reason, the IFC congratulates all of the clubs for their time and effort, because football is a family and it can only be to the common good for more information to be passed between them. Too often we hear about clubs refusing to assist one another when, in reality, many clubs will all have similar problems. It can be assumed that most clubs reading through the annual charter reports will recognise the problems being faced by dozens of other clubs.

The IFC applauds those clubs who have appointed a designated Customer Services Manager. This is a key role within football clubs yet, until recently, was largely seen as something that anyone could do. Many clubs, whether due to lack of interest or lack of finance, would give the role of Customer Services Manager to someone else. This tends to blur things

slightly and can cause confusion within the club because they do not know who is fulfilling that role. In the case of a single telephone number coming through to a receptionist, it sounds unprofessional if the person answering the phone does not know to whom the call should be directed.

The principle of using charters is evolving. As football clubs become more and more involved in other areas such as community, education, racism campaigns, the staging of events other than football, increased hospitality, websites, media and an ever-rising level of marketing and merchandising, all means that football clubs are responding to many more customers than 'just' the football fan. If the club is providing a service to an individual, then the club charter should apply to them. Many people are now involved with football clubs, yet never go along to a game.

It has to be anticipated that charters will change. The IFC recognises this and looks forward to a meaningful discussion with the governing bodies and clubs.

Spurs provide an interesting quote from their legend, Bill Nicholson. It is two sentences that many clubs could take note of:

"We must always consider our supporters, for without them there would be no professional football."

"It would be better having more fans watching football the way they liked it played, rather than have a few fans watching football the way we would like it played."

Recommendations

The IFC recommends that immediate steps should be taken to simplify the reporting process by both FA Premier League and Football League clubs.

Further, the governing bodies should ensure that their charter reports suitably reflect the work carried out during the appropriate season and that only the clubs in their leagues during that season are included.

Charters themselves should be reflective of individual clubs' needs. However, all should contain reference to tickets and the clubs' complaints procedures.

The Complaints Process

The IFC has acted as the final and independent point of appeal in football's complaints process, within the limits of charter-related issues since January 2002, when they were established. So far the revised complaints procedures agreed with the football authorities have worked well. The IFC believes that the introduction of a final, independent referral point has acted as an incentive to clubs to resolve complaints at local level, with or without the help of a higher football authority.

As reported in previous years, the number of complaints adjudicated by the IFC still remains minimal. Our view still remains that most of the complaints referred to us should not have needed our involvement.

Only nineteen complaints have been referred to the IFC in its four years of existence. Of these the IFC has issued adjudications on fifteen, three of them in 2005.

COMPLAINTS REFERRED TO THE IFC

equal opportunity	1
FA rules for operating the league system	2
stadium bans on supporters	3
stewarding	4
ticketing (cup competitions)	7
ticketing (other)	2
total	19

As in previous years, the IFC conducted a survey of the matchday programmes we have collected in search of clear advertising of complaints processes. Of the 12 programmes it examined during the calendar year, the IFC only found 1 programme which mentioned their complaints procedure, and the same programme mentioned the involvement of the IFC.

IFC SURVEY OF MATCHDAY PROGRAMMES 2005

Number surveyed:	12
Premiership:	3
Championship:	1
League 1:	2
League 2:	2
Internationals:	3
Cup competitions:	1
Reference to:complaints procedures:	1
Independent Football Commission:	1

On-Going Work

Agents

In its 2004 Annual Report (p52), the IFC announced that it planned to 'examine the role and activities of agents in player transfers and contracts, and study regulations concerning them'. This work began towards the end of 2005 and is expected to be completed by the summer of 2006.

In the case of agents, there has been a steady increase in the amount of public interest in the role of agents and whether they are a leech upon football. There appears to be a frequent flurry of activity, especially within the media, and then the topic dies down. However, the frequency of stories linking clubs and managers to 'dodgy dealing' involving agents seems to be on a general increase.

There is a feeling that football is awash with 'bungs' and that 'tapping-up' is rife. However, proving that these events happen is extremely difficult, bearing in mind that there is nothing written down at any sort of official level and most of the allegations are based on rumour.

A few concrete cases have surfaced. Chelsea were accused of 'tapping-up' Ashley Cole, and there have been promises of spilling the beans from Luton Town's manager Mike Newell, Queens

Park Rangers manager Ian Holloway, and the England coach Sven Goran Eriksson. However, despite negotiations with the FA, nothing has surfaced that would seem to be part of the way along the road to solving this problem.

And it is a problem, and strongly perceived to be such among supporters.

Football fans are suspicious of what is going on at their club, where the money they hand over at the turnstiles is being spent and why a player has been signed for what appears to be a vastly inflated fee.

Of course, the only way to remove all suspicion would be to have all payments to players and agents made completely transparent. Transfer dealing could be published in annual accounts, as Manchester United has done. The IFC also warmly welcomed the decision to publish biannual summaries of all Football League clubs' payments to agents.

The initial response of the authorities was to regard the IFC enquiry into agents as unnecessary, since there were several other enquiries ongoing. However, the FA, FA Premier League and Football League were content for us to approach the clubs to ask for them to volunteer any information.

However, within two weeks of the approach to the clubs, the FA Premier League announced that it was launching its own far-reaching inquiry into alleged irregular payments from transfer dealings. It will study all transfers since 1 January 2004. The former Metropolitan Police Commissioner, Lord Stevens, will chair the inquiry. As they say, they have no evidence of any wrongdoings, but there is such a climate of suspicion that they feel something must be done. There are concerns that the reputation of the FAPL is being affected. As a consequence of establishing its own enquiry, the FAPL has instructed its clubs not to respond to the IFC's request for information. The IFC in its ongoing enquiry will of course collaborate with Lord Stevens in any way that may be deemed helpful.

The FA, as the game's governing body in England, has a responsibility to all football clubs in this country. It also has a responsibility to report to FIFA and follow the international rules and regulations.

This latter point causes a problem. Individual countries have separate rules regarding agents. We shall look at this matter later.

Closer to home, there is disagreement between the FA and the Football League in respect of certain sections of the proposed new rules and regulations which were issued in January 2006. The main stumbling block has been dual representation, where an agent works on behalf of both the player and the club. Again, we will look into this later. Another contentious matter is the fact that many clubs pay the player's agent, rather than the player paying his own agent.

With all of this in mind, the IFC felt that it was right to look into what the authorities were doing about agents and/or illegal payments. The IFC has already had meetings with the FA, FA Premier League and Football League. The IFC will progress its enquiry during 2006 and its work will include discussions with UEFA and FIFA.

European Experience for English Fans

On the 29 May 1985, English football clubs were banned from playing in European competitions. It was to be an indefinite ban following the riot between Liverpool and Juventus fans at the Heysel Stadium in Brussels which saw 39 fans die. The ban was eventually lifted 5 years later although it took several more years for English clubs to reassert their influence within European football.

On 15 April 1989, 96 people lost their lives at Hillsborough following a crush at the Leppings Lane End. Although this wasn't a European fixture (FA Cup semi final between Liverpool and Nottingham Forest), the effect of the Hillsborough disaster was far-reaching in terms of the English game and therefore has an influence on the way football at all levels is played here.

Since those two disasters, there has been a marked improvement in the way our grounds are run and built. Hooliganism within football grounds is, thankfully, much less prevalent than it was at the time of Heysel and Hillsborough although it hasn't been completely eradicated. There are still isolated incidents but the days of mass fighting within English football stadia appear to be largely over.

But, although we appear to have our own 'house in order', what about the experience for English fans who travel to watch their teams in European fixtures? They will quite rightly expect the same levels of safety and security as they have at their own ground. They also expect to have access to decent facilities, a decent seat and a decent view of the game. In many cases, fans will have taken time off work and paid out a not inconsiderable amount of money to follow their team.

In an ideal season where teams successfully go through their qualification fixtures, we have 4 clubs in the European Champions League, 2 or 3 clubs in the UEFA Cup and, if they decide to enter, various clubs in the Intertoto Cup. In addition there are likely to be pre-season friendlies and some sponsor-led tournaments. The numbers of fans able to travel to these fixtures is likely to increase, mainly due to the availability of cheap air travel from regional airports. It should also

be remembered that many fans will travel to the away game without a match ticket, merely to enjoy the atmosphere in the build-up and aftermath. There is the temptation of visiting a potential tourist destination and, hopefully, enjoying some sunny weather. It makes a tempting proposition for any football nut, irrespective of whether they watch the game at the stadium or sit in a local bar viewing it on a TV.

