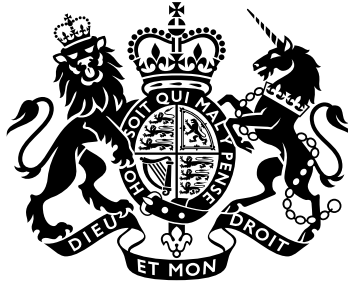




Government Response to the Independent Review of Women's Football: Reframing the opportunity in Women's Football

December 2023

CP 965



Department for Culture, Media and Sport

Government Response to the Independent Review of Women's Football: Reframing the opportunity in Women's Football

Presented to Parliament by the Secretary of State for Culture,
Media and Sport by Command of His Majesty

December 2023

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Ministerial Foreword



We are at a defining moment in women's football in this country. The Lionesses' win at UEFA EURO 2022, and their journey to the final of the FIFA World Cup 2023, helped ignite unprecedented interest in the women's game. For the first time ever, the women's game has taken centre stage and begun to command the same respect as the men's game. It is the time, working with footballing bodies, to seize on this momentum and transform the future of women's football.

Despite the phenomenal achievements of the Lionesses at consecutive major tournaments, there is still a long way to go. Half a century ago, in the year of the Equal Pay Act, women were still actively banned from playing football so whilst steps have been taken down the path to financial sustainability, the women's game has some way to go to realising its full potential.

Karen Carney's [Review into women's football](#) sets out a bold vision for the women's game. It has raised the bar and been instrumental in setting out a clear-eyed plan to lift minimum standards and deliver bold, sustainable growth at the grassroots and elite levels.

As a Government, we are determined to maximise the potential of women's sport in the future so we can sustain that pipeline of talent and expand it. We are investing over £600 million in school sport across the next two academic years, this will help drive up the quality of Physical Education and ensure girls have equal access to opportunities to play sport.

We are investing over £300 million in grassroots football and multi-sport facilities across the UK by 2025 which will further support women and girls accessing sport, and all projects in England will be required to share plans to ensure women and girls receive this funding. Last week, I announced a further £30 million investment (£25 million of additional Government

funding, and £5 million from the FA) to create the Lionesses Futures Fund, which will deliver an extra 30 new state-of-the-art artificial grass pitches with gold-standard provision to encourage and enable more women and girls who want to take up sport. At the same time, we have begun opening pitches across the country and naming them after Lionesses to help celebrate their legacy and give young girls in those areas role models they can aspire to one day emulate.

Rightly, the ambition has been for the Review's recommendations to go beyond women's football and apply across women's sport - sharing best practice and giving women and girls equal opportunities to play the sport they love.

We recently published ['Get Active'](#), our sport strategy, which includes our intention to provide the conditions needed to get as many women and girls as possible active or involved in sport. To help increase the visibility of women's sport we will continue to support and champion the UK's hosting of major women's sporting events such as the Rugby World Cup in 2025, and the 2026 T20 Cricket World Cup. Women's sport will also be a highlight at the Olympic and Paralympic events in Paris next year and I look forward to seeing the Lionesses in action in future tournaments such as the next UEFA EUROs in 2025 and the next FIFA World Cup in 2027.

I want to take this opportunity to again thank the Chair, Karen Carney MBE, her panel of experts, and all of those that contributed through the call for evidence or engagement sessions. An enormous amount of hard work and passion went into producing such a prominent Review.

Enterprise, hard work and aspiration, English women's football exemplifies values that are at the core of our national identity. As the team continues doing their bit on the pitch, we plan to keep doing ours off it – doing everything possible to drive forward all women's sport. It is important that football bodies work together to fully implement the Review's recommendations. I am confident this continued work and determination can propel the women's game even further, setting the standard for women's sport as a whole.

A handwritten signature in black ink that reads "Lucy Frazer". The signature is written in a cursive, flowing style.

Rt Hon Lucy Frazer KC MP
Secretary of State for Culture, Media and Sport

Executive Summary

Women's football has developed at pace in recent years, as highlighted by the recent successes of the Lionesses. It is important that we now capitalise on these successes and ensure that they leave a lasting legacy for women's and girls' football, raising the minimum standards within the professional environment, and improving the opportunities within the grassroots game across the country.

Despite the clear progress that has been made in women's football, the Review highlighted the urgent need to address and resolve issues and challenges being faced within the game. It made strong recommendations to a range of stakeholders: the Football Association (FA); NewCo (the new independent entity that will be responsible for the management of the women's professional game); clubs; the Premier League; the English Football League (EFL); broadcasters; the Football Foundation; the Sports Grounds Safety Authority (SGSA); Sport England and the Government.

The Government agrees that all ten of the Review's strategic recommendations should be actioned. In line with our continued commitment to supporting women's sport at every opportunity, we will continue to drive forward all recommendations requiring Government action whilst working closely with other key stakeholders to ensure successful and effective implementation across the board.

To that effect, we will convene an implementation group composed of stakeholders across the game, who will work collaboratively and be responsible for driving mutual accountability on the delivery of each recommendation. The group will assemble in March and July 2024 to provide updates and assess progress, with the aim of working together to overcome any challenges faced in order to continue the development of the women's game.

We want to continue to build on the successes of recent years and make the most of opportunities to ensure a long lasting and sustainable future for women's football in this country. We want to use these learnings to improve not only the world of women's football, but that of all women's sport on a global scale.

Summary of Women's Football Review Recommendations

Recommendation	To Action	Government Response
<p>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.</p>	<p>FA, NewCo</p>	<p>Support - the FA and NewCo should work to raise the minimum standards across the game.</p>
<p>2. The FA needs to fix the talent pathway in order to create generation after generation of world beating Lionesses.</p> <p>2.1. The FA should choose a strategic partner willing to invest in building a sustainable pipeline of domestic talent.</p> <p>2.2. Clubs should be allowed access to an increased pool of international talent while the domestic pathway is fixed.</p>	<p>FA</p>	<p>Support - the FA should develop a sustainable talent pathway.</p>
<p>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:</p> <p>3.1. Addressing the gulf in minimum operating standards between tiers 1 and 2.</p> <p>3.2. Providing gold standard physical and mental health provision.</p> <p>3.3. Mandating elite training facilities for elite players.</p> <p>3.4. Mandating a world leading parental package.</p> <p>3.5. Funding full union representation to both tiers.</p> <p>3.6. Uplifting duty of care provision for players.</p> <p>3.7. Offering best in class career transition support for players leaving the professional game.</p>	<p>FA, NewCo, Government (DCMS)</p>	<p>Support - professionalisation needs to be prioritised across the game.</p> <p>Accept - the Government will convene a roundtable for women's sport.</p>
<p>4. The FA should urgently address the lack of diversity across the women's game - in both on and off-pitch roles.</p>	<p>FA</p>	<p>Support - the FA should prioritise a workforce strategy.</p>

