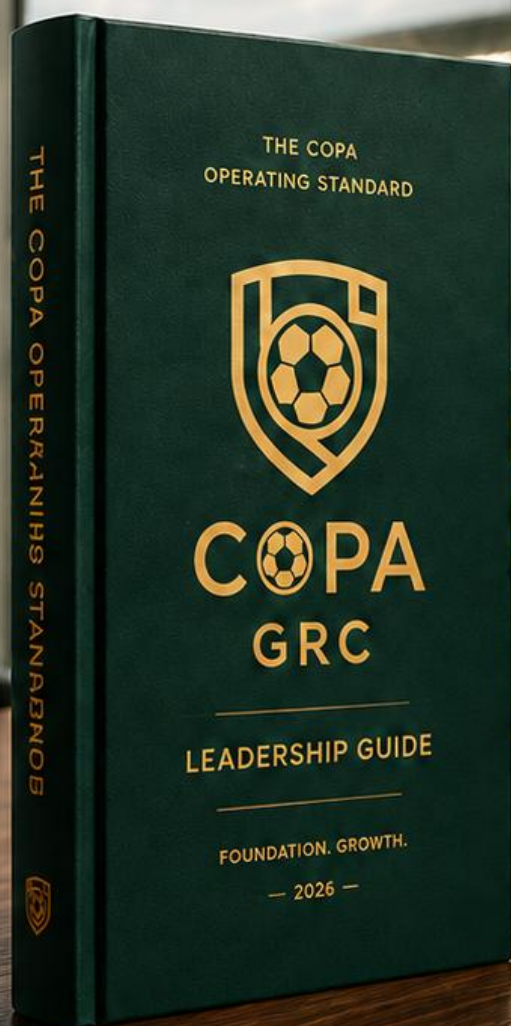




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# THE COPA OPERATING STANDARD

## LEADERSHIP GUIDE

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Building Better Football Clubs  
in a Regulated Environment

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A practical leadership guide to stronger governance, risk and compliance capability in professional football clubs.

**BETTER OPERATING CAPABILITY BUILDS BETTER FOOTBALL CLUBS.**

[copagrc.co.uk](http://copagrc.co.uk)



## 1.0 FOREWORD

# Why I believe this matters for football clubs

I spent most of my career working in heavily regulated environments, where governance, risk and compliance were simply part of how organisations had to operate. When I started looking closely at the arrival of statutory regulation in English football, my first instinct was naturally to consider what clubs would need to do to meet the new requirements.

The more I learned about football, spoke to people across the game and considered what the new environment could mean in practice, the more convinced I became that compliance on its own is too narrow an answer.

Football clubs already deal with enormous complexity. Sporting ambition, financial pressure, ownership, supporters, people, infrastructure and commercial priorities all compete for leadership attention. Regulation now becomes another important part of that environment, but it should not become a separate exercise disconnected from how the club operates.

There is a bigger opportunity here: to use this moment to strengthen the way the club is run.

That will look different from club to club. Some already have well-developed governance, financial controls and specialist support. Others operate with smaller teams, people covering several roles and greater reliance on individual knowledge. Most will have things they do very well and areas that could be better connected or more reliable.

The purpose of this Standard is to help clubs think about what good GRC capability could look like for them, without importing unnecessary complexity from other regulated sectors.

For me, the real value is much wider than meeting regulatory requirements, while recognising that the arrival of statutory regulation is itself a major change that deserves timely attention. If leadership has a clearer view of what the club is trying to achieve, the risks and opportunities around those objectives, who owns important responsibilities and where attention is needed, it is better placed to make good decisions and pursue its ambitions.

That matters whether a regulator is asking a question or not.

I hope this Leadership Guide gives owners, directors and executives a useful way to think about their club. If it helps make regulation more manageable, prompts a better leadership conversation or identifies something that could work more effectively, then it has served its purpose.

### THE AIM

Better football clubs, able to pursue their ambitions and operate confidently in a regulated environment.

