



THE INDEPENDENT FOOTBALL COMMISSION

INTRODUCTION

The role of the Independent Football Commission (IFC) is to evaluate the effectiveness of football's existing self-regulatory framework and to suggest improvements. The IFC is independent, both of those who provide services within football and those who use them. It aims to exert influence on the football authorities - the Football Association, the FA Premier League and the Football League - in order to bring about improvements in the way they meet the needs of the football community in England. It has no statutory powers; it has been described by the Secretary of State as part of the government's belief in "light touch regulation". The IFC's full terms of reference can be found in the IFC 2002 Annual Report and on the IFC website.

THE IFC IN 2002

The IFC set the following priorities for its first year:

- to establish the IFC's role in football's complaints procedures
- to assess the success and effectiveness of Customer Charters
- to examine ticketing policies and practice with regard to away supporters
- to review the work of the FA's Financial Advisory Unit (FAU)
- to identify and respond to issues of concern to those involved in football.

In its Annual Report, the IFC has produced practical recommendations for action by the governing bodies to bring about improvements in English football. Its recommendations are based on knowledge and evidence, drawn from fieldwork, research, and listening to the views of a wide range of organisations and individuals.

The Commission has generally experienced support and enthusiasm for its role, although there is scepticism about whether it can influence affairs, given its lack of powers. The Commission's relations with the football authorities have been generally cordial, although tensions have arisen from time to time and the co-operation it has received has been variable. Delays in responding to requests for information have impeded progress. The IFC is a new body and its presence and novel role has had to be accommodated into a structure which, in 2002, was itself subject to unusual strain. Some tension was to be expected, therefore, between the IFC as a scrutiny and audit body, and those it was inspecting and evaluating. The first test of the authorities' acceptance of the role of the IFC will be their response to the recommendations in its Annual Report.

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Members of the Independent Football Commission, December 2002.

From left to right: John Taylor, John Simpson, Alan Watson, Derek Fraser (Chairman), Ann Taylor, Kate Barker, Julian Wild

The Independent Football Commission was established at the end of 2001 by the football authorities, with the agreement of government, in response to the recommendations of the Football Task Force. The Task Force was established by the new Labour government in 1997 to tackle some of football's problems at a time when its image was deteriorating, amidst general public concern. The IFC's full terms of reference can be found in the IFC 2002 Annual Report and on its website. The IFC is principally required to review and report on:

- the football authorities' handling of customer relations
- the introduction of Customer Charters
- the functioning of complaints procedures
- the work of the FA's Financial Advisory Unit.

Additionally it is asked to review the rules and regulations of the governing bodies relating to financial and other matters.

The IFC's Chairman, Professor Derek Fraser, was appointed in August 2001, following an open recruitment process. A similar procedure led to the appointment of six commissioners, who represent a wide and valuable range of experience and, additionally, many years of supporting football from the terraces. Since meeting for the first time in January 2002, the IFC has built a wide network of contacts within the game; has met with over 50 organisations active in the football business; and has developed an extensive knowledge and understanding of the issues facing professional football.

The IFC is funded by a grant from the football authorities.

The IFC Annual Report explains the IFC's work during 2002 and gives full details of its findings and conclusions. The Report contains all 22 recommendations that the IFC has put to the football authorities.

Copies of the **Annual Report** and **I'm Still not Satisfied** - the IFC brochure on complaints procedures - can be obtained from the IFC office:



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THE INDEPENDENT **FOOTBALL** COMMISSION

IFC ANNUAL REPORT

EXECUTIVE SUMMARY 2002

pushing the pace of reform

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SUMMARY OF RECOMMENDATIONS

The IFC recognises that the football authorities have taken steps to modernise communications and customer relations, and welcomes the achievements of the last two years. However, a popular perception remains that football is unduly mercenary and uncaring. Against a backdrop of turmoil throughout football, many supporters feel neglected. ***The IFC's principal themes are that short-term difficulties must not deter the football authorities from building on the progress already made in responding to the needs of supporters and other stakeholders; that accountability and transparency must be even higher on the governing bodies' agendas; that a better balance must be found between successfully managing the game as a business and responding to supporters' interests.***

The following paragraphs summarise the IFC's findings in specific areas and list its principal recommendations. The complete list of recommendations is in the IFC Annual Report.