<p>5. The FA, Premier League, EFL and broadcasters should work together to carve out a new dedicated broadcast slot for women's football.</p>	<p>FA, Premier League, EFL and broadcasters</p>	<p>Support - all parties involved to convene to ensure women's football has the visibility it deserves.</p>
<p>6. Clubs must provide better value and support their fans - the FA should raise minimum standards to enforce this.</p>	<p>FA, football clubs and The Sports Grounds Safety Authority (SGSA)</p>	<p>Support - fan experience should be a priority and minimum standards raised.</p> <p>Accept - fan safety should be a priority and the SGSA will work to ensure all stadia which women play at are subject to the same safety checks as men's.</p>
<p>7. Government must deliver on recent commitments around equal access to school sports for girls.</p>	<p>Government (DfE)</p>	<p>Accept - DfE will continue to drive forward equal access for girls and increase transparency on funding.</p>
<p>8. Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls.</p>	<p>Government (DCMS), Premier League, Football Foundation, FA, Sport England, local authorities</p>	<p>Accept - Meaningful facilities access for women and girls is vital and the Football Foundation are working to update a new snapshot of the facilities required to meet demand. Government has recently committed to invest a further £25 million, along with a £5 million FA contribution, specifically to deliver up to 30 artificial grass pitches and provide gold-standard usage programmes for women and girls.</p>
<p>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.</p>	<p>FA, Premier League and Football Foundation</p>	<p>Support - It is essential that facilities can access available funds within the game and utilise these to increase opportunities for women and girls.</p>
<p>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.</p>	<p>FA</p>	<p>Support - The FA have an opportunity to focus attention on development of the grassroots game as part of their national league strategy and the handover of the professional game to NewCo.</p>

Introduction

The reach of women's football is extensive, inspiring and changing the lives of women and girls not only within this country but around the world. Women's football is gaining traction, with its presence on the global stage continuing to grow. The UEFA EURO 2022 attracted a record global audience of more than 365 million people. The final of this year's FIFA World Cup 2023 between England and Spain set a new UK record for the most watched women's football match with a peak audience of 14.8 million tuning in. Almost two million fans attended the tournament which was an increase of more than 600,000 people on the previous record. Domestic women's football is also continuing to rise in popularity with the 2023 Women's FA Cup final seeing the biggest ever attendance for a women's club game, and new records being set across broadcast viewership and matchday attendance.

We have been presented with an opportunity to capitalise on the successes in women's sport and address the challenges still being faced within the industry. By launching a Review into Women's Football ("the Review") at a pivotal moment, the Government has ensured that critical issues and challenges within the game have been identified. As a result, a variety of stakeholders now have responsibility for implementing a series of recommendations that will support the continued growth of women's football. We thank the Chair and her panel for their dedication in providing such evidence-based recommendations across a breadth of areas.

More than football though, many of the issues identified resonate across other women's sports. The Government will use the Review to share best practice and help raise minimum standards across all professional women's sport - ensuring women are wholeheartedly championed in their sport, receiving the support they rightfully deserve.

The Review, chaired by Karen Carney MBE and published in July 2023, was brave and unapologetic in its demand for change. The fundamental objective of the Review is to transform women's football into a world leading sport that not only creates significant economic and social benefits, but also raises the minimum standards for women's sports on an international scale.

There is a golden opportunity for the women's game to cement itself as a world leading sport, creating a best-in-class environment for players, coaches, fans and commercial partners. Sustainable investment across the entire women's football pyramid will support the game in reaching its full potential. This investment in future success will allow the game to grow exponentially.

The Review identified a series of ten strategic recommendations that should be implemented to have a positive impact on the future of women's football. The Review outlined specific actions for organisations across the women's game, including the Government, FA and incoming NewCo, Women's Super League and Championship clubs, the Premier League, the Football Foundation, and broadcasters. This Government response sets out the mechanisms by which the recommendations for Government will be delivered. In addition, the response outlines how the Government will continue to engage with stakeholders to ensure that the full complement of recommendations are implemented at pace.

The FA conducted an ownership review of the Women's Super League and the Women's Championship and made the decision 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. In November 2023, Women's Super League and Women's Championship Clubs unanimously agreed to proceed with the formation of NewCo. Clubs participating in the top two tiers of women's football will act as shareholders of NewCo, and the Government understands that all 24 clubs will now begin proceedings to move into a new governance structure ahead of the 2024-25 season. NewCo will play a vital role in shaping the future of the women's game, and the Government believes that NewCo must prioritise the recommendations set out in the Review.

Fundamentally though, the Government believes that the Review's recommendations are the right blueprint for the future of women's football. Our attention will be on making them a reality, and holding the football industry to account for their success.

Response to Recommendations

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.

1. The FA conducted an ownership review of the Women's Super League and Women's Championship. As an outcome of this Review, a decision was made to establish an independent new entity (NewCo) that will be responsible for managing the women's professional game. A Professional Game Working Group has been created to make decisions about the vision, partners, routes to investment and governance of NewCo in preparation for its launch before the 2024-25 season begins.
2. Recognising the transition phase that the women's game is currently in, the Review outlined five key principles that NewCo should prioritise. The Government agrees with the approach taken by the Review in setting out principle-based recommendations given the moment of transition the game is in, as changes to its administration are made and NewCo is established. The Government advises that NewCo prioritises these principles and creates the framework for world-leading standards in the women's game.

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

3. Women's professional football should ultimately aim to be financially sustainable and, to ensure it continues to grow sustainably, effective financial regulation and cost controls will be critical. The Professional Game Working Group is currently conducting a review of the cost controls it will likely put in place for the women's game. The Government expects an update on the outcome of this Review at the inaugural implementation group meeting in March 2024, with clear plans for how it is financially sustainable.
4. As outlined above, interest in the women's game continues to be on a positive trajectory in terms of broadcast viewership and matchday attendance. Continued growth of the fanbase, broadcast and matchday revenues will be pivotal to the future development of the women's game. It will also put the game on a pathway towards independent sustainability, which should continue to incentivise new investment into the game.
5. The Government's new ['Get Active' sport strategy](#) has highlighted the growth not just of women's football, but of women's sport more broadly in recent years. In the strategy, Government has set out its commitment to highlighting best practice and opportunities for inward investment into the domestic sport sector, including in women's sport.

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.

6. A key reform introduced in the Government White Paper, [A sustainable future - reforming club football governance](#), was the commitment to introduce an independent Regulator for the top five tiers of English men's football. This decision was taken due to clear evidence of market failures that risk causing harm and which cannot be solved through self-regulation.
7. The Government agrees with the recommendation that the women's game should be given the opportunity to self-regulate rather than moving immediately to independent statutory regulation. By taking learnings from the men's game and the incoming independent Regulator (for example on enhanced owners' and directors' tests and on corporate governance), the women's game has the chance to effectively self-regulate. The independent Regulator will be set up to cooperate with, and support, NewCo, which may include sharing relevant information and best practices. The effectiveness of self-regulation will be kept under review by the FA and Government as NewCo is established.
8. However, this does not equate to no financial regulation. The areas of interest for the independent Regulator provide a good basis for this: debt, liquidity, cost controls and sound financial planning. It is completely within the gift of NewCo's clubs to introduce the measures necessary at their foundation. We will expect to see regulations to ensure that over-spending is limited, and that the game can grow without jeopardising some of the clubs that have taken it this far. Regulation will remain an agenda item at forthcoming implementation group meetings.