## Rishi Gajree

Founder, COPA | Director, The GRC Group



## 2.0 ABOUT THIS LEADERSHIP GUIDE

### A practical guide for club leadership

The COPA Operating Standard considers what good governance, risk and compliance capability can look like within a professional football club.

This Leadership Guide is the main practical guide to the Standard. It is written primarily for owners, Boards and executive teams who want to understand the thinking and consider what it means for their club.

For many readers, this document should be enough.

The separate 'Standard Overview' provides a short introduction. The Full Operating Standard is there when more depth is useful, for example to explore a particular area, develop the club's GRC arrangements or support leadership through significant change or closer regulatory scrutiny.

Its 13 chapters are not a programme to work through in sequence. They examine different parts of one connected operating model and can be used as a reference according to the club's circumstances.

| STANDARD OVERVIEW  | LEADERSHIP GUIDE                   | FULL OPERATING STANDARD      |
|--------------------|------------------------------------|------------------------------|
| Quick introduction | Primary practical leadership guide | Detailed reference framework |

The Standard is developed and published by The GRC Group. It is independent of, and not endorsed by, the Independent Football Regulator. It is not official regulatory guidance, a compliance checklist or a prescribed organisational structure.

#### DIFFERENT STARTING POSITIONS

The purpose is to understand what already works, connect the capability the club has and strengthen what needs to work better.

## 3.0 THE NEW OPERATING ENVIRONMENT

### Regulation is the catalyst

The Football Governance Act 2025 and the creation of the Independent Football Regulator bring statutory licensing, continuing supervision and a different level of regulatory accountability into professional football.

Clubs already operate within general law, football rules and competition requirements. What changes is the expectation that they can show, on a continuing basis, who is responsible, how important matters are managed, how significant decisions are made and how leadership knows that key responsibilities are being met. That will be tested through the IFR's licensing regime and ongoing supervision.

Clubs will meet that change from different starting positions. Some already have established governance, risk and compliance capability, specialist teams and mature routines. Others operate with leaner structures, overlapping roles and greater reliance on individual knowledge or external support. All will face their own mix of sporting, financial, ownership, people and operational pressures.

Many clubs are already well run, and good capability is already present across the game. The question is whether that capability is sufficiently connected and dependable for the club's circumstances and its new regulatory relationship.

Pressure can arise when important responsibilities rely too heavily on individuals, information is difficult to bring together or an issue only becomes visible when a deadline, incident or external request forces attention.



When that happens, the club feels the effect as well as the regulator. Leaders spend time chasing information, work is repeated, decisions can be taken without the full picture and evidence has to be pieced together afterwards. If weaknesses persist, the consequences can become more serious.

The response will not be identical from club to club. Larger or more complex clubs may already have dedicated risk or compliance capability, while others may coordinate it through existing roles and targeted external support. What matters is that regulatory responsibilities connect into the way the club is run, rather than becoming an isolated exercise.

#### CLUB REALITY

Clubs will face different pressures, capacities and starting positions. The model needs to work for the club as it actually operates.

#### THE OPPORTUNITY

Regulation provides the immediate reason to look at GRC capability. The wider opportunity is to make the club itself stronger.