So, we have the potential for more clubs and more fans making their way to a European destination than ever before.

A natural assumption would be that familiarity with European clubs would lead to an improvement in facilities and conditions for English fans travelling to the continent. It would be hoped that the experience of one club playing in Europe would be passed on to successive English clubs travelling to the same venue.

It would therefore be safe to assume that when reports of concerns regarding safety, control of fans, ticketing, transportation, policing and stewarding etc. are passed on to the relevant authorities, that these issues would, if sufficiently serious, be dealt with by UEFA.

UEFA has a set of guidelines that any clubs involved in a European competition must follow. UEFA has a reputation for acting swiftly if any English club steps out of line. There are always veiled threats that if a club or any supporters cause a problem, then English clubs and even the England team, could be thrown out of various competitions. Without doubt, the reputation of English fans continues to worry European clubs and UEFA.

However, with all of the experience gained by English clubs in Europe and the fact that travelling to watch a European game is no longer a rare experience for many fans, why are there still problems endured by English clubs and English fans? It is by no means rare for the same problems to raise their head at a ground where an English club had played in only the previous season.

Is it really necessary to herd supporters onto buses like cattle? Why are some fans kept in the ground for approaching two hours after the game has finished? Why are English fans searched at the turnstiles for almost every conceivable item whilst the home fans seem to have access to distress flares, thunder flashes and huge flags? Do fans need to be at the ground three hours before kick off? Does a seat number on a ticket really mean stand anywhere? When is a seat not a seat? Why does the local constabulary like to flex its muscles by hitting English fans? And does anyone have the faintest idea how a single lavatory is supposed to cope with over 3,000 people?

It was because of these and other concerns, that the football authorities invited the IFC to review the experience of English fans when travelling abroad in Europe.

There exists a real concern that European games do not appear to be staged on 'a level playing field'. Here in England, we abide by UEFA rulings. Our stadia are unrecognisable from the days of Hillsborough but, elsewhere in Europe football is still being played in some very primitive arenas. Even clubs with experience of staging both domestic and international games, where you would anticipate no problems, there are glaring concerns. And yes, why, if a European

club is breaking UEFA rules, is that club not thrown out of the competition until their ground meets the required standards? The suspicion is that it would happen to an English club if it was failing to abide by UEFA regulations, so why doesn't it happen to clubs beyond our shores?

The IFC has visited the six English clubs who were involved in the main European fixtures. They were Arsenal, Bolton, Chelsea, Liverpool, Manchester United and Middlesbrough (Everton had already been eliminated from the UEFA Cup before our investigation got under way). All of them had strong opinions about playing games in Europe, the actions of UEFA and the way we stage games here in England. We also met with senior officials from the Government to find out the role of British Consul when it comes to football matches, and we spoke to senior security officers from the Football Association.

At the time of publishing this Annual Report, the IFC has attended European fixtures in Spain, Portugal, Germany, Italy, Switzerland and France. We have joined planning visits where the English clubs travel to the venue in order to check out where their fans will be situated, how they will get to the stadium, policing, ticketing etc. We have noted that promises made at these meetings sometimes are not kept, arrangements have been altered and, on one occasion, the local police refused to speak to the UK police representatives.

We have also noted that when European clubs come to England, they rarely bother to send anything more than a token party for a planning visit. Some don't bother at all. On one occasion, the security chief at one English club had to pass on any policing/stewarding information to a visiting travel agent.

With all of this in mind, the IFC will be reporting in a special publication later this year what European clubs do, fail to do, and what UEFA should be doing. We will be reporting on how English clubs prepare for their away matches and how fans are prepared for what awaits them on the other side of the Channel. We shall look at the UK police and study their role when abroad, and the involvement of the foreign consular service.

The aim of this IFC report will be to analyse current practice and thereby contribute to allowing English fans travelling into Europe the chance to have a more enjoyable and safer time. If it encourages UEFA to take action, such a response would be warmly greeted by English clubs. At the moment, English clubs are doing their utmost to anticipate and resolve any problems before their fans arrive at the stadium, without much in the way of assistance from the home club.

Recommendations will be given in the IFC's European Experience Report which we hope will make watching football in Europe a truly enjoyable experience.

The report is anticipated to be available during late summer.

What's up next?

The IFC will always have certain core features within its Annual Report. However, it is also important that we report on new initiatives from any of the three authorities as well as highlighting anything we feel as though they should be looking at.

The topics that will be revisited on an annual basis are:

- Governance and Finance
- Racism and Equal Opportunities.
- Community
- Child Protection
- Charters
- The Complaints Process

In addition, over the course of 2006, we intend to publish two further reports covering the topic of **Agents** and the **European Experience**.

The **Agents** report will look into the action of the three authorities following several flurries of media speculation regarding what became known as the 'bung culture' within the English game. We will be talking to the authorities, football clubs, Government, Inland Revenue and the agents themselves.

The **European Experience** report will look at why fans of English teams continue to encounter problems when visiting opposing clubs in European competitions. We study whether there is a trend affecting certain European clubs or countries and suggest what could be done to prepare supporters for what, in many cases, can be an intimidating experience instead of an enjoyable one. We also suggest how some of the problems could be resolved.

In addition to the above special reports, the IFC also intends to look into **ticketing**, and what sort of effect **TV coverage** and **TV scheduling** have on attendances at grounds.

In what is hopefully going to be a memorable year for the England national team, the IFC will review the supporter experience at the **2006 World Cup** in Germany, following on from the Report which looked into the 2004 European Championships in Portugal.

Annexes



Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
Self-Regulation report				
1	<p>The IFC recommends that option 4 in the Self-Regulation report be taken forward.</p> <p>This option gives the IFC a new funding base and a stronger focus on its having independence and authority. It stands between football and statutory regulation. It proposes a shift in emphasis and suggests that football structure its self-regulatory model around a formal Code of Practice, devised by the football business, drawing on an empowered regulatory body to adjudicate breaches of the Code. Public concerns would thus be addressed through a powerful and effective complaints mechanism.</p>	<p>The FA responded to the IFC report on self regulation, initially in June 2004 and subsequently with all three football authorities in September. As a result the IFC will continue in its present form, and both a budget and work programme for 2005 have been agreed.</p> <p>This decision was based on the role of the IFC to date, measured by the relevance of their reports and the adoption rates of the recommendations. The decision recognises that the IFC forms part of the self-regulatory framework in football.</p> <p>The FA values the role the IFC has played in the governance of the game. We anticipate a review of their terms of reference taking place as part of the overall structural review of the FA, being currently undertaken by Lord Burns and further referenced later in this document.</p>	<p>We are not convinced that this section is appropriate for the annual report though we would be pleased to discuss this matter with you separately from this response.</p>	<p>The Football League and other football authorities have responded to the IFC with a commitment for funding the Commission on a one year rolling basis with notice by September 30th of any year if the arrangement is to be discontinued.</p>

Report on Euro 2004

2	<p>The IFC recommends that the FA should give careful consideration to its strategic objectives for the 2006 World Cup qualifying campaign and competition and express them unequivocally from a position that recognises the relatively small role it can play, and a willingness to contribute to the larger strategy led by the Home Office.</p>	<p>The FA agrees with the recommendation. The strategic objectives for any major tournament are simple; firstly, to try and win the tournament on the field; secondly, to help ensure the safety and security and enjoyment of all those attending. It is an important role that FA plays in the strategy to ensure England's successful participation, and one that it consciously plays as part of a larger team. The co-operation between agencies for Euro 2004 was very successful and we have been careful to retain as much knowledge as possible in preparing for World Cup 2006.</p> <p>This response contains several references to World Cup 2006. We should preface all references with the appreciation that England's qualification is not assured. Our planning is not a sign of over-confidence – we want to be as prepared as possible and cannot afford to wait until October 2005 before starting.</p>		Noted
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Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
		<p>Within days of returning home from Portugal the project team met to discuss and record the lessons learned from the experience, and an action plan for the 2006 campaign was prepared. A meeting with the German World Cup 2006 organising committee quickly followed this. An FA delegation will be joining the Australian delegation at the Confederations Cup in Germany in the summer of 2005, to assess arrangements and logistics.</p> <p>We realise that the challenges and risks of Germany 2006 are different from Portugal 2004, though there are many lessons that we are trying to use from that successful off-field campaign.</p>		
3	The IFC believes the FA adopted the right approach in providing support and encouragement to supporter empowerment, but keeping it low-key and, in the case of its office in Lisbon, low-profile. It recommends that this policy should carry forward to preparations for 2006.	<p>The low profile approach is one we are keen to continue. It is essential that any initiatives or processes involving the promotion of a positive England support are fan-led. We will continue to promote, support and encourage the network of supporter relationships we have built over the last two years.</p> <p>We will also continue to use our influence and profile to ensure that the supporter-led projects are given the exposure they deserve. A relevant recent example was the support given to fans by The FA following the incidents involving England supporters and the Spanish Police in Madrid. 'englandfans' representatives collated the views of fans who felt they had received rough treatment from the local Police, which then formed a part of The FA's representatives to FIFA and RFEF (Spanish FA).</p> <p>The 'englandfans' team has attended seven forums since Euro 2004 to build on the success of the tournament. We intend to use the experience of Portugal as a template for success and have also secured a budget to support fan-led initiatives in 2005/2006.</p>		Noted
4	The recommends that the FA revisit its risk assessment procedures, drawing on external expertise.	While there has been a marked and extremely encouraging improvement in the image and behaviour of England fans at the last two tournaments, we cannot be complacent and we will continue to take the appropriate measures		Noted