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

9. The Government agrees that all players and staff should have access to the elite standard of professional infrastructure that they deserve and which will enable them to excel. The Review set out that this could be achieved through a series of uplifts to minimum standards.
10. The FA has confirmed that they have plans in place that will continue growing and professionalising the women's game but the Government has yet to see any detail. The FA has raised concerns that moving towards immediate licence criteria uplifts across the board, without unlocking increased funding, could threaten clubs' ability to operate. The FA believe the most suitable approach is to consider individual needs on a club-by-club basis rather than blanket licence uplifts.
11. The Government understands that some of the uplifts recommended in the Review will come at a significant cost to clubs however we do believe these are the right recommendations to protect the future of the game and those working in it. We therefore support the Review's phased approach as a way of giving clubs time to financially prepare.

12. The Government is keen to understand more about the FA's alternative approach and how it will achieve the ultimate aim of a fully professional infrastructure. The professionalisation of the game is a priority and the Government will continue to work with the FA and NewCo to ensure it remains one, particularly given the role uplifts to minimum standards can play in unlocking revenue streams. We expect regular updates at the implementation group meetings in March and July 2024, and will not accept any approach that undermines the necessary move to professionalisation and improved standards.

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

13. The Government recognises that the professionalisation requires significant investment, but with investment comes opportunity. The Government is fully behind the notion that becoming a world leader in women's sport offers first-mover advantages in terms of commercial deals and broadcast and is something women's football in England could and should aspire to. To kick-start investment the Review has noted mechanisms for clubs, the FA and NewCo to consider in terms of opening up and disseminating central revenues. For example, FA Cup prize money quantum and distribution, external investment via a strategic partner, and owner/affiliate club investment. This is also crucial to enable a different financial model to large parts of the men's game, where clubs are heavily owner-subsidised.
14. The Government welcomes the recent news that the FA has provided an additional investment of £3 million for the women's FA cup prize fund for the 2023-24 season, taking the total prize fund for the competition to £6 million. This increased investment will see the winners of this season's women's FA Cup receive £430,000 and will also provide an increase in prize money for clubs competing from the third round onwards. Increases in revenue are key to helping provide smaller clubs in particular with additional resources to address the uplifts to minimum standards recommended in the Review.
15. The Government encourages the FA and NewCo to continue to prioritise work in this space and we expect an update at the implementation group meeting in March 2024.

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

16. The Government endorses the suggestion that NewCo and the FA should incorporate key governance principles into their governance structures as they finalise them. We want to emphasise the importance that the women's game is properly represented at all levels of governance within the FA as changes are being made.
17. The Government is of the opinion that the optimal governance structure would allow the new entity to make independent decisions. The recommendation for a one board principle between the leagues should be a priority and allow clubs to be represented

in equal share. Independent decision-making is not only good governance, but is crucial to ensure vested interests do not drag the game to places that are not in the interest of everyone. NewCo has an opportunity to take this approach in its foundation, and we urge NewCo not to miss the opportunity.

18. We understand that the FA will have a golden share in the women's game which will enable the FA to vote on key issues affecting the women's professional game. The Government expects the FA to ensure its independence from NewCo and use its golden share to ensure that financial sustainability and professionalisation are prioritised as set out above. We expect an update from the FA on how the golden share is working at the first implementation group meeting in March 2024.

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.

19. While the women and girls' talent pathway has seen some improvements over the years, the Government agrees that attention to the pathway structure and investment are needed to build a sustainable pipeline of talent for the future. The Review highlights the disparity in levels of available financial resource between the development pathways for boys and girls, and notes how these resource restrictions are impacting the quality of provision offered for women and girls.
20. In line with the Government's ['Get Active' sport strategy](#), it is imperative that a well-funded and sustainable talent development pathway is established to ensure that every girl has the opportunity to advance within the system. The Government would like to emphasise how important it is for the FA and NewCo to appoint a new strategic partner who is committed to fully investing in building a sustainable talent pathway for girls.
21. Starting in the 2023-24 season, the FA is implementing a compensation model to ensure club investment into girls' academy systems is protected and incentivised. Clubs within the Women's Super League and Women's Championship will be required to pay a recognition fee for the transfer of academy players. We see the introduction of the compensation structure as a positive step but encourage the FA to keep the fee structure under review. It is important to ensure the structure is appropriate and provides protection for players in which clubs have invested significant sums of money throughout their academy journey. This measure is crucial to encourage clubs to develop their own talent and to continue creating future generations of successful Lionesses.
22. The Review observed that, due to challenges that currently exist within the talent pathway, there is insufficient high-quality home-grown talent progressing through the system. Clubs have indicated that the recruitment of additional international talent could address this issue. The Review heard that the Governing Body Endorsement

(GBE) threshold that is currently in place is considered too high by clubs, meaning that many clubs simply cannot afford the talent available. The GBE criteria are set by the FA in consultation with the Home Office.

23. If the FA were to look at lowering the GBE criteria threshold for an initial trial period of three years, this would provide clubs with the opportunity to access a balance of home-grown and overseas players while the talent pathway itself continues to develop. The FA is responsible for keeping the GBE criteria for the men's and women's game under annual review. To submit a GBE criteria proposal, formal consultation needs to occur. The Home Office is updating the Code of Practice for Sports Governing Bodies to clarify the requirement of formal consultation.
24. The FA has recently established a Technical Consultation Group for GBE in the women's game. Our expectation is that the Technical Consultation Group should be composed of technically qualified league nominees. The group should give full consideration to, and work toward consensus on, any proposed GBE criteria amendments while balancing the needs of the whole sport. This is a positive step and we are now encouraging the FA to formalise the role of the group, and develop clear terms of reference which are explicitly aligned with the Code of Practice for Sports Governing Bodies.
25. We expect changes in this space would lead to a greater opportunity to grow international talent. An update from the FA on any proposed changes to the GBE criteria is expected at the first implementation group meeting in March 2024.

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.

26. There has been a continuous increase in professionalisation of women's football in recent years. However, the Review highlighted the fact that players are still not being treated like the elite athletes that they are, and performance environments are falling short of the expected standard at some clubs. The game as a whole is not going far enough to provide female players with the protection and quality of employment they need.
27. Women's football is now at a turning point. As the women's game transitions from the FA to NewCo, it is absolutely crucial that the implementation of the following recommendations focused on professionalisation remain a priority. The Government believes that the basic minimum standards and structures need to be in place to protect both players and workforce in the game. These standards should be seen as the absolute minimum and foundations on which a successful, professional and sustainable environment can be built. These should be universally applied to women's sports to establish best practices.
28. The FA has highlighted that given some of these recommendations are for the longer term, they will ultimately be the responsibility of NewCo to implement. However, we believe the FA should play a role in ensuring that NewCo is incentivised to prioritise

these recommendations as part of the transition process, particularly if it receives a golden share. It is essential that the FA and NewCo consult with clubs and players as part of the implementation of future recommendations.