## 4.0 THE VALUE

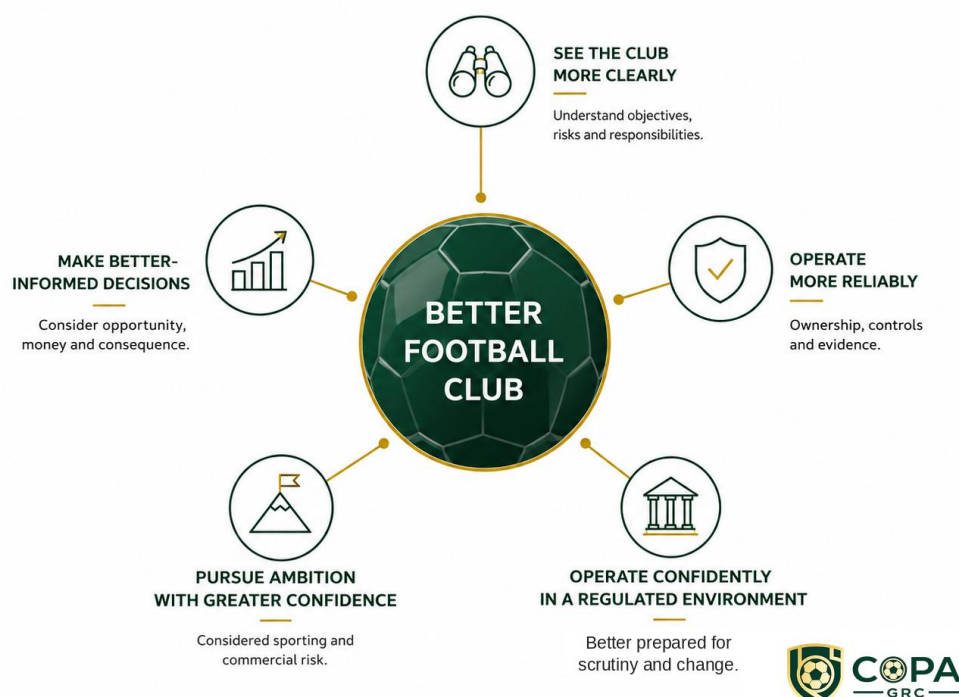
### Better operating capability builds better football clubs

Governance, risk and compliance should help the people running the club understand what they are trying to achieve, what could affect those objectives, who owns important responsibilities and where action is needed.

The practical benefits go much wider than compliance. Better-connected GRC can give leadership a clearer view of the club, improve significant decisions, make important activity more reliable and support sporting and commercial ambition from a stronger foundation.

In practice, that can mean less time chasing information, earlier visibility of problems, clearer accountability and stronger continuity when people or circumstances change. It should help leadership spend more time managing what matters and less time reconstructing what has happened.

