



RAISING THE BAR



Reframing the opportunity in women's football

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FOREWORD

When I was offered the opportunity to Chair this Review, I immediately understood the responsibility I was taking on. As a player, fan, and pundit I have met countless people who care deeply about the future of women's football. I had a duty to them, and to everyone else who has a stake in the game, to undertake a comprehensive review of where we are now with the sport and where we want to be in the future.

Players understand responsibility. When I played we would talk about the concept of borrowing the jersey you put on for your team – and that when you passed it onto the next player you wanted the team to be in a better position. The responsibility of this Review is different, but the concept is the same. My guiding principle throughout this process has been to implement recommendations that will establish strong foundations and leave the game in a better place.

We are at a pivotal moment in women's football. The game is developing at such a pace that if I had conducted this Review a year previously, the recommendations would look very different to those I am putting forward now. Equal access to sport was something that the Lionesses rightly campaigned for after their historic win in EURO 2022. Their legacy is over £600 million in funding to ensure that happens.

There are now a number of major changes being proposed and implemented in how the professional game is overseen. The FA has decided that the league should move from being fully integrated in the FA to a fully independent club owned entity via a 'NewCo' – a new entity established to enable that transition. The Professional Game Working Group has been tasked with setting the strategic vision and business plan which will underpin the development of the game.



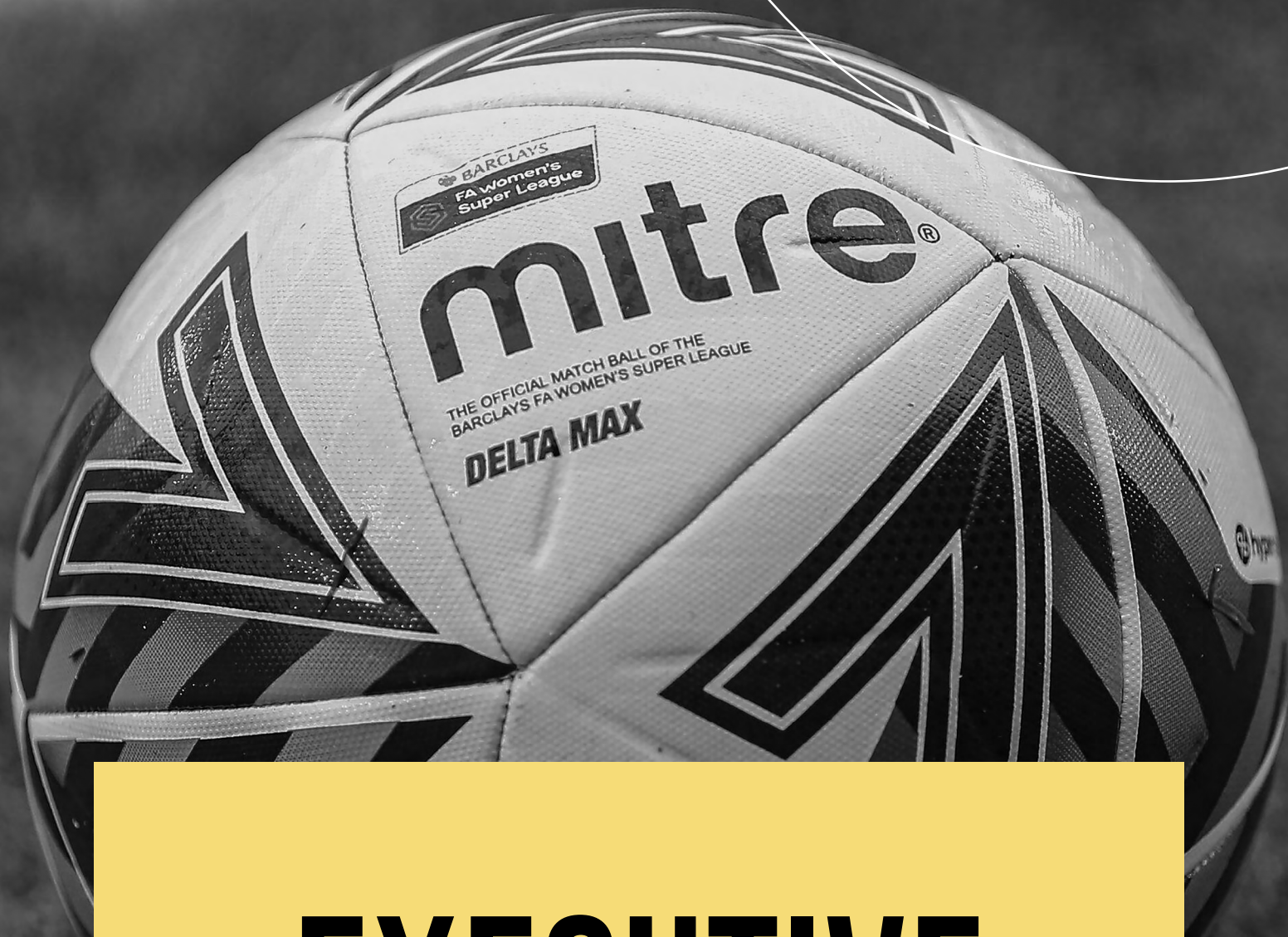
These changes will take time to bed in. Success will depend on a number of factors, but it is crucial that all involved engage fully and in good faith. I believe this is a reflection of the shift in perception people have of women's football, and women's sport more broadly. There is increasing recognition of the potential inherent within the game, and the need to establish a new way of working as a result.

This Review is therefore coming at a time of significant change in women's football, and the recommendations I am putting forward must account for those changes. The central theme of my Review is that there is a need to lift minimum standards across four key areas – corporate structures, the professional environment, fan experience, and grassroots. The professional environment is, as you might imagine, something which has personal resonance with me. However, I also believe that it is the area where reforms are most urgently needed. Improving the standards that elite players can expect, improving the talent pipeline, and elevating the importance of adequate representation in the women's game are the foundations from which the sport can go to the next level.

Meaningful progress in these areas are crucial in catalysing the virtuous cycle of investment which can support the organic growth of women's football. As players are nurtured and developed in an increasingly elite performance and welfare environment, on pitch standards will continue to improve, bringing in larger audiences and unlocking new investment from broadcasters and commercial partners.

I would like to thank everyone who took the time to submit evidence to this Review; their thoughts have been invaluable in coming to the conclusions set out in this report. In particular, I would like to thank the expert panel who have supported me in assessing that evidence – Ian Wright, Hope Powell, Jane Purdon, Dan Jones, Lisa O'Keefe and Brett Gosper. I would like to sincerely thank the dedicated team of officials who worked on the Review throughout — Lucy Sanga, Laura Denison, Millar Paisley, Hannah Davis, Leah Nuttall, Beth Powell and Alex Miller.

Playing football was always a dream for me. I couldn't have done that without the support of my family, friends and teammates and I'd also like to thank them for supporting me in this project. As always, we need a huge team effort to keep driving the sport forward. Women's football is at a turning point, and we have a huge opportunity to establish a path on which it can reach new heights and lead the world. That opportunity is slowly being realised, but now is the time to grasp it fully and push the sport to the next level.



EXECUTIVE SUMMARY

Background

Women's football in England has a history that dates back over a hundred years. However, in 1921, the Football Association (the FA) banned women from playing on Football League grounds and deemed that *"...the game of football is quite unsuitable for females and ought not to be encouraged"*. The ban was lifted in 1971, with the FA taking on the administration of the women's game from 1994, but the legacy of that ban has meant the women's game is still at a relatively nascent stage – the Women's Super League only became a fully professional league for the first time in 2018.

2022 was a record-breaking year for women's football in England, and the success of the Lionesses at the European Championships in England in summer 2022 has galvanised interest in the game. The Championships sold over 574,000 tickets, more than doubling previous tournament sales, with over 87,000 tickets sold for England's win against Germany in the final at Wembley. The Women's Super League and Women's Championship have also since seen record attendances set in season 22/23, including a new Women's Super League record of over 47,000 fans at the Emirates stadium. Arsenal also broke the record for a women's club match in England when over 60,000 fans attended their Champions League semi final against Wolfsburg, and more records were set at the final of the Women's FA Cup 2023, which over 77,000 fans attended.

Record breaking broadcast audience figures for the Women's Super League have already been seen for the 22/23 season with 16.5 million UK viewers watching 3 minutes or more of live coverage, an increase of 9% on viewing figures for the previous season.¹ There is also definite commercial growth in the women's game – Barclays extended its sponsorship of the Women's Super League and became the first title sponsor of the Women's Championship from the 22/23 season.

It is undeniable that the women's game is gaining traction and is able to point to numerous highlights in recent months. This is a fantastic point to reach for a game that was unjustly held back for so long, but given its history the game is still essentially in startup mode. Lots of the recent success in the top two tiers of the women's pyramid has been dependent on investment from affiliated men's teams, and the game now needs to grow in its own right to reach its true potential and stand on its own two feet.

¹ <https://www.womenssporttrust.com/new-womens-sport-trust-partnership-with-the-ra-reveals-womens-sports-fans-feel-underserved-despite-record-breaking-viewing-figures/>

The history of the Review

The Fan Led Review of Football Governance, conducted in 2021, recommended that *“given the many, but interconnected, issues affecting a meaningful future for women’s football needing to be addressed and resolved successfully, the future of women’s football should receive its own dedicated review”*. The Government therefore launched this Review of the Future of Women’s Football in September 2022, which has examined the strategic priorities for the development of the game.

A key part of this development concerns some very live changes to how the women’s elite game (the top 2 tiers of the women’s pyramid) is structured and governed. Right now, in addition to its core role around developing grassroots women’s football and operating the women’s national team, the FA runs the Women’s Super League (tier 1), the Women’s Championship (tier 2) as well as the Women’s National League (tiers 3 and 4). The FA has undertaken an ownership review of the Women’s Super League and Women’s Championship, which recognised that its role in running the leagues needs to fundamentally change. This chimes with multiple submissions to this Review, where contributors flagged inherent conflicts in the running of so many aspects of the women’s game - particularly around decision making that can balance the interests of the national team and the commercial growth of the domestic elite pyramid.

The FA’s proposal is to set up a new entity - which it is calling NewCo. The intention is to transfer the top two leagues in domestic women’s football from being integrated within the FA to a fully independent entity, with its own Chief Executive Officer and dedicated senior executive team. To this end, the FA has established a Professional Game Working Group, which has been tasked with developing the long term strategic vision and business plan for the future of the women’s game. The working group is made up of representatives from ten Women’s Super League and Women’s Championship clubs, as well as senior FA officials.

This Review understands that the Professional Game Working Group aims to make decisions around the vision, partners, routes to investment and governance of its NewCo in time to fully launch it before the beginning of the 24/25 season (provisionally August 2024).

Aims of this Review

All of this leads to a moment in the history of the sport that will dictate its future growth trajectory. The opportunity for women's football right now is huge, and English women's football is uniquely situated to capitalise on this following momentum from the Lionesses' ongoing success. UEFA estimates that European women's football could see a sixfold increase in commercial value over the next decade, reaching an annual value of €686m by 2033, with club sponsorship set to increase to €295 million in that time.² This poses both a challenge and an opportunity for the English women's pyramid; demand has the potential to outstrip resource and capacity if key stakeholders do not align around a clear set of strategic principles for growth.

The intent of this Review is to examine in detail this defining moment for the women's game, and to look not only at what this means for the elite game, but for the pyramid as a whole, from young girls getting their first experiences of watching and participating in football, right through to grassroots clubs and the professional game.

The next four chapters will look at these areas in detail. This Review cannot answer every question in the women's game, but instead sets out a plan to lift minimum standards in key areas that will allow the game to seize the opportunity at hand. Done correctly, the women's game in this country can become **a world leading sport that not only generates immense economic and social value, but sets the standards for women's professional sport globally that allows others to follow.**

² [The Business Case for Women's Football – UEFA](#), Aug 2022 Potential value was estimated using data from the club and league surveys, consumer research and additional proprietary data. The base-case and high-case scenarios were established based on specific parameters for each revenue stream (e.g. broadcast on pay TV versus free-to-air in the media rights evaluation).

STRATEGIC RECOMMENDATIONS

1. **The new entity tasked with running elite women's football should not settle for anything less than world leading standards for players, fans, staff, and everybody involved in the women's game.**
2. **The FA needs to fix the talent pathway in order to create generation after generation of world beating Lionesses.**
 - 2.1. The FA should choose a strategic partner willing to invest in building a sustainable pipeline of domestic talent.
 - 2.2. Clubs should be allowed access to an increased pool of international talent while the domestic pathway is fixed.
3. **Both the Women's Super League and Women's Championship should become fully professional environments designed to attract, develop and sustain the best playing talent in the world.** This means:
 - 3.1. Addressing the gulf in minimum operating standards between tier 1 and 2.
 - 3.2. Providing gold standard physical and mental health provision.
 - 3.3. Mandating elite training facilities for elite players.
 - 3.4. Mandating a world leading parental package.
 - 3.5. Funding full union representation to both tiers.
 - 3.6. Uplifting duty of care provision for players.
 - 3.7. Offering best in class career transition support for players leaving the professional game.
4. **The FA should urgently address the lack of diversity across the women's game - in both on and off pitch roles.**
5. **The FA, Premier League, English Football League and broadcasters should work together to carve out a new dedicated broadcast slot for women's football.**

6. Clubs must better value and support their fans - the FA should raise minimum standards to enforce this.
7. Government must deliver on recent commitments around equal access to school sports for girls.
8. Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls.
9. The FA, Premier League and Football Foundation should work together to make sure that women and girls are benefitting from funding flowing into facilities across the pyramid.
10. The FA should leverage the handover of administration of the top two tiers of women's football to even more acutely focus on grassroots clubs and the Women's National League.



INTRODUCTION

Vision

1. Football is our national sport, but one that for generations left women and girls behind. Thanks to the hard work and dedication of administrators, coaches, and players, that continues to change. The challenge now is where the game goes next and what our ambition is for the future of the sport.
2. From the hundreds of hours of evidence this Review has received, there is a clear passion to take the game to the next level. At its heart that means making women's football a sport that genuinely enhances the lives of women and girls in England, and is recognised as a fundamental part of our national sporting landscape. It has the ability to offer a unique and accessible environment for all types of fans, and most importantly to pave the way for women's sport across the world. Standing on the shoulders of generations that have struggled before, the game is well placed to be one of our sporting success stories, and one of the country's greatest exports. The challenge is how to do that.
3. We now need to hold the game to higher standards. We should not be satisfied until:
 - Women and girls of all ages see football as an accessible, safe, positive, welcoming and inclusive environment to participate in.
 - A diverse and inclusive fanbase is nurtured and embraced, with in person and broadcast audiences growing at pace.
 - The elite game becomes the gold standard for women's sport globally – offering a best in class working environment for players, coaches and staff, reflecting a diverse population. It is underpinned by a sustainable pyramid, with competitive and exciting leagues and success at international level.
4. This should ensure women's football in England becomes **a world leading sport that not only generates immense economic and social value, but sets the standards for women's professional sport globally that allows others to follow.**
5. This is a defining period for women's football with interest growing across the world, presenting an unique opportunity for English football to get ahead of the curve. To achieve this vision we need a major uplift in investment across the entire women's football pyramid from all stakeholders. Without that uplift, and soon, we do not believe that the game can reach its potential. This should be seen as an investment in future success, with some key gateways and minimum standards that, when met, will allow the game to grow exponentially.

6. In football, organic (self generated) revenue broadly comes via three major sources – broadcast revenue, revenue derived from commercial sponsors and, to a smaller extent, matchday revenue. In order to access higher revenue in the women’s elite game, it needs to build audiences across broadcast, social media, and matchday attendance, particularly to unlock increased investment from broadcasters and sponsors.
7. There is also a route to accelerating investment in the elite game via external investors, owners or – in the case of many tier 1 and 2 women’s clubs – affiliated club funding. With certainty around the product they are investing in – which will come via raising minimum standards and clarifying expectations around minimum investment levels – there is an opportunity to drive this investment forward.
8. Many will say that this has been a consistent refrain in the women’s game – that more money is needed – but that the vision for what it delivers is lacking. This Review aims to confront that challenge head on and set out how we foster an environment that encourages maximum investment into all levels of women’s football, and holds stakeholders accountable for delivering a best in class environment for players, participants, fans, and staff. We need investors to have confidence that there is an end goal in order to put the investment in now.

Opportunity

9. **Landmark sporting moments are becoming more frequent – and reflect a growing audience that wants to see more of the same.**
10. Attendance and broadcast viewership records for women’s football have been broken over the past 12 months, and these peaks in interest demonstrate that fans have a real appetite to engage with both the national and elite professional game. Landmark moments offer a route into women’s football both as a fan and a participant, offering women and girls the opportunity to see themselves reflected on the biggest stage. In turn, growing audiences will continue to entice more investment from broadcasters and commercial partners looking to address previously unexplored (and arguably underserved) groups tuning into women’s football.
11. **There are, however, gaps below this throughout the elite game and throughout the rest of the women’s football pyramid.**
12. At elite level, there is a risk that landmark moments contradict an inconsistent environment in the Women’s Super League and Women’s Championship. Club finances across the top two tiers of women’s football diverge wildly, with annual turnover in the Women’s Super League peaking at around £7m, and Women’s Championship sides recording turnover as

low as £150,000. Attendances at the Emirates and Wembley show potential audiences for the women's game, but it is also important to note that not all clubs are accessing this fanbase – a halfway point study of the Women's Super League 22/23 season showed that discounting the eight matches held at main stadia, the average Women's Super League crowd stood at 2,800.³ This is still a remarkable year on year increase (from 1,500 in the 21/22 season), but offers some framing of where the game is now, and where it has the opportunity to grow.

13. The elite game is professionalising, but there are still gaps around minimum standards in some critical areas such as medical provision, where the prevalence of anterior cruciate ligament (ACL) injuries in the Women's Super League alone cannot go unnoticed.
14. In the grassroots space, school sport and parity of access to physical education (PE) and football specifically for girls has come under even more scrutiny this year, and while there are positive interventions in the space, there remains a cultural environment in which gender stereotyping around girls' role in sport is embedded at primary school level⁴ and entrenched by secondary school age.⁵ Yet encouraging more girls to participate is crucial to the growth and success of the sport – both by unlocking future talent but also future audiences.
15. **If we are to take the game to the next level, we need to improve standards throughout, rather than focusing on individual elements. This will require investment, but based on a blueprint for how the game can be sustainable and a world-leading women's sport environment.**
16. There is a huge opportunity to transform the experience of those playing in, working in, and supporting women's football, but investors need to be enticed into investing into something that offers real growth.

³ <https://www.forbes.com/sites/asifburhan/2023/03/03/big-game-strategy-fundamental-to-267-increase-in-womens-super-league-attendances/>

⁴ <https://womeninsport.org/research-and-advice/our-publications/sport-stereotypes-and-stolen-dreams/>

⁵ <https://www.footballbeyondborders.org/news/inspiring-a-generation>

17. In spinning out the women's top two tiers of football into its own entity, there is an opportunity to build out a virtuous circle of continually raising the bar on the professional and fan experience of elite women's football. As players are nurtured and developed in an increasingly elite performance and welfare environment, on pitch standards will continue to improve, enticing larger consistent audiences in person and on broadcast, and unlocking major investment streams from broadcasters and commercial partners alike.

Virtuous cycle



18. There is an opportunity for the FA's new entity to leverage initial investment from a strategic partner to drive the uplift in standards and kick start that virtuous circle in the coming years. Clubs too should be incentivised to further drive investment in women's teams that have the opportunity to earn exponentially more than they have to date. This, in turn, has the potential to unlock revenues that start flowing down from the Women's Super League into the Women's Championship and into grassroots football, while also generating enough investment to calibrate a women and girls' talent pathway that is currently severely underfunded. We need an environment where every club is adding to the value of the league in order to deliver rapid growth.
19. This Review will aim to illustrate the priority areas that must be addressed across the women and girls' football ecosystem in order to capitalise on this opportunity and ultimately achieve its vision of **a world leading sport that not only generates immense economic and social value, but sets the standards for women's professional sport globally that allows others to follow.**



CHAPTER 1.

Generating an Environment that
Maximises Investment Opportunities

Recommendation 1:

The new entity tasked with running elite women's football should not settle for anything less than world leading standards for players, fans, staff, and everybody involved in the women's game.

In doing so, it should prioritise five key principles:-

- 1** The ultimate objective of women's professional football should be a financially sustainable, competitively compelling game.
- 2** Financial regulation should be stringently deployed by NewCo in order to ensure the financial issues present within other elite sports are not mirrored.
- 3** NewCo and clubs must provide the necessary professional infrastructure for staff and players to compete.
- 4** In order to provide the necessary infrastructure and product, clubs, the FA and NewCo must unlock additional investment and funding streams.
- 5** The FA should develop governance structures that allow NewCo to embrace independent decision-making.