29. The uplift to licence criteria is clearly a mechanism by which clubs can be held accountable for uplifting and upholding minimum standards. The Review highlighted concerns that existing licence criteria are not reliably enforced. Following the implementation of any licence changes, it is essential that players have a route to reporting non-compliance with these licence criteria. The FA and NewCo must make clear to players and staff the appropriate routes to raising concerns where licence criteria are not being met. This will ensure that clubs are accountable for providing the minimum standards of care set out below.
30. The establishment of the implementation group will be critical in ensuring NewCo continues to prioritise the recommendations set out in the Review.

3.1. Addressing the gulf in minimum operating standards between tiers 1 and 2.

31. The Review highlighted the gulf in minimum operating standards between the Women's Super League (tier 1) and Women's Championship (tier 2). The Review focused particularly on the disparities in minimum player contact time and salaries between these two tiers.
32. The Government supports the Review's recommendation for phasing in increased contact time as part of licence criteria for Women's Championship clubs. Through incremental increases, the Women's Championship clubs would reach a parity with the Women's Super League, both having a minimum contact time of 20 hours by the 2027-28 season.
33. In addition to increased minimum contact time, it was recommended that the women's game introduce a salary floor for Women's Super League players as part of licensing requirements for the 2025-26 season. The salary floor would then be introduced in the Women's Championship once revenues allow. We support the introduction of these measures and believe doing so will raise minimum standards and ensure players earn an appropriate wage, enabling them to truly focus on maximising their on-pitch performance.
34. The Government recognises the challenges that the FA have highlighted in terms of immediate implementation of these recommendations. Clearly for some clubs there will be significant cost implications whereas others will already meet the outlined minimum standards. The Government believes that the phased approach recommended by the Review should give clubs the necessary time to implement these changes in a financially sustainable way. This is clearly linked to the need to generate greater inward investment per recommendation 1.
35. We expect an update from the FA / NewCo working group on plans and timelines for implementation of these recommendations at the first implementation group meeting

in March 2024. We are firmly of the belief that minimum standards around contact time and salary are absolutely the right ones for elite women's football.

3.2. Providing gold standard physical and mental health provision.

36. The Review brought attention to the severe lack of sport exercise and scientific research which currently exists in women's sport - the estimation that [only 6% of sport exercise and science research involves only women](#) is a stark statistic. It has been well documented that female football players are around three times more likely to suffer an anterior cruciate ligament (ACL) injury than their male counterparts¹. The lack of awareness of issues such as this means female athletes are not being given the protection, expertise and support they need to perform at the highest level. It is important that we continue to work with the relevant stakeholders to ensure further progress is made around player welfare.
37. The introduction of a centrally funded unit which focuses on research for issues affecting female players is a necessary step forward to propel the women's game. The FA is currently carrying out a number of female-focused elite athlete research initiatives, in collaboration with Nottingham Trent University. One specific study is focussed on ACL injuries, which have been having a notable impact on female players. We also understand that NewCo is exploring a centralised work programme and athlete hub. We expect to hear more about this work in the first implementation group meeting in March 2024. The Government's aspiration is for these insights and innovations to be actively shared across all women's sports.
38. To stimulate work in this space, the Government accepts the Review recommendation and will convene a roundtable discussion with industry leaders across all women's sports in early 2024. Our ambition for this forum is to highlight common themes and challenges being faced by different sports, share best practices and innovative research, and accelerate progress in the space. The Government will provide an update on this at the first implementation group meeting.
39. The Review placed a significant emphasis on the importance of player welfare and the need for players to be able to secure appropriate medical treatment within their club environment. The FA is responsible for the creation and implementation of medical licensing criteria. These criteria are an opportunity to set the benchmark for what players can, and should, expect in terms of medical provision from their clubs.
40. The Review recommended uplifting the medical support requirements within licensing criteria, as well as extending players' access to medical provision for a period of six months following their retirement. The Review also highlighted the importance of performance psychologists within high-performance sports. It recommended that this role become mandatory, to provide players with a clearly identifiable route should they wish to raise any concerns regarding their wellbeing.

¹ <https://pubmed.ncbi.nlm.nih.gov/18063176/>

41. We understand that the FA has made a small number of changes to medical licence criteria for the 2023-24 season. However, the Government believes the FA could have gone further and is disappointed that the FA has not mandated clubs to recruit sport and exercise psychologists for the 2023-24 season, as recommended in the Review.
42. The Government has had discussions with the FA, and have set out our expectation for them to fully consider the recommendation around medical licensing uplifts for the 2024-25 season. We expect an update from the FA and NewCo on plans to review the medical licence criteria for the 2024-25 season at the first meeting of the implementation group in March 2024.

3.3. Mandating elite training facilities for elite players.

43. The Review identified vast differences which exist in terms of the training facilities being offered across the professional game. It is essential that training facilities create an environment which allows players to continue their development and perform at the highest level on a day-to-day basis. Challenges around access to, and standards of, facilities for women and girls is a sport-wide issue and not limited to football alone.
44. The Review recommends that the FA's licence criteria should be expanded to provide clarity on precisely what clubs should provide in terms of an elite training environment. The FA has updated the licence criteria for the 2023-24 season, following a detailed audit with the performance and medical lead of training facilities. Under the 2023-24 licence conditions, the minimum standards for clubs' training facilities have been uplifted and given greater clarity.
- full size (at least 100 metres x 64 metres) grass pitch or 3G artificial pitch, with a separate training area for goalkeepers
 - adequate lighting for pitches
 - a high-quality performance gym including equipment for testing and monitoring of cardiovascular fitness, free weights and equipment for plyometrics exercises
 - a changing room for players and staff
 - adequate medical facilities (as determined by the club's medical lead) including defibrillators and equipment for rehabilitation from injury
 - a meeting room for players to use; adequate office space and equipment to meet the needs of club staff; adequate parking; and adequate storage space.
45. The introduction of these parameters is a welcome step forward, and will help to create elite training environments which enable players to thrive on a daily basis. This should be the minimum standard across women's elite and professional sport more broadly.

3.4. Mandating a world-leading parental package.

46. The Review highlighted the positive steps the FA has made in relation to maternity policy, with the recent introduction of 14 weeks' full maternity pay for all players in the Women's Super League and Women's Championship. Whilst this is a move in the right direction, the Review noted concerns from current and former players who remain dissatisfied with the maternity package on offer, indicating that assumptions remain that players have to make a choice between motherhood and their football career.
47. The Review's recommendation for the FA to conduct an in-depth analysis of its current maternity policies with current and former players and the incoming union is the correct approach. It is essential that players' voices are heard in this space, and that individuals are empowered to contribute to the development of a maternity policy which provides assurance and confidence for women wishing to have children while continuing their professional football career. As outlined in the Review, this can become a baseline standard for players in the top two tiers of English Football, but can also provide the foundation for women's sport and an opportunity for women's football to lead the way in this space.
48. The FA has confirmed that NewCo will be commencing plans to assess and review existing maternity policies to ensure players are provided high-quality maternity care and support. The Government looks forward to seeing the outcome of this work, and we expect to have an update on the maternity policy at our first implementation group meeting in March 2024. Players should not settle for anything less than high-quality maternity care, and the game must do better to support them.