Complaints procedures

The IFC has specified the role it will play in the complaints procedures operated by the football authorities. Full details can be found on the IFC website. Additionally the IFC has produced a simplified version of this guidance: *I'm Still Not Satisfied*. It has been distributed to all FA Premier League and Football League clubs; to supporters' organisations for onward distribution to their members; to the football authorities; and to organisations involved in football. The IFC is satisfied that clubs and the governing bodies have complaints procedures. However, they are not always clear, easy to understand or use; they are not always well-publicised for the benefit of supporters; and, at governing body level, they can be slow and cumbersome. The football authorities have each established a customer relations unit to deal efficiently with enquiries and complaints and have told the IFC that response time targets set for these units are met. The Commission welcomes this positive step, which is also reflected at club level. 30 issues were raised with the IFC in the period April - 6 December 2002, of which 7 were submitted as formal complaints which the complainants felt had not been resolved by clubs, or the relevant governing body. These were investigated by the IFC; in some cases the investigation was ongoing

at the time the IFC Annual Report was written in December 2002. Summaries of the IFC's findings are in its 2002 Annual Report.

The IFC's main recommendations are that:

- the governing bodies should oversee the simplifying of complaints procedures
- when time limits for dealing with complaints are exceeded, the complaint should normally move immediately to the next stage in the complaints hierarchy
- appropriate target timescales for dealing satisfactorily with customer complaints, at all levels, should be publicised, and performance reviewed by the IFC in 2003.

Charters

The IFC has been impressed by the positive approach to charters by both the FA Premier League and the Football League, and particularly welcomes initiatives piloted by the FA Premier League, and the efforts made by Football League clubs during a difficult year to address customer relations. The exercise would be improved if an element of external validation were to be introduced. The IFC's own independent research found that few fans know about the charters or are persuaded that their clubs care about them as paying customers. The charters exercise to date has served more to develop the relationship between club and governing body than to strengthen the relationship between club or governing body and supporters. The IFC found scope for improvement in the quality of customer charter produced by the football authorities themselves, which tend to be too general in character. It sees the improvement of charters as an evolving process, however, and welcomes the commitment of the governing bodies to this principle.

The IFC's main recommendations are that:

- new and innovative initiatives should be introduced for familiarising supporters with the purpose and consequence of charters, success to be evaluated through independent surveys during 2003
- charters should include clear, measurable improvement targets for each year, and progress reports should be made public
- there should be external and independent validation of specific charter issues, a first validation exercise to be complete before the start of the 2003/04 season. The IFC will monitor progress.



Ticketing

The IFC commissioned its own survey¹ of supporters' perceptions of the treatment of away fans at Premier League and Football League games. The governing bodies' rules on ticketing for away supporters are, on the whole, clear; but despite commitments in club charters to observing these rules, loopholes evidently exist and infringements occur. Issues raised with the IFC, the findings of the IFC survey, other informal research, and examination of club reporting on complaints received, all show ticketing - and the related issue of match rescheduling - as the greatest source of discontent and the area where perceptions are strongest that clubs could improve matters in the interests of the fans.

The IFC's main recommendations are that:

- FA Premier League rules² 7.1 and 9 and Football League rules 31.2.1, 31.2.5, 31.2.6 should be tightened; in particular "comparable accommodation" should be defined so that it can be readily monitored. Penalties should be imposed for infringement of these rules
- rules should require that seat prices, including concessions, should be displayed at all points of sale and within football grounds. Concession schemes should be simplified, presented consistently at club level, and it should be clear which are applied equally to home and away supporters
- the Football League and the Football Association should review, co-ordinate and consistently apply their refund policies for matches they host.

The FA's Financial Advisory Unit

The IFC found that the concept of the unit is soundly based; that it is professionally staffed; that it is clear about its advisory purpose; that it has conducted wide-ranging examinations of financial practice at Football League clubs and those in the Football Conference and feeder leagues, and has offered relevant guidance on improving financial management. From the evidence received, the IFC has concluded that the FAU has been of significant benefit in raising awareness and standards at small clubs, and that over time it should lead to considerable improvements in the financial management of clubs, especially in the lower leagues where inevitably there is less expertise. The FAU has monitored no Premier League clubs, arguing that it intended to await the introduction of UEFA licensing in 2004. Responsibility for preparing clubs for UEFA licensing has been delegated to the FAU. The IFC is concerned that the present five-year cycle for visiting clubs may be too long and feels that, overall, the monitoring of financial practice could be improved by a more explicit set of aims for the FAU and a more effective reporting structure.