Context

20. The FA's decision to spin out the Women's Super League and Women's Championship into NewCo – a club-led model – addresses the calls made by many participants in this Review for structural change of the professional game, and for the leagues to be run independently of the FA.
21. This shift provides an opportunity to create a landscape which incentivises investment at club level to uplift minimum standards across the professional game. This can ultimately become a best in class environment for players and supporters, and can continue to generate new broadcast, sponsorship and matchday revenues in years to come.

22. In making any recommendations around the future commercial models of the women's elite game, this Review must take into account the many moving parts at its point of publication, particularly the FA's Professional Game Working Group which is in the process of making fundamental decisions about the future of the women's game and is likely to announce these in the coming months.
23. This Review will therefore make largely principles-based recommendations on the future commercial models for the top two tiers of the women's game.
24. There will be difficult decisions and trade offs that the FA, and whomever it selects as strategic partner, will need to take – this Review will aim to cover some areas of those decisions which the Chair considers critical to its success. To this end, there are five principles that must be prioritised in the future commercial development of the elite women's game.

Principles

Principle 1 – The ultimate objective of Women's professional football should be a financially sustainable, competitively compelling game.

25. The goal of fully independent financial sustainability and annual cash break even on a standalone basis for women's teams is the right one for the long term sustainability and growth of the game, and to avoid repeating the financial instability and failures of other sports.
26. Of course, it cannot be ignored that this is against the backdrop of men's football, in which losses are regularly sustained at the highest level, but where the overall growth in value of the asset renders this tolerable – clubs in the men's game are able to run at a loss, but still generate huge revenue when sold on, so wealthy investors are willing to keep driving cash into the business.
27. Part of this environment in the men's game – and particularly the Premier League – is the rate at which broadcast revenues continue to increase. The maturity of the business, captive audience, and broadcaster willingness to invest on this trajectory offers investors into clubs guaranteed incremental income which isn't the case for the women's game yet.
28. This Review has heard directly from owners and executives at clubs across the Women's Super League and Women's Championship who have become frustrated with the cost to sustain participation within the women's game, with costs currently much higher than the revenue being organically generated by women's teams. While broadcast audiences are growing fast, the women's game is still nascent in terms of unlocking the scale of

broadcast revenues that can begin to match what is seen in the men's game, so there simply isn't as strong of an incentive to endure losses against upfront investment.

29. Given its stage of development, continued growth of matchday, broadcast and sponsorship revenue – with a view for the women's game to become independently sustainable – is the right way to incentivise continued long term investment by clubs. This may initially mean a slower growth trajectory than that seen in the men's game, but should ultimately lead to a sustainable pyramid with committed stewards of the game.
30. On a compellingly competitive product, this Review understands that the FA's Professional Game Working Group is considering a range of proposals to offer radical change to the women's game, including a closed league approach to the top two tiers of the women's elite club game that is aimed at giving certain teams more security around their investment.
31. While incentivising investment at club level should be a priority for the FA's NewCo, closing the leagues – even in an interim phase – would risk detracting from a compelling experience for fans, players, and clubs. An open league structure enables clubs to aspire to reach their highest potential level, and creates dynamism and added value and drama for the commercial product.
32. Promotion and relegation between tiers creates jeopardy and extends interest throughout a season, and can help to create stories and a narrative which are of interest to fans and the media, increasing the commercial value of the competition. Promotion and relegation also create additional value below the top tier – it provides an incentive for teams in the division below to invest and target promotion and a reward for success. All of this is proven to drive broadcast value in the men's game, and is something that we should continue to replicate on the women's front.
33. A closed league could be argued to provide more certainty for financial investment, planning and management, but an open league structure coupled with appropriate financial regulations and licensing to prevent financial recklessness is preferable.
34. Finally, unlocking greater central revenues for distribution down the pyramid should be central to any vision for the future of the game. A compellingly competitive league should provide the foundation for sponsor interest and broadcaster investment which will drive this.

Principle 2 – Financial regulation should be stringently deployed by NewCo in order to ensure the financial issues present within other elite sports are not mirrored.

35. Stringent financial regulation of the women's game will derisk investment in it – investors will be looking for something stable and well governed to put their money into, and strong financial regulation will instil confidence that money going into the game won't be wasted.
36. While some may argue that immediate regulation under the incoming independent regulator for men's football is a means of ensuring the financial risk taking of the men's game is not repeated in elite women's football, this Review considers that the women's game should be given the opportunity to self regulate rather than moving to immediate independent statutory regulation. The Football Regulator as set out in the Government's recent White Paper⁶ is designed to be created for, and focused upon, addressing the governance issues in men's professional club football in England. The women's game has a unique opportunity to take learnings from the men's game and the establishment of the independent regulator, and proactively address issues so that the game can run on its own two feet.
37. This does not mean that learnings cannot be taken from the failures of other sports, or that independent regulation should be taken off the table in perpetuity, rather that the women's game should be given the opportunity to incentivise investment with a greater focus on financial sustainability in a model that sits between the financial recklessness of other sports and immediate independent regulation, particularly while governance structures of NewCo are yet to be defined.
38. These learnings are in some areas tweaks to existing regulation present in the women's game – broadly the areas that should be focused on are:-
 - Clarity in accounting to reflect owner/affiliate subsidy
 - Clear commitments to honour owner/affiliate funding
 - Adherence to a bespoke code for governance
 - Enhanced Owners' and Directors' Tests
39. **On accounting clarity**, a fundamental challenge right now is true clarity on the financial health of the top tiers of women's football, where public accounts often do not reveal the full picture of a women's team's resources, particularly where that team is affiliated to another club.

⁶ Department for Culture, Media and Sport, 'A Sustainable Future – Reforming Club Football Governance, February 2023

40. The FA currently provides direction through its licensing criteria that women's teams should provide clear accounts including income forecasts for the two upcoming seasons. What is less clear - certainly in the public sphere - is the disclosure of the scale of any solidarity funding from a men's team to an affiliated women's team, and a clear breakdown of revenue attribution from shared sponsors where clubs are affiliated.
41. There needs to be greater rigour applied by all clubs in their contracting with external partners and their internal accounting and external reporting to ensure that a true picture of the finances of their women's team, and of the women's league as a whole, collectively can be seen. This is essential to support strategic business planning and assess growth and performance for the women's game. Once accounting is more clearly represented by clubs, NewCo will have a better understanding of where risk lies within clubs, and will be better placed to assess where additional guarantees from owners or affiliated clubs should be required.
42. **On committed owner/affiliate funding**, there is real concern around how teams will be treated in certain scenarios – for example, what happens to a women's team if the affiliated men's team suffers a financial shock such as relegation. There are currently no mechanisms in place to protect the women's team financially from such an event.
43. There should be a clear commitment for funding to be honoured if it is included as part of annual business plans submitted to NewCo in order to protect women's teams against potential financial shocks. There are a number of measures which may be taken in this space. It may be the case that NewCo is happy to accept that, following an assessment of the financial information it receives, the club's owners and directors will have planned appropriately to have the funds to cover their outgoings in any scenario that may arise.
44. However, given the likelihood that in the short term the women's game will continue to be reliant on solidarity funding from owners and affiliated teams to support its development, it is likely that some form of additional funding guarantee will be required to ensure the sustainability of the game. Upon the establishment of NewCo, consideration should be given to what sort of funding guarantee regime the clubs and league would consider to offer the right balance.

45. There are examples across sport which require owners to demonstrate that their funding commitments are secure. Examples of how this can be demonstrated include:
- A personal guarantee from the club's owner
 - A parent company or other group guarantee from the club's corporate group
 - A letter of credit from a financial institution
 - A payment into an escrow account
46. In order to make sure such funding commitments are contractually adhered to, NewCo will need to make its chosen regime a condition of licence. While a big step for the women's game, being upfront around what is required from clubs will help to bring clarity to potential investors around the landscape they are looking into, and will in turn attract the right kind of investors looking to make long term commitments to women's teams.
47. **On corporate governance**, the FA already has some stipulations as part of its licensing regime, but it would be beneficial for the women's game to take learnings from the Code for Football Governance that the independent regulator for men's football plans to introduce. NewCo should work with the regulator to ensure any code that is adopted in the women's game is adapted for the specific tenets of the sport.
48. **On enhanced Owners' and Directors' Tests**, NewCo should review the enhanced tests the independent regulator develops and consider where elements of those tests may be implemented in its own regulations. The need for rigour around the custodians of a sporting asset are vital to the financial sustainability of any sporting entity, and there may be elements of those revised tests that the FA's current system can adopt, tailored to the specific needs of the women's game.
49. Together, these elements of enhanced financial regulation will be pivotal to the drive toward financial sustainability, which itself will increase investor confidence both within clubs and externally. It is also better for broadcast and commercial sponsors – an environment with clear financial parameters and regulation will mitigate concerns about clubs losing funding. This leads to long-term contracts and better stories that drive broadcast audiences and entice broadcast revenue.

Principle 3 – NewCo and clubs must provide the necessary professional infrastructure for staff and players to compete.

50. To enable the continued professionalisation of the league, further improve the on pitch product, and unlock increasing revenue streams, a series of uplifts to minimum standards will be recommended across this Review. Teams themselves have pointed to this as an urgent area for attention; in their submission to the Review's call for evidence, one Women's Super League club stated that *"In order to enhance the availability, access and quality of medical care across Women's Football, there is a requirement to develop enhanced minimum standards across all levels of professional football, which is regulated and reviewed on a consistent basis"*.
51. These uplifts will in places come at a significant cost to clubs, however the Review deems these uplifts necessary to ensure that players and staff have access to the elite standard of professional infrastructure that they deserve. The Review recognises that whilst some of these uplifts could be implemented at pace, others will need to be phased in over time. In order to allow clubs to adapt to, and financially plan for, uplifts with a cost implication, this Review will recommend phasing in those recommendations most likely to have a material cost to the majority of clubs – an indication of estimated costs and phasing is outlined in the conclusion of this report.
52. The professionalisation of the game is a priority, and all clubs must ensure that all players and staff are able to operate in the highest standard of environment possible. Introducing enhanced minimum standards will ensure that the women's game in England can attract the most talented individuals (both playing and non playing staff), and enable the quality of the on-pitch product to continually improve.
53. Increases in investment and central funding streams, as outlined in **Principle 4**, should provide some assistance to clubs with the implementation of licence uplifts, however all clubs will be required to make a significant financial commitment to offering a fully professional infrastructure to those working in the game.

Principle 4 – In order to provide a necessary professional infrastructure and product, clubs, the FA and NewCo must unlock additional investment and funding streams.

54. As demonstrated above, the full professionalisation of tiers 1 and 2 of the women's game will require significant investment and resources. In turn, however, with this investment, there is an opportunity to create a world leading women's sport environment, which creates a blueprint for success that other sports can use as a benchmark for success. Being a world leader in women's professional sport brings first-mover advantage in terms of commercial deals and broadcast, and this is something English football should aspire to. With the right commercial strategy to capitalise on these opportunities, the overall quantum of revenue available to all clubs across the women's football pyramid will increase over time.
55. In order to kickstart this virtuous circle of investment, there are avenues available to clubs, the FA and NewCo to open up and better disseminate central revenues that support teams in reaching new minimum standards. These could include:-
- Novel distributions calculations
 - FA Cup prize money quantum and distribution
 - External investment from a strategic partner
 - Owner / affiliate club investment
56. **On novel distributions calculations**, this Review understands that the FA's Professional Game Working Group is looking at distribution calculations that take into account metrics other than final league position. This innovative thinking is welcomed – it can incentivise targeted interventions at club level and recognise those clubs that are already working towards league wide priorities such as financial sustainability. Other sports have recently looked to similar radical change – in Rugby League, for instance, IMG has announced a new club grading criteria which is aimed at incentivising the long term and sustainable growth of clubs and the league as a whole.⁷ The weighted grading criteria, which will determine the licence category clubs are awarded, will be based on five metrics: Fandom, On-Field Performance, Finance, Stadium, and Community. While the Rugby League interventions are designed to allocate membership to its top tier competition, similar principles could be applied to approaches to financial distributions in women's football.

⁷ <https://www.skysports.com/rugby-league/news/12204/12860710/rugby-league-grading-criteria-radical-new-proposals-voted-in-by-majority-of-clubs>

57. **FA Cup prize money** remains a contentious topic. For the 22/23 season, the FA announced a significant uplift in the prize money within the Women's FA Cup competition with the total fund increasing from £430,000 to just under £3m.⁸ This uplift was welcomed by clubs within the women's game, and is a step in the right direction. However, even with this uplift, there remains a clear disparity in comparison to the prize fund in the men's competition, which was also increased last year and currently sits at nearly £20m.
58. Equalising the prize money in the FA Cup is something the FA is in the position to address, and would send a powerful message on equality. Increases in central revenue would be key in providing some of the smaller women's clubs with much needed additional resources to address those uplifts to minimum standards this Review has recommended.
59. While ultimately equalisation of FA Cup prize money should be the ambition, a simple aggregation and equal split of funds is problematic – the different competitions have differing cost bases, a different number of teams participating and a different number of rounds. However, working towards a distribution of prize funds which benefits a greater number of teams, in tandem with the overall projected commercial trajectory of the women's game as a whole, is an important step for the FA to work through with NewCo; this should be underpinned by a clear commitment to equalising prize money as soon as is feasible.
60. It is clear that the competition prize fund allocated to the men's and women's game are worlds apart, and the revenue generated by the men's competition is growing much faster than the women's game, as reflected in the most recent round of prize pot increases. This Review sees an opportunity for the FA to redirect some of its men's prize pot growth into the women's prize pot in the form of solidarity funding. This offers a route to quicker growth of the women's prize pot without taking away large chunks of existing prize money from the men's competition. Relatively modest increases in distributable income will allow some Women's Championship clubs to embrace minimum standards uplifts without facing existential risk.
61. Other sports are making public commitments in this area - such as tennis, with the Women's Tennis Association (WTA) recently committing to securing equal prize money at events where both men and women feature by 2027, in order to go further than their current provision of equal prize money at the four Grand Slams.

⁸ <https://www.thefa.com/news/2022/mar/14/vitality-womens-fa-cup-prize-fund-increase-for-2022-23-season-20221403>



Case Study

Women's Tennis Association Plan for Equal Pay by 2027

In June this year, the Women's Tennis Association (the world professional tennis tour for women) announced a 'pathway to handing out equal prize money' for men and women at combined 1000 and 500 events starting from 2027.

Equal prize money is already offered to men and women at the four Grand Slams but WTA tour events have often offered less prize money than those on the separate men's Association of Tennis Professionals (ATP) circuit.

The women's tour will increase the number of WTA 1000 tournaments - the highest level of competition outside of the Grand Slams - to ten.

The aim is for WTA 1000 and 500 combined events to reach prize money parity by 2027, while it is expected non-combined WTA 1000 and 500 events will do so by 2033.

The WTA said the move will ensure the *"consistent presence of the top athletes at these premium events"*.

"Every generation contributes to striving to leave their sport in a better state for the next," former US Champion Sloane Stephens said. *"I take pride in being a part of this evolution and fully support the WTA's commitment to progress."*

62. **On external investment from a strategic partner**, this Review cannot select a preferred strategic partner for NewCo, but it is clear there is appetite across a range of stakeholders to invest in the women's game and capitalise on its growth opportunity. The FA should highlight the areas of uplift recommended in this Review to potential strategic partners and cost those into future business models to ensure the opportunity - but also the upfront investment needed to maximise that opportunity - is reflected.
63. The FA has the opportunity to select a strategic partner willing to invest in the long term future of the game against the background of upfront investment needed to truly realise its potential.
64. **On owner / affiliate club investment**, as highlighted already, creating a clear set of minimum standards will create a level of certainty in the top two tiers of the game that will attract investors looking for certainty around their investment which clubs have told us is currently lacking. Creating clear parameters offers a more investable product, and will attract responsible investors who are committed to the women's game over the long term.

Principle 5 – The FA should develop governance structures that allow NewCo to embrace independent decision-making.

65. A large majority of the clubs in the Women's Super League are affiliated to influential Premier League teams, meaning that the voice of some of the smaller / independent clubs is often limited. As NewCo is established and governance arrangements are designed, a 'one board' principle between the leagues should be retained. Retaining a one board principle across the two leagues will protect the voice of the Women's Championship clubs, and ensure that any decisions which are taken have given full consideration to all clubs within the professional leagues.
66. Careful consideration will have to be given to voting rights within this governance structure, to avoid challenges apparent in the men's game around key issues such as models of financial distributions through the leagues. The FA has the opportunity to take learnings from other leagues that have addressed challenges posed by multi league governance structures, and design something bespoke to the needs of the women's game.
67. Additionally, the FA and NewCo should formulate governance structures against a clear set of priorities. This Review recommends a governance structure which:
 - Enables strong and sustainable growth of the league
 - Ensures that key decisions are made by the member clubs, but with decision-making structures containing meaningful independent voice

- Ensures the views of all clubs are heard
 - Equitably balances the objectives of, and distributions to, all clubs within the overriding objective of achieving strong and sustainable growth of the league
 - Builds unity of purpose and vision amongst clubs
 - Has clear expectations about the shared values and expected behaviour of the league, its member clubs, and their owners and directors
68. On top of this, the FA and NewCo should prioritise governance that allows the new entity to take independent decisions. This Review understands that the level of Golden Share the FA is looking to retain in the women's game goes beyond that present in the men's game. This Review encourages the FA to ensure that these reins are not too tightly held - given the opportunity to create an independent entity that can embrace the growth opportunity currently present in the elite women's game, this Review recommends that the FA prioritises a move towards an independent elite game, and seizes the opportunity to reframe its relationship with the women's pyramid. By creating role clarity between the governing body and the elite league, there is an opportunity for both to thrive in their strategic priorities.
69. Finally, there is a need to ensure that governance is fit for purpose across the women's game - both in terms of the FA's interaction with NewCo, but also NewCo's future interaction with FA. The FA should therefore undertake a review of the representation of the women's game at all levels of its governance (including whether a 'special share' is appropriate in respect of it) in order to ensure that a) it is properly represented throughout the FA's governance structures, and b) those structures enable decisions to be made in the best interests of the women's game as a whole.

Conclusion

70. It is right that we celebrate the successes the elite game has achieved to date, however now is the time to capitalise on the positivity and enthusiasm surrounding the game, and cement its position as a world leading sport.
71. Despite the positivity and recent successes, the women's game still finds itself in a startup phase and financially vulnerable position, with cost bases and salaries fast outgrowing revenues, and clubs are therefore continuing to rely on financial injections from owners which have no protection or guarantee. As the pace of development and professionalisation of the league intensifies, continued investment via clubs, the FA, and any future strategic partner to NewCo will be critical in ensuring the game can continue its development.
72. As the game continues on its growth journey, it must ensure it does so with sustainability and competitiveness as key principles, and with stringent financial regulation, strong governance structures, and regular player and supporter consultation in any key decisions taken relating to the future of the game. In this way, NewCo can develop an environment that offers clarity and stability to potential investors looking for certainty around their investment. Once this certainty is created, these investors have the ability to realise the burgeoning potential of the women's professional game in this country.

AMERICAN EXPRESS ELITE FOOTBALL PERFORMANCE CENTRE



CHAPTER 2.

Reframing Minimum Standards for
the Professional Environment

Context

73. Women's football in England has the opportunity to move quickly towards establishing itself as the gold standard for women's sport globally. This has to start with offering a best in class working environment for players, coaches and staff. Taking this approach will ultimately continue to attract the best talent from around the world to play in England, resulting in a product which will continue to captivate new audiences, and entice new commercial and broadcasters partners to invest in the game.
74. If women's football in England wants to capitalise on current momentum driven by its national team, it needs to focus attention – and investment – on building a sustainable pipeline of talent. We have seen the power of the Lionesses as role models, but also in driving fans to stadiums. Focusing on developing future icons of the elite women's game that are representative of local communities will further drive fan engagement and interest which will entice ongoing investment from brands and broadcasters.
75. A major finding of this Review has been that while the Lionesses are admirably succeeding consistently on the pitch, real challenges remain within the domestic pyramid. Some of the most compelling evidence heard by the Review came from current and former players, who painted a picture of a game that is striving for success, but struggling to offer a working environment that fully protects and supports those working in it.
76. The Review also heard compelling evidence around the lack of diversity and representation throughout the football pyramid, and this is an area that must be tackled head on and at pace.
77. The recommendations in this chapter will require upfront investment from clubs and the stewards of the league, but they should be seen as measures which provide certainty for potential investors around the product they are investing in. Resetting the bar around the professional environment will both better protect those working in the game and create clarity around minimum standards that investors have to account for. Uplifting the on pitch output of teams will only continue to unlock further revenues over time.

Recommendations

Recommendation 2:

The FA needs to fix the talent pathway in order to create generation after generation of world beating Lionesses.