3.5. Funding full union representation to both tiers.

49. Union representation is an area where there remains a clear disparity between the men's and women's game. Formal union representation offers players an important independent route to addressing concerns, as well as protection and representation of their rights and voices.
50. The Professional Footballers' Association (PFA) uses funding from the Premier League, the English Football League, and the FA to provide formal representation to players in the men's game. To date, the PFA has been able to extend its services and support to players in the Women's Super League, however the PFA currently receives no ring-fenced funding from the FA towards providing this service. Players in the Women's Championship currently receive no formal union representation or independent support. Without ring-fenced funding, the PFA's ability to support female professional footballers outside the Women's Super League will continue to be limited.
51. The Women's Championship is a challenging environment where players often have to contend with short term contracts and limited contact time and compensation. The Government therefore supports the recommendation to introduce formal union

representation across both tiers, to ensure all players within the women's game have access to the independent support and advice that they may require.

52. We understand that negotiations are continuing between the FA and PFA, and encourage these negotiations to be expedited to ensure players are not left without the appropriate support. We expect an update from both parties at the first meeting of the implementation group in March 2024.
53. It is important to ensure that players from both the Women's Super League and the Women's Championship are offered protections around contracts and working conditions, and that their voices are heard as the future of the women's game is shaped. We understand that the FA is now planning to establish a Professional Football Negotiating and Consultative Committee (PFNCC) for the women's game, which is a welcome step forward. We understand the finer details of the group are still being established, but we expect this to give the same protections and mechanism to players as the equivalent in the men's game. The Government expects a status update on the establishment of the PFNCC at the March 2024 implementation group meeting.

3.6. Uplifting duty of care provision for players.

54. The Government strongly believes that sport should be a place where athletes and participants feel safe and welcomed. The Review rightly emphasised the urgent need to ensure that robust and effective duty of care processes exist within the game, to offer protection and support to players if they experience issues of misconduct and abuse. It is vital that sports bodies continue to work together to address issues in this space, and that all players feel like appropriate measures and controls are in place which create a safe environment for them to operate within.
55. There is no place for sexism, misconduct or abuse in sport, or any other walk of life. The FA has put in place a player welfare and safeguarding strategy with a focus on strengthening provision and guidance in this space. The FA has also recently introduced an independent reporting line for the 2023-24 season. This reporting line provides players and staff with an anonymous and formalised route to escalate any situations where duty of care issues are not being managed effectively, and signposts routes to raise issues with the leagues and football authorities.
56. The Government sees duty of care as a priority and hopes that the mechanisms being deployed by the FA are effective. We request an update on the rollout of these mechanisms at the end of the 2023-24 season at the first meeting of the implementation group in March 2024. Nobody should ever feel unsafe or unwelcomed in sport.

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

57. As identified in the Review, the women's game is clearly not yet at a stage where its players are earning enough money to allow them to comfortably retire at the end of

their playing careers. This means that guaranteeing players are well-prepared for life after football is a critical measure which clubs must ensure is in place. All players should be provided with educational opportunities to continue developing their skillset away from football, and given help in identifying opportunities following retirement.

58. We agree with the recommendation that the leagues and clubs should ensure that all players have access to mandated in-depth support to assist with their transition out of the game. This must be the responsibility of the FA, NewCo, clubs, and any incoming players' union.

Recommendation 4 - The FA should urgently address the lack of diversity across the women's game - in both on and off-pitch roles.

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.

59. The Review highlighted the glaring lack of representation of individuals from ethnically diverse backgrounds throughout women's football both on and off the pitch. The Government fully supports the sector as it moves to become more inclusive and welcoming of its spectators, participants and people in its workforce.
60. We want to see more women in all positions across sport - whether playing, coaching, in medical and support roles, or at board level. As set out in the sport strategy, we want sport to be an exemplar in championing equality of opportunity. Recent changes to the Code for Sports Governance mean that all sport organisations receiving public funding from either UK Sport or Sport England (including national governing bodies) are now required to develop a detailed and ambitious diversity and inclusion action plan. Although the Code for Sport Governance does not apply to the Women's Super League and Women's Championship, we encourage all clubs to look at the principles which have been set out in the Code.
61. The FA has made several interventions with the aim of addressing the lack of diversity within the game, including the launch of the Football Leadership Diversity Code in October 2020. This aims to ensure English football better represents our modern and diverse society, on and off the pitch. The code aims to tackle disparity while increasing the representation of underrepresented groups across senior leadership positions, wider team operations and coaching roles.
62. The Review noted how the introduction of the Discover My Talent referral scheme by the FA has led to [an increase in talent within the pathway from ethnically diverse backgrounds](#). The Government is pleased to see improvements in this space and hopes that this will have a positive impact on developing a sustainable talent pathway, and will continue to shift the dial on the levels of representation in all positions and at all levels across the game.

63. As recommended by the Review, we encourage the continued evaluation, transparency, accountability and shared learnings on the success of interventions in this space.
64. The Review recommended the FA establish workforce data to assess the demographics of the current workforce in football. It was suggested that, using this data, the FA designs and implements a workforce strategy for the women's game which targets specific under-representation of identified groups.
65. In November, the FA announced that from the start of the 2024-25 season it will be mandatory for all professional clubs in English leagues to report full data on a number of characteristics within their organisations.
66. The Government does not set or require diversity targets for private or voluntary sector organisations. However, we will seek an update from the FA on the development of a workforce strategy at the first meeting of the implementation group in March 2024.
67. More broadly, addressing the lack of diversity across the game is vital. Football needs to be inclusive and welcoming at all levels of the game, from grassroots through to the elite.

Recommendation 5 - The FA, Premier League, EFL and broadcasters should work together to carve out a new dedicated broadcast slot for women's football.

68. The Review draws attention to the lack of scheduling consistency within the women's game across the football broadcast calendar. It highlights the difficulty of finding an appropriate slot to play matches which balances strong broadcast viewing figures with physical matchday attendance. At present, the women's game is predominantly broadcast on a Sunday evening which limits the number of supporters attending the game in person.
69. The Government agrees that the women's game should have a protected broadcast time slot that also promotes matchday attendance. Continued growth of the fanbase, broadcast and matchday revenues will be pivotal to the future development of the women's game, and in unlocking revenues which enable clubs to continue uplifting minimum standards. While we recognise there may be need for research into the right slot for the women's game this should be undertaken at pace to inform discussions.
70. The Review recommended that the FA, Premier League, English Football League, and broadcasters work collaboratively to create a bespoke window for women's matches to be regularly showcased. The Government believes this could be done as part of better collaboration over the football calendar. Editorial and commercial decisions are for broadcasters and rights-holders to take, independent of Government. However, we note the debate around Article 48, which allows a football

authority to prohibit any football matches being broadcast on live TV (in England, between 2:45 pm and 5:15 pm on Saturday), will continue in this space.