The IFC's main recommendations are that:

- explicit aims should be set out for the FAU's work, against which progress could be judged
- the FAU should produce an annual report and there should be a clear reporting line from the FAU to a properly constituted Advisory and Compliance Committee or similar body
- consideration should be given to classifying the clubs according to financial strength, and visiting the weaker ones more frequently.

¹A National Football Fan Survey on Customer Charters, Ticketing, and Travelling Away, conducted by the Sir Norman Chester Centre for Football Research at the University of Leicester, for the Independent Football Commission

²These rules principally require the home club:
to reserve 3,000 tickets (2,000 in case of the FL) or 10% of its ground capacity if that is less than 30,000 (20,000 in the case of the FL) for visiting supporters;
not charge visiting supporters admission prices that are higher than those for home supporters in comparable accommodation;
to extend certain concessions to visiting supporters.
The full text of the rules is given in the IFC Annual Report.



WIDER ISSUES AND ONGOING WORK

In addition to its work in the four areas discussed above, the IFC has given attention to a number of other issues on which it has conducted preliminary fieldwork. It will continue to seek dialogue with the football authorities on these, to recommend action, and to investigate other issues brought to its attention.

• **Merchandising.** Spot checks and other research by the IFC show that club practice is uneven throughout the FA Premier League and Football League in identifying the expected lifespan of replica kits. **The IFC recommends that the requirement to attach swing tickets to replica kits advising the launch date be extended to include the expiry date where this does not already happen; and that this information should also be displayed at all sales points, including franchised outlets and internet sites.** The investigation by the Office of Fair Trading into price fixing, and public wrangling over the FA's role in relation to England merchandise, will keep the issue in the public arena and merit urgent review by the FA.

• **Rescheduling of matches.** The IFC has taken note that this is a grievance often voiced by supporters, who see the demands of television contracts as the principal driver behind rescheduling. The demands of European competitions, affected by league match schedules that follow a different pattern from those in England, can also be a major displacer, particularly in the run-up to the end of the season - when various cup matches and replays can also make a heavy impact. The IFC will give this issue further attention in 2003.

• **Football in the community.** The IFC has encountered some excellent initiatives within the Community Programme in Professional Football. Assessment of impact and outcomes is patchy, however, and **the IFC recommends that the introduction of formal evaluation should be explored.** The IFC believes that there is a case for the football authorities to exert greater influence over clubs' relations with immediate neighbourhoods affected by club activities but whose concerns are generally not encompassed by football's formal community programmes.

• **Racism.** Action taken to combat racism in football has been impressive and demonstrably effective at matches in England. Signs that racism remains a problem in Europe surfaced at the end of 2002, how-

ever. Additionally, research and issues brought to the IFC's attention demonstrate that much remains to be done to encourage the involvement of ethnic minorities at all levels of the game. In 2003 the IFC will be examining the effectiveness of current policies. Given the potential for football to influence attitudes, **the IFC recommends that the FA commitment to take a lead in positive action against racism is publicly stated in its charter, with specific targets at domestic and European levels.**

• **Clubs in crisis.** The IFC has begun a series of case studies on clubs in, or going into, administration, to examine how the football authorities respond to clubs in serious financial difficulties, and to assess whether they exercise their powers and responsibilities effectively to pre-empt crisis. This work will carry forward into 2003 and will include an assessment of the adequacy of existing rules and regulations. The IFC looks forward to the full co-operation of the governing bodies in this exercise.

• **Governance.** As the IFC's work developed during the year, the Commission became increasingly aware of numerous questions and concerns about the governance of football clubs. It understands that the FA has begun to explore steps that might be taken to apply "fit and proper person" criteria to the appointment of football club directors and senior executive posts, and whether existing rules adequately protect club assets. The IFC will examine the FA's position on these and related issues in 2003.

• **Compliance.** The IFC understands that the FA has established a compliance unit. The IFC believes that how the FA handles compliance may become fundamental to the perceived image and reputation of football and therefore intends to examine this very important matter, including the remit and role of the new compliance unit, early in 2003.

• **Effectiveness of the governing bodies.** The IFC's experience is that the football authorities, as bodies responsible for managing the football business, are not greatly valued by supporters and other stakeholders. The IFC expects the football authorities to take urgent steps to enhance public understanding of their roles and to improve perceptions of their image, and will take a close interest in the results.

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