FIGURE ES.1 | THE VALUE OF GOOD GRC CAPABILITY







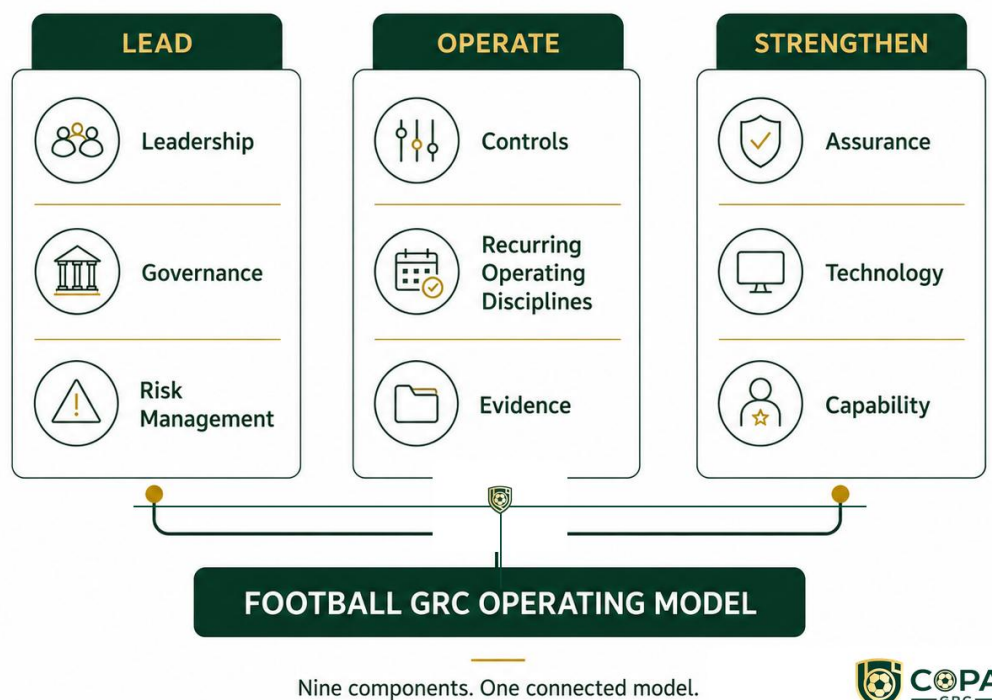
## 5.0 THE MODEL

### The Football GRC Operating Model

A football club may already have many of the things it needs to govern well, manage risk and meet its compliance responsibilities. The difficulty is that they may sit with different people, systems and ways of working.

The Football GRC Operating Model brings them together. The nine components do not require nine departments. What matters is that the capability exists, responsibilities are understood and the different parts work together well enough for leadership to understand how the club is operating.

FIGURE ES.2 | THE FOOTBALL GRC OPERATING MODEL



## 6.0 OPERATING THE MODEL

### Making the model work

A Football GRC Operating Model only becomes useful when it is part of the way the club actually operates.

Most clubs already have many of the routines needed. Boards meet, executives review performance, finance teams forecast and report, significant decisions are approved, supporters are engaged and regulatory responsibilities are managed. The starting point should usually be to make better use of those arrangements rather than automatically adding new meetings or layers of process.

Important responsibilities need clear ownership and enough structure to make sure they happen reliably. People should understand what they are responsible for, when something needs to happen, what evidence should exist and when an issue needs to be raised. The frequency will depend on the activity and the level of risk.



### IN PRACTICE: A KEY EXECUTIVE LEAVES

Leadership needs to know what that person owned, which deadlines or decisions are approaching, where the relevant information sits and who takes responsibility in the meantime. Where that knowledge already belongs to the club rather than mainly to the individual, the transition is much easier to manage.

Culture matters just as much as process. Controls will only take the club so far if people are reluctant to challenge an assumption, raise a concern or say when something has not worked. Leadership sets the tone, and people need to know how to raise issues constructively and early. People, culture and EDI should form part of normal leadership and management, not sit separately from the way the club operates.

Evidence should also come naturally from the work. An approval should leave a record. A control should show that it happened. A significant decision should capture enough of the reasoning and challenge to explain what leadership considered at the time.

### PRACTICAL TEST

For any important responsibility, does the club know who owns it, what needs to happen, how leadership knows it has happened and what follows if something goes wrong?