- 2.1** The FA should choose a strategic partner willing to invest in building a sustainable pipeline of domestic talent.
- 2.2** Clubs should be allowed access to an increased pool of international talent while the domestic pathway is fixed.

2.1 The FA should choose a strategic partner willing to invest in building a sustainable pipeline of domestic talent.

- 78. The FA and NewCo need to prioritise a step change in pathway structure and investment, and therefore need to make sure whoever it chooses to partner in the development of its new entity is willing to fund this.
- 79. There is currently a huge difference in the funding provided for the girls' development pathway compared to the boys' system. In its submission to the Review, the FA stated that "*central investment from the Premier League into men's academies is £88M per annum compared to the overall FA budget for women's academies of £3.25M per annum*".
- 80. Specifically, any investor needs to commit to the level of funding required to elevate the availability and standard of provision to the elite women's pathway across all age groups – an area highlighted as a particular issue in the current pathway. Multiple clubs and other participants in the Review have expressed concerns that there is a gap, for example, in competitive playing opportunities for girls aged 11-14 in the development pathway, with girls being forced to seek out mixed gender playing environments during this period. Clubs told the Review that they anticipate a risk of dropout from girls not wanting to play against more physically developed boys.
- 81. The impact of a lack of investment is a shortage of full-time and appropriately skilled individuals working with the most talented young female players. Clubs shared concerns that the lack of funding for the

pathway risks missing the opportunity to build on the success of the current generation of Lionesses, which is fundamental to sustain the ongoing growth trajectory of the pyramid.

82. Many clubs, particularly within the Women's Championship, rely on the development of home grown talent to feed their first team squads but, due to a lack of investment in the pipeline, the system is not delivering enough players who can readily progress into first team football.
83. Clubs reflected that the current situation is compounded by the fact the current academy system structure offers little or no returns on club investment into player development, due to the lack of a compensation structure for the transfer of academy players. A new compensation structure is being implemented by the FA in order to counter this issue. This is an essential reform for the game to address the lack of incentive to invest, and must be implemented at pace. It should also be reviewed regularly - while introducing compensation is an important step, the absolute figures involved are as low as £500 per year when players are transferred between Championship clubs. This must go much further to encourage and protect investment in the talent pipeline.
84. This Review recognises that the current player pathway system is hugely underfunded. This had led to the FA having to make trade-offs into how it allocates a limited budget, leading to unintended consequences such as the gaps in age provision that stakeholders have raised concerns about.
85. Long term, funding for the pathway should operate in a similar manner to the men's game, with the onus on clubs and sustainable league funding to support enhanced structures. However, to kick start this process, and to allow the new compensation system to entice clubs to more confidently invest in player development, the FA needs to price in the cost of fixing the current pathway to any strategic partnership around the elite women's game.
86. A strongly funded club and league owned development pathway system, which ensures the development of players at all age groups, is critical to ensuring the continued success of the Lionesses, and ensuring that the growth potential within the domestic game can be realised.

2.2 Clubs should be allowed to access an increased pool of international talent while the domestic pathway is fixed.

87. Specifically, this Review recommends that the FA lowers the current Governing Body Endorsement (GBE) points requirements for an initial trial period – indicatively three years – to allow all clubs access to a balance of overseas and home grown talent.
88. Currently in the Women's Super League, a maximum of 25 players (including players on long term loan) may be registered to play for a club in competitions at any one time during a playing season. Women's Super League Clubs must register a minimum of 8 Home Grown Players within this 25 player squad. Women's Championship clubs are required to register a minimum of 15 Home Grown Players, should they fill their squad cap of 25 players.
89. Should a club wish to sign an international female player, the player must receive Governing Body Endorsement (GBE) from the FA. The GBE requirements are made in conjunction with the Home Office's Points Based System.⁹ To receive GBE, female players must accrue a total of 24 points across a range of categories including; international appearances, domestic league minutes, continental minutes, continental progression, final league position, and league quality.
90. Alongside a step change in the investment in the women's talent pathway, clubs have called for more international talent to be allowed into the game via the GBE system. This would not only allow more English talent to gain experience of working with international talent, but also has the potential to drive on pitch quality and audience growth. One Women's Super League club described the benefits of a better balance stating that *"teams consisting of the best English and foreign players have consistently shown themselves to be a successful model on and off the pitch. It is also an excellent way to develop young English talent (i.e. by having them able to train, play and learn every day with and from the world's best)"*.
91. The current GBE requirements, coupled with homegrown talent requirements, are a particular problem for Women's Championship clubs; they cannot afford international players whose costs become prohibitive due to the current high points bar, whilst the lack of investment in the academy system means that not enough quality home grown talent is being produced.

⁹ <https://www.gov.uk/government/publications/uk-points-based-immigration-system-employer-information/the-uks-points-based-immigration-system-an-introduction-for-employers>

92. In addition, the Review has heard that English talent has been sometimes left to sit on the benches of top tier teams to fulfil their home grown player requirements, whilst receiving few playing minutes, but also restricting smaller clubs access to these players, ultimately limiting the competitiveness of the league.
93. Fundamentally, there is an opportunity to ensure that the current Lionesses are followed by further generations of home grown talent. Allowing a larger pool of international talent to drive on pitch standards in the domestic game over the short term can both upskill domestic talent and drive more investment into the pyramid via a more dynamic product that broadcasters and sponsors will want to invest in.
94. This must be balanced with a major uplift in pathway investment to ensure that the net can be thrown as wide as possible to entice and nurture the best possible talent into a larger, better supported pathway that can offer a depth of world leading home grown talent that not only performs at international level but also within the domestic game.

Recommendation 3:

Both the Women's Super League and Women's Championship should become fully professional environments designed to attract, develop and sustain the best playing talent in the world. This means:

- 3.1** Addressing the gulf in minimum operating standards between tier 1 and 2, specifically:-
 - 3.1.a Minimum contact time
 - 3.1.b Player salaries
- 3.2** Providing gold standard physical and mental health provision.
- 3.3** Mandating elite training facilities for elite players.
- 3.4** Mandating a world leading parental package.
- 3.5** Funding full union representation to both tiers.
- 3.6** Uplifting duty of care provision for players.
- 3.7** Offering best in class career transition support for players leaving the professional game.

95. There has been an increasing professionalisation of women's football in recent years. The Women's Super League now has 12 fully professional teams. The Women's Championship is also made up of 12 teams and has a mix of semi-professional teams (where minimum contact time is lower and players are more likely to be working multiple jobs to support themselves) and professional teams. There also remains a mixture of team structure across the leagues – some of whom are affiliated to men's teams and others who remain independent entities.
96. Players in both the Women's Super League and Women's Championship are elite athletes and deserve to be treated as such. The Review has seen some positive examples, with some women's teams starting to increase the use of shared club resources, and investing properly in elite training facilities and environments to provide a best in class experience for players. Brighton's investment of £8.5m¹⁰ into a purpose built training facility for the women's team is an example of the facilities that can and should be offered to players playing professional football, including state of the art training pitches, medical facilities, and recovery and gym areas.
97. However, unfortunately this Review has heard instances where players in both leagues have referred to being treated "*like second class citizens*" as opposed to elite athletes. Players highlighted that often "*everything revolves around the schedules of the men's teams*", with others noting the lack of parity in access to adequate medical provision and facilities such as gyms and swimming pools.
98. Clubs playing in the top two tiers of women's football have to adhere to a series of licensing requirements in order to become licensed to participate in the leagues. This Review has reviewed the licence requirements for season 22/23, and taking evidence into account, will recommend a series of uplifts to address serious concerns raised.
99. By ensuring players are working in a professional environment with appropriate minimum standards, they will feel safe, valued, respected and able to fulfil their potential, which in turn will create a best in class on pitch output.

¹⁰ <https://www.brightonandhovealbion.com/news/2771094/powell-our-facilities-are-inspiring#:~:text=Based%20at%20our%20Lancing%20training,restrictions%20in%20place%20last%20season>.

3.1 Addressing the gulf in minimum operating standards between tier 1 and 2 – Minimum Contact Time.

3.1.a Minimum Contact Time.

100. To address inconsistent standards across the top two tiers of the women's elite game, this Review recommends that in the medium term, the minimum contact time between clubs and players in the Women's Championship should be increased. Minimum contact time is set by the FA, and baselines how many hours of contact a club should have with a player – this is a condition of licence, so clubs have to abide by it in order to be licensed to play in the top leagues.
101. Right now, Women's Championship clubs only have to offer (and pay at minimum salary) 8 hours of contact time with a player per week, whereas clubs in the Women's Super League have to offer a minimum of 20 hours of contact time with a player per week (excluding match days in both cases).
102. To balance the gap between minimum contact time between the leagues, this Review recommends phasing in increased contact time for Women's Championship clubs on the same terms as the Women's Super League did five years ago. This would mean an increase from 8 hours of minimum contact time as things stand to 16 from season 24/25, rising to 20 hours by season 27/28.

3.1 Addressing the gulf in minimum operating standards between tier 1 and 2 – Player Salaries.

3.1.b Player Salaries.

103. Longer term, this Review recommends that the new entity tasked with running the elite women's game introduces a salary floor for Women's Super League players as part of licensing requirements for the 25/26 season. In the Women's Championship, licensing requirements should gradually introduce the increase in paid contracted hours and, once revenues render it sustainable, its own salary floor.
104. Salary floors already exist across international women's leagues including Spain, Italy, the US and Australia, so there is precedent for the women's game in England to draw on. For a sense of scale, the US currently has a salary floor of \$36,400 (around £28,500) per annum per player.¹¹

¹¹ <https://prosoccerwire.usatoday.com/lists/hwsl-reference-guide-2023-everything-you-need-to-know-for-the-upcoming-season/>

105. Many players in the Women's Championship spoke of having to balance playing football whilst working other jobs to support themselves. As a result players' nutrition, rest, physical and mental wellbeing is often compromised. One player from the Women's Championship noted that she is having to work three jobs alongside playing football professionally and highlighted that this significantly impacts her recovery.
106. In its evidence submission, the Professional Footballers' Association (PFA) highlighted that "*pursuit of a career within the women's game is likely to still be viewed as a financial risk*". Due to the low number of mandated contracted hours in the Women's Championship, players could earn less than £5,000 a year from their football career, forcing them to supplement their income via other jobs. Research published in the American Journal of Public Health suggests that working multiple jobs can increase an individual's risk of injury.¹²
107. Many clubs in the Women's Super League have already invested in their playing squads and offer a living wage. However, it is critical that minimum standards provide a solid foundation in which players can work and thrive in football in order to continue improving the quality of play and therefore the investability of the leagues. Failure to address the gulf in standards between the leagues ultimately risks continuing to stretch the competitive gap amongst teams, which will be damaging to the league's commercial value.
108. An increase in minimum contact time and the introduction of a salary floor will enable players to become truly professional, and to maximise their performance on the pitch. Uplifting minimum expectations here will improve the quality of the on pitch product by showcasing athletes who are adequately supported to focus on their craft and fitness full-time, which will also make for a more enticing investment entity for broadcasters and brands.

3.2 Providing gold standard physical and mental health provision.

109. This Review recommends six interventions to uplift minimum expectations around standards of physical and mental health provision. Specifically:-
- The FA should introduce a centrally funded unit with a dedicated research budget for issues affecting female footballers.
 - Government should establish a new board of sports involving NewCo, UK Sport, and professional sports entities across the UK to look at how to ensure best practice adoption in key areas common to all elite athlete environments for women.

¹² Marucci-Wellman HR, Willetts JL, Lin TC, Brennan MJ, Verma SK. Work in multiple jobs and the risk of injury in the US working population. Am J Public Health. 2014 Jan;104(1):134-42. doi: 10.2105/AJPH.2013.301431. Epub 2013 Nov 14. PMID: 24228681; PMCID: PMC3910039.

- The FA should revise current medical support requirements within licensing criteria with the aim of uplifting expertise, quality of care, availability of support and continuity of care.
- Clubs should extend medical support for a period of 6 months to players transitioning out of the game.
- Performance psychologists should become a mandatory role within the FA's basic licensing requirements in both the Women's Super League and Women's Championship.
- Players should be offered an official route to anonymously reporting non-compliance with licensing requirements. This could be through a third party such as a union and a whistleblowing policy.

110. **On dedicated research into issues affecting female football players:** The Review received substantial evidence around the gap in research on support for female athletes, both physically and psychologically in a professional football environment. It has been estimated that only 6% of sport exercise and science research involved only women.¹³ One Women's Super League club in particular highlighted that *"injuries such as ACL ruptures are far more common in female footballers than male footballers, but there is limited understanding as to the contributing reasons why and therefore limited understanding of what can be done to mitigate the situation"*. It has been well documented that female football players are around three times more likely to suffer an ACL injury than their male counterparts.¹⁴
111. This situation must be addressed urgently, it is not acceptable that players are exposed to this additional level of risk relating to their physical health, and the game needs to do better to understand why this is the case. To protect players – but also continue improving the on pitch product – football must do everything it can to ensure that the best athletes are consistently available to perform at the highest possible level. Failure to address this issue will undermine the credibility and quality of the sport going forward.
112. This is not only an issue of basic player welfare and on pitch success – losing high profile players risks dampening attendance and broadcast interest, which has a tangible commercial knock on impact. Additionally, seeing elite players consistently sidelined without any improvement to the situation risks putting off future players.

¹³ <https://journals.humankinetics.com/view/journals/wspaj/29/2/article-p146.xml?alreadyAuthRedirecting>

¹⁴ A meta-analysis of the incidence of anterior cruciate ligament tears as a function of gender, sport, and a knee injury-reduction regimen <https://pubmed.ncbi.nlm.nih.gov/18063176/>

113. The FA has advised that recent research commissioned by Women's Super League and Women's Championship, and conducted by The Well HQ, also identified the need to equip the women's game workforce with the knowledge and skills to better understand female specific health issues and provide appropriate support. This Review calls on the FA to continue investing in this research, and to create a centrally funded unit to prioritise the development of even more insight in this space.
114. **On a new board of sports:** Football is not the only sport trying to address this lack of insight into female athletes; England Netball and The Well HQ recently announced a partnership that seeks to understand, nurture and support women through exploring female health, life stages and bodies and how this relates to performance and participation.¹⁵ The partnership's aim is to *"usher in a new era of best practice for active women through health and training through a female filter whilst raising standards and outcomes for women everywhere."*



Case Study

NETBALLHer: England Netball and The Well HQ

NETBALLHer is a programme developed by England Netball and The Well HQ to better educate women and girls at all levels of sport about their bodies across the different life stages. England Netball is aiming to bring women and girls to the fore by challenging a sporting structure that for too long simply hasn't served them sufficiently.

¹⁵ <https://www.EnglandNetball.co.uk/the-well-hq-partnership/>

Research shows that there is a lack of support and understanding of female life stages in sport and society, for example:

88% of women say their menstrual cycle symptoms limit performance.

30% say symptoms 'significantly' impact quality of life.

50% of post-natal women experience pelvic floor dysfunction, a barrier to return to sport.

64% of girls will have left sport by the time they finish puberty.

- NETBALLHer is an industry leading education programme which aims to drive real change and normalise conversations on topics around the female body.
- By educating staff, coaches, officials and volunteers to create environments where females can train and compete irrespective of what their changing body throws at them.
- The programme looks to collectively improve experiences, foster a sense of belonging that could reduce the dropout and increase the number of females playing across different life stages as well as improve athlete performance through optimising training around players' physiology.

115. The Review has noted in cross sector conversations that there is currently a lack of active, formalised cross-sport sharing of best practices and innovation around issues that impact elite female athletes across the sports industry. There is an opportunity to share best practice advances in the space more formally for the benefit of female athletes and all women participating in sport. Government should convene this group, which should establish links with academia and have a shared mission of resetting the bar for the professional environment of female athletes in this country.

116. **On current medical support requirements in licensing criteria:** Often, players have been forced to source treatment on the NHS, which has resulted in long wait times for treatment, long periods on the sidelines, and in some severe cases, has forced players into retirement. Players told the Review that medical staff within the game often do not have the necessary experience to effectively treat injuries. The Review heard how one player remained injured for 5 months for an injury that could have been treated in 4 weeks with the correct medical care.
117. This is not only an expertise problem, but is also a culture and attitude issue, with one former player stating that “[Medical] Decisions seem to be made based on [my] worth to the club.”
118. Offering players better baseline medical care will again foster depth of talent available for selection on matchdays, driving the quality of play upwards, and increasing crowds and therefore investment interest in the game as a whole. This should be benchmarked against the provision in the elite men’s game to establish best practice.
119. **On extended medical support:** This Review heard evidence from ex players who in some cases explained that injuries had forced them to retire from playing football. Short contracts meant that they were suddenly left with no support in managing injuries sustained in the professional field. In order to better protect players coming to the end of playing contracts, club medical support should be extended for a period of 6 months to players transitioning out of the game.
120. **On mandatory performance psychologists:** Players highlighted barriers to accessing mental health support, including a lack of awareness of where to find support and fears of the repercussions on their footballing career. One former player shared that “while I was a player I didn’t feel comfortable expressing how I felt in case it jeopardised my position in the team”. The Review heard this reservation repeatedly by both current and former players.
121. For clubs, it is currently optional for Women’s Super League and Women’s Championship clubs to employ a Performance Psychologist; this is an issue which has to be addressed.
122. The game must also ensure that all players have access to independent mental health and wellbeing support. This Review will recommend that a player’s union take on a more formal representation of the Women’s Super League and Women’s Championship, which should ultimately provide this mental health and wellbeing support service.

123. **On licensing compliance:** Players highlighted that even with minimum medical staffing expectations written into licence criteria, these are not reliably enforced. For example, it is a condition of licence that clubs provide players with private medical insurance, however players being forced to rely on NHS treatment belies adherence to this requirement. The FA should therefore give players an independent, anonymous route to reporting clubs' non compliance with licensing requirements, which will empower them to speak up about any gaps in standards of care.

3.3 Mandating elite training facilities for elite players.

124. This Review recommends that the FA strengthen training facilities standards as part of licensing requirements by giving more detailed parameters of what constitutes an appropriate training environment. These minimum standards should be clear enough to ensure that training facilities reflect the elite standard that players are expected to compete at.
125. This Review heard evidence that there are vast differences in the quality of training facilities across the elite game. These differences are particularly acute and growing between the Women's Championship and the Women's Super League. Clubs and players highlighted various instances of poor standard of facilities on offer, such as inappropriate changing facilities and poor pitch quality. One Women's Championship player described how they used bin bags as curtains in changing rooms. Another Women's Championship player described how it was so cold in their unheated facility that players needed to wear a winter coat indoors to do match analysis.
126. Current licensing requirements provide some parameters for training environments, but they are largely high level and non specific. Per Schedule 3 of the FA's Tier 1 licensing requirements:

The Club training ground shall, as minimum, have access to:

- a grass pitch or 3G artificial pitch;
- floodlighting;
- a high quality, performance gym;
- a changing room; and
- adequate medical facilities.¹⁶

¹⁶ FA Club Licence to participate in Tier 1 of professional women's football season 2022/23 onwards

127. Being explicit about what these environments should consist of will get rid of any leeway for clubs to provide substandard environments. It will also foster an environment which supports elite athletes to thrive, and can set clear minimum standards for women's professional sport more broadly.

3.4 Mandating a world leading parental package.

128. This Review recommends that the FA conducts an in depth analysis of the success of its current maternity policies with current and former players – alongside an incoming player union – and engages cross industry to introduce enhanced maternity packages to better protect players who want to become parents during their playing career. This should become a baseline standard for players in the top two tiers of English football.

129. Enhancements to maternity provision for players were introduced for the 22/23 season which now mean a player going on maternity leave will be paid their full weekly wage, as well as any other remuneration and benefits for the first 14 weeks, before reverting to the applicable statutory rate.¹⁷

130. Positive change is of course welcomed. However, the Review heard from many former players who stated that the recent changes to maternity policy do not go far enough. There have been recent high profile players speaking out about their experiences in relation to maternity provision. One player described how she lacked specialised mental and physical health support during and following her pregnancy and feared the response she would receive when announcing her pregnancy.¹⁸ Players have also publicly suggested how policies could be improved to stop more players from having to choose between motherhood and their career.¹⁹

131. The recent ruling in relation to the case of one player - who, while employed by a tier one European club, did not receive the statutory maternity pay despite new FIFA regulations - demonstrates the damaging culture towards mothers that exists within the game.²⁰

132. Former players described how the current policies have not taken the experiences of mothers into account, advising that the current maternity policy does not address the practical difficulties women face after having a child and returning to play. There remains limited support for women when

¹⁷ <https://womenscompetitions.thefa.com/article/fa-pfa-agree-maternity-long-term-sickness-benefits-20220102>

¹⁸ <https://www.newstalk.com/podcasts/the-coygig-pod/i-had-to-fake-an-injury-they-never-even-came-and-spoke-to-me-emma-mitchell-the-maternity-minefield-of-pro-football-the-coygig-pod-ep-53-2>

¹⁹ <https://fifpro.org/en/supporting-players/conditions-of-employment/maternity-and-parental-provision/sanne-troelsgaard-pregnancy-is-the-start-of-something-beautiful-not-the-end-of-your-career>

²⁰ <https://www.theplayertribune.com/posts/sara-bjork-gunnarsdottir-soccer-pregnancy>

transitioning back to work, with an environment of short contracts coupled with a 14 week maternity pay offer placing pressure on women to return to work quickly.