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
		<p>to ensure this progress continues. Despite the progress, the problems of Belgium 2000, France 1998 and importantly Germany 1988 are too recent to think that they have been completely resolved. Again we do not take qualification for the World Cup in 2006 for granted, but have already begun preparations for Germany.</p> <p>Regarding risk assessment, The FA has used and will continue to use external expertise in a number of ways. Sir John Evans, former Chief Constable and President of the Association of Chief Police Officers (ACPO), has been used as a consultant throughout the build up to Euro 2004 and has been retained for 2006. A complete scenario planning exercise was also completed with external facilitation from Marsh, risk and insurance experts, an exercise which will be repeated including the differences between Portugal and Germany.</p>		
5	The IFC recommends action to widen the membership of englandfans, looking particularly to attract more families, ethnic minorities, youth groups, the disabled, and senior citizens.	<p>Targets have been set in this year's Customer Charter to ensure increased diversity within 'englandfans'. This forms part of The FA's commitment to achieving the Commission for Racial Equality's 'Sporting Equals' intermediate level. In December for example, The FA and 'englandfans' promoted the new membership at the 'Football For All' Conference at Bradford City FC, but we realise it will take more than distributing information at conferences to diversify the membership.</p> <p>The expansion of 'englandfans' commenced on 1 January 2005. It now includes two 'tiers' and gives access to tickets for home matches. At the time of writing, the capped number of members of 25,000 at tier 1 (home and away membership) has almost been reached, and there is no limit on the number of home-only fans who can join. We are awaiting the results of the diversity monitoring forms that were distributed with all membership packs.</p>		Noted

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
6	The IFC recommends that there should be an annual occasion when fans' representatives could discuss current issues with the FA's Chief Executive or a senior manager with the power to make executive decisions.	<p>We appreciate the value of access to the more high profile members of FA staff. Over the last campaign 'englandfans' and supporters groups have had access through forums and meetings to David Davies, Mark Palios, Sven-Goran Eriksson, Brendon Batson and Sir Trevor Brooking, and we would hope to achieve the same with the new FA Chief Executive, Brian Barwick, who has already attended meetings with supporters. Notably and deliberately, Brian has done this before giving any media interviews or access and considers the views of the England supporters to be very important.</p> <p>In addition, the 'englandfans' Operations Manager and Senior Customer Relations Manager personally attended over 40 forums and meetings in the build-up to Euro 2004. Although this may not have the impact of an appearance from a 'name', these are two of the key FA staff involved in making decisions with regard to 'englandfans'.</p> <p>We will look to continue with this dual approach in the coming months.</p>		Noted
7	The IFC recommends that the FA should make information available on how the official ticket allocation for away international games and tournaments is distributed, and the vetting procedures applied to all recipients of tickets.	<p>Information on how tickets are allocated is detailed in this year's FA Customer Charter. This is available in hard copy to every current and new member of 'englandfans', which at the current estimate numbers 50,000. Fans will be informed of the ticketing and vetting procedures in the communications that they receive.</p> <p>Ticketing allocations have already been announced by the organising committee for World Cup 2006, and we anticipate that the 8% of stadium capacity per competing team will not satisfy demand in England. We have made it clear that we would be willing to accept more tickets for our fans should they become available.</p>		Noted
8	The IFC recommends that the FA gives particular attention to the timescales, currency and manner of its communications and suggests that, additionally there would be merit in establishing a specific, measurable target to do with deadlines for match and ticket-allocation information, and fan's perception of transparency.	<p>The FA will always endeavour to release the information on ticketing and venues to members as a priority. There is no advantage to be gained from delaying the release of this information. Ultimately, we are limited by the timeliness of the host Associations and Federations.</p>		Noted

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
		<p>A good example of this has been shown in 2005 when the venue for the Spain v England away match was only confirmed three weeks before the match date, and The FA was forced to sell tickets without knowing the 'official' price, as it had not been confirmed by the Spanish authorities. All of this resulted in great inconvenience to both fans and The FA. The FA also incurred financial loss as a result.</p> <p>The FA has also endeavoured to plan home fixtures as far in advance as possible, to provide maximum certainty for fans. Away matches against the USA, Columbia and Denmark have now also all been agreed and made public. That said, we are not complacent and accept that there is scope for communicating this point more effectively. There clearly continues to be a lack of understanding of this issue by members.</p>		
9	The IFC recommends that the FA reviews the level of service provided by major contractors and objectively monitors its members' satisfaction.	<p>Service level agreements are in place with all third-party service suppliers and the contracts are continually under review. Member feedback via various methods (annual questionnaire, e-mail, fans forums, website and telephone) is a key source of information for these reviews, and specific complaints are logged and detailed in the annual Customer Charter.</p> <p>The FA does not provide travel or travel packages to matches but has an agreement with two 'approved' travel companies. FA staff have travelled with these companies to test their service and it has consistently met out standards.</p> <p>The task of providing ticketing services to The FA has been awarded to Ticketmaster for 2005, with a review to take place at the end of that period. The review will then lead to the selection of a ticketing partner for 2006 and beyond, which will include the provision of tickets for events at the new Wembley.</p>		Noted

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
10	The IFC recommends that the FA should work with the 'englandfans' membership to set and communicate standards, values and objectives for the club for the short and longer term, measure progress and report it regularly in a document available to club members.	As stated above, we believe supporter-led initiatives, rather than FA-imposed conditions, are the key to the long-term success of 'englandfans' and the image of English football fans. As such we will continue to build on the relationships formed during the build-up to Euro 2004 to continue to improve the club and also the image of England fans. This will continue to be communicated through our Customer Charter, as will our standards and objectives. The rules of the new 'englandfans' organisation already include references to these standards and objectives.		Noted
11	The IFC recommends that the FA should, in the immediate future, reach an understanding with the international authorities concerning responsibility for travelling supporters who are not 'englandfans' members. The objective should be to preclude any sense of buck-passing in future and to avoid internal and public disclaimers of responsibility, damaging to the purpose and presentation of English successes in building and managing support for English football in safety.	<p>The FA stated to UEFA prior to Euro 2004 that it could not be held responsible for all English people to Portugal. The limit of our responsibility is the fans to whom we have sold tickets, while they are inside the stadium, and the need for clarity on this issue from the relevant authorities (UEFA/FIFA) is our priority. We have already made this clear to the German organising committee for World Cup 2006.</p> <p>Regarding the open sale of tickets for 2006 via the FIFA website, details of the plan for ticket sales have already been finalised and released. There was no prospect of any change in legislation before the sale commenced on 1 February 2005, and it would be unreasonable of The FA to expect a policy exemption or exclusion for England, based on our unique circumstances – we consistently have the largest travelling support, media interest and television audiences.</p> <p>Despite this maintenance of our position in relation to responsibility, and our limited role, as per Euro 2004 we will assist the organising committee, police in both countries and other national football associations in any way possible to ensure that England's participation contributes to the tournament's success.</p>		Noted

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Implementation of 2004 Recommendations

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Annual Report 2004

2004: A Critical Year for the IFC

12	The IFC recommends that it should receive combined funding from football and government. This will let it build on its achievements and strengthen its contribution to improving the business of football.	The request for Government funding is best directed to the Government itself. The FA feels that the IFC has made a valid contribution to the business of football, established and funded by the football authorities themselves.		As recommendation 1.
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Self-Regulation: How Well is it Working?