71. It is the Government's view that revoking Article 48 for women's football alone is one viable option to support the women's game, and significantly increase its broadcast and commercial revenue. We recognise that there are challenges to this with the men's game, but it does not feel credible to hold the women's game back on this basis when it would generate significant revenue for a game that has lagged behind commercially. If there is reluctance to revoke Article 48, or find a suitable and credible alternative slot, there is a legitimate question about recompensing the women's game for this missed opportunity for revenue.
72. We encourage the FA, Premier League, English Football League and broadcasters to convene at pace to begin discussions about a bespoke broadcast slot, Article 48, and financial flows, and request an update at the first meeting of the implementation group in March 2024.

Recommendation 6 - Clubs must better value and support their fans - the FA should raise minimum standards to enforce this.

73. The Review recognises the growing interest in the women's game, which has been propelled by the success of the Lionesses in recent years. As outlined in the introduction, records are continuing to be set across matchday attendance and broadcast viewership, both domestically and internationally. This demonstrates the clear interest and enthusiasm that exists for the women's game.
74. The Review offered a series of recommendations, with the ultimate goal being to improve the experience of supporters of the women's game. The growth of the game's fanbase can help take the women's game to new financial heights. Many of the recommendations in this section are for the FA and individual clubs to implement, with the exception of recommendation 6.4 which the Government will continue to drive forward. The independent Regulator in the men's game will set out an approach which could be voluntarily adopted regarding fans.

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

75. The Review recommended that the FA amend its licence requirements to make it mandatory for all clubs to have a dedicated women's football marketing resource. The Government supports this and thinks that a committed marketing resource within the women's game should be a priority to enable clubs to continue driving attendances and growing their fanbase.
76. We understand that NewCo is exploring a strategy which focuses on centralised league marketing, with a view to progressing the league as a whole rather than on a club-by-club basis. Following the establishment of NewCo from the 2024-25 season, clubs will have influence over licensing criteria and can decide whether to mandate marketing resources.

77. We encourage both NewCo and clubs to continue giving full consideration to the most appropriate club marketing strategy. It remains a priority for clubs to be encouraged to continue investing in, and developing their own, marketing capabilities.
78. We expect to hear further details of the marketing strategy at the first meeting of the implementation group in March 2024.

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.

79. The Review noted that challenges in purchasing a ticket to a women's game could act as a barrier for supporters. For the 2023-24 season, the FA has introduced a licence condition which requires all clubs in the Women's Super League and Women's Championship to have a ticketing policy. The ticketing policy will be published on the club's website. The policy will introduce new minimum requirements on ticket availability, purchasing and information, tickets for spectators with disabilities, and information on match abandonment protocols for spectators who have purchased tickets.
80. Government appreciates the introduction of this licence criteria and encourages the FA and clubs to ensure that these conditions are met and reviewed annually. We also recommend that the FA and clubs actively seek feedback, reflecting and adapting licence criteria to support the experience of spectators. It should be straightforward to get a ticket at home or away, otherwise clubs will not see the increase in fans they expect.

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.

81. The number of record-breaking domestic match attendances leaves no doubt that clubs have had success when hosting matches in main stadia. The Review proposed that the FA introduce a licence requirement for clubs to produce a stadium strategy focused on growing matchday attendance.
82. The FA has confirmed that a stadium strategy which accommodates the difference in resources between Women's Super League and Women's Championship clubs is being developed for the 2024-25 season. The Government is supportive of this initiative, and reiterates the importance of consultation with fans and supporters' groups on the development of this strategy.
83. We encourage the FA and NewCo to continue this work and request an update at the implementation group in March 2024.

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 the SGSA.

84. The Review emphasised concerns around 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.
85. The Government agrees it is essential to ensure facilities being used by top tier clubs are of the highest safety standards and fit for purpose, especially given the growing number of supporters frequently attending women's football matches.
86. Whilst there are some commonalities between the men's and women's professional game, the women's professional game frequently differs significantly from the men's game in terms of funding and resources, structures and governance, supporter profile and the facilities used to host fixtures. For this reason, it is important that the SGSA's work with the women's game is tailored to reflect these differences, in a shared approach to spectator safety.
87. We agree that the SGSA's licensing should be extended to cover all grounds used in the Women's Super League to ensure facilities are safe and fit for purpose. We commit to working with the SGSA on a suitable resourcing model. As outlined in the Review, of the 24 primary and secondary grounds used by the 12 clubs in the Women's Super League, only 17 are currently licensed by the SGSA. These 17 grounds are licensed as a consequence of being the home grounds for Premier League or English Football League clubs.
88. In order to extend the SGSA's licensing responsibilities to the Women's Super League, secondary legislation will be required, which will be subject to Parliamentary time and approval. The Government understands that further work needs to be undertaken by the SGSA to establish these changes and will continue to work with the SGSA throughout this process. Over the next year, the SGSA will consult with stakeholders and carry out research at grounds used in the Women's Super League, to develop a bespoke approach to licensing which reflects the different characteristics of the women's professional game.
89. For the Women's Championship, the Government agrees that spectator safety should sit within a self-regulated model with clear guidance and support from the SGSA. The SGSA will work with the FA and Women's Championship clubs to identify trends, safety risks and possible mitigations. This should be kept under review as the women's game continues to grow in years to come, and in line with risks to spectator safety.

90. We will continue to work alongside, and support, the SGSA to keep this under review on an annual basis. We expect an update from the SGSA on its scoping work at the first meeting of the implementation group in March 2024.

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.

91. Fans are the most important stakeholder for any football club. The incoming Regulator will be setting a minimum standard of fan engagement through its licensing regime for men's football. This will require clubs to have a framework in place to regularly meet a representative group of fans to discuss key strategic matters at the club, and other issues of interest to supporters, including club heritage. This representative group should at least include adequate representation for the women's team if the club has one affiliated. Full detail on the way in which the independent Regulator will oversee fan engagement is available in the [football governance white paper](#).

92. The Government recognises that not all clubs within the Women's Super League and Women's Championship are affiliated to a men's team that will be subject to independent Regulation. We therefore support the recommendation that these clubs should ensure they have mechanisms and structures in place to independently engage and consult with their supporters on key strategic issues. The Regulator's guidance will be helpful in this regard.

93. The Review advised that clubs in both the Women's Super League and Women's Championship should be mandated to have supporter liaison officers, which has been a mandatory requirement for clubs in the Premier League and English Football League since the 2012-13 season. Supporter liaison officers are an interface between the club and fans, and provide a route of engagement to flag issues arising or opportunities which may have otherwise been missed.

94. Fans play a pivotal role in shaping the future of women's football and it is important that NewCo ensures that fans' voices are incorporated into the long-term vision for the professional game.

95. Licensing requirements for the 2023-24 season will require clubs to have a supporter engagement policy which covers consultation, structured engagement and supporter and community liaison. This requirement is a positive step and will provide both fans and clubs with a clear framework for engagement.

96. The incoming supporter engagement policy and fan engagement standards dictated by the Regulator should improve fan engagement and representation across the women's game. We recommend that in addition to these incoming changes, the need for mandatory supporter liaison officers is kept under review by the FA, with this becoming a regular item at future implementation group meetings.