133. The value of listening and learning from the experiences of players who have had children – especially those who have experienced the administration of the latest maternity provision – is clear and must be prioritised.
134. One Women's Super League player has publicly attributed her positive experiences of returning to play as stemming from having a manager who understood the importance of maternity care.²¹ The player specifically referenced the fact that her manager introduced a pelvic floor coach and allowed her to sign an extended contract, which allowed her to focus on football without worrying about her contract situation – neither of which is currently mandated as part of league-wide maternity provision.
135. The women's sport industry as a whole can and should be more proactive in formally sharing best practice. The RFU, for example, announced a new enhanced parental policy for the Red Roses in February 2023 that should be looked to as an example of groundbreaking practice in maternity support and provision.²² While this specific policy is only offered to national team players at this point, it is a holistic approach that the FA can look to as taking into account the broadest possible set of needs that all professional players in the Women's Super League and Women's Championship should have access to.

²¹ <https://www.bbc.co.uk/sport/football/64897396#:~:text=%22If%20I%20was%20to%20have,the%20squad%20following%20maternity%20leave>

²² <https://www.englandrugby.com/news/article/new-maternity-pregnant-parent-adoption-leave-policy-for-england-women-players>



Case Study

RFU Maternity, Pregnant Parent and Adoption Leave Policy

In February 2023, the Rugby Football Union and Rugby Players' Association announced a new policy with an aim of providing a supportive environment for players after having children, and to support players during pregnancy.

- The updated policy will support players who wish to maintain their involvement in the team whilst pregnant, following a full risk assessment to determine the level of duties that can be safely performed.
- Players will also be supported with 26 weeks of full pay maternity leave, and will be supported into alternative employment within the rugby network until the player's maternity leave begins.
- Players returning from maternity leave will also now be able to travel with their infant to match days, providing a relevant support person also attends to assist with care and supervision of the child. The RFU will also financially support mothers with children aged less than 12 months, by covering travel and accommodation costs for children and support persons whilst travelling to competitions.

- If at any point during pregnancy or whilst on maternity leave, contracts are renegotiated or extended, the player who is pregnant or on maternity leave will be included in all discussions and have their contract extended for a period of not less than 12 months. Performance is then reviewed once they have returned to playing and are embedded back into a performance environment. This is important from a job security point of view.

136. Offering women best in class parental packages will allow a wider pool of talent to perceive professional football as a career that can align with a desire to start a family, and continue to forge a career once that family is established. If our vision is to attract the best talent in the world, women's football needs to create an environment that does not ask women to preemptively count themselves out of football as a career in the first place, or have them fear negative implications should they wish to become parents during their careers.

3.5 Funding full union representation of both tiers.

137. This Review recommends that the FA should fund comprehensive and formalised union representation for both Women's Super League and Women's Championship players.
138. Access to union representation is something that exists in the men's game via the PFA, and provides players with an important independent route to addressing concerns and giving a voice to player priorities when negotiating with the leagues and national governing body.
139. The PFA has advised the Review that it does not currently receive any ring fenced funding from the FA towards its representation of professional players from the women's game – though it does offer support to players in the Women's Super League and has expressed a desire to provide an expanded and formalised service across the top two tiers.
140. Women's Championship players do not currently have any union representation at all. A lack of union representation at this level has left players feeling vulnerable as they do not have independent advocates that can provide advice, support and guidance on a variety of issues from employment rights to mental health and welfare support. Giving full union representation to both Women's Super League and Women's Championship players is fundamental to creating a fully professionalised environment for both tiers.

141. Once full union support is established, there will be an opportunity to further embed player support, by establishing a Professional Football Negotiating and Consultative Committee (PFNCC) for the women's game, and by reforming pension provision.
142. This Review acknowledges a PFNCC will further protect female players from changes in their contracts, and that adequate pension contributions will provide certainty and security in a career that is currently unstable, short and insecure. Both measures will need to come once the game is fully professionalised, and formal union representation is introduced for all professional players.

3.6 Uplifting duty of care provision for players.

143. Football, and sport generally, should be a place where athletes and participants feel safe, welcomed, and are enabled to be the best they can be. In any situation where issues regarding the safety and welfare of players are impacted, participants must have access to clearly identifiable routes to reporting these issues, and have absolute confidence that these concerns will be dealt with in a timely, appropriate and confidential manner.
144. Across women's sport there have been cases of abuse and misconduct which have led to high profile interventions. The Whyte Review into abuse within British gymnastics²³ highlighted severe instances of bullying, abuse and discrimination in the sport. More recently, Swim England came under criticism for its safeguarding policies, with an independent report finding that Swim England is "*heading to a situation where the protection and safeguarding of children will be placed at risk... given the risks and decisions taken to date*".²⁴
145. In women's professional football there are two recent and high profile reports that uncovered systematic abuse across US Soccer. The publication of the Yates report²⁵ in 2022 found that teams in the National Women's Soccer League (NWSL) and United States Soccer Federation (USSF) failed to put in place basic measures for player safety, and that abuse in the NWSL was systemic - teams, the league, and the Federation failed to adequately address reports and evidence of misconduct.

²³ <https://www.sportengland.org/guidance-and-support/safeguarding/whyte-review>

²⁴ <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2023-03/SRUK%20report.pdf?VersionId=z9yBTbldSvHFcaezmxJmv9Jmyv7GnPv3>

²⁵ <https://www.ussoccer.com/stories/2022/10/sally-q-yates-investigation-findings>

Case Study

US Soccer Investigations



In October 2021, USSF commissioned an independent investigation into decades of allegations of misconduct in professional US women's soccer.

In 2022, the Yates Report released its full findings of abuse and misconduct and provided 12 recommendations with a view to reducing recurrence.

In January 2023, USSF announced its plans for implementing all 12 of the recommendations made by the Yates report which were as follows:

- Teams should be required to accurately disclose misconduct to the NWSL and USSF.
- USSF should require meaningful vetting of coaches.
- USSF should require the NWSL to conduct timely investigations into allegations of abuse, impose appropriate discipline, and immediately disseminate investigation outcomes.
- USSF should adopt uniform and clear policies and codes of conduct.
- USSF should require the NWSL to conduct annual training for players and coaches on applicable policies governing verbal and emotional abuse, sexual misconduct, harassment, and retaliation.
- USSF, NWSL, and teams should each designate an individual within their organisations who is responsible for player safety.
- USSF should strengthen player safety requirements in professional leagues.
- USSF should require the NWSL to implement a system to annually solicit and act on player feedback.
- USSF should collaborate with its youth member organisations and other stakeholders to examine whether additional measures are necessary to protect youth players.
- The NWSL should determine whether discipline is warranted in light of these findings and the findings of the NWSL/NWSL Players Association (NWSLPA) joint investigation.

- Teams, the NWSL and USSF should not rely exclusively on SafeSport to keep players safe.
- The Federation should determine the most effective structural mechanism to evaluate and implement recommendations and further reforms.

In October 2021, the NWSL also commissioned an independent investigation into misconduct in the league.

The NWSL/NWSLPA joint report then revealed further misconduct and administration failures within the game, with the following recommendations being made:

- Strengthen Anti-Harassment Policies.
- Develop and Enforce Guidelines Addressing Appropriate Interactions Between Club Staff and Players.
- Develop and Implement Trainings That Reflect and Address Player and Staff Experiences.
- Coordinate with Clubs and US Soccer to Improve and Centralise Hiring Practices.
- Enhance Reporting and Investigation Procedures.
- Prioritise diversity, equity and inclusion initiatives to Create a More Inclusive Environment for All Players and Staff.
- The NWSL announced a series of sanctions against individuals and teams following the report.

146. Clearly, these issues are not limited to the organisations mentioned above. This Review heard evidence from players within the game, which highlighted issues regarding the current safeguarding protocols which exist within the elite game. Specifically, players highlighted cases where following an investigation, individuals in question have appeared back at clubs or in other roles within the game, leading to a sense that cases / investigations have not been formally resolved. Additionally, players voiced concern around a lack of independent routes to reporting issues outside of club structures.

147. Individuals of concern being allowed back into the professional women's game following investigations was a key issue identified by the Yates report, and US soccer has since recognised the need to mandate meaningful vetting of coaches and immediately disseminate outcomes where an investigation has taken place. The FA should note this reform and its focus on transparency, and ensure it addresses the risk of inappropriate individuals retaining roles within the women's game.
148. Independent routes to reporting issues is something this Review understands the FA is looking into, and mirrors approaches other sports have taken on this front – for example, UK Sport has recently launched a 'Sport Integrity' pilot – an independent disclosure and complaints service available for all athletes and staff on Olympic and Paralympic performance programmes to report allegations of unacceptable behaviour.
149. It is understandable that players often feel a reluctance to report issues through internal club channels, with some players viewing speaking up about issues as a significant risk to their future career progression. Introducing independent reporting mechanisms is therefore critical to empowering players in the game to raise any concerns, and should also fundamentally interact with formal union representation of Women's Super League and Women's Championship players.
150. The professional game in England should be creating an environment which is best in class in terms of player care and support. All players must feel like appropriate measures and controls are in place which create a safe and world leading performance environment, which will therefore attract and retain the best talent.

3.7 Offering best in class career transition support for players leaving the professional game.

151. This Review recommends that the FA, NewCo, clubs and the union benchmark transition support against new initiatives in the space and signpost clubs and players to resources available to them as they consider their future careers.
152. Preparing a player for a career after football is particularly important in women's football as average income and salaries earned over a career are significantly lower than the men's game. A recent Telegraph Sport investigation, found that as of 2022, Women's Super League salaries ranged from as little as £20,000 per annum to as much as £250,000 per annum, plus bonuses, across the 12 top clubs.²⁶

²⁶ <https://www.telegraph.co.uk/football/2022/03/08/revealed-womens-super-league-players-paid-little-20000-a-year/>

153. The average salary in the Women's Super League is around £25,000 to £27,000 a year, with salaries in the Women's Championship as low as £4,000 a year.²⁷ As a result, many female footballers require a further career to support themselves financially both during their career, as well as after retirement from football. In comparison, the average Premier League player salary is over £3 million per year.²⁸ Players must therefore be provided with adequate support to develop a skillset which properly equips them for a career outside of football. Even if a modest salary floor is introduced per the recommendation of this Review, players will still need this support in order to ensure they have a solid post playing career pathway.
154. Former players highlighted how discussions about their futures were often not started early enough, which left them unprepared for a career after football. A former player that completed an educational qualification alongside their football career described how some coaches discouraged players from pursuing educational opportunities as they viewed it as a *"distraction from football"*.
155. Following the introduction of Newco, the league and clubs must ensure that all players have access to mandated in depth support to assist their transition out of the game. This must expand on current transition support signalled within FA licence requirements. Again, this will help to make professional football as attractive a career as possible for women and girls, which will ultimately widen the talent pool available to the game and uplift the on pitch product.

²⁷ <https://www.itv.com/news/anglia/2022-08-01/lionesses-set-for-payday-after-euros-victory-but-it-wont-match-the-men>

²⁸ <https://thepfsa.co.uk/football-wages-how-much-do-footballers-get-paid/>

Recommendation 4:

The FA should urgently address the lack of diversity across the women's game - in both on and off pitch roles. Specifically:-

- 4.1** The FA should publish data on the success or failure of its existing Equality, Diversity and Inclusion interventions.
- 4.2** The FA should establish workforce data to give an understanding of the demographics of the current football workforce in all roles and at all levels.
- 4.3** The FA should use workforce data to design and implement a workforce strategy for the entire women's game.

4.1 The FA should publish data on the success or failure of its existing Equality, Diversity and Inclusion interventions.

156. Only three members of the Lionesses EUROs winning squad were of black or mixed heritage. This is a glaring reflection of a wider lack of diversity in both the workforce in women's football on and off the pitch and in the youth and grassroots women's game. It is critical that football is representative of society and accessible to all in society.
157. It is clear that there is a lack of representation of women and individuals from diverse backgrounds throughout the workforce of women's football – from grassroots through the elite pathway and into the professional game. This is not an issue unique to women's football, however the increased visibility of football within society makes the impact of a lack of representation clear. In order to attract the best talent both on and off the pitch, it is vital that no single characteristic is a barrier to a career in football.
158. The Review heard many concerns regarding the number of visible role models from ethnically diverse backgrounds within the women's game. Kick It Out raised this issue and stated *"We need to ensure that football appeals to everyone and is accessible to everyone. The relative absence of women of colour from the elite game and its feeder leagues needs to be addressed"*.

159. This is something being addressed across women's sport, and there are opportunities for industry to share learnings from the successes and challenges associated to targeted interventions in place - there are pilot initiatives that have been trialled in other sports such as hockey that take this targeted approach, where learnings could be shared and interventions scaled to tackle specific barriers to entry more effectively.



Case Study

England Hockey and Muslim Sports Foundation

Utilising Sport England's Commonwealth Games legacy funding, the project led by England Hockey and Muslim Sports Foundation aims to give Muslim girls in Birmingham the chance to play hockey for the first time.

Cultural barriers alongside body image and confidence issues as well as financial barriers hindering travel to and from facilities, often result in low participation rates for girls from Muslim backgrounds living in urban areas.

The project is working with local mosques and community leaders to engage with girls in inner city Birmingham and tackle the barriers they face to accessing sport and physical activity.

Yasmin Hussain from the Muslim Sports Foundation commented on the success and popularity of the sessions, saying:

“The sessions have proved to be very popular with the community and we have had amazing feedback from parents and girls. Sessions like these emphasise our mission which is ‘every child, deserves every opportunity, at every sport.’ The girls have thoroughly enjoyed coming every week with passion and enthusiasm and it is the collaboration between Muslim Sports Foundation and England Hockey that has enabled it to be a success.”

Local coaches have been delivering a free weekly hockey session since the summer. A group of 36 girls aged between 8 and 18 have enjoyed accessing the sessions and learning how to play hockey.

Coach Christine Dalby-Ali has shared why this project is so important to her and the impact it is having on the girls attending:

“It’s been wonderful to be involved in this project and to see the girls improve so quickly. It’s always lovely to see them running to get to the session on time and desperate to collect their sticks and balls. As a Muslim myself, it’s a joy to share the sport I love with other Muslims and see the enjoyment of playing hockey on their faces every week.”

England Hockey will now look to replicate and roll out further schemes in partnership with Muslim Sports Foundation across the country.

160. The FA has launched measures to reach girls from inner city locations and from diverse backgrounds. There are early signs that the ‘Discover My Talent’ pathway is leading to an increase in talent identified from ethnically diverse backgrounds.²⁹ However, concerns remain that more action may be needed to address barriers to minority ethnic participation.

²⁹ <https://www.theguardian.com/football/2023/feb/09/england-fa-lionesses-new-scheme-pathway-increased-diversity>

161. Transparency and accountability on the impact of the FA's Equality, Diversity and Inclusion initiatives, and shared learning from the success of targeted interventions across sport, will help foster a culture of openness around best practice.

4.2 The FA should establish workforce data to give an understanding of the demographics of the current football workforce in all roles and at all levels.

162. This Review recommends that the FA should establish comprehensive workforce data to give an understanding of the demographics of the current football workforce in all roles and at all levels, from the elite game to grassroots, and from playing talent to coaches and corporate staff. It is critical that all posts within football are seen as obtainable to anyone regardless of their gender or ethnicity.
163. Looking at gender and the corporate environment, for example, research has found that there are wide benefits to gender diversity on boards, with clubs containing gender diverse boards linked to higher financial performance.³⁰ Greater gender diversity was also associated with improved corporate governance, more effective risk management, better decision making, and an enhanced workplace culture.
164. Sharing an understanding of the demographics of the current football workforce in all roles and at all levels, will provide a picture of who exactly is working on women's football, what they do, where there are representation gaps in the leadership and workforce, and why those gaps exist. This should look at all protected characteristics and should cover all roles and all levels: from the boardroom to frontline football, and across all on-pitch and off-pitch skill sets.

4.3 The Review recommends that the FA should design and implement a workforce strategy for the women's game.

165. Building on the baseline workforce data recommended above, the FA should design a workforce strategy that addresses the specific findings of that research.
166. A women's football workforce strategy should set the vision of the future women's football workforce in terms of size, areas of expertise, and diversity. It should also create a roadmap for how the game is going to achieve this

³⁰ Fair Game UK – <https://static1.squarespace.com/static/6047aabc7130e94a70ed3515/t/6225fcd351786a64ba4421b0/1646656733257/The+Gender+Divide+That+Fails+Football%27s+Bottom+Line+-+Fair+Game+Report+March+2022.pdf> p. 12-13

vision and assign responsibilities and accountability. It should include pathways for players to transition into other areas of the football workforce, and set out how the women's workforce will be upskilled and supported to ensure retention and progression to more senior roles for people from all backgrounds.

167. As part of this, the FA and NewCo should consult with Sport England and UK Sport to understand the impact of equality, diversity and inclusion provisions in the Code for Sports Governance – both the 2016 edition and the 2021 edition. The 2021 edition of the Code represents a positive model for improving equality, diversity and inclusion in individual sporting organisations and across the sporting sector.

A Code for Sports Governance



Case Study

Sport England and UK Sport - A Code for Sports Governance (2021)

The Code for Sports Governance sets out the levels of transparency, diversity and inclusion, accountability and integrity that are required from those organisations who seek – and are in receipt of – UK Government and National Lottery funding from UK Sport and/or Sport England.

Key provisions related to equality, diversity and inclusion include an obligation on each sporting organisation to:

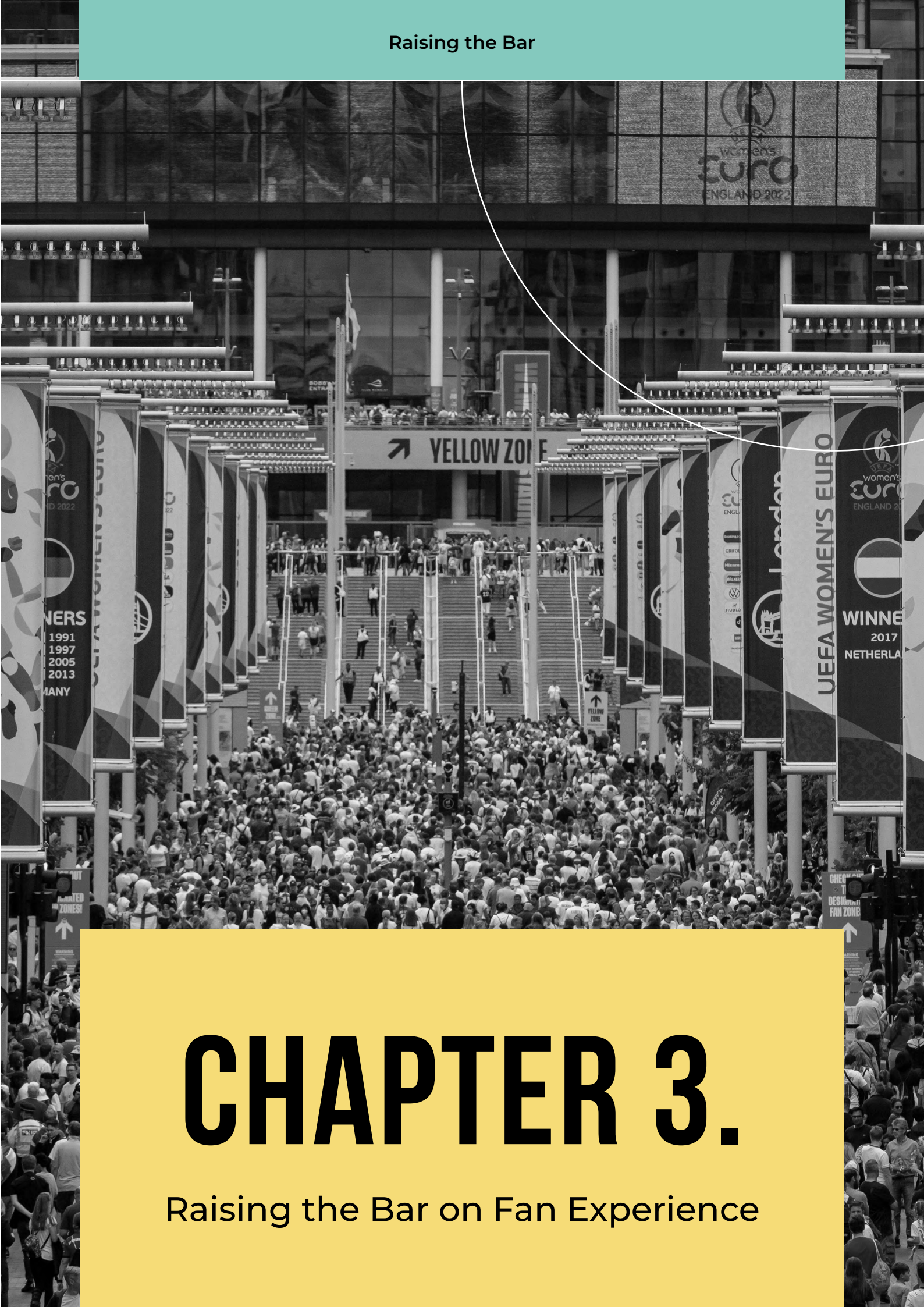
- Publish clear ambitions to ensure its leadership represents the diversity of the national and/or local community (as appropriate).
- Demonstrate a strong and public commitment to promoting, embedding and advancing diversity and inclusion on the Board, senior leadership team and beyond
- Create and agree with Sport England/UK Sport a Diversity and Inclusion Action Plan.
- Create a Diversity and Inclusion Action Plan that, amongst other things, identifies actions needed to achieve, support and then maintain the organisation's ambitions and how these will be reviewed.
- Publish its Diversity and Inclusion Action Plan and review and update the plan annually.