## 7.0 PROPORTIONALITY

### Clubs start from different positions

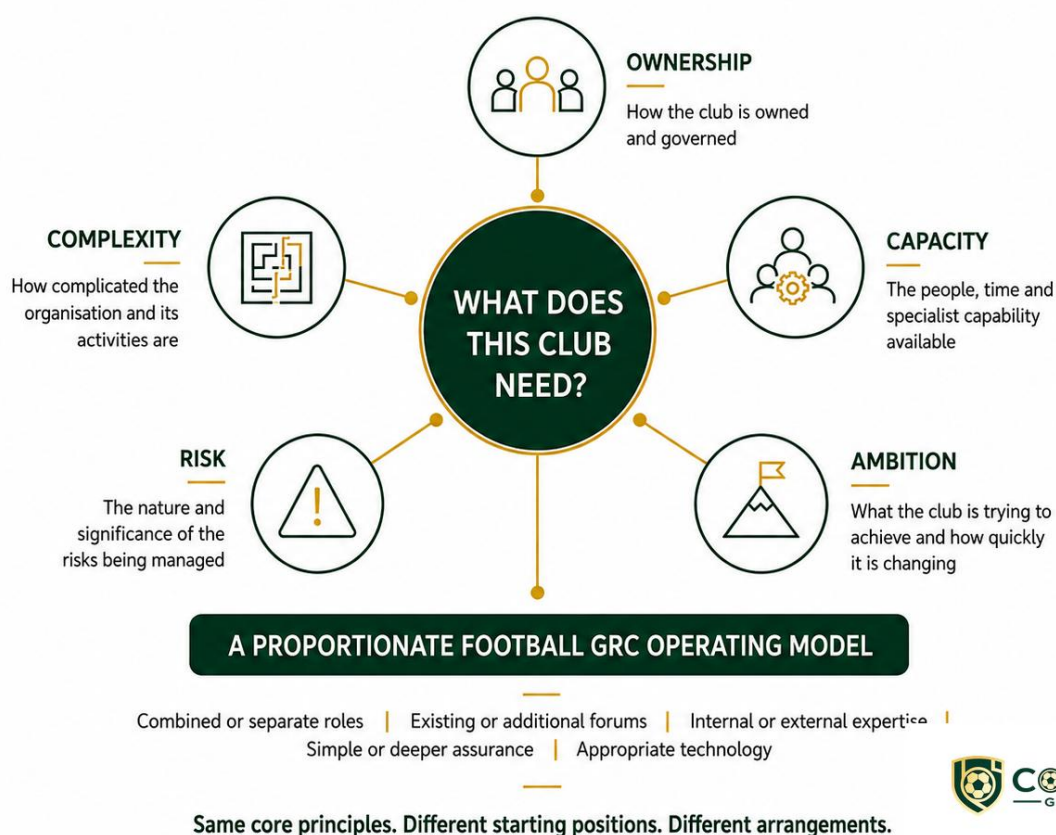
There is no single version of good GRC that every football club should copy. Clubs start from different positions, and most will have a mixture of strong capability, informal practices and areas that could work better.

Proportionality is about having enough capability for the club's circumstances without creating arrangements that are unnecessarily complicated or difficult to sustain.

Ownership, financial position, organisational complexity, capacity, risk and ambition all matter. A smaller club may sensibly combine roles and use targeted external support; a larger or more complex club may need dedicated capability, clearer separation of responsibilities and deeper assurance. Neither is automatically better. The test is whether the arrangement is sufficient for the club and works reliably in practice.