Recommendation 7 - Government must deliver on recent commitments around equal access to school sports for girls.

97. The Review called for greater specificity and transparency for the commitments made by the Government around equal access in March 2023. The Government is already delivering on this recommendation. Building on the Department for Education's (DfE) launch of the Your Time programme in March 2022, and the Lionesses' open call to the Government in summer 2022, the Government made an announcement on 8 March 2023 which set out a series of commitments around equal access to school sport for girls. Further details and specific actions on these commitments were published in the [School Sport and Activity Action Plan \(SSAAP\) in July 2023](#).

98. The ['Get Active' sport strategy](#) introduces an ambition to get more than one million more children active by 2030. Schools are vitally important in helping children and young people get active and, as Government, we are committed to providing the continued support needed to ensure quality experiences of sport in schools.

99. To ensure that the Government is committed to the targets set out in the strategy and to publicly monitor progress, we have introduced a new cross-Government National Physical Activity Taskforce (NPAT). The NPAT brings together Government departments, the sport sector and independent experts to deliver coordinated and innovative policies that will help encourage people to get active. An analytical subgroup will report into the NPAT to present key data sets and to monitor progress in groups where inactivity rates have remained stubbornly high.

7.1 In order to provide transparency around the success of the expansion of the School Games Mark 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.

100. The [School Sport and Activity Action Plan \(SSAAP\)](#) provides further guidance to schools about what they can do to establish equal access to sports for boys and girls.

101. The School Games Mark rewards schools for their commitment to the development of school sport. DfE and DCMS have been collaborating with the Youth Sport Trust to phase in equality criteria to the School Games Mark which will cover curricular and extracurricular sport. The introduction of equality criteria started in September 2023 and will become mandatory from September 2024. To promote transparency, the number of schools achieving the School Games Mark will be published annually going forward.

102. The Government recognises that schools are often the first, and in some cases the only, avenue for children to participate in sport. DfE plans to provide non-statutory guidance to schools by the end of 2023. The guidance will offer a range of approaches to schools for effectively ensuring a minimum of two hours of physical education per week within the curriculum, as well as equitable access to physical education and extracurricular school sports and competitions. The SSAAP has indicated to schools that two hours of curriculum PE is a minimum starting point.

103. The Department for Education's Opening School Facilities (OSF) programme aims to support schools in opening their facilities out of school hours. This is referenced in more detail in paragraph 112.

7.2 Government should commit to the specific figure for the PE and Sport Premium - currently "over £600 million across the next two academic years".

104. The Primary PE and Sport Premium fund can be used by schools to make additional and sustainable improvements to the quality of Physical Education, sport and wider physical activity they provide. The current PE and Sport Premium commitment is for over £600 million across two academic years, 2023/24 and 2024/25. The Review called for Government commitment of this figure.

105. In July 2023, DfE published updated guidance for the 2023/24 academic year, with the exact allocations of over £320 million for the 2023/24 academic year published in October 2023. In the summer of 2024, DfE will update the PE and Sport Premium guidance with exact allocations for the 2024/25 academic year to be published in October 2024.

106. The Government will provide an update on the PE and Sport Premium at the first implementation group in March 2024.

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.

107. Updated PE and Sport Premium guidance was published in July 2023 to help schools focus on effective spend. Issuing the update to the Premium guidance in the summer term, instead of the precedent of sharing guidance in October, has created a strong signal to schools on the reset of expectations for the PE and Sport Premium. DfE is engaging with schools to provide support and clarity over the changes and expectations on accountability. DfE will evaluate the impact of the PE and Sport Premium and use the findings to inform further changes to the policy and guidance.

108. The guidance outlines the plans for the employment of a digital tool, provides further detail on compliance of spending, and highlights areas for further tightening of conditions of grant.

109. DfE is piloting the use of a new digital tool during the 2023/24 academic year to increase transparency of fund deployment. The digital tool will become mandatory in schools from the 2024/25 academic year.
110. This new digital tool will improve financial compliance of PE and Sport Premium spend. Schools will be required to report figures on the overall spend of the PE and Sport Premium to the DfE, providing detail on what the funding has been spent on and any underspend. The new digital tool will provide a further measure of accountability, and will help identify any non-compliant spending of the PE and Sport Premium.

Recommendation 8 - Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls.

111. To deliver against the Government's ambition to increase activity levels by 2030, we need to ensure we are meeting the increasing demand from women and girls for access to facilities that are fit for purpose.
112. As set out in the sport strategy, we also need to do more to better connect community sport teams and other physical activity clubs to schools' sport facilities. With 35% of all sports facilities in this country behind school gates, an obvious way to increase participation is to open these up for community use. The Department for Education's Opening School Facilities (OSF) programme is investing up to £57 million over a three-year period, with the aim of supporting schools to open their facilities in the evenings and weekends, and during the holidays. The programme also aims to target schools where opening up the facilities will support raising the activity levels of the most inactive pupils.
113. There are a range of partners involved in funding grassroots football facilities across the UK including the Government, FA, Premier League, local authorities, schools and clubs as well as private companies and local partners. The Government has significantly increased its investment into these facilities in recent years, committing £302 million into up to 8,000 improved pitches across the UK by 2025. To build on this, all partners work together to ensure further investment to help meet the ongoing rise in demand for facilities. It is vital that we improve the operational management and programming of existing facilities to increase the focus on providing equal opportunities for women and girls to play football.
114. In addition to the £302 million already committed across the UK, in 2024-25 the Government will be providing a further £25 million uplift in funding to the Football Foundation, specifically to deliver facilities with gold-plated provisions for women and girls. Up to 30 state-of-the-art artificial grass pitches will be built around women's and girls' priority use, using things like reserved peak-time slots, women and girls-only evenings and priority booking for women's and girls' teams, to drive up participation.

115. The Football Foundation has worked with the FA to develop Local Football Facility Plans, which map out the demand for football facilities across every local authority in England. The Review noted that the most recent estimates of funding required to deliver on these plans were made in 2019, which is not representative of the significant increase in numbers of women and girls playing football or of the impact of inflation since then. The Review recommended the Football Foundation undertake a review of current needs in order to calculate the current and forecasted deficit, through its Local Football Facility Plans. The Football Foundation has already commenced this work, and has now established a working group which will generate an up-to-date assessment of the whole game facility need across England and the amount of investment that will be required to meet this need. This analysis includes the impact of increased participation in the women's and girls' game, inflation, the need for facilities that support multiple sports at the same site, and consideration of other insights from delivery so far.
116. We expect the Football Foundation to be in a position to communicate a revised assessment of facility need by January 2024, which can then be used to estimate the funding required to deliver those facilities. Recognising that demand and provision changes over time, we expect the facilities investment target to continually be kept under review by the Football Foundation.
117. Once a new target facility provision figure has been established, Sport England should convene partners involved in funding grassroots facilities to explore how to unlock the funding required to deliver this. We expect an update from the Football Foundation and Sport England at the March 2024 implementation group.

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.