168. Creating opportunities for people from a variety of backgrounds will ensure that the best talent is attracted to the sport. It is essential that women's football fosters an environment where people can thrive and grow both personally and professionally. This will encourage high workforce retention rates and provide women's football with the commercial and sporting expertise that will financially benefit the whole pyramid as women's football continues to grow.
169. Embedding diversity and representation across the sporting pyramid on and off the pitch will also provide role models for young girls. There is an opportunity to set up the foundations of a talent pipeline and workforce that has the skills to maximise commercial growth and support the game's long term growth.

Conclusion

170. It is crucial to reset the bar for those currently playing at elite level, as well as those aspiring to reach the top tiers of women's football. This will require a fundamental shift in mindset for all those involved in the professional game – at clubs, the FA, and whoever runs the top two tiers from season 24/25.
171. It will also require a fundamental uplift in investment from all sides – clubs will have to invest more in their players and working environments, and the FA and NewCo will need to unlock more centralised revenues to support clubs in doing so.
172. By investing in women's football there is an opportunity to create a greater number of role models in the sport that will drive fan engagement across broadcast, social and in stadiums. In turn, this will generate increased commercial revenues, a more rapid growth in broadcast audiences and matchday attendees, more competitive leagues and sustained international success.
173. However, given the immediate and pervasive harms to players and staff currently working in the game, this Review considers that this uplift in investment is not only warranted but too slow in arriving. Players, staff, coaches and executives should be afforded a truly professional environment to operate in. Without this, we will continue to see players hurt, teams struggling to compete on the pitch, and cohorts of potential players, coaches and wider staff deterred from pursuing opportunities in the game.

Raising the Bar



CHAPTER 3.

Raising the Bar on Fan Experience

Context

174. **The popularity of the women's game in England has grown throughout the 2000s, and the success of the Lionesses in summer 2022 has galvanised the interest in the game.** As highlighted throughout this report, records have been broken across all forms of women's football in terms of matchday attendance and broadcast viewership.
175. In terms of revenue generation, Women's Super League broadcast rights were first allocated in 2017 to BT Sport and the BBC. In 2021 Sky Sports replaced BT Sport as the subscription broadcaster of the Women's Super League, with the BBC renewing their rights deal, for a combined estimated £25 million. With audiences increasing at pace, there is an opportunity to monetise broadcast rights further and create distributions in the women's game that can benefit the game as a whole.
176. At present there is no Women's Championship live coverage available on television, despite Sky and BBC having the option to broadcast these games. Sky introduced a Women's Championship highlights show in season 22/23 which is a welcome expansion of access for fans of the women's game. However, in order to ensure the continued growth and interest in the women's game beyond the Women's Super League alone, broadcasters should look for innovative ways to engage new audiences in women's football and provide greater access to tier 2 matches. This should work in conjunction with improvements to the professional environment and the commercial aspects of the game to ensure that the quality of the matches draws in viewers.
177. There is a clear appetite for women's football which is increasingly being met by clubs, leagues and the FA. However, there is a larger opportunity which, taken together with the wider improvements outlined in this Review, can be capitalised on for the benefit of the whole game. Fans are eager to engage with women's football and want new and improved ways to do this.
178. **Ensuring that fans have access to a best in class matchday experience and broadcast product will be critical in ensuring that these numbers can continue to grow and help to generate the organic revenue that the women's game needs to continue to flourish, and remain world leading.** These elements are symbiotic – generating an exciting and accessible matchday experience creates a better broadcast product, which in turn attracts more fans who want to attend live matches.



Case Study

DAZN, YouTube and the UEFA Women's Champions League

Approach

In 2021, DAZN, UEFA and YouTube agreed a four-year global broadcasting partnership for the UEFA Women's Champions League (UWCL). DAZN made the initial two-years (21/22 and 22/23) available for free on its platform and via the DAZN UWCL YouTube channel to drive visibility and increase interest.

The enhanced exposure for the competition and participating clubs was aimed at bringing benefits for the whole European women's football commercial ecosystem through increased viewership, match attendances, and sponsorship value.

Match content is delivered with high production values, including preview and review analysis-led content to ensure fan expectations and experiences are met and delivered.

Results

There has been a significant and sustained growth in viewership as well as other forms of interests:

- 362,000 DAZN UWCL YouTube Channel subscribers – the most subscribed channel dedicated to female sports on YouTube
- 12.3m unique views
- 8.5m hours watched on YouTube
- 77% of clubs have seen a positive impact on sponsorship interest
- Increase in the percentage of female fans viewing up from 20% to nearly 30%
- 65% of views from 18-34 year-olds

DAZN's women's football strategy is an example of the 'virtuous cycle' in effect. However, for visibility and value to translate into viability and sustainability, women's football must transition to establishing, and realising, its true commercial value.

Therefore, from next season DAZN's UWCL coverage is moving to a free/pay hybrid model, with 42 of the 61 matches in the competition being paid for services on the DAZN platform. This represents another step in the evolution of women's football broadcasting as its popularity and value continue to increase.

179. **The active participation of supporters is clearly crucial here, and it is essential that supporters' voices are heard loud and clear.** Their feedback, at club and league level, must be accounted for as important decisions are taken regarding the future of the women's game.
180. The elite women's game has the opportunity to capitalise on growing interest in the sport and lower any remaining barriers to entry for fans looking for a unique sporting experience; one that offers an alternative to preconceptions around what being a fan of football – or sport generally – should look like. Supporters, both at home and at matches, must be central to the development of the game to preserve the inclusive environment which defines women's football and can draw in new fans. This will continue to drive viewing figures, engagement, and ultimately commercial revenues to benefit the pyramid as a whole, via uplifts in broadcast, partnership and matchday income.

Recommendations

Recommendation 5:

The FA, Premier League, English Football League and broadcasters should work together to carve out a new dedicated broadcast slot for women's football.

181. Understanding where women's football is available to view was raised as a significant issue throughout the Review's evidence. Due to conflicts with the men's game, there is a lack of scheduling consistency within the women's game across the football broadcast calendar. It has become increasingly difficult for the women's game to find an appropriate slot to play matches which balances strong broadcast viewing figures with match day attendance numbers.
182. Contributors to the Review described following the women's game as "*patchy*" and "*inconvenient*". Continuing to grow the fanbase will be critical in the game's commercial growth, and creating a clear appointment to view around women's football will be central to this.
183. There was a strong consensus in the evidence that women's football must be given its own independent and dedicated broadcast slot which is separate to that of any men's football broadcast. This was raised by a number of supporters and supporters' trusts. One Women's Super League club suggested that the women's game "*continues looking for new TV slots for the women's game that don't clash with men's matches i.e. Saturday mornings/Sunday evenings*".
184. There is a clear need for a new dedicated slot for women's football which is convenient for attendees and maximises broadcast viewership. This will give women's professional football a space in the broadcasting calendar where it does not have to compete with men's football, attracting additional viewers and driving up the value of the broadcast as a result.
185. Broadcast revenue is central to the development of a sustainable business model for all sports, and women's football is no different. It is shared across clubs and gives them the basis to invest in their team's elite performance capability and welfare, further increasing the pipeline of talent and overall

quality of the leagues and, as a result, the value of broadcasting women's football. This is a central part of the virtuous circle of investment, and it is therefore important that we get it right.

186. The obvious gap within an otherwise crowded broadcast calendar is 3pm on Saturday. The FA and Scottish FA voluntarily opt into Article 48 of the UEFA Statutes, which allows European national football associations to have the right to prevent matches from being broadcast within a 2.5 hour window on selected weekends. At least 50% of the matches from the top two divisions must take place during the specified blackout period, which takes place between 14.45 and 17.15.
187. Introduced in the 1960s, the Article 48 regulations were designed to encourage supporters to continue attending football matches and to support grassroots football. They were not designed with the women's game in mind (women's football was effectively banned at the time), and an opportunity exists for football authorities to agree to exempt women's football from the broadcasting blackout to drive new audience growth.
188. The exact mechanism for this must be for footballing authorities to determine. The application of Article 48 is voluntary, and without support from the Premier League and the EFL, any application to exempt women's football from the broadcast blackout would be extremely unlikely to deliver benefits for the women's game. Furthermore, any new slot must balance broadcasting viewership with the ability of fans to attend matches in person. Women's football is often shown on Sunday evenings, however these matches are more difficult for fans to attend, affecting ticket sales and negatively impacting the atmosphere in the stadium.
189. The FA, Premier League, EFL, and broadcasters should work together to create a bespoke window for women's matches to be regularly showcased. This would provide women's fixtures with a clear regular window for broadcast (at a convenient time for match attendees) where no other football can be shown. With the support of stakeholders across men's football, the women's game has a chance to carve out a home that makes viewing the sport available for the broadest possible set of fans.

Recommendation 6:

Clubs must better value and support their fans - the FA should raise minimum standards to enforce this.

- 6.1** The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.
- 6.2** Following the introduction of FA licensing requirements for clubs to have ticketing policies, the FA should review these annually and clubs should actively seek feedback from their fans on how these should be adapted.
- 6.3** The FA should introduce a licence requirement for clubs to produce a stadium strategy focused on growing their matchday attendance, with a particular focus on increasing the number of matches played in the main stadia for affiliated teams.
- 6.4** The Sports Grounds Safety Authority (SGSA) should extend its licensing scheme to all grounds used in the Women's Super League to ensure high standards of safety, while the Women's Championship should implement a self-regulation model with guidance, support and assurance provided by SGSA.
- 6.5** All clubs should ensure that the recommendations in the Football Governance White Paper with regards to fan engagement should be delivered on with meaningful representation for fans of the women's team.
- 6.6** Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.

6.1 The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.

190. Building a full understanding of the current and potential audiences for women's football has been identified as a gap within the game. There is still ambiguity around who constitutes the current – and potential – fanbase for women's football and more research needs to be undertaken. This Review heard evidence offering conflicting opinions on these current and unexplored audiences.

191. The FA has recently commissioned research to look into these trends. This Review encourages the FA and NewCo to continue supporting clubs with central research to ensure that all clubs have an adequate understanding of their current and potential audiences, so that matchday experiences, merchandise and other marketing initiatives can be developed accordingly.
192. Whilst some clubs have been successful in marketing and growing their fanbase, there remains a discrepancy in the level of dedicated resources between clubs. For some clubs there is a clear commercial opportunity to invest in this resource as affiliated clubs will have access to a high quality stadium and the potential to reach a large audience. Many do not take this chance because that marketing capability can, at the moment, be more profitably deployed towards the men's side. However, the huge interest in landmark moments in women's football demonstrates the commercial possibilities which exist within the game, and developing broader, more engaged audiences will be a gateway to further investment as the ticketing and broadcast revenue increase.
193. Arsenal have clearly demonstrated the positive impact that dedicating appropriate marketing resources to the women's team can have on matchday attendance numbers, having initially broken the Women's Super League attendance record in season 22/23 with over 47,000 fans attending their match against Tottenham at the Emirates. In part, this was achieved by Arsenal opening ticket sales immediately after the conclusion of England's victory in the Women's European Championships, but the consistent application of marketing expertise and resource has also helped to deliver high attendances.
194. Juliet Slot, Arsenal's Chief Commercial Officer, has overseen the marketing and communications work around the women's team to drive interest and record ticket sales. Juliet has applied a clear focus on marketing the women's game as well as the men's game at a time when *"the appetite for women's football in this country has never been clearer"*.³¹ This approach, underpinned by a concerted marketing effort focused on promoting the big games throughout the season, has continued to bear fruit relative to the rest of the Women's Super League. This was further demonstrated by another landmark moment for the club when in May 2023, Arsenal broke the record for a women's club match when over 60,000 fans attended their Champions League semi final against Wolfsburg.

³¹ https://uk.sports.yahoo.com/news/arsenal-play-three-women-super-130043594.html?guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guce_referrer_sig=AQAAAMtCoHGLnqJ_ZZ7TNEvtdWq5EI3ID7Lk_hER9KoWrK4ChATSihh_qz_aBhVVLp-GEJgtL0mZORoOuXx3Hyr67MmZVb96ljxFr6aRAOUej-nMdtY1jx7uliBoFpp-OWmVOrlnD0uS--hdBpvgEzZKGtzOE1ej9gWaeMhOppfkMP4F

195. This Review recommends that the FA amends its licence requirements to require all clubs across both tiers to have dedicated specialist women's football marketing resource, with all clubs being encouraged to ensure women's football is fully integrated into wider club marketing strategies (where they are affiliated to a men's team).
196. Doing so will allow clubs to leverage centralised insight provided by the FA and focus them on outcomes that directly benefit fans, drive attendances, and access increased revenue streams from matchday (whilst also benefiting the broadcast product for the leagues as a whole).

6.2 Following the introduction of FA licensing requirements for clubs to have ticketing policies, the FA should review these annually and clubs should actively seek feedback from their fans on how these should be adapted.

197. As outlined above, 2022 was a record-breaking year for match attendance at women's football in England. The ambition for the women's game should be to build on the crowd numbers seen at marquee international and domestic fixtures into regular strong attendance numbers throughout the season. To enable this, clubs must ensure that they are providing a best in class experience for fans, from the point they first purchase a ticket.
198. Ticketing within the women's game was an issue consistently raised in the Review's call for evidence. One supporter noted that purchasing an away ticket to a Women's Super League match requires fans to register an account with the home team, meaning that to follow your own club home and away for a whole season, you would need to have 12 different registrations - they said *"It is ridiculous for a Women's Super League club supporter to have to register with the other 11 clubs to be able to buy tickets for away games"*. The Football Supporters' Association (FSA) also highlighted that currently, *"ticketing processes can be extremely difficult and create a barrier for Supporters"*.
199. A number of suggestions with regards to ticketing initiatives were made in the Review's call for evidence, including a proposal from the FSA for women's matches to provide both away fan and mixed sections in the stands. The variety of suggestions on ticket purchasing, pricing and seating initiatives demonstrates that clubs must tailor their ticketing offer to the fanbase of their women's team. Research has found that when comparing women's only and men's only sports, on average, 23% fewer ticket purchasers for

women's only sports were 'known' to ticket rights owners.³² This knowledge gap could limit the ability of stakeholders to gain insights into audiences and supporters of women's football.

200. Improving the experience and convenience of buying tickets will make it easier for clubs to keep fans coming back to watch matches, and should be viewed as a minimum expectation for any club which wants to expand its match going fanbase. A fan-centred approach will enable the club to tailor their offer on tickets (and, as a result, the matchday experience) which, in tandem with the deployment of dedicated marketing resource, can increase attendances and support the overall business model of clubs.
201. This Review understands that the FA is considering mandating all Women's Super League and Women's Championship clubs to have a ticketing policy. The Review welcomes this decision, and recommends that the FA reviews club policies annually, providing supporters with adequate opportunities to feed back on key ticketing experience issues.

6.3 The FA should introduce a licence requirement for clubs to produce a stadium strategy focused on growing their matchday attendance, with a particular focus on increasing the number of matches played in the main stadia for affiliated teams.

202. There is significant variance in the quality of stadiums used throughout the leagues. Although affiliated clubs are able to use a main stadium – and these have been used to host significant numbers of fans – many choose not to because they do not attract enough visitors to make it a suitable choice. Many will therefore host their matches at alternative venues which can create a poor match day environment for players, supporters, sponsors and broadcasters.
203. Matches which are hosted in main stadia of affiliated teams have the potential to hold larger audiences, given the increased capacity and quality of facilities on offer. However, given the potential drawbacks for some clubs, a balance must be struck to meet the potential offered through use of the main stadium while meeting the challenges – and costs – that come with opening and hosting a major sports stadium.
204. Over a quarter of all respondents to the Review's call for evidence suggested that women's teams host more matches in affiliated teams' main stadia throughout the season. The current FA requirement is for all teams with

³² <https://www.womenssporttrust.com/closing-the-visibility-gap/>

an affiliated men's club to host one match per season in the main stadium, however some clubs are starting to play more matches in main stadia as their fanbases grow.

205. Given that hosting matches in main stadia can generate bigger audiences when suitable opportunities are identified and prepared for through fan engagement and marketing resource, the one match minimum requirement in main stadia should be retained. In some cases, particularly in the short term as support for women's football continues to grow, this may lead to cost implications for clubs. However, the use of the main stadium should be viewed as part of the wider vision for women's football.
206. Going forward, this Review recommends the FA introduce a licence requirement for clubs to produce a stadium strategy focused on growing their matchday attendance, with a particular focus on increasing the number of matches played in the main stadia for affiliated teams. This should be complemented with a review of the club's profit and loss statement, breakeven threshold and ticket pricing policy. The development of these strategies should look to pave the way for additional usage of larger stadia in future seasons as attendance numbers grow.

6.4 The SGSA should extend its licensing scheme to all grounds used in the Women's Super League to ensure high standards of safety. The Women's Championship should implement a self-regulation model with guidance, support and assurance provided by SGSA.

207. Some concerns have been raised about the safety implications of women's matches being hosted in facilities which do not hold the same safety certificates or that may not be subject to the same safety regulations which exist in the men's game. At present, 18 of the 24 grounds (primary and secondary grounds of each of the 12 clubs) used within the Women's Super League are already licensed grounds by the SGSA due to ground sharing agreements which are in place.
208. The SGSA is the UK Government's advisor on safety at sports grounds. They have a legal responsibility to licence league and international football grounds in England and Wales used for the men's game and regulate their safety certification by local government. Given the continued increase in numbers of supporters attending women's football matches, we must ensure that all facilities which are being used are safe, appropriate and fit for purpose.

209. As already outlined, the Women's Super League is seeing a large influx of spectators attend games and there is, rightly, an ambition to accelerate this going forward. It is therefore this Review's recommendation to extend the SGSA's licensing scheme to all grounds used in the Women's Super League to ensure high standards of safety.
210. Attendances for Women's Championship matches are some way behind the Women's Super League. SGSA licensing naturally incurs a cost for the club, and the Review does not consider it a proportionate approach to require Women's Championship clubs to be brought within the scope of the SGSA licensing regime immediately. For these clubs, the Review recommends a self-regulation model with guidance, support and assurance provided by the SGSA – these are still likely to incur some cost for clubs but at a lower level than full SGSA licensing.
211. This should be aimed at ensuring a consistent approach to safety across the league, with continuous improvement aimed at smoothing the transition for clubs who achieve promotion to the Women's Super League.

6.5 All clubs should ensure that the recommendations in the Football Governance White Paper with regards to fan engagement should be delivered upon and there should be meaningful representation for fans of the women's team.

212. Growth of the fanbase for women's football is critical to the sustainable development of the sport. They are the lifeblood of any club, and ultimately, it is their support which will drive the game forward and allow it to reach new heights. Women's football has fostered an inclusive and distinct atmosphere which is cherished by many and it is important that, in widening access to the game, fans are consulted on how this develops.
213. The Football Governance White Paper, published in February 2023, underlined the Government's expectation of all men's clubs with regards to fan engagement. The independent regulator for football will oversee a licensing regime which, among other aspects, will ensure that clubs regularly consult a representative group of fans on key issues and decisions as they relate to the business and strategy of the club. These representative groups should include adequate representation for the women's team if the club has one affiliated.
214. This Review supports the recommendation of the Football Governance White Paper with regards to fan interests and we encourage all clubs to ensure that these outcomes are delivered upon in a timely manner, and that the representation of the women's team is delivered in a meaningful fashion.