FIGURE ES.3 | THE PROPORTIONALITY OF GOOD GRC CAPABILITY

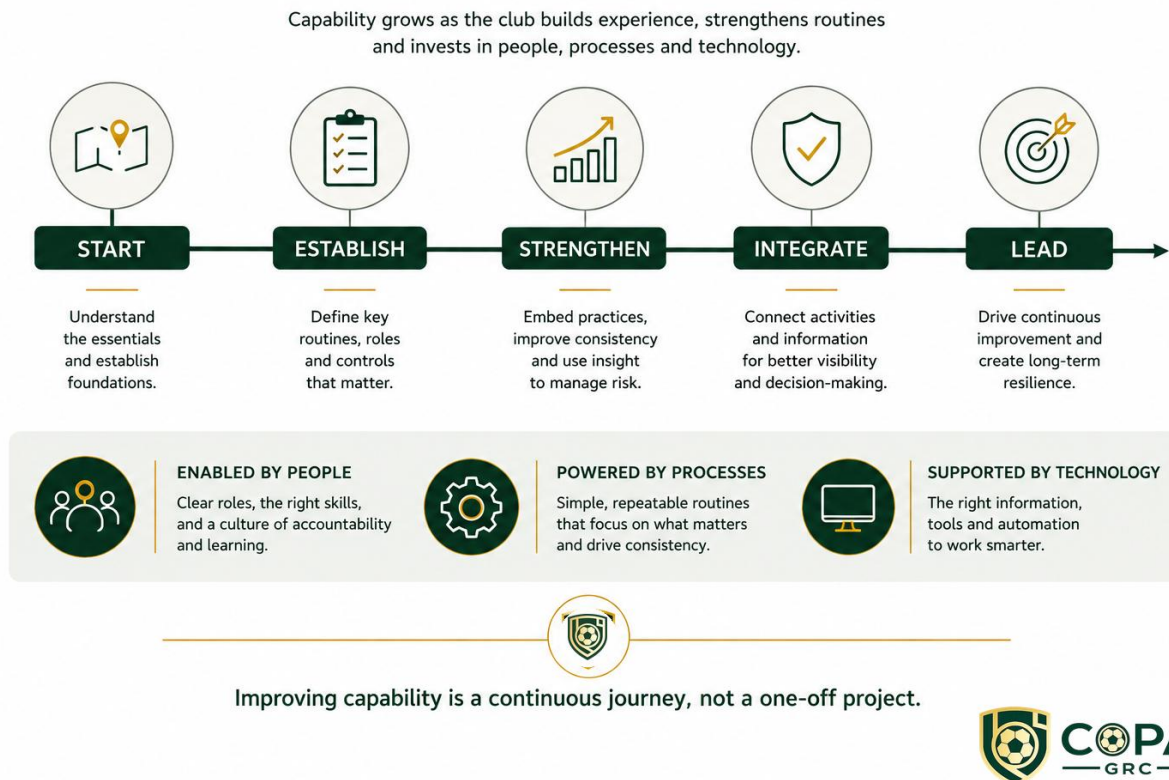


## 8.0 DEVELOPMENT

### Capability develops over time

Stronger GRC capability is not created simply by approving a framework, introducing technology or completing a project. It becomes dependable through use.

The stages below are useful because they help leadership think about development. They are not labels for clubs and they are not a league table. Progress will rarely be even: a club may be strong in one area and less mature in another, and capability can weaken when key people leave or circumstances change. The useful question is not which label applies to the club, but what needs to become more dependable next.


**FIGURE ES.4 | CAPABILITY DEVELOPS OVER TIME**


## 9.0 DECISION QUALITY

### Better decisions, better clubs

Football clubs make difficult decisions all the time. Player investment, senior appointments, borrowing, ownership change, infrastructure and major commercial commitments can shape the club for years.

Good GRC does not make those decisions. It helps leadership make them with a clearer understanding of the opportunity, the assumptions behind it, the club's financial capacity, the principal risks and what happens if events do not unfold as expected.

#### FOOTBALL IN PRACTICE: FIRST-TEAM INVESTMENT

Say the club wants to make extra first-team investment to push for promotion. The football case may be strong, but leadership still needs to know whether the club can carry the cost if promotion does not happen, what assumptions sit behind the plan and what else that spend may limit. GRC does not pick the player or set the ambition. It helps the club understand the commitment it is making.




**FIGURE ES.5 | A BETTER-INFORMED DECISION**

Leadership should bring these together around any significant decision.



Good GRC does not make the decision.  
It gives leadership a clearer basis on which to make it.



## 10.0 REGULATORY CONFIDENCE

### Confidence is built through normal operation

Regulatory confidence describes the extent to which leadership, the regulator and other stakeholders can rely on the club to understand its responsibilities and manage them consistently.

It develops through the way the club operates over time, not through producing a good answer when a question arrives. Clear ownership, reliable information, effective controls and accessible evidence all matter. So does the way the club responds when something goes wrong.

No club will operate without mistakes, weaknesses or difficult judgements. The better test is whether problems are identified, understood, raised to the right people and followed through properly. That also depends on culture. Leadership needs to be able to hear bad news early, and people need to feel able to raise concerns before they become larger problems.

Good GRC does not create immunity from regulatory challenge, enforcement or sanctions, and it cannot guarantee a particular outcome. It can put the club in a stronger position to establish the facts, explain how it operates and demonstrate how weaknesses are being addressed.

#### WHAT LEADERSHIP SHOULD BE ABLE TO RELY ON

Clear ownership. Reliable information. Important controls operating as expected. Evidence that can be produced without a major exercise. Issues identified and escalated early enough to act.