118. The Review rightfully highlighted concerns raised by participants around the quality, availability, and access levels of facilities available across the women's football pyramid. In order to increase participation, it is important that we are providing suitable facilities that meet the needs of women and girls, from grassroots to professional.
119. The Review noted the existing funds which are already available to uplift facilities within the women's game, such as the Premier League Stadium Fund (available to clubs across tiers 1 to 4) and the Premier League Women's Infrastructure Fund (available to clubs in tiers 3 and 4). These funds are specifically designed to create more welcoming environments for female players, fans and officials at the venues in which they play. Clubs have raised challenges around the requirement to have long tenure agreements in place in order to access the funds, which has led to a limited uptake by clubs.
120. The Review suggested the criteria of the Premier League Stadium Fund and the Premier League Women's Infrastructure Fund are reviewed in order to promote

greater uptake. The Review also suggested expanding these funds in order to ensure the wider football pyramid can benefit from the bespoke funds which exist.

121. The Government welcomes the work being undertaken by the Football Foundation, the Premier League and the FA, who distribute these funds.
122. The Government understands that the FA is working alongside the Premier League Stadium Fund with tier 3 and 4 clubs to develop bespoke facility plans, as well as working with stadium operators to build longer-term partnerships for the women's game.
123. The women's game is growing at a significant pace, with stadium requirements being enhanced at regular intervals. There is a need to ensure that Premier League Stadium Fund investment is used on stadia that will meet the women's game requirements for the long term. The Government understands that a cross-game working group has been formed in order to better understand the future facility ambitions of the Women's Super League and Women's Championship, to help inform investment decisions. The Government encourages partners to come together to create a women's game facility strategy, in order to help prioritise facilities investment in the longer term.
124. The Government expects a progress update from the FA, NewCo, Premier League and Football Foundation at the first implementation group meeting in March 2024.
125. Finally, the Review emphasised the importance of women and girls feeling empowered to understand what commitments their local grassroots facilities have made around meaningful access. The Football Foundation currently requires any applicants who bid for facilities funding in excess of £25,000 to demonstrate that a robust women and girls' strategy has been embedded into the project plan. As it stands, there is no public accountability mechanism for users to understand the commitments the facility has made, and to hold them to account for them. It is the responsibility for the Football Foundation to prioritise plans for how they are going to improve accountability. The Football Foundation will conduct post-award assurance to ensure facilities funding is being delivered in line with the required standards, and we expect an update at the first implementation meeting. The Government agrees that it is essential for women and girls to be able to identify where facilities have made commitments to offer increased access for women and girls, and have a means of escalating where these commitments are not being delivered.

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.

126. The Review recognised that it could not conduct a thorough review of the grassroots game and National League system. However, during discussions with National League clubs, issues were identified around fixture scheduling, funding, and

support with promotion/regulation. The Review highlighted the opportunity that the FA now has in handing over the administration of the professional game, to refocus its attention and support to the National League.

127. The FA launched its National League strategy 'empowering for success' in 2022, with the aim of ensuring that the National League can also benefit and capitalise on the growing interest within the women's professional game in England, and that benefits can be realised throughout the women's football pyramid.
128. In August 2023, it was reported that the entire management committee of the Women's National League had resigned. The FA has since confirmed that the previous volunteer-led structure will be replaced by an FA-managed structure. This structure will be responsible for running the leagues; providing support on improving player education; coach development and mentoring programmes; the creation of a high-performance coaching programme; additional support for referees and subsidised funding for clubs for match officials; a centralised club development team supporting clubs with minimum standards; and a leadership programme for club non-coaching staff.
129. The Government will seek to meet with National League clubs and the FA at least twice a year to be updated on the rollout and implementation of the National League strategy, and encourages the FA to prioritise continued consultation with clubs as future changes are worked through.

Conclusion and next steps

130. There is no doubt that the Review has presented a pivotal opportunity to transform not only women's football but women's sport more widely. Domestically and internationally, conversations are taking place about improving standards in the game. Audiences are continuing to grow with records being broken.
131. The Government believes that raising standards across the women's football pyramid, from grassroots to elite, is vital in ensuring that the women's game propels itself to the next level. This Government response sets out our views on each of the strategic recommendations, reflecting the positive work that is already underway, as well as where further work is needed. By driving forward the recommendations from the Review, women's football in England has a unique opportunity to showcase itself as a world-leading sport which can set the standard for all women's sport, both domestically and internationally.
132. As set out throughout the response, responsibility for taking the recommendations forward sits across multiple stakeholders. Therefore, the Government will be establishing an implementation group responsible for monitoring progress on the recommendations outlined in the Review. The group is an excellent opportunity for stakeholders to come together, share updates and innovations, and support each other in moving the dial on women's sport. The Government welcomes

the engagement so far with the football authorities, and looks forward to continuing to work with the sector to ensure that the Review's recommendations come to fruition.

133. Throughout this response, we have referenced points where we will seek updates from stakeholders. We have outlined these below and look forward to discussing them at the first implementation meeting in March 2024.

- Update on cost controls being considered by NewCo - FA, NewCo
- Update on proposed financial regulation model of the women's game - FA, NewCo
- Update on progress to professionalise the women's game - FA, NewCo
- Update on NewCo central distribution mechanisms - FA, NewCo
- Update on FA golden share in NewCo - FA
- Update on proposed changes to GBE criteria - FA
- Update on plans for addressing salary floor and contact-time recommendations (appreciating these may be implemented longer term) - FA, NewCo
- Update on NewCo plans for a centralised work programme and athlete hub - FA, NewCo
- Update on Government roundtable discussion with industry leaders - Government (DCMS)
- Update on increasing medical licence criteria - FA, NewCo
- Update on development of maternity policy - FA, NewCo
- Update on union representation, including establishment of PFNCC - Professional Footballers Association, FA
- Update on the rollout of the player welfare and safeguarding strategy and rollout of the independent reporting hotline - FA
- Update on the development of workforce strategy - FA
- Update on broadcast discussions - FA, Premier League and the English Football League
- Update on marketing strategy - NewCo
- Update on stadium strategy - NewCo, FA
- Update on SGSA scoping work - Sports Grounds Safety Authority
- Update on supporter engagement - FA, NewCo
- Update on school sport and the PE and Sport Premium - Government (DfE)
- Update on grassroots facilities funding - Football Foundation, Sport England
- Update on accessibility of professional game facilities funds and future women's game facility strategy - Football Foundation, FA and the Premier League
- Update on post-award assurance - Football Foundation

134. We would like to share on record our thanks to stakeholders for their work to date in taking forward recommendations, and we are looking forward to further progress and continued development of the women's game. The Government firmly believes that this continued work and determination can propel the women's game to world-leading heights, setting the standard for women's sport globally.

135. Finally, we would like to conclude by thanking the Chair Karen Carney MBE, the expert panel, and all other contributors to the Review. The meticulous work of

these individuals has highlighted the challenges being faced within the game and provided a clear pathway to positive change. In addition, we would like to extend our thanks to all players and administrators who are continuing to drive the game forward year on year. It is time for us to make a big change to this evolving game, and we do not want to waste the opportunity we have in front of us.

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