215. This means there should be the same level of representation of the women's team to that of the men's in any representative group. While clubs who do not have affiliations to men's teams will not be required to do this under the football regulator, we recommend that similar mechanisms are put in place to ensure adequate representation of their supporters' views to club management, with the measure mandated and audited by NewCo.

6.6 Women's Super League and Women's Championship clubs should each implement a Supporter Liaison Officer.

216. The Supporter Liaison Officer (SLO) role has been mandatory at Premier League and EFL clubs since the 12/13 season. This is a designated member of staff at each club who provides a key interface between clubs and fans on a wide range of issues. Evidence presented to the Review suggests that some fans of the women's game feel isolated from key processes and decisions which are being taken at league level.

217. The importance of the SLO role was identified in the Government Expert Working Group on Football Supporter Ownership and Engagement. Giving fans a dedicated and direct route of engagement allows clubs to quickly recognise where there are issues arising or opportunities which are being missed. Acting on that feedback will improve the fan experience and ensure it is being developed with supporters in mind. In turn, this will grow the club's fanbase as more people become interested in an experience developed with supporters in mind, leading to improved attendances, increased potential for use of the main stadium, and a strengthened commercial case for improved broadcast deals.

218. Therefore, the development of a network of club SLOs, focused on women's football, will provide a further channel for supporters to input into the development of the game. Women's Super League and Women's Championship clubs should each implement a supporter liaison officer to engage with fans and provide the basis for an SLO network across the leagues. This may be done through independent SLOs for women's teams, or club level SLOs who must provide equal time commitments to the supporters of the women's game.

Conclusion

219. Improving the fan experience in stadium and on broadcast will enable the women's game to accelerate the growing interest in the sport. This will help develop the vision of a diverse and inclusive fanbase growing at pace, but will also be a key part of the game's future commercial success.
220. Key to this will be the establishment of a dedicated broadcast slot for women's football. This will be a game changing development, but it requires the active support of football authorities. This Review has set out some of the challenges this brings but the benefits are obvious – a clear appointment for fans to watch women's football has the potential to vastly increase viewership figures. This will naturally increase the value of any broadcast deal which can deliver this, unlocking a significant revenue stream which is central to football's business model.
221. Ensuring the experience of supporters in the stadium is of sufficient quality will also be important – for clubs, fans and the wider game. Progress is being made here but this Review has set out some further steps that should be taken to build on this.
222. We have heard directly from fans on the issues that matter to them most, and it is only right that football recognises the importance of these voices, and takes note of the recommendations outlined above – not only to best serve fans, but also as part of unleashing revenue streams that can continue to support fans, participants, and those working in the game.



CHAPTER 4.

Driving Momentum and
Accountability in the Grassroots Game

Context

223. **Women and girls of all ages should see football as an accessible, safe, positive, welcoming and inclusive environment to participate in.** The ability to play football for women and girls at all levels is fundamental in delivering the broadest talent pool to play professional football, and ensuring football can play its part in tackling inequality in sport more broadly. The access and provision of football offered to women and girls at the local level is instrumental in securing a diverse and wide talent pool in the pathway, whilst also providing women and young girls with both physical and mental benefits.
224. There is clear evidence that the success of the England Lionesses at the European Championships was a groundbreaking moment for the sport which inspired the nation. There is an opportunity to capitalise on this momentum by increasing participation opportunities for women and girls - there are some green shoots here, with girls registered to take part in Schools Football Week 2023 at over 87,000 in comparison to 57,000 registered last year. Figures published by UEFA in their Post EUROs Flash Report show that more than half of local residents and 2 in 5 spectators and tournament volunteers have been inspired to do more sport and physical activity.³³
225. However, the success of the Lionesses alone cannot address the systemic issues that surround women and girls' participation in all sports, not just football.
226. The latest Sport England Active Lives data shows that men (66%) are still more likely to be active compared with women (61%)³⁴ and that boys (50%) are more likely to be active than girls (45%).³⁵ This, like many other challenges in women's sport, was exacerbated by the pandemic with an overall decrease in participation levels for women and girls. Research on the impact of Covid-19 restrictions on women's participation in sport showed that women with children juggling home-life, work, and schooling, and women aged 70 plus had suffered the greatest isolation and 39% of women said that losing their fitness would have a long-term impact.³⁶
227. This Review has examined evidence of issues in football and across sport that must be addressed to fundamentally change mindsets and increase the opportunities for all women and girls to engage with sport.

³³ https://editorial.uefa.com/resources/027a-1641ea2e007a-a662149c421d-1000/ukc-024555_weuro_-_flash_report_11.pdf

³⁴ Sport England Active Lives Adult Survey November 2020-21 Report

³⁵ Sport England Active Lives Children and Young People Academic Year 2021-2022

³⁶ <https://www.womeninsport.org/wp-content/uploads/2020/07/Lockdown-Research-Implications-for-Womens-Participation.pdf>

228. **Crucially, stereotypes and perceptions of girls participating in sport are being embedded at both primary and secondary school levels.** Research shows that gender stereotypes hold girls back from participating in sport and girls are starting out surrounded by expectations that will limit their enjoyment of and participation in sport and physical activity.³⁷
229. Primary school is often the first opportunity for children to engage with sport and therefore schools play a key role in influencing girls' attitudes to sport through physical education (PE) lessons, after school clubs and the wider playground environment. Recent research shows that only 49% of girls aged 5 to 11 take part in a team sport, compared to 70% of boys, against a backdrop of only 30% of parents thinking that playing sports is very important for their daughters compared to 41% of parents for their sons. Parents and carers play a huge role in supporting their children to take part in sports, and these perceptions can have a negative influence on girls' participation rates.
230. By the time girls are teenagers, many have already decided that they do not belong in sport. Research found that more than one million teenage girls (43%) who once considered themselves 'sporty', disengage from sport following primary school.³⁸ This shows that the perceptions of girls taking part in sport are being embedded at an early age and that girls are being edged out of sport before they even reach secondary school.
231. Research also shows male domination of the cultural value of football at secondary level. Football Beyond Borders conducted research with teenage girls based in inner-cities, suburban and rural settings to better understand whether the Lionesses winning the European Championships has led to them becoming more engaged in the women's game. The research shows that after the tournament 25% of teenage girls still haven't watched any women's football and 63% of teenage girls don't know any of the Lionesses' names.³⁹ Despite the increased visibility of the women's game, there is a risk that national success is not yet trickling down to engage more young girls in women's football.
232. **In addition to this cultural backdrop, more grassroots facilities, with sufficient playing opportunities for women and girls, are needed to sustain growing levels of participation. There remains a deficit in adequate grassroots football facilities that risks hampering attempts to accommodate any increase in demand for playing opportunities from women and girls.**

³⁷ <https://womeninsport.org/research-and-advice/our-publications/sport-stereotypes-and-stolen-dreams/>

³⁸ <https://womeninsport.org/wp-content/uploads/2022/03/Tackling-Teenage-Disengagement-March-2022.pdf>

³⁹ <https://www.footballbeyondborders.org/news/inspiring-a-generation>

233. Clearly more investment is needed to bring grassroots sports facilities to the appropriate level to support a future pipeline of talent, to ensure greater participation in sports and to provide communities across the UK with the facilities they need. There is investment needed to address the overall deficit, but this lack of facilities is particularly acute for women and girls, with the current demand for facilities outstripping the hours of use that are available - at a moment in which we are trying to encourage even more women and girls to participate in grassroots football, this gap will only widen unless ambitious investment targets are set to allow supply to keep up with demand. This Review's call for evidence found that there is currently both a deficit of facilities and that they continue to be male dominated, with a lack of ring-fenced or prioritised access for female use.
234. To tackle this huge problem we need all stakeholders involved in funding grassroots facilities to collectively increase investment. The FA and Premier League should continue to deliver increased investment, including in partnership with Government via the Football Foundation, and combined with leveraged funding from local authorities and the private sector. The UK Government should also continue to provide sustainable investment, with a clear objective of improving participation of women and girls, and other under-represented groups, building on its £300 million capital investment into grassroots facilities since 2021.
235. **Simultaneously, the Women's National League has a huge role to play in connecting the grassroots game to the elite game, but is facing major challenges of its own.**
236. In May 2022 the FA announced a new Women's National League Strategy 2022-25 which seeks to strengthen the third and fourth tiers of women's football in England. The strategy is targeting priority areas to enable Women's National League clubs to develop players, workforce, and infrastructure.
237. Stakeholders from the Women's National League have welcomed the FA Women's National League Strategy, and contributors to the Review highlighted the outcome of the first stage of the competition review as a positive step forward – in April 2023 the FA announced that from season 23/24 both Women's National League Premier Division title winners will be promoted into the Women's Championship, replacing the incumbent system of a single promotion place decided via a play off between respective winners of the FA Women's National League Northern and Southern Premier Divisions.⁴⁰

⁴⁰ <https://womenscompetitions.thefa.com/en/Article/statement-promotion-and-relegation-between-tiers-two-and-three-20232804>

238. However, the Review has also heard evidence that clubs continue to face major issues including an increasing financial gulf between tiers, a lack of accessible funding streams, and fixture scheduling issues that undermine attempts to build out a core fanbase. Clubs expressed concerns that without a clear acknowledgment of these issues, the commercial trajectory of NewCo could leave them behind without the opportunity to continue to participate in the pyramid.
239. **Alongside this, it is also key to note that grassroots clubs should be supported to offer maximum opportunities for women and girls to participate in football.** Multiple contributors to the Review reflected that women's football has experienced top down momentum driven by the success of the national team, rather than the bottom up momentum that other English team sports have enjoyed. This Review recognises that the FA has the opportunity to fully focus on club football for women and girls as it hands over stewardship of tiers 1 and 2 to NewCo.
240. The Review recognises there is no silver bullet to address these issues, and effectively shifting the dial will require attention and investment from multiple stakeholders in the grassroots game in order to help women and girls to feel like they can participate in and engage with football.

Recommendations

Recommendation 7:

Government must deliver on recent commitments around equal access to school sport for girls. Specifically:

- 7.1** In order to provide transparency around the success of the expansion of the School Games kitemark to recognise delivering equality of opportunity for girls, the Youth Sport Trust - which operates the School Games Mark programme - should publish annual figures on:
- 7.1.a The number of schools signed up to the scheme
 - 7.1.b The number of schools reaching platinum status
 - 7.1.c The names of schools that have reached platinum status
- 7.2** Government should commit to the specific figure for the PE and Sport Premium - currently "*over £600 million across the next two years*".

7.3 Government should leverage its new digital tool around the Premium to provide transparency around the deployment of funds; not just from an audit perspective, but so that schools may begin to derive best practice approaches to maximising output from their investment.

241. Schools provide an important opportunity for all children to participate in sport, including through curriculum PE. Given that schools often act as a gateway into grassroots football, and are the key to ensuring that girls have a positive experience of the game, there is an urgent need to improve PE provision to ensure that it is helping to pave the way for the development of future players.
242. Raising the minimum standards around school sport provision and creating more inclusive environments is only going to enhance the women's game by creating a greater interest in the sport. This will help inspire future generations of talent to see professional women's football as a viable and successful career path.
243. The Lionesses' open letter to the government,⁴¹ following their historic win last summer, garnered the support of the public on the issue of access to football for girls at school. The letter called for every young girl in the nation to be able to play football at school, that all girls have access to a minimum of 2 hours a week PE, and highlighted the need to invest in and support female teachers in providing girls' football sessions.
244. In response to evidence of lowered girls' participation rates following the Covid pandemic, coupled with public demand for more government intervention in the school sports space, there were a series of announcements made on 8th March this year. These included:
- Encouraging schools to deliver a minimum of 2 hours of curriculum PE with more support on how to achieve this being offered through a refreshed School Sport Activity Action Plan.
 - Expansion of the **Schools Games Mark** – so that it now rewards schools delivering equality of opportunities for girls. The kitemark scheme, delivered by the Youth Sport Trust, recognises schools that create positive sporting experiences across all sports for young people, supporting them to be active for 60 minutes a day.

⁴¹ <https://twitter.com/Lionesses/status/1554829482757828617>

- Over £600 million across the next two years for the **PE and Sport Premium** – a funding commitment to improve the quality of PE and sports in primary schools to help children benefit from regular activity.
- A new digital tool for PE and Sport Premium to support schools in using the funding to the best advantage of their pupils.
- £22 million for two years of further funding for the **School Games Organiser network** (SGOs).
- Up to £57 million funding for Phase 3 of the **Opening School Facilities programme** – to open up more school sport facilities outside of school hours especially targeted at girls, disadvantaged pupils and pupils with special educational needs.

245. This Review notes the progress made around girls' access to school sports over the last six months, but is seeking clarity on how these initiatives will be delivered and audited in the near term. Only with specificity around these commitments and transparency around their delivery can the impact of these interventions be measured.

Recommendation 8:

Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls.

246. If girls can access PE – and football specifically – at school, improving the provision of women and girls' football outside of school is contingent on access to suitable facilities. Providing greater access to facilities that are truly fit for women and girls use will create environments where women and girls are more likely to succeed.

247. The quality and quantity of available grassroots facilities was mentioned repeatedly in responses to the call for evidence. The FA highlighted the extent of this shortfall in their submission, *"1,500 more 3G pitches and 20,000 grass pitches are needed to meet the total demand of grassroots football, with 96% of local areas reporting they do not have enough to meet demand. Two in three pitches are rated as 'poor' or 'basic' quality, and these factors risk stifling the growth and development of the women and girls' game"*. The Review also heard evidence from grassroots players about the availability

of facilities, with one participant saying *“it is so evident how limited good quality, accessible and affordable pitches are...the competition between groups for prime spots means that many miss out”*.

248. The Government, the FA, Premier League, local authorities, schools and clubs as well as other private companies and local partners currently invest in facilities across the UK. However despite this investment in England, the current levels are not enough to meet the national need, especially as demand grows from women and girls.
249. The most recent estimates of the funding required to deliver Local Football Facility Plans (detailed reports that map out the football facilities needed across every local authority area in England) were made in 2019. While Government, the FA and the Premier League have all invested in addressing the current deficit in adequate facilities since then, the funding required is likely much higher than 2019 estimates – particularly when you account for inflation and the significant challenges faced by local authorities in a cost of living crisis, such that many facilities won't have been properly maintained in that time.
250. In order to get to an appropriately ambitious target investment level, the Football Foundation - the charity that delivers grassroots facilities funding in England, funded by contributions from the FA, Premier League and central Government via Sport England - should undertake a review of current needs to calculate the current and forecasted deficit through their Local Football Facility Plans. This should inform an ambitious target for holistic grassroots football facilities investment across stakeholders. All parties should then come together with plans for delivery of this.
251. If all stakeholders can align around a shared vision and investment target, and share that target publicly in order to be held accountable, there is an opportunity to address the specific deficit in facilities funding which is identified and forecast now. This will be pivotal in creating a supply of facilities to house the increase in demand from women and girls that the game is aiming to generate over the coming years.

Recommendation 9:

The FA, Premier League and Football Foundation should work together to make sure that women and girls are benefitting from funding flowing into facilities across the pyramid. Specifically:

- 9.1** The FA, Premier League and Football Foundation should create a revised strategy to offer targeted facilities funding for the entire women's football pyramid.
- 9.2** Women and girls should be empowered to understand what commitments their local facilities have made around meaningful access, and to hold those facilities accountable on delivering this.

9.1 The FA, Premier League and Football Foundation should create a revised strategy to offer targeted facilities funding for the entire women's football pyramid.

252. Evidence in the Review surfaced that current facilities for women and girls are often unsuitable. Many respondents to the call for evidence referenced the lack of female-friendly toilets and changing rooms available at existing facilities. One parent wrote about the experience of their daughter who played for a Regional Talent Centre that competes in a local boys grassroots league, noting that *"Sometimes we have to travel an hour to games where there are no changing facilities or toilets available. This is completely unacceptable for teenage girls"*. Another respondent said *"Toilet, changing and shower facilities must be adequate, cleaned regularly and have sanitary bins available"*.
253. There is evidence of other sports targeting investment to improve the quality of facilities for girls and women.



Case Study

Rugby World Cup 2025 Impact Facility Fund

Between 2023 and 2027, the Rugby Football Union (RFU) are delivering a transformational Rugby World Cup 2025 Impact programme in partnership with HM Treasury, DCMS (Department for Culture, Media and Sport) and Sport England. The programme includes a £7m facility investment fund. The objective of this fund is to; 'Enhance the rugby club experience for females' as set out in the RFU's Every Rose Action Plan 2021-2027. Within the programme grant funding is available for:

- The provision of basic sanitary requirements.
- Improvements to rugby club female toilets.
- Impact refurbishments to create female friendly club social spaces.
- Enhancements to existing and construction of new female changing rooms.

254. In football, there are specific funds available to women's teams in tiers 1 to 4 which seek to improve the standard of facilities for players, supporters and officials. The Premier League Stadium Fund is available to both men's and women's clubs, but applicants must have security of tenure via either freehold or an uninterruptible lease of at least 10 years remaining term. The Premier League Women's Infrastructure Fund is specifically available to women's clubs at tiers 3 and 4 and applicants must have security of tenure of via either freehold, an uninterruptible lease of at least 5 years remaining term or a 5-year ground share agreement.
255. These grants are designed to promote inclusivity by enabling eligible clubs to make facility improvements to create more welcoming environments for female players, fans and officials at the grounds they play at. Examples of improvements could include upgrading and modernising existing changing rooms, showers or toilet facilities.⁴²
256. However, the Football Foundation and Premier League have advised that uptake of these grants by women's teams is low. The Review received feedback from Women's National League clubs that the majority of clubs in tiers 3 and 4 do not own the grounds they play at, and many clubs find it difficult to get leasehold agreements for longer than 3 years, which means they would not qualify for either of the funds available to them.
257. In addition, both schemes are only open to tiers 1 to 4 of the pyramid, which means there are many grassroots facilities outside of tier 1 to 4 which wouldn't be eligible for these funds at all. For the sake of clarity, the Football Foundation does offer funding for women and girls' grassroots teams, it is just that specific, targeted funding to uplift existing facilities using measures that have been identified to promote accessibility for women and girls isn't currently clearly available or signposted.
258. By opening up targeted funding to the entire pyramid and addressing issues that tiers 1 to 4 have raised in accessing existing grants, there is an opportunity to better target funding already available to address basic concerns around access to appropriate facilities for women and girls, and work more efficiently towards the overall objective of women and girls viewing football as an accessible, safe, positive, welcoming and inclusive environment to participate in.

⁴² <https://premierleaguestadiumfund.co.uk/additional-support-tiers-3-and-4-womens-pyramid>

9.2 Women and girls should be empowered to understand what commitments their local facilities have made around meaningful access, and to hold those facilities accountable on delivering this.

259. The Football Foundation currently demands that all applicants for facilities funding which amounts to more than £25,000 must provide equal access for women and girls. Criteria for demonstrating this includes demonstrating that a “*robust Womens and Girls strategy*” has been embedded into the project plan. While this is a powerful intervention at the point of grant award, audit of the delivery of this specific strategy is not currently a priority - right now, women and girls using funded facilities would not be aware of what that facility has committed to creating meaningful access for them.
260. In order to best empower these users, the terms of Football Foundation grants should be clarified to highlight that facilities are at risk of having to repay grants should they fail to deliver on commitments to women and girls. Facilities in receipt of Football Foundation funding should be mandated to make their women and girls strategy publicly available - for example by publishing it on the facility’s website and users should be given a means of flagging if the strategy is not being implemented. The Football Foundation should work with facilities to design the most appropriate route for concerns to be raised and appropriately addressed.
261. This will go some way to addressing concerning evidence the Review heard around women’s and girls’ current experience of trying to gain or maintain meaningful access to facilities. The Review heard evidence that girls and women’s teams are often treated as lower priority, resulting in men’s teams having better access to adequate pitches and facilities. One respondent described her experience; “*We rented a MUGA for 23 years and the boys club have just told us they need it for a boys team, sends the wrong message to all involved!!! More facilities need to give access to women and girls as a priority and not just fit about men’s and boys teams*”.
262. If facilities have to be transparent about their commitments to women and girls in order to unlock funding from the Football Foundation, facilities will be held accountable to their commitments by the players they are aiming to serve. Women and girls will be empowered to understand what baseline inclusion and meaningful access at their local facility is supposed to look like, and will have a clear route to escalate concerns if commitments are ever deprioritised.

Recommendation 10:

The FA should leverage the handover of administration of the top two tiers of women's football to even more acutely focus on grassroots clubs and the Women's National League.