13	The IFC recommends that its Self Regulation report should be taken into account during the structural review of the FA, and that the IFC should be consulted early and extensively in the review.	<p>Copies of the IFC's Self-Regulation report were passed to Lord Burns at the outset of his review. As the review is purposely independent, Lord Burns will decide who and when to consult, but The FA did advise him on a list of stakeholders including the IFC, again at the outset of the review.</p> <p>The review is important clearly to the FA itself, but its importance to other football organisations such as the IFC is recognised.</p>		Although this recommendation is noted, The Football League feels that this issue has already been dealt with by the football authorities, when agreeing to extend the future of the IFC.
14	It further recommends that the review should conclude no later than summer 2005, in the interests of setting football on a clear forward path.	<p>Again the appropriate timetable for the review has been decided by Lord Burns. He has published a consultation document, available on TheFA.com on 4 April, with a deadline for responses of 5 May. This document asks for views pertaining specifically to the scope of the review (corporate governance structures and decision making) as well as asking for input into a broader range of issues – such as what The FA's priorities should be – information which will help colour the review and be captured to assist the organisation in moving forwards. The review recommendations will then be published in July 2005.</p> <p>Lord Burns is meeting a large number of people – and intends to continue doing so all the way through the process. April and May will be intense and will include a large number of one-to-ones and some regional seminars, focussing on the county FAs and regional clubs who form the shareholder base of the FA.</p>		This is noted and is a matter for the FA.

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
		Lord Burns is already identifying emerging themes and commonalities with a view to identifying possible solutions. In due course, he expects to start testing some of these thoughts with individuals in future meetings. This may include the IFC but again this is a decision for Lord Burns himself.		

Euro 2004: How Did It Go?

15	The IFC recommends that the FA pursue clarification of the relevant rules applied to FIFA and UEFA tournaments, and their interpretation, with the aim of avoiding the confusion that produced potentially harmful tensions at Euro 2004.	The recommendation is welcomed. Discussions with both FIFA and the German World Cup 2006 organising committee have commenced and it is our intention to maintain this position for 2006, while assisting the authorities as much as possible in safety and security matters. At present we have not received clarification of the 'official' view on responsibility for those travelling to matches but are pursuing the matter at every opportunity.		Noted
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Governance and Finance: Changes and Challenges

		The FA's work in this area is collated in the annual report of the Financial Advisory Committee (FAC), which the IFC has received in March 2005. This report details both the progress made in finance and governance in 2004, as well as setting out the ambitions for 2005. Regarding the specific recommendations below, we offer the following comments.		Noted
16	The IFC recommends that the Football League should give a lead, in consultation with Supporters Direct, on providing benchmarking data to clubs, and facilitating imaginative opportunities to share best practice and ideas, outside the formal structure.	<p>We would refer the IFC primarily to the response of the Football League on this recommendation.</p> <p>The FA wholeheartedly supports the principles of sharing best practice and ideas, and this is borne out by its commitment to the work of the Financial Advisory Unit (FAU), such as the publication of various guidance documents and the proposed guide to corporate governance, referenced in the FAC report (section 3.1(V)).</p>	The FAPL and FAPL Clubs are committed to community engagement in many and diverse ways. We are keen to develop any relationships by which this can be achieved. The Recommendation focuses on Supporters Direct and Trusts. There are few active Trusts at FAPL Clubs, as historically Trusts tend to have been set up at Clubs where there may be financial or ownership problems. However, the lack of Trusts does not mean that there is a lack of willingness for Clubs to consult and engage – we will address this issue directly with Supporters Direct.	The Football League has undertaken its own benchmarking exercise on a range of financial information. Clubs take part in this scheme on the condition that all the information is provided on an anonymous basis and that remains private and confidential. The Football League while agreeing with the principle of benchmarking does not share the view that the information should be made public. Where the Supporters Trusts have representation or are involved in the management of clubs, they will have access to such documentation.

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
		The FAPL Clubs have of course committed to the "Football in the Community" scheme. FAPL Clubs are committed to the objects of the scheme and we will report to the IFC on this and similar schemes in the coming year.		
17	The IFC recommends that the football authorities, through Football in the Community and liaison with Supporters Direct, should assist Trusts' greater and purposive contribution to community partnerships.	The FA acknowledges the positive contribution of Supporters Direct to the game and hopes to continue its good relationship with the organisation in 2005 and beyond. The input of Supporters Direct to the work of the FAU is welcomed, as is that of all the game's stakeholders. The FAU has also consulted with them over certain governance developments that Supporters Direct wish to see take place, such as the possibility of mutuals being able to run clubs.		The Football League wish to clarify as to what areas of community work Supporters Direct and their affiliated trusts wish to engage in. The League and Supporter's Direct should meet to ensure roles and responsibilities are understood and that any new opportunities are defined.
18	The IFC recommends that national licensing, stricter financial undertakings on changes of club ownership, examination of the rules affecting ground tenure, and directors' loans should stay on the Financial Advisory Committee's agenda. The IFC will monitor progress in 2005.	Reviews of these items are on the list of proposed FAC work streams for 2005, with the exception of directors' loans, and we would refer the IFC to the detail in the 2004 FAC Report (section 4). The treatment of directors' loans is examined in the course of all FAU club financial reviews, and has been included in the rules of the four leagues at Steps 1 to 4 since summer 2004. FA Rule 11 (g), "Documentation of loans made to a Club", has also been in force for several seasons already. The 2005 FAC work streams are to be debated at the next meeting of the Committee on 29 June 2004.	<p>The FAPL is committed to the FAC process and has contributed throughout to its work – the Fit and Proper Persons Test development is a key example of where the FAPL has devoted considerable time and energy to developing a complex new piece of regulation. We have been present at every FAC meeting and wish to promote additional dialogue with Kate Barker.</p> <p>The IFC recommends that national licensing, stricter financial undertakings on changes of club ownership, examination of the rules affecting ground tenure and directors' loans should stay on the agenda of the FAC. We support the detailed consideration of these topics by the FAC over the coming year in order to examine whether they are appropriate or necessary to achieve the FAC's stated objectives.</p> <p>UEFA licensing affects the majority of our Clubs. We note that UEFA plans to further strengthen the criteria on finances and therefore a national licensing scheme would be an unnecessary duplication of FAPL Clubs.</p>	<p>The Football League supports the resourcing of the Financial Advisory Unit to fulfil its current terms of reference. However, we are currently satisfied with the 5-year cycle of visits, and do not envisage a role in expanding the concept of a national license.</p> <p>The League continues to discuss with the FA, through the FAC issues relating to retention of ground but this remains one of the most difficult areas to address given the needs to ensure clubs are not put in the position of being held to ransom by landlords. Further, The League does not support a stricter undertaking in the respect of change of ownership outside the area of insolvency.</p>

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
		<p>The IFC's report also raises the issue of Clubs divulging more information regarding player transfers. This is an issue that the FAPL will look at during the coming year, in conjunction with the FAC. It is an issue that is raised with Club Financial Directors at our regular meetings and has been considered in other club meetings. The present position is that Clubs may voluntarily divulge information relating to players' and agents' payments, as has previously occurred in the case of Manchester United plc.</p>		
19	The IFC recommends that the progress the Premier League and the FA have made in implementing the UEFA Licence should be publicised through websites, and with cross-reference or links to announcements on the UEFA site.	<p>The FA would be pleased to publish such details on TheFA.com, but would question the 'newsworthiness' of, and interest in, such coverage. We published a recent article regarding the UEFA licensing system, shown below, and for the first time this year the FAC annual report, which includes reference to the development of the UEFA licence, will be publicly available on TheFA.com.</p>	<p>We are proud of the lead taken by the FAPL Clubs in creating and implementing the UEFA Licence. The Recommendation has already been actioned and the relevant page was provided from www.premierleague.com.</p>	Noted

Charters: Communication and Commitment

20	The IFC recommends that the FA makes clear which of its charter pledges it will report on, and that they should number no more than a dozen in any one year.	<p>In this year's Customer Charter our commitments are as follows:</p> <p>Charter Awareness (5 Pledges) englandfans (13 Pledges) Consultation (2 Pledges) Merchandise (3 Pledges) Ticketing (6 Pledges) Staff Conduct and Response Times (1 Pledge)</p> <p>The commitments made in The FA Charter range from short-term commitments and ongoing service standards to more long-term pledges such as increasing diversity within englandfans. We believe they are realistic and achievable. We will look to report on all these pledges in the 2005 Customer Charter.</p>		Noted
21	The IFC recommends that the Premier League further simplify its reporting, designate its audience, and express its charter commitments in terms of results, rather than process.	The IFC should refer this point to the FA Premier League.	<p>The IFC's initial focus on validation led us to produce detailed evidence of each of the Clubs' claims in all its reports. However, we agree that the process should be simplified, both for charters as well as reports. A new format for charter reporting has been agreed internally and was discussed with the IFC. The FAPL are grateful for Alan's input in to the process.</p>	Noted