The first beneficiary should be the club itself. If the Board and executive team cannot form a reliable view of important responsibilities, risks, controls and issues, it will be difficult to give confidence to anyone outside the organisation.



### IMPORTANT BOUNDARY

Within the Standard, regulatory confidence is a COPA operating concept. It is not an official IFR status, safe harbour or regulatory rating.

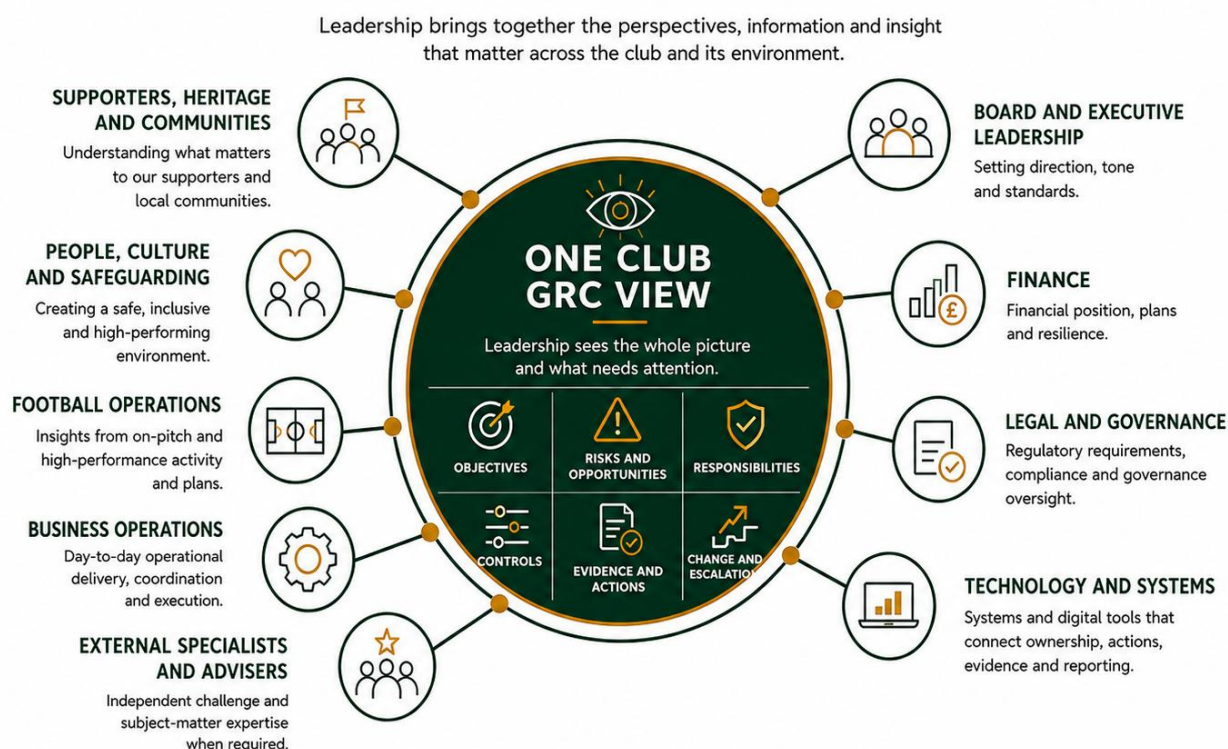
## 11.0 WHOLE-CLUB VISIBILITY

### One connected Club GRC view

Important information inside a football club does not always arrive as one coherent picture. Each area can be well managed while leadership still has to join the pieces together.

A connected Club GRC view should make that easier. It gives leadership enough visibility to understand where objectives, risks, responsibilities, controls, evidence, actions and change connect across the club.

**FIGURE ES.6 | ONE CONNECTED CLUB GRC VIEW**



**Different parts of the club. One clear view for leadership.**

The aim is visibility and connection, not centralising every responsibility.



## 12.0 STEWARDSHIP