263. As the FA decouples its responsibility of running the professional women's game, it will retain a critical role in stewarding the development of the rest of the women's football pyramid.
264. In order to further develop the grassroots level of the women's game, there needs to be greater emphasis on creating fully inclusive grassroots clubs that provide opportunities for all. The Review understands that the FA has the opportunity to review its grassroots clubs grading criteria in order to provide more weighting to the provision of women's and girls' teams. As part of this, the FA could prioritise funding for grassroots clubs to those clubs with a full women and girls development plan. As part of its pivot away from direct management of the elite game, this is the type of intervention that could bring focus to the women and girls' game at club level.
265. Additionally, the Women's National League remains an integral part of the women's football ecosystem, and this Review has listened to the key issues which clubs within the National League feel need to be addressed.
266. As mentioned earlier, the FA has embarked on the delivery of its National League Strategy 2022-2025, and has already announced a fundamental change to promotion opportunities in tier 3, which clubs have welcomed.
267. This Review of Women's Football is unable to undertake a comprehensive review of the Women's National League at this point, but seeks to highlight some key areas clubs outlined as fundamental to their ongoing ability to participate in the pyramid:
- Funding – where, as mentioned above, due to the 10 year security of tenure requirement in the Premier League Stadium Fund, and the 5 year security of tenure requirement in the Premier League Women's Infrastructure Fund, access to grants has been impossible for a number of clubs. There is also no central distribution mechanism currently available from the top two tiers which National League clubs can leverage.

- Fixture scheduling – where the Women’s National League has raised challenges with external cup competitions often being disruptive to their standard league campaigns due to inconsistent cup competition formats and timelines, as well as varying rules around player eligibility. The Women’s National League has called for entry to County Cup competitions to become voluntary rather than mandatory and for the precedence of cup competitions to be amended to exclude tiers 3 and 4, which would be consistent with the men’s game.
- An existential threat to clubs – where in season 22/23 in tier 4, two clubs had to fold due to not being able to cope with the step up from tier 5. The Women’s National League have voiced a need for more support from the FA in helping clubs make the step up from tier to tier.

268. Raising the profile of just a few issues raised by Women’s National League clubs cannot do justice to a complex environment in which largely volunteer run clubs are committing time and focus to a critical part of women’s football.

269. Following the decoupling of the administration of the top two tiers of the women’s game, the FA should move greater focus onto the development of the grassroots level of the game. This must include consulting with - and responding to - the live concerns of the grassroots club game and the Women’s National League, which will enable the FA to be better placed to execute on its strategy in the area.

Conclusion

270. Evidence submitted to the Review on this theme demonstrates that there is work to do in leveraging existing funding around grassroots women’s football more efficiently, as well as holding stakeholders accountable to much needed increases in investment in the space.

271. If stakeholders accountable across the grassroots environment can step up in their delivery of fundamental investment and focus on the women’s game at this level, there is an opportunity to create systematic change that means that women and girls will be able not only to perceive football as a welcoming environment to participate in, but will have a wealth of opportunities to access that environment and benefit from all that women’s football has to offer.

272. Foundational work here has momentum behind it, but now is the moment to double down on that commitment to address priorities in the grassroots game in order to optimise that momentum.



CONCLUSION

The progress that has been made across all levels of the women's game is clear, and we should absolutely celebrate the positive strides forward. More people are playing, watching and attending women's football than ever before, creating a landscape that can and should entice new commercial investment into the game.

The women's game in England has a golden opportunity to cement itself as a world leading sport, which creates a best in class environment for players, coaches, fans and commercial partners. This Review firmly believes that uplifting minimum standards across the game will provide the foundation for a thriving pyramid. This will attract the best talent into women's football, creating a quality product for broadcasters and fans to ultimately drive future commercial interest and investment in the game.

The Review acknowledges the significant investment which will be required from all sides to take the game to the next level. Tables (1 and 2) show the expected cost of certain uplifts to clubs.

The estimates are based on a series of assumptions which are detailed in the methodological note at Annex B. Some additional expenditure arising from recommendations such as implementing a gold standard maternity package has not been reflected in these calculations, because the cost of these recommendations are dependent on the specific measures implemented following consultations. Provisions related to physical and mental health should be viewed as examples to consider as part of creating a gold standard physical and mental health package. The tables below show estimated costs incurred to clubs for some key recommendations in addition to current expenditure. This is based on a rise from the current minimum requirements to *recommended* minimum requirements in each case.

These costings should only be seen as illustrative to demonstrate the potential costs of implementing certain recommendations. Further work by clubs and FA will be needed to benchmark and/or understand wage rates at the time decisions are made.

Table 1: Estimated uplift costs to Women’s Super League clubs linked to Review of Women’s Football Recommendations

Women’s Super League Recommendation	Base year	Year 1	Year 2
	2023/24	2024/25	2025/26
The Women’s Super League to introduce a salary floor for its players ⁴³	£0	£0	£348,000
All WSL and WC clubs are to provide gold standard physical and mental health provision. Example costing of introducing at least one full-time physiotherapist by the 2024/25 season ⁴⁴	£0	£9,000	£9,000
All WSL and WC clubs are to provide gold standard physical and mental health provision. Example costing of introducing at least one full-time performance psychologist by the 2024/25 season.	£0	£41,000	£42,000
Clubs in both tiers to introduce dedicated marketing resource	£0	£0	£0
Clubs in both tiers to employ a Supporter Liaison Officer	£0	£0	£42,000

⁴³ The costs for a salary floor have been calculated based on a full-time job paid at the national living wage. This would result in an annual player wage of £19,838 that would increase yearly based on salary increases. This should be seen as illustrative of costs as in reality costs may differ. The exact value of a salary floor should be determined in consultation with players and clubs and take into account international precedent. Please see the methodological note for more information on calculations.

⁴⁴ Proving gold standard physical and mental health provision will require more extensive intervention than the increase to a full-time physiotherapist and performance psychologist for players calculated above. These figures should be viewed as indicative of the cost of basic measures that could be considered as part of this gold standard package. The Review expects the FA to benchmark best in class provision against physical and mental support provided in the men’s game and other sports. The package should be mandated following extensive consultation.

Table 2: Estimated uplift costs to Women’s Championship clubs linked to Review of Women’s Football Recommendations

Women’s Championship Recommendation	Base year	Year 1	Year 2
	2023/24	2024/25	2025/26
An increase in minimum contact time in the Women’s Championship to 16 hours per week (ramping to 20 hours over the following three years) ⁴⁵	£0	£113,000	£190,000
The Women’s Championship to introduce a salary floor for its players ⁴⁶	N/A	N/A	N/A
All WSL and WC clubs are to provide gold standard physical and mental health provision. Example costing of introducing at least one full-time physiotherapist by the 2024/25 season.	£0	£9,000	£9,000
All WSL and WC clubs are to provide gold standard physical and mental health provision. Example costing of introducing at least one full-time performance psychologist by the 2024/25 season.	£0	£41,000	£42,000
Clubs in both tiers to introduce dedicated marketing resource	£0	£0	£23,000
Clubs in both tiers to employ a Supporter Liaison Officer	£0	£0	£42,000

Recognising the series of investments required, the Review is also recommending the phasing in of interventions to enable clubs to prepare for upcoming changes in licensing requirements and to conduct long-term planning. The table 3 sets out the recommended phasing of key recommendations.

⁴⁵ This assumes that the rise from 16 hours of contact time per week to 20 hours occurs in the first season that clubs will have available to transition towards 20 hours. In reality many clubs may spread this over the available three season period. A slower increase in hours would result in a smaller year on year rise in costs.

⁴⁶ A value illustrating the cost of a salary floor for the WC has not been included in this report as the year it will be introduced is dependent on when revenues render it sustainable. A nominal cost is detailed in the methodological note, however, this value will be subject to annual salary increases.

Table 3: Potential phasing of uplifts in minimum standards with impact on club investment

Recommendation	Phasing		
	By Season 24/25 (Establishment of Newco)	By Season 25/26	Longer Term
An increase in minimum contact time in the Women’s Championship to 16 hours per week (ramping to 20 hours over the following three years)	X		
The Women’s Super League to introduce a salary floor for its players		X	
The Women’s Championship to introduce a salary floor for its players			X
Mandating a world leading parental package	X		
Providing gold standard physical and mental health provision	X		
Clubs in both tiers to introduce dedicated marketing resource		X	
Clubs in both tiers to employ a Supporter Liaison Officer		X	

The desire to progress the women’s game to the next level is evident, with stakeholders across the game coming together to signal that they are ready for the challenge. The women’s game is at the most critical stage of its journey so far, with a once in a lifetime opportunity to capitalise on huge momentum generated in recent months. With the implementation of recommendations set out by this Review, the women’s game can become **a world leading sport that not only generates immense economic and social value, but sets the standards for women’s professional sport globally that allows others to follow.**



ANNEXES

Annex A – Terms of Reference

Background

One of the recommendations of the [Fan Led Review of Football Governance](#) was for Government to undertake a dedicated review into women's football, so that the unique circumstances and opportunities for the game could be further explored. Following the success of the UEFA Women's EUROs, DCMS in partnership with the FA has announced a Review into the Future of Women's Football. The Review, chaired by former Lioness Karen Carney, aims to report on the future direction of the Women's game.

Terms of Reference

The Review sought evidence around three key themes:

- Audience and Growth
- Commercial and Broadcasting
- Structures and Governance

These three key themes were broken down into six sub-themes to help steer the direction of the Review. Expert stakeholders were then invited to join workshops to discuss these themes in more depth and provide further evidence. The six sub-themes were as follows:

- Homegrown Talent, Club Pathways and Professional Environment
- Increasing Matchday Attendance
- Commercial Growth and Broadcasting
- Financial Health
- Facilities
- Club Structures and Governance

Objectives

At the outset, the Reviews objectives were defined as follows: The review will:

- Assess the potential audience reach and growth of the game by considering the value and visibility of women and girls' football in England, including the potential to grow the fanbase for women's football for the future of the game and whether current growth still support home-grown talent and can be achieved without overstressing infrastructure.

- Examine the financial health of the game, its financial sustainability for the long-term including exploring commercial opportunities and ways to support the commercialisation of the women's game; broadcast revenue opportunities; and the sponsorship of women's football.
- Examine the structures within women's football, including affiliation with men's teams, prize money, the need for women's football to adhere to the administrative requirements of the men's game; assess the adequacy, quality, accessibility, and prevalence of the facilities available for women and girls' football for the future growth and sustainability of the game.

Annex B – Methodological Note

Introduction

The following note outlines the methodology used to estimate the expected costs that women's football clubs would face in the first year of implementation for each of the recommendations based on current minimum expenditure. The current expenditure is taken from the 22/23 season minimum requirements for licensing at each tier. Different recommendations, if implemented, would be introduced in different years, so the figures reflect this.

Cost calculations in this note, are based on certain assumptions (described below) and should only be seen as illustrative, aimed at demonstrating the potential costs of implementing certain recommendations if a club moved from the current minimum requirements to the recommended minimum requirements. In reality the cost of uplifts in minimum licensing requirements will be less for many clubs than the figures stated in this note as they already exceed current minimum standards. For some clubs there will be no implementation costs as they already meet the recommended minimum standards. Further work by clubs and the Football Association (FA) will be needed to benchmark and/or understand wage rates at the time decisions are made.

For example, if every club is required to hire a performance psychologist ahead of one season, they may have to compete with each other and therefore offer higher salaries. This analysis is not designed to capture this. It captures what we expect the costs to clubs to be based on current cost assumptions, and does not take account of any behavioural changes in the demand and supply side of the labour market.

The methodology will lay out, for each recommendation: the key assumptions, the existing requirements relevant to each recommendation, and the estimated minimum costs to the clubs associated with implementing each recommendation, compared to the counterfactual. The counterfactual is what the situation would be without the introduction of the recommendations, i.e. the current level of requirements, prior to any recommendations being implemented.

Terminology

WSL: Women's Super League (Tier 1)

WC: Women's Championship (Tier 2)

Recommendations

The full set of recommendations can be found in the main body of the review, but the recommendations where costings have been analysed are listed below.

Recommendation 3: Both the Women's Super League and Women's Championship should become fully professional environments designed to attract, develop and sustain the best playing talent in the world.

3.1.a: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically **minimum contact time**.

Analysis: The analysis calculates the minimum costs that WC clubs will face to be brought up to standard with WSL clubs, by means of minimum contact time. The analysis shows the cost uplift of bringing WC players from their current 8 hour minimum contact time a week, firstly to a 16 hour minimum contact time by the 2024/25 season, and then to a 20 hour minimum contact time by the 2025/26 season.

Caveat to recommendation 3.1.a costings: Clubs will have three years from the 25/26 season to introduce the 20 hour a week minimum contracts. In reality, some clubs may choose to introduce this by the 2025/26 season, and hence for this analysis we have assumed this will be the case..

3.1.b: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically player salaries.

Analysis: The analysis has calculated the costs that WSL and WC clubs will face with the introduction of a salary floor based on the National Living Wage, by the 2025/26 season in the WSL, and in the longer term in the WC. However, this is an indicative cost and the exact value of the salary floor should be informed by consultation with players, clubs and international precedent.

3.2: All WSL and WC clubs to provide gold standard physical and mental health provision.

Analysis: The analysis separately shows example costing of introducing at least one full-time physiotherapist by the 2024/25 season, and example costing of introducing at least one full-time performance psychologist by the 2024/25 season.

Caveat to recommendation 3.2 costings: Proving gold standard physical and mental health provision will require more extensive intervention than the increase to a full time physiotherapist and performance psychologist for players calculated above. These figures should be viewed as indicative of the cost of basic measures that could be considered as part of this gold standard package. The Review expects FA to benchmark best in class provision against physical and mental support provided in the men's game and other sports. The package should be mandated following extensive consultation with experts, clubs, players and the player union.

Recommendation 6: the FA should drive clubs to better value and support their fans.

6.1: The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.

Analysis: The analysis shows example costing of introducing at least one full-time marketing specialist by the 2025/26 season.

6.6: Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.

Analysis: The analysis shows example costing of introducing at least one full-time supporter liaison officer by the 2025/26 season.

A summary table of the cost uplift for each recommendation can be seen in the table below.

Summary Table

Recommendation	Current licensing requirements		Year recommendation introduced	Cost uplift per club in the first year recommendation implemented	
	WSL	WC		WSL	WC
3.1.a: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically minimum contact time.	Pre-Season and Season 20 hours per week between 9am-6pm	Pre-Season and Season 8 hours per week	2024/25	N/A	24/25: £113,000 25/26: £190,000
3.1.b: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically player salaries.	Pre-Season and Season 20 hours per week between 9am-6pm	Pre-Season and Season 8 hours per week	WSL: 2025/26 WC: Not specified yet - longer term (Base year value given here)	£348,000	N/A ⁴⁷

⁴⁷ The table does not include a cost to implement a salary floor in the Championship as any figure would be subject to any annual rise in wages. The nominal cost of introducing a salary floor from current estimated expenditure is £470,000.

Recommendation	Current licensing requirements		Year recommendation introduced	Cost uplift per club in the first year recommendation implemented	
	WSL	WC		WSL	WC
3.2: All WSL and WC clubs to provide gold standard physical and mental health provision. Example costing for one-full time physiotherapist.	Be in attendance at all training sessions and Competition Matches played by the Club throughout the Season and Pre-Season, as well as providing or arranging equivalent services to Players during the off season to ensure continuity of treatment. Equivalent to 0.8 FTE		2024/25	£9,000	£9,000
3.2: All WSL and WC clubs to provide gold standard physical and mental health provision. Example costing for one full-time performance psychologist.	Optional		2024/25	£41,000	£41,000
6.1: The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.	Full-time 35-40 hours per week	Minimum 21 hours	2025/26	£0	£23,000
6.6: Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.	Not specified		2025/26	£42,000	£42,000

Note: All figures rounded to the nearest £1,000

Cost uplift to clubs per year

The following table shows the cost uplift to each club per year from the base year 2023/24 to 2026/27. The cost shows the cost uplift to each club each year, i.e. the cost increase they will face compared to the counterfactual, where the counterfactual is what the situation would be without any recommendations being introduced. The salaries include a 2.5% per year salary increase.

Women's Super League Recommendation	Base year	Year 1	Year 2
	2023/24	2024/25	2025/26
Recommendation 3.1b: player salaries	£0	£0	£348,000
Recommendation 3.2: All WSL and WC clubs to provide gold standard physical and mental health provision. Example costing for one-full time physiotherapist.	£0	£9,000	£9,000
Recommendation 3.2: All WSL and WC clubs to provide gold standard physical and mental health provision. Example costing for one full-time performance psychologist.	£0	£41,000	£42,000
Recommendation 6.1: The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.	£0	£0	£0
Recommendation 6.6: Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.	£0	£0	£42,000

Note: All figures rounded to the nearest £1,000.

Women's Championship Recommendation	Base year	Year 1	Year 2
	2023/24	2024/25	2025/26
Recommendation 3.1a: minimum contact time	£0	£113,000	£190,000
Recommendation 3.1b: player salaries	N/A	N/A	N/A
Recommendation 3.2: All WSL and WC clubs to provide gold standard physical and mental health provision. Example costing for one-full time physiotherapist.	£0	£9,000	£9,000
Recommendation 3.2: All WSL and WC clubs to provide gold standard physical and mental health provision. Example costing for one full-time performance psychologist.	£0	£41,000	£42,000
Recommendation 6.1: The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.	£0	£0	£23,000
Recommendation 6.6: Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.	£0	£0	£42,000

Note: All figures rounded to the nearest £1,000.

Methodology

Overarching assumptions:

Salary calculations

Assumptions:

Hourly wage assumptions:

- National Living Wage:⁴⁸ £10.42
- The Real Wage Foundation's Real Living wage:⁴⁹ £10.90

Minimum weekly contract hours:

- WSL: 20 hours
- WC: 8 hours

Number of contracted weeks per year:

- Current: 42 weeks (36 week season + 6 week pre-season)

Matchday pay:

- Based on 88 hours per season (4 hours per matchday * 22 matchdays)

Employer non-wage labour cost:

- 22% based on RPC guidance. This includes non-wage labour costs, for example employers' national insurance contributions.⁵⁰

Salaries and costs based on the above assumptions:

The following salaries and costs are used for the cost calculations for some of the recommendations, where specified. These values are the salaries for the base year, 2023/24, and are used as the counterfactuals, i.e. before any recommendations are introduced.

⁴⁸ Gov.uk (2023), National Minimum Wage and National Living Wage rates

⁴⁹ Living wage foundation (2023), What is it? The calculations relate to the UK National Real Living Wage. This should not be interpreted as an endorsement of the Real Living Wage for a salary floor. Rather, this note has used it to illustrate the potential costs of a salary floor. The exact value of a salary floor should be determined in consultation with players and clubs and take into account international precedent.

⁵⁰ RPC (2019), RPC guidance note on 'implementation costs'

- Annual player salaries including matchday pay:⁵¹
 - WSL: £9,670 [20 hour a week contract]
 - WC: £4,418 [8 hour a week contract]
- Total annual cost to employer (player salary with matchday pay + 22% uplift)⁵²
 - WSL player cost: £11,797
 - WSL squad cost (25 players): £294,928
 - WC player cost: £5,390
 - WC squad cost (25 players): £134,751

To note, these are hypothetical costs. There is evidence from the club accounts published on Companies House and the ‘Deloitte 2023 Annual Review of Football Finance’ report that some clubs, particularly in the WSL, are paying wages far above the minimum requirements. In this case the introduction of a salary floor would have minimal impact on club finances. The report also provides evidence that there is a large and growing range in the wage costs paid by clubs, with the range in wage costs across WSL clubs increasing to £3.6m in 2021/22. The Review has heard that wages in the Women’s Championship can be significantly lower. As one of the aims of these recommendations is to ensure minimum standards provide a solid foundation in which players can work and thrive in football, the calculations relate to minimum requirements.

Salary increases year on year:

In order to calculate costs where the recommendation will be implemented in future years, the following assumptions have been made. Since 2018, the average annual growth in the national living wage has been 5.91%.⁵³ Therefore, this has been applied to the future costs for recommendation 3.1. Since April 2017,⁵⁴ the average annual percentage growth in gross median weekly earnings in the private sector has been 3.1%.⁵⁵ Therefore, this has been applied to the future costs for recommendations 3.2, 6.1 and 6.6.

⁵¹ Player annual salary was calculated by multiplying the minimum contact hours by the National Living Wage and adding on matchday pay. For the WSL this equates to: [20 hours*£10.42*42 weeks] = £8,752.80 plus matchday earnings [11 teams to play against*2 matches per team*4 hours per game = 88 hours per season*10.42 = £916.96] for a total minimum annual salary of £9,669.76. The figure shown above is rounded to the nearest pound. Exact salaries may be higher as cup fixtures have not been included in these calculations. This is because the number of cup fixtures can vary significantly.

⁵² The total cost to employers of each player was calculated by adding a 22% employer costs to the annual player salary. For the WC employers costs may be: [£4,418.08*1.22] = £5,390.06. The figure shown above is rounded to the nearest pound. To calculate the squad cost there is an assumption that a squad contains 25 players. The cost to the employer figure is then multiplied by 25. For the WC this equates to: [£4,418.08*1.22*25] = £134,751.44. The figure above is rounded to the nearest pound.