Implementation of 2004 Recommendations

	RECOMMENDATION	FA – Received April 2005	FAPL – Received 31 May 2005	FL – Received 28 November 2005
<i>Addressing Public Concerns</i>				
22	The IFC recommends that the IFC's role should formally be extended to include complaints concerning services provided by County Football Associations, and that it should be resourced to fill this role.	<p>The FA is looking at ways of establishing a standard complaints procedure across all County FA's.</p> <p>This is likely to involve County FAs committing to certain minimum standards in their customer service procedures. This could constitute making their customers aware of how and where to send correspondence of this nature as well as a specific time frame in which the customer will receive a response. Initially, The FA may ask CFAs to devise these procedures themselves within the resources available to them.</p> <p>The FA is also looking to put in place procedures for monitoring the commitments made by respective County FAs. These procedures will supplement the existing route of appeal to The FA in respect of any formal decisions by County FA Commissions, where a clear process already exists. We hope that by getting such a commitment it will lead to higher standards of customer service, give customers peace of mind as to when correspondence will be dealt with and ultimately reduce the number of complaints.</p> <p>This initiative will follow the progress made in on-field discipline in recent years, with the introduction of a national online administration system and increased guidance for County Associations, making the disciplinary system more consistent and transparent for participants. The FA will keep the IFC informed of progress in 2005.</p>	Although not addressed to the FAPL, we would not support widening the Terms of Reference of the IFC to the national game, whether it by the Country or other Affiliated Associations or the 2,000 or so sanctioned leagues and other competitions. We do not consider that this is part of the role or remit of the IFC.	The Football League would wish to ensure that this recommendation were implemented that the potential burden of cost does not fall on The Football League.
23	The IFC recommends action from the football authorities to encourage clubs to publicise complaints procedures, and to encourage public advertisement at matches of the public's rights and opportunities for redress.	<p>The FA publicises the procedures via TheFA.com and 'englandfans' internet sites. A document explaining the process was sent to every ticket holder for the City of Manchester tournament in Summer 2004, and a full page in the FA Cup Final 2004 programme was devoted to the Charter. This year, a copy of the customer charter has been sent to every member of 'englandfans' following the relaunched initiative.</p> <p>With reference to Clubs, the IFC should refer to the Premier League and Football League.</p>	We acknowledge this point. Many FAPL Clubs already do publicise the Charters in the way the recommendation suggests. The new reporting process should make this clearer to the IFC and we will continue to work with Clubs in order to make further improvements in this area. We are extremely keen to ensure that supporters and customers are aware of their rights and how they can exercise them.	The Football League will work with its member clubs through its Customer Services Department to encourage clubs to continue to disseminate the charter and complaints process to supporters. The League includes this issue in its Annual Customer Services Seminars and asks clubs to feedback to The League how they undertake this.

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
1	The FA to consider specific resourcing to enable CFA CPOs to become paid posts.	The FA will review the use of central funding to the County Association with the intention of increasing support for the role of the CFA CPO. The appointment of fulltime CPOs at each of the 47 County Associations is not a viable proposition at this stage but The FA will work towards establishing a more favourable position in terms of time and remuneration. It is to be noted that some County Associations already support their CPO financially. These models of practice will be shared.	The Board welcomed the report and was pleased that it recognised that a 'tremendous amount' had been achieved in the area of Child Protection in the recent past. The Board hoped that the IFC would do all it could to stress that, whilst there was no room for complacency, arrangements to safeguard children at Premier League Clubs had been considerably developed and provided models of good practice for other sports organisations.	Of the 23 recommendations, The Football League has commenced work on several that relate specifically to us such as the Customer Services elements of Child Protection, while we will continue to move forward the high standards of work set on the Youth Development and Community side. The League notes the IFC's concerns about photographic images in publications, together with your concerns regarding other general club activity specifically relating to match day supporter issues. We intend to address these issues through our Customer Services Seminars. The IFC will attend a selection of the events and see the work we will do in this area over the forthcoming months. Many of the issues brought up in the report will be discussed as part of the All Agency Child Protection Forum. The Football League confirmed that they will take part in this group and will work through the necessary and relevant points following consultation with the group.
2.	CPOs and CWOs to be identified on county/club/league literature; the format of job/person specifications should be reviewed.	County Associations will be encouraged to heighten the profile of the CFA CPO by including contact details and information about their role in general County Association literature. Due to the turn over of volunteers in grassroots football, The FA does not feel that it is realistic to expect County Associations to be able to include contact information for Club Welfare Officers (CWOs) in general literature. However the County Administration System (CAS) will be utilised to carry a comprehensive database of CWO as they are appointed and trained. Youth leagues will be encouraged to facilitate an annual gathering of welfare officers with support from the County Association and guidance will be provided by The FA with regards to information sharing and networking locally. The format and content of the CFA CPO job description will be reviewed in 2006.	Addressing the detail of the Report, the Board decided that the following action should be taken: <ul style="list-style-type: none"> ■ Feedback on the effectiveness of liaison between Clubs and schools in respect of the welfare of Students at Clubs' Football Academies to be included as part of the annual monitoring undertaken by the League. ■ Guidelines to be drawn up covering the photographing of children and their publication in match programmes. ■ The issue of making senior players aware of child protection issues (which has been previously raised with the PFA) to be discussed again with the Association, on the basis that in the first instance, the PFA representative at each Club is asked to complete the FA three hour workshop on Child Protection matters. 	
3	The FA to work closely with the Football Foundation in its review of child protection criteria for the award of grants.	The FA has already met with the Football Foundation (FF) to establish clearer criteria in relation to safeguarding. This will inform the decision making process for the awarding of club grants. In addition an evidence based system has been established in order that FF staff can ascertain if the clubs applying for grant aid have actually implemented safeguarding policies. This is designed to establish if the club understands the policy or if they have simply attempted to 'tick the box' in terms of meeting the required standards for applying for a grant. The FA will review the effectiveness of this system with the FF in August 2006.	The Board considered that comment about the recruitment and retention rates of, and release arrangements for, Students in the 8-16 age groups at Clubs' Football Academies and Centres of Excellence is often anecdotal. They therefore commissioned an analysis of Clubs' data, with a view of establishing an accurate description of the incidence and release and developing good practice guidelines for Clubs to follow when releasing Students.	

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
4	Guidelines on the use of photographic and other images to be updated and reissued.	The FA is already in the process of reviewing the images guidance. The FA Moving Football Forward, Child Protection Conference (November 2005) invited the general public and partners to review the draft guidance that has been developed. The final version of this guidance will be available in March 2006.	The Board welcome the Report's acknowledgements of the League's training and support arrangements for Children's Officers. Noting that the Portfolio Qualification for Children's Officers had now been developed by the Education and Child Protection Manager, the Board agreed that an additional budget sum should be made available for the implementation of the training programme associated with the qualification.	
5	National strategy for ID cards/licensing within youth football to be clarified and communicated within an overall review of monitoring.	The FA has considered the principle of a national ID card scheme for those working with children in affiliated football. This proposal will be considered as part of the Football Industry Child Protection Forum process.	The Board gave careful consideration to the IFC comments about CRB Registration and Screening Processes and has asked the Education and Child Protection Manager to submit a further report on this complex matter following further consultations with the FA and with the Children's Officers at their forthcoming annual conference.	
6	Portability of CRB decisions to be functional on CAS in early 2006.	The FA acknowledges the time that it has taken for CAS to be installed to provide efficient and accurate information regarding CRB information. The FA is confident that CAS will provide necessary data to County Associations by the end of February 2006.	The Board also considered the IFC comments about the potential for closer liaison between the three bodies concerned with professional football.	
7	CRBU to look at information flow when CRB checks fall outside target time-scales, and guidance on expediting processes. FA to consider a general rapid update system out to counties.	The FA will implement a quarterly review of the FA CRB Unit process with specific focus on time frames for dealing with checks. Currently all CRB Disclosures are dealt with within agreed timeframes notwithstanding Disclosures that are delayed through the police system for reasons of complexity or dispute. This was acknowledged by the CRB in their inspection report in 2005.	The specialist officers in Child Protection at the Premier League have, of course, always maintained regular contacts with their opposite numbers at the FA since the development of the latter of its own Child Protection Team. However, following the Board's consideration of the IFC's report, the Chief Executive has agreed with the FA and the Football League, that a multi agency working group from the three bodies should be established to consider and report on matters relating to Child Protection. The initial meeting of this group will be convened by the FA and it is the Board's hope, and expectation, that through this group's work common approach will be strengthened. That said, the IFC will recognise, that the Premier League will not, of course, be prepared to dilute in any way its commitment to, and pursuit of, best practices in the safe guarding of children, and still wishes to maintain a direct relationship with the IFC on this issue.	