⁵³ National Living Wage Rates

⁵⁴ April 2017 has been used as it encapsulates the last 6 recorded periods

⁵⁵ ONS (2022), Employee Earnings in the UK: 2022

Recommendation 3: Both the Women’s Super League and Women’s Championship should become fully professional environments designed to attract, develop and sustain the best playing talent in the world.

Recommendation 3.1.a

	WSL	WC
Recommendation	3.1.a: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically minimum contact time.	
Analysis	<p>The analysis calculates the minimum costs that WC clubs will face to be brought up to standard with WSL clubs, by means of minimum contact time. The analysis shows the cost uplift of bringing WC players from their current 8 hour minimum contact time a week, firstly to a 16 hour minimum contact time by the 2024/25 season, and then to a 20 hour minimum contact time by the 2025/26 season.</p> <p>Caveat recommendation 3.1a: Clubs will have three years from the 25/26 season to introduce the 20 hour a week minimum contracts. For this analysis, we have assumed that they choose to introduce this by the 25/26 season, as some clubs may choose this and therefore the costings should be reflective of this.</p>	
Current Requirement	Pre-Season and Season 20 hours per week between 9am-6pm.	Pre-Season and Season 8 hours per week.
Counterfactual	Players have 20 hours per week contracted. At National Living Wage this is equivalent to £11,797 per year for employer costs (includes 22% uplift).	Players have 8 hours per week contracted. At National Living Wage this is equivalent to £5,390 per year for employer costs (includes 22% uplift).

Raising the Bar

	WSL	WC
Methodology	<p>For WSL squads, the cost to clubs will be the same as the counterfactual, as they already have a minimum 20 hour weekly contracts, so this recommendation will not increase costs for them.</p> <p>For WC squads, their current costs are £134,751 per squad per season, in the base year, 2023/24. This is based on the 8 hour minimum contract.</p> <p>The cost of a 16 hour minimum contract per player is calculated the same way as the counterfactual 8, and 20 hour minimum contracts, at statutory National Living Wage for 42 weeks a year plus matchday pay.⁵⁶ The total cost to employer is [$£9,661 \times 25$ players] = £241,536 per squad per season, in the base year 2023/24.</p> <p>The cost of a 20 hour minimum contract is £294,928 per squad per season in the base year, 2023/24.</p> <p>The total cost is from the recommendation being introduced, and this is applicable to WC clubs. In 2024/25 this is the total cost of a 16 hour minimum contract, and in 2025/26 this is the total cost of a 20 hour minimum contract.</p> <p>The cost uplift in 2024/25 is the difference between the 16 hour minimum contract and the 8 hour minimum contract. The cost uplift in 2025/26 is the difference between the 20 hour minimum contract and the 8 hour minimum contract.</p> <p>A 5.91% annual salary increase has been included in these costs as this is the average annual growth rate of the National Living Wage since 2018.</p>	

⁵⁶ This applies the same method as the calculation of the current cost of 20 hour contracts in the WSL. Player annual salary was calculated by multiplying the 16 hours of contact time by the National Living Wage and adding on matchday pay. For the 16 hours of contact time, this equates to: [$16 \text{ hours} \times £10.42 \times 42 \text{ weeks}$] = £7,002.24 plus matchday earnings [$11 \text{ teams to play against} \times 2 \text{ matches per team} \times 4 \text{ hours per game} = 88 \text{ hours per season} \times 10.42 = £916.96$] for a total minimum annual salary of £7,919.20. The total cost to employers of each player was calculated by adding a 22% employer costs to the annual player salary and multiplying the total by 25 to represent the cost of a squad. This equates to [$£7919.20 \times 1.22 \times 25$] = £241,535.60. The figure shown above is rounded to the nearest pound. Exact salaries may be higher as cup fixtures have not been included in these calculations. This is because the number of cup fixtures can vary significantly.

Raising the Bar

	WSL	WC	
Year	WSL (2024/25)	WC (2024/25)	WC (2025/26)
Total cost	N/A	£256,000	£350,000
Counterfactual cost	N/A	£143,000	£160,000
Cost uplift	N/A	£113,000	£190,000

Note: Figures rounded to the nearest £1,000.

Recommendation 3.1b

	WSL	WC
Recommendation	3.1.b: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically player salaries.	
Analysis	<p>The analysis has calculated the minimum costs that WSL and WC clubs will face with the introduction of a salary floor based on the Living Wage Foundation's UK National Real Living Wage, by the 2025/26 season in the WSL, and in the longer term in the WC. However, this is an indicative cost and the exact value of the salary floor should be informed by consultation with players, clubs and international precedent.</p> <p>All WSL players will have a salary floor by the 2025/26 season. All WC players should have a salary floor when revenues render it sustainable.</p>	
Current Requirement	Pre-Season and Season 20 hours per week between 9am-6pm	Pre-Season and Season 8 hours per week
Counterfactual	Players have 20 hours per week contracted. At National Living Wage this is equivalent to £11,797 per year for employer costs (includes 22% uplift).	Players have 8 hours per week contracted. At National Living Wage this is equivalent to £5,390 per year for employer costs (includes 22% uplift).

	WSL	WC
Methodology	<p>From the salary calculations described in the start of the methodology section, the current cost (counterfactual) to clubs per squad are:</p> <p>WSL: £294,928 per year.</p> <p>WC: £134,751 per year.</p> <p>To earn a salary floor, it is assumed that players earn the equivalent of a full-time employee regardless of contracted hours. The calculations of what a full time employee would earn are based on a standard contract of 35 hours per week, for 52 weeks a year, at the UK National Real Living Wage. A standard contract has been used to illustrate the cost of paying players like a full time employee.</p> <p>The total salary per player calculated is [35 hours* £10.90* 52 weeks] = £19,838. Adding 22% non-wage labour costs, total cost to employers is £24,202 per player, in the base year, 2023/24.</p> <p>The total squad cost for 25 players is [£24,202* 25 players] = £605,059, in the base year. The total squad cost will increase each year with the assumed 2.5% salary increase.</p> <p>A 5.91% annual salary increase has been included in these costs as this is the average annual growth rate of the National Living Wage since 2018.</p> <p>As it is not specified when the salary floor will be implemented for the WC, the nominal, base year value is used. In reality, these figures will be subject to annual increases in salary for when it is introduced.</p>	

Raising the Bar

	WSL	WC
Year	WSL (2025/26)	WC (Nominal, base year value) ⁵⁷
Total cost	£679,000	£605,000
Counterfactual cost	£331,000	£135,000
Cost uplift	£348,000	£470,000

Note: Figures rounded to the nearest £1,000.

⁵⁷ In this note recommendations '3.1.a: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically minimum contact time' and '3.1b: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically player salaries' are calculated separately. The nominal, base year value assumes an increase from current expenditure straight to the introduction of a salary floor. In reality, implementation costs would be significantly lower for Championship clubs if recommendation '3.1.a: Addressing the gulf in minimum operating standards between Tier 1 and 2, specifically minimum contact time' is accepted. This is because Championship clubs will increase their contact time to 20 hours and then implement a salary floor, therefore, when a salary floor is introduced the costs would be similar to those described for introducing a salary floor in the WSL.

Raising the Bar

Recommendation 3.2: physical health provision

	WSL	WC
Recommendation	All WSL and WC clubs to provide gold standard physical and mental health provision.	
Analysis	The analysis shows example costing of introducing at least one full-time physiotherapist by the 2024/25 season.	
Current Requirement	Be in attendance at all training sessions and competition matches played by the club throughout the season and pre-season, as well as providing or arranging equivalent services to players during the off season to ensure continuity of treatment. Equivalent to 0.8 FTE.	
Assumption	The median salary for a physiotherapist in the UK, taken from the ASHE database ⁵⁸ is £35,013. Adding 22% employer non-wage labour costs, this has an estimated cost to employers of £42,716, in the base year 2023/24.	
Counterfactual	0.8 FTE = £34,173	
Methodology	<p>The cost increase to clubs is the difference between the total cost of having a performance physiotherapist full-time (£42,716 in the base year), and having one for 0.8FTE (£34,173 in the base year), for both WSL and WC clubs.</p> <p>The cost uplift to clubs, is the minimum cost we expect clubs to face compared to the counterfactual, in the first year of the recommendation being introduced, which is by the 2024/25 season.</p> <p>Calculations for this recommendation have used the annual percentage of growth in gross median weekly earnings in the private sector since April 2017. The average growth rate for this period is 3.1%.</p>	
Year	WSL (2024/25)	WC (2024/25)
Total cost	£44,000	£44,000
Counterfactual cost	£35,000	£35,000
Cost uplift	£9,000	£9,000

Note: Figures rounded to the nearest £1,000.

⁵⁸ ONS (2022), Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14 (Excel sheet Table 14.7a)

Raising the Bar

Recommendation 3.2: mental health provision

	WSL	WC
Recommendation	All WSL and WC clubs are to provide gold standard physical and mental health provision.	
Analysis	The analysis shows example costing of introducing at least one full-time performance psychologist by the 2024/25 season.	
Current Requirement	It is optional for clubs to have a performance psychologist.	
Counterfactual	Clubs have no performance psychologists.	
Assumption	The median salary of a psychologist, taken from the ASHE database ⁵⁹ is valued at £32,450. Adding 22% employer non-wage labour costs, this has an estimated cost to employers of £39,589, in the base year 2023/24.	
Methodology	<p>The cost increase to clubs is the difference between the total cost of having a performance psychologist full-time (£39,589 in the base year), and not having one, for both WSL and WC clubs.</p> <p>The cost uplift to clubs, is the minimum cost we expect clubs to face, in the first year of the recommendation being introduced, by the 2024/25 season.</p> <p>Calculations for this recommendation have used the annual percentage of growth in gross median weekly earnings in the private sector since April 2017. The average growth rate for this period is 3.1%.</p>	
Year	WSL (2024/25)	WC (2024/25)
Total cost	£41,000	£41,000
Counterfactual cost	£0	£0
Cost uplift	£41,000	£41,000

Note: Figures rounded to the nearest £1,000.

⁵⁹ ONS (2022), Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14 (Excel sheet Table 14.7a)

Recommendation 6: The FA should drive clubs to better value and support their fans.

Recommendation 6.1: marketing resource

	WSL	WC
Recommendation	The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.	
Analysis	The analysis shows example costing of introducing at least one full-time marketing specialist by the 2025/26 season.	
Current Requirement	A full-time 35-40 hours per week.	Minimum 21 hours per week.
Assumption	The median salary for a marketing specialist in the UK, taken from the ASHE database ⁶⁰ as a marketing manager, is £44,363. Adding 22% employer non-wage labour costs, this has an estimated cost to employers of £54,123, in the base year 2023/24.	
Counterfactual	One full time marketing specialist: £54,123.	0.6 FTE marketing specialist (21/35 hours per week): £32,474.

⁶⁰ ONS (2022), Earnings and hours worked, occupation by four-digit SOC: ASHE Table 14 (Excel sheet Table 14.7a)

Raising the Bar

	WSL	WC
Methodology	<p>The cost increase is the difference between the total cost of having a marketing specialist full-time (£54,123 in the base year), and the counterfactuals:</p> <ul style="list-style-type: none"> ■ WSL: already having one full-time (£54,123), or ■ WC: already having one for 0.6 FTE (£32,474), both in the base year, 2023/24. <p>As WSL teams already have one full-time marketing specialist, the cost uplift to them is £0.</p> <p>The cost uplift to clubs in the WC, is the minimum cost we expect clubs to face, in the first year of the recommendation being introduced, by the 2025/26 season.</p> <p>Calculations for this recommendation have used the annual percentage of growth in gross median weekly earnings in the private sector since April 2017. The average growth rate for this period is 3.1%.</p>	
Year	WSL (2025/26)	WC (2025/26)
Total cost	£58,000	£58,000
Counterfactual cost	£58,000	£35,000
Cost uplift	£0	£23,000

Note: Figures rounded to the nearest £1,000.

Raising the Bar

Recommendation 6.6: supporter liaison officer

	WSL	WC
Recommendation	Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.	
Analysis	The analysis shows example costing of introducing at least one full-time supporter liaison officer by the 2025/26 season.	
Current Requirement	Not specified.	
Assumption	Taken from Glassdoor, ⁶¹ the average salary for a supporter liaison officer in the UK is £32,328. Adding 22% employer non-wage labour costs, this has an estimated cost to employers of £39,440, in the base year 2023/24.	
Counterfactual	No supporter liaison officer.	
Methodology	<p>The cost increase is the difference between the total costs of having a supporter liaison officer (£39,440 in the base year, 2023/24) and not having one, for both WSL and WC clubs.</p> <p>The cost uplift to clubs, is the minimum cost we expect clubs to face, in the first year of the recommendation being introduced, by the 2025/26 season.</p> <p>Calculations for this recommendation have used the annual percentage of growth in gross median weekly earnings in the private sector since April 2017. The average growth rate for this period is 3.1%.</p>	
Year	WSL (2025/26)	WC (2025/26)
Total cost	£42,000	£42,000
Counterfactual cost	£0	£0
Cost uplift	£42,000	£42,000

Note: Figures rounded to the nearest £1,000.

⁶¹ Glassdoor (2023), Supporter Liaison Officer Salaries in United Kingdom

Annex C – Contributors to the Review

Contributors to the Review of Women's Football

Amelia Bradbourne

Anne Bryson

Arsenal FC

Arsenal Supporters' Trust

Asfordby Amateurs Ladies, Girls and Inclusive FC

Barclays

BBC

Beecholme Belles FC

Beth Clarkson

Birmingham City

Blackburn Rovers

Boldmere Falcons F.C.

Brighton and Hove Albion

Bristol City

Carrie Dunn

Charlton Athletic

Chelsea FC

Christina Phillipou

Coventry United

Crystal Palace

Danni Toward

Deloitte

Deloitte Sports Business Group

Dr, Pippa Bennett

Durham University

Eleven Campaign

Contributors to the Review of Women's Football

Ella Cheetham

English Football League

English Schools FA

Eric Jontz

Fair Game

Football Beyond Borders

Football Supporters' Association

Gemma Law

Holly Hughes

Ian Stebbings

Jean Tanner

JulieAnn Thomas

Justine Thomson

Karin Gronert

Kathryn Holden

Katie Seager

Ken Houston

Kick it Out

Kieran Maguire

Kimberley Flint

Kirsty Clarke

League Managers Association

Leicester City

Level Playing Field

Lewes FC

Liverpool FC

Liverpool Women's Supporters Club

London City Lionesses

Contributors to the Review of Women's Football

Manchester City

Manchester United

Martin Dix

Michael Scoates

Miriam Hawley

Neil McLoughlin

Nicolas Andrews-Gauvain

Nielsen Sport

Oliver Wyman

Owen Driscoll

Paula Jacobs

Rachel Habbergham

Reading FC

Richard Clark

Sheffield United

Sinead Laverty Rapley

Sky

Southampton FC

Sport England

Sported

SportFive

Stacey Pope

Stephen King

Stourbridge FC

Sunderland AFC

Talented Athlete Scholarship Scheme (TASS)

Tam Neill

The FA Women's National League

Contributors to the Review of Women's Football

The Football Association

The Football Foundation

The Premier League

The Professional Footballers' Association

The Space Between Agency

The Sports Grounds Safety Authority

The Women's Super League

Tim Mills

Tina Hamilton

Tottenham Hotspur

Tottenham Hotspur

Watford FC

West Ham United

Women in Football

Women in Sport

Women's Sport Trust

Xero

The Chair would also like to thank all those who submitted evidence anonymously, particularly those current and former players willing to share in depth experiences that have shaped the content of this Review.

Annex D – Glossary

Review of Women’s Football - Glossary

ACL - anterior cruciate ligament

DCMS - Department for Culture Media and Sport

FSA - The Football Supporters’ Association

FIFA - Fédération Internationale de Football Association

GBE - Governing Body Endorsement

LTA - Lawn Tennis Association

NWSL - National Women’s Soccer League

NWSLPA - National Women's Soccer League Players Association

PE - Physical Education

PFNCC - Professional Football Negotiating and Consultative Committee

RFU - Rugby Football Union

SGO - School Games Organiser

SGSA - Sports Grounds Safety Authority

SLO - Supporter Liaison Officer

The FA - The Football Association

The PFA - The Professional Footballers' Association

UEFA - Union of European Football Associations

USSF - United States Soccer Federation

WNL - Women's National League

WTA - Women’s Tennis Association

Annex E – Recommendations in Full

- 1. The new entity tasked with running elite women’s football should not settle for anything less than world leading standards for players, fans, staff, and everybody involved in the women’s game.** This involves five key principles:
 - 1.1. The ultimate objective of Women’s professional football should be a financially sustainable, competitively compelling game.
 - 1.2. Financial Regulation should be stringently deployed by NewCo in order to ensure the financial issues present within other elite sports are not mirrored.
 - 1.3. NewCo and clubs must provide the necessary professional infrastructure for staff and players to compete.
 - 1.4. In order to provide the necessary infrastructure and product, clubs, the FA and NewCo must unlock additional investment and funding streams.
 - 1.5. The FA should develop governance structures that allow NewCo to embrace independent decision-making.

- 2. The FA needs to fix the talent pathway in order to create generation after generation of world beating Lionesses.**
 - 2.1. The FA should choose a strategic partner willing to invest in building a sustainable pipeline of domestic talent.
 - 2.2. Clubs should be allowed access to an increased pool of international talent while the domestic pathway is fixed.

- 3. Both the Women’s Super League and Women’s Championship should become fully professional environments designed to attract, develop and sustain the best playing talent in the world.** This means:
 - 3.1. Addressing the gulf in minimum operating standards between tier 1 and 2.
 - 3.2. Providing gold standard physical and mental health provision.
 - 3.3. Mandating elite training facilities for elite players.
 - 3.4. Mandating a world leading parental package.
 - 3.5. Funding full union representation to both Tiers.
 - 3.6. Uplifting duty of care provision for players.
 - 3.7. Offering best in class career transition support for players leaving the professional game.

- 4. The FA should urgently address the lack of diversity across the women's game - in both on and off pitch roles. Specifically:**
 - 4.1. The FA should publish data on the success or failure of its existing Equality, Diversity and Inclusion interventions.
 - 4.2. The FA should establish workforce data to give an understanding of the demographics of the current football workforce in all roles and at all levels.
 - 4.3. The FA should use workforce data to design and implement a workforce strategy for the entire women's game.
- 5. The FA, Premier League, EFL and broadcasters should work together to carve out a new dedicated broadcast slot for women's football.**
- 6. Clubs must better value and support their fans - the FA should raise minimum standards to enforce this.**
 - 6.1. The FA should amend its licence requirements to require all clubs to have dedicated women's football marketing resource.
 - 6.2. Following the introduction of FA licensing requirements for clubs to have ticketing policies, the FA should review these annually and clubs should actively seek feedback from their fans on how these should be adapted.
 - 6.3. The FA should introduce a licence requirement for clubs to produce a stadium strategy focused on growing their matchday attendance, with a particular focus on increasing the number of matches played in the main stadia for affiliated teams.
 - 6.4. The Sports Grounds Safety Authority (SGSA) should extend its licensing scheme to all grounds used in the Women's Super League to ensure high standards of safety, while the Women's Championship should implement a self-regulation model with guidance, support and assurance provided by SGSA.
 - 6.5. All clubs should ensure that the recommendations in the Football Governance White Paper with regards to fan engagement should be delivered on with meaningful representation for fans of the women's team.
 - 6.6. Women's Super League and Women's Championship clubs should each implement a supporter liaison officer.

- 7. Government must deliver on recent commitments around equal access to school sports for girls.**
 - 7.1. In order to provide transparency around the success of the expansion of the School Games kitemark to recognise delivering equality of opportunity for girls, the Youth Sport Trust - which operates the School Games Mark programme - should publish annual figures on:-
 - 7.1.1. The number of schools signed up to the scheme
 - 7.1.2. The number of schools reaching platinum status
 - 7.1.3. The names of schools that have reached platinum status
 - 7.2. Government should commit to the specific figure for the PE and Sport Premium - currently *“over £600 million across the next two years”*.
 - 7.3. Government should leverage its new digital tool around the Premium to provide transparency around the deployment of funds; not just from an audit perspective, but so that schools may begin to derive best practice approaches to maximising output from their investment.
- 8. Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls.**
- 9. The FA, Premier League and Football Foundation should work together to make sure that women and girls are benefitting from funding flowing into facilities across the pyramid.**
 - 9.1. The FA, Premier League and Football Foundation should create a revised strategy to offer targeted facilities funding for the entire women’s football pyramid.
 - 9.2. Women and girls should be empowered to understand what commitments their local facilities have made around meaningful access, and to hold those facilities accountable on delivering this.
- 10. The FA should leverage the handover of administration of the top two tiers of women’s football to even more acutely focus on grassroots clubs and the Women’s National League.**