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
8	Roles and processes for re-accreditation of the workshop and CRB re-certification to be clearly communicated in autumn 2005.	<p>Confirmation of the Child protection and best practice – Workshop recertification process on a 3 year cycle has been communicated to all County Associations, FA Cp Tutors and CFA CPOs. All those who completed The FA workshop are contacted by letter to inform them that they are required to renew their certificate and the process by which to do this. The FA.com also provides this information for clarification. The FA is committed to exploring the merits of providing the recertification programme online.</p> <p>There is ongoing consultation currently with the professional game as to the most effective way for scholars to engage in the recertification process within the academies and centres of excellence.</p>		
9	Wider communication advertising of Charter Standard clubs and their benefits.	The FA will continue to promote Charter Standard status and it's benefits. The CWO training will advocate this programme and encourage clubs to seek this award. In addition County Associations will be encouraged to publicise those Charter Standard Clubs within their locality in 2006. National promotions of Charter Standard will/already identify the benefits of joining a Charter Standard Club as well as providing guidance for those seeking to find a club in their locality.		
10	Guidance on handling scouts to be included in training.	The issue of information regarding scouts will be considered as part of the review of the Child protection and best practice – Workshop materials for August 2006. The FA needs to establish the main priorities for inclusion within this workshop and it may well be that another avenue is sought for this to be shared. Since the issue is one that sits with the professional game rather than grassroots other opportunities for disseminating this important information will be sort.		

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
11	Slower pace for future roll-out with a limit on new initiatives.	<p>The FA has welcomed the recommendation of consolidation for 2006. As such the focus for safeguarding in football will be as follows:</p> <ul style="list-style-type: none"> ■ submitting evidence for the Sport England/NSPCC National Standards Awards ■ establishing quarterly meetings for the Football Industry Child Protection Forum and prioritising actions for 2006/07 in relation to case management, CRB Disclosures and best practice guidance ■ maintaining the education and awareness programme ■ providing continuing professional development for tutors and designated persons ■ monitoring phase 2 of the Welfare Officer Training pilot project and making clear links to the CRB verifier training process within this ■ continuing to process CRB disclosures for those with direct access with children and young people ■ agreeing priority groups for mandatory CRB checks, with timeframes and sanctions. 		
12	The Football League to issue central guidance and direction on general club activity and clarify which policies and procedures its clubs must follow, and monitoring compliance.	<p>The Football League has worked closely with The FA during 2005 to develop a reviewed safeguarding policy and to provide training for club CPOs. This provides a good foundation and direction from which the Football League can build a holistic approach to safeguarding that embraces all club activities involving children and young people. The FA offers their full support to help to address this issue.</p>		
13	FA Premier League and Football League monitoring to include quality and measures of effectiveness, as well as adherence to rules.	<p>The FA feels that it is not appropriate to comment at this stage on recommendations 13, 15, 16 and 17 other than to say it is aware of the current need for these issues to be addressed and will support the Football League and FA Premier League in whatever way it can. The FA is aware of current best practice on a number of these issues and would encourage the Football League and FA Premier League to share this information and facilitate debate amongst those who are best placed within the clubs to comment.</p>		

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
14	At least 2 staff with responsibility for child protection at all clubs, one male, one female.	The challenge of appointing an appropriate designated person into every football club across England is immense. Whilst The FA recognises and endorses the benefits of having 2 designated persons within a club (1 male and 1 female) this stance will only be encouraged by The FA and not expected. It should be noted that a club can constitute 1 team or numerous teams of twenty or more. Consequently, the recommendation for 2 designated persons in every club does not fairly reflect the actual and individual needs of clubs. The FA will continue to advocate for 1 designated person to each club and develop guidance in 2006 for those clubs containing multiple teams.		
15	FA Premier League and Football League to review communication to parents and children concerning the decision-making processes around release/retention at academies, and assess and assure transparency and understanding.	The FA feels that it is not appropriate to comment at this stage on recommendations 13, 15, 16 and 17 other than to say it is aware of the current need for these issues to be addressed and will support the Football League and FA Premier League in whatever way it can. The FA is aware of current best practice on a number of these issues and would encourage the Football League and FA Premier League to share this information and facilitate debate amongst those who are best placed within the clubs to comment.		
16	Minimum standards for the care and safety of ball boys/girls and child mascots, to include a requirement for guidance or training for those with direct responsibilities.	The FA feels that it is not appropriate to comment at this stage on recommendations 13, 15, 16 and 17 other than to say it is aware of the current need for these issues to be addressed and will support the Football League and FA Premier League in whatever way it can. The FA is aware of current best practice on a number of these issues and would encourage the Football League and FA Premier League to share this information and facilitate debate amongst those who are best placed within the clubs to comment.		

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
17	Clear instructions from the centre on appropriate child protection measures in stewarding, geared towards achieving consistent practice and the understanding of all security personnel.	The FA feels that it is not appropriate to comment at this stage on recommendations 13, 15, 16 and 17 other than to say it is aware of the current need for these issues to be addressed and will support the Football League and FA Premier League in whatever way it can. The FA is aware of current best practice on a number of these issues and would encourage the Football League and FA Premier League to share this information and facilitate debate amongst those who are best placed within the clubs to comment.		
18	Updated policy on the use of photos and recorded images of children to apply to all levels of the game.	Please refer to the response to recommendation 4 detailed above.		
19	Shared practice and closer liaison between the FA and FA Premier League on CRB checks, referrals and case management, with specific attention to portability.	The FA commits to working together with the football agencies to explore these issues further, and to address any inherent risks to the safeguarding of children in football. The FA acknowledges the proactive steps that FA Premier League Clubs have taken in implementation of CRB checks within their clubs.		
20	The football authorities to monitor and actively deter CRB “creep”.	The FA will continue to be vigilant over only appropriate persons being allowed to apply for an FA CRB Disclosure. A unified system as described above will prevent the unnecessary multiple checks that exist in football. The FA will continue to contribute to the national debate over portability both within football and generally in sport.		
21	Football League and FA Premier League in collaboration with the PFA and the FA to introduce basic child protection guidance and training for professional players.	The FA is keen to work closely with the PFA, Football League and FA Premier League to find the most effective and impacting way in which to provide basic child protection awareness training for professional players. The model utilised by clubs such as Norwich City FC and Manchester United FC provides a basis for this discussion. The Football Industry and Child Protection Forum will provide the forum for this debate.		

Implementation of Child Protection Report Recommendations

	RECOMMENDATION	FA – Received 22 December 2005	FAPL – Received 25 October 2005	FL – Received 1 February 2006
22	Football authorities to include specific guidance on girls, as players and in other forms of participation, in their child protection policies and procedures.	The issue of specific guidance for girl's as players and other forms of participation, was addressed initially via a workshop at The FA Moving Football Forward, Child Protection Conference (November 2005). The outcomes from this workshop will form the basis for developing some simple key messages in line with the FA child protection and best practice guidelines. It will also be raised via the planned review in 2006 of the Child Protection and best practice – Workshop and workshop pack. This information has also been linked in to The FAs Long Term Player Development Strategy.		
23	Discrimination awareness to be a clear component in child protection training.	procedures gives clear guidance about inclusivity. The FA has a clear policy on anti discrimination which is well communicated both implicitly within the safeguarding policy and explicitly.		

Meetings, Visits, Consultations and Matches

4England
 Amateur Athletics Association
 Arsenal Football Club
 Aston Villa Football Club
 Avon and Somerset Police (Child Safe)
 BBC Sports Summit
 Birkbeck College
 Birkbeck College –
 State of the Game report launch
 Birkbeck College Seminar –
 *How well is football working? Regulation
 of the Football Industry in England*
 Birmingham City Football Club
 Birmingham County Football Association
 Birmingham Pilot Scheme
 Blackpool Football Club
 Blandford Youth and Community Club
 Bolton Wanderers Football Club
 Burnley Football Club
 Cambridgeshire County Football
 Association
 Chelsea Football Club
 Children's International Games
 Cleveland Constabulary
 Commission for Racial Equality
 Criminal Records Bureau
 Department for Culture, Media and Sport
 Doncaster Rovers Football Club
 Dorset County Football Association
 Durham County Football Association
 englandfans
 Essex County Football Association
 FA Compliance Unit
 FA County FA's Meeting
 FA CRB Unit
 FA Financial Advisory Committee
 FA Premier League
 FA Referees (North East Manager)
 FA Referees Department
 Federation of Stadium Communities
 Football Association
 Football Association conferences:
 Football For All; Moving Forward
 Football in the Community
 Football League
 Football League Customer Services
 Seminars
 Football Licensing Authority

Football Supporters' Federation
 Gloucestershire County Football
 Association
 Home Office
 Liverpool Football Club
 Lord Terry Burns
 Manchester United Football Club
 Middlesbrough Borough Council
 Middlesbrough Football Club
 Minister for Sport
 (Department for Culture,
 Media and Sport)
 National Audit Office
 Independent Regulators Conference
 Newcastle United Football Club's
 Supporter's Panel Meetings
 Norwich City Football Club
 Notts County Football Club
 NSPCC
 Oxford United Football Club
 PKF LP (UK)
 Professional Footballers' Association
 Reading Football Club
 Rugby Football League
 Show Racism the Red Card –
 annual video launch
 Soccervation
 Sport and Anti-Racism in the 21st Century
 Conference
 Sport England
 Stockton-on-Tees Borough Council
 Supporters' Direct
 Surrey County Football Association
 Teesside Athletic Youth Football Club
 University of Gloucestershire
 University of Liverpool
 West Bromwich Albion Football Club
 West Riding County Football Association

Organisations represented at the IFC seminar to discuss the IFC's Report on Euro 2004, 30 March 2005

4England
 englandfans (London)
 englandfans (North West)
 Football Association
 Football Supporters' Federation

FOOTBALL MATCHES ATTENDED BY THE IFC, 2005

2004/05 Season

Arsenal v Liverpool (FA Premier League)
 Arsenal v Manchester United (FA Cup Final) *
 Brentford v Hartlepool United (FA Cup Fourth Round)
 Denmark v England (UEFA European Women's
 Championship 2005)
 England v Austria (World Cup Qualifier) *
 England v Azerbaijan (World Cup Qualifier) *
 England v Holland (Friendly) *
 England v Sweden (UEFA European Women's
 Championship 2005)
 Grimsby Town v Wycombe Wanderers (League 2)
 Liverpool v Chelsea (Carling Cup Final) *
 Rushden and Diamonds v Cambridge United
 (League 2)

2005/06 Season

Benfica v Manchester United (Champions League)
 Chelsea v Sunderland (FA Premier League)
 Crewe Alexander v Leeds United (Championship)
 Doncaster Rovers v Blackpool (League 1)
 Everton v Middlesbrough (FA Premier League)
 Oldham Athletic v Brentford (League 1)
 Reading v Ipswich Town (Championship)

Additionally, members of the Commission have attended approximately 140 matches in their personal capacity.

* complimentary tickets provided

Issues Raised with the IFC

A total of 31 issues were received in the IFC office in 2005. A further 28 were carried forward from 2004 and closed in 2005.

Category	Subject	Governing body
Customer Relations	Lack of contact by Club to a supporter (1) Lack of contact by Governing Body to supporter organisation (1)	FA Premier League Football League
Finance	Costs to Football Clubs under new licensing laws (1)	FA Premier League
Governance	Fit and proper person tests (1)	Football League
Match scheduling	Rescheduling (1)	Football League
Merchandising	Replica kit policy (2)	FA Premier League
Racism	Racist comments made by fans (1)	Football League
Ticketing	Cancellation of ticket registration scheme membership (1) Problems with obtaining tickets for Champions League match (1) Ticket prices for FA Cup Semi-final (2) Ticket allocation for FA Cup Final (1) Ticket prices for FA Cup Final (2) Quality of seats at International match (1)	FA Premier League FA Premier League Football Association Football Association Football Association Football Association
Other	Treatment of fans by Stewards (2) Banning / ejection of supporters from football ground (3) Supporter worried about Club debt to the Inland Revenue (1)	Football League Football League Football League

We received 3 issues from fans regarding decisions made by referees, but unfortunately on-field matters are not dealt with by the IFC and all of these issues were passed on to the FA Premier League for them to action.

A further 6 issues could not be dealt with by the IFC as they did not come under our jurisdiction and were passed on to the Football Association for action. 4 of these issues concerned County Football Association's which is a subject the IFC have discussed with the Football Association in the past.

Complaints Adjudicated by the IFC: Summary Findings

Subject of complaint	Summary	IFC findings/state of play
<p>Handling of Carling Cup Final 2004 ticket allocation by Bolton Wanderers FC</p>	<p>A long-standing season ticket holder applied unsuccessfully to his club for tickets for the Carling Cup Final. He complained to the Club in March 2004 and received a letter of apology which referred to publicised reasons why the Club had been unable to satisfy demand, and offered a meeting. The complainant alleged that the Club was in breach of its charter commitments to season ticket holders. The complaint was referred to the Football League as owners of the Carling Cup competition.</p> <p>The Football League advised us that it had received 16 other complaints on this issue and that, as the matter concerned a break of charter commitments, it also concerned the FA Premier League, even though the game was within their competition. After consultation with the FA Premier League, the Football League responded to the complainant in May, advising that a club charter indicates intent and does not carry sanctions and regretted that they could take no action with the Club.</p> <p>Under the agreed complaints procedures, the second stage of a complaint against a Club required the governing body formally to investigate. Some debate ensued during June as to which authority should do this. In July we formally asked the FA Premier League to accept ownership of the complaint, as it was a club charter matter on which the Football League had no authority.</p> <p>The FA Premier League disputed this, but confirmed in August that it was content for the complaint to pass directly to the IFC.</p>	<p>The IFC concluded that the distribution of tickets lay with the Club and that the Football League had behaved properly in making tickets available to the competing clubs and delegating responsibility to them for the distribution of tickets. The Club recognised that it made an error of judgement in allowing two tickets per season ticket holder; this resulted in demand exceeding supply. The IFC accepted that the Club's motives were to ensure the full ticket allocation was subscribed and noted the Club's indication that in future it will allow one ticket per season ticket holder in the short term, making other distribution arrangements for any remaining unsubscribed tickets. This was no consolation to those deprived of tickets, especially as the club might not reach a similar final again. The IFC felt the Club could have responded more sympathetically to the disappointed supporters.</p> <p>The IFC upheld the complaint, judging the club to be in breach of its charter obligations. We recognised that it was not possible fully to recompense the complainant, in view of the uniqueness of the occasion, but suggested that the Club should make a gesture of goodwill and recommended that the Club should offer two complimentary tickets to an away game of his choice.</p> <p>Regrettably, the Club refused to implement the IFC's recommendation and the FA Premier League could not do anything further about the matter.</p>
<p>Ejection of Supporter from Burnley FC</p>	<p>The complainant alleged that he had been unjustifiably ejected from the Burnley v Coventry City match and that his subsequent complaint to Burnley FC had not been dealt with satisfactorily.</p> <p>He attended the match in October 2004 as an away fan and during the first half he, along with around 30 other supporters stood while watching the game. He was advised by stewards that he was being ejected for persistent standing, despite him not having been asked to sit at any time. He was also subsequently advised by the police that he had been ejected for swearing, which he categorically denied.</p> <p>He put his complaint in writing to the Club but did not receive neither an explanation or the copies of the charter and complaints procedure which were requested and the club refused to have further correspondence with him. Following further correspondence from the complainant, the club did provide him with a copy of the ground regulations, and was advised that as his name was known to them, they were not willing to discuss the matter further.</p> <p>In November 2005 the complainant contacted the IFC who advised him to put his complaint to the Football League and they responded one month later saying that his complaint was really a matter for the club, over which they had no jurisdiction. In response to enquiries from the Football League, the Club said that both supporters had been ejected for legitimate reasons, in line with their ground regulations. One fan had provided his details; the other had not. The club had told the complainant that the matter was closed and they were satisfied that they had dealt with it in the proper manner.</p>	<p>There can be no doubt that stadium safety is a matter of great importance and that there is a requirement that spectators in seated areas should not persistently stand. This cannot be a matter of dispute, and is common knowledge to fans of clubs. It is clear from video evidence that the complainant was one of a group of fans persistently standing, therefore the club were entitled to eject him. However, what was in contention was why he was selected for ejection and whether he was treated even-handedly.</p> <p>The clubs policy and procedures on persistent standing has the approval of the Local Authority, the Football Licensing Authority and the police, all of whom were satisfied that appropriate action had been taken. The IFC accepts that to try and eject large numbers of offenders has the potential to cause a serious public disorder. The decision to eject the complainant was taken from the control room by the Safety Officer in conjunction with the police match commander. We are satisfied that there was no untoward behavioural reason for his selection. He was chosen because he was standing in a prominent position where it was possible to sit and still be able to see the match, he was one of the more animated fans in terms of arm waving, and he was readily identifiable both from the CCTV footage and by the stewards, so there could be no case of mistaken identity.</p>

Complaints Adjudicated by the IFC: Summary Findings

Subject of complaint	Summary	IFC findings/state of play
	<p>The complainant remained dissatisfied and the IFC took up his complaint. In their comments to the IFC, the Football League said they had obtained advice from the clubs Security and Operations Adviser and they viewed persistent standing as a serious safety matter and clubs were under pressure from local authorities and the Football Licensing Authority to take firm action against those who decide to ignore the relevant ground regulations.</p> <p>Over a period of several months the IFC tried to bring the respective parties together in a meeting to review the evidence of the incident. The complainant was not available to meet in the IFC's preferred location of Burnley FC, due to work commitments.</p> <p>Members of the IFC met with representatives from the club, the Local Authority Safety Advisory Group, the Football Licensing Authority and the local Football Intelligence Officer, and viewed video footage of the crowd at the match.</p> <p>One of the IFC Commissioners met with the complainant at his home and confirmed from the club's photographs that he was the ejected fan who had not given his name.</p>	<p>The complainant maintains that he was given no warning in advance of his ejection. There is no evidence to suggest that he was given an individual warning, but the CCTV evidence showed stewards mingling with fans suggesting that they were trying to get spectators to sit. In the circumstances, he can consider himself unlucky to have been selected as an example to make other standing fans comply with the regulations, but that is not to say that the club were not entitled to do what they did. It is obviously necessary from a licensing point of view that they are seen to be acting to enforce compliance with the ground regulations.</p> <p>The complainant maintained that Coventry fans had continued to stand during the second half, but this was certainly not apparent during the first few minutes of the second half, as seen by CCTV, and in any event has no bearing on the circumstances of his ejection.</p> <p>Finally, the club refused to correspond with the complainant after their initial exchange because he had not provided his identity details. While we can understand the club's position, in that he had not helped himself by his refusal, they should nevertheless have provided the information he had requested. The IFC recommended that now the club knew he was second fan, they send him a copy of their customer charter and details of their complaints procedure, as he requested.</p> <p>These details were provided by the club in January 2006, via the IFC.</p>
Ticket prices for FA Cup Final 2005	<p>The complainant claimed that the FA's ticket pricing strategy for the Millennium Stadium, was flawed, and that the ticket allocated to him should not have been priced in the highest category. Having obtained a ticket through a Club ballot, he was unaware of the price until the ticket arrived. The ticket was priced at £90 and was regarded as inferior to previous tickets he had purchased. Attention was also drawn to Health and Safety issues relating to the Stadium. All of these issues were put to the Football Association in May 2005. The Football Association replied saying that they use a four-tier pricing structure, which is consistent to whichever stadia their games are played in. They also said that there is always an element of subjectivity and supporters would have different ideas as to where the best views were to be had, and there would always be disparity between the worst and best seats in any category. They said that they price the tickets on the basis of the view from the seat and considered the complainant's seat to have been priced appropriately. In June 2005 the Football Association supplied additional information about pricing structure in the Millennium stadium to the IFC, which was shared with the complainant. The IFC queried the information received from the Football Association as it seemed to suggest that the seat in question was in a different category to what it had been priced at and asked them to approach the stadium authorities regarding the health and safety concerns which had been raised. The Football Association wrote to the IFC apologising for the confusion over the seat details, and confirmed that the seat had been in the correct category and that they had asked the Millennium Stadium authorities to reply to the complainant.</p>	<p>The IFC gave careful consideration to the complaint and reaction of the Football Association to it. The IFC is sympathetic to the complainant, who was clearly dissatisfied with the position of his seat in comparison with others in the same category, and to those he had enjoyed on previous occasions in the Stadium. The IFC could also understand how enjoyment of the match can sometimes be spoiled by close proximity to opposing supporters. The IFC accepted the argument that lines have to be drawn somewhere, and at the margins there will always be spectators who are in a less advantageous position than those in neighbouring rows.</p> <p>Insofar as the Football Association applied their categories policy consistently, and the fact that the IFC would not generally consider it appropriate to comment on ticket prices, we did not uphold the complaint. Nevertheless, the IFC requested that the Football Association review their pricing policy to ensure that they are fully and properly taking into account distance from the playing area in the larger stadia, and the proximity of opposing supporters.</p>

Complaints Adjudicated by the IFC: Summary Findings

Subject of complaint	Summary	IFC findings/state of play
<p>Sheffield Wednesday FC refusing permission for supporter to renew the hire of Executive Box</p>	<p>The complainant was aggrieved because Sheffield Wednesday FC refused permission for him to renew the hire of his Executive Box at Hillsborough. He claimed that he had been given no reason for being excluded. He contacted the IFC in April 2005 by way of copying a complaint letter addressed to the Chief Executive and other Directors of the club. The IFC advised the complainant of the complaints procedure, particularly of the need to complete the club and governing body stages before the IFC could become involved.</p> <p>The complainant took his complaint to the Football League in May 2005, and confirmed this to the IFC, while adding a further dimension by saying that he had not received a copy of the club charter which he had requested. The Football League invited comment from the club, which responded in June 2005. The club asserted their right to refuse admission. In July 2005 the Football League informed the IFC that it regarded the matter at a close and the club was within its rights to refuse admission. The complainant wrote to the IFC in September 2005, stating that he was not satisfied with the outcome.</p>	<p>The adjudication panel reviewed all correspondence from all the parties and studied the club charter in some detail. The Football League confirmed that in its view Sheffield Wednesday FC was within its rights to refuse admission and that its actions accorded with Football League rules. The Football League confirmed that it had written to the club reminding it of its charter obligations.</p> <p>We concluded that on the substantive matter of the refusal to renew the box the club acted within its own and Football League rules. The IFC had already confirmed this view while the complaint was at the governing body stage. In a letter from the complainant received in September 2005 he claimed that he had received no written confirmation of the decision not to renew his box, though in April 2005 he did refer to a letter from the club dated February 2005 informing him of the decision. On the main issue of the complaint the IFC confirmed that the club had acted within its legal authority.</p> <p>The secondary issue of charter obligations is less straightforward. In two important respects the club has apparently not fulfilled its charter commitments, first in not supplying the club charter and second in not replying to the complainant's communication within 7 working days. Moreover the Football League suggested that there was a presumption that the club's right to refuse admission had been published in the charter. A careful reading of the charter document reveals no reference to the club's right to refuse admission nor to the grounds on which this right would be exercised. There is a reference to the exclusion of supporters who breach the club's "Code of Conduct", but it was not alleged that the complainant breached this code.</p> <p>On the matter of the refusal of Sheffield Wednesday FC to renew the hire of the executive box the complaint was not upheld, on the grounds that the club was within its right to refuse admission.</p> <p>On the charter issues the club was found to be in breach of its own charter obligations. The IFC endorsed the Football League's reminder to the club that it is expected to take its charter obligations seriously. We also recommended that the Football League instructed the club to supply the complainant with a written copy of the charter and to respond to his communications within 7 working days of receipt of the Football League instruction.</p> <p>Since there was no reference to the right to refuse admission to the club, the IFC recommended that the Football League requires all clubs to make a clear public statement of this right.</p> <p>The Football League confirmed in December 2005 that they would provide the club with a copy of the IFC's adjudication and said that it was then a matter for the club whether or not they take further action or consider the matter closed. They also confirmed that they would discuss with the clubs that they make a clear public statement of the clubs right to refuse admission.</p>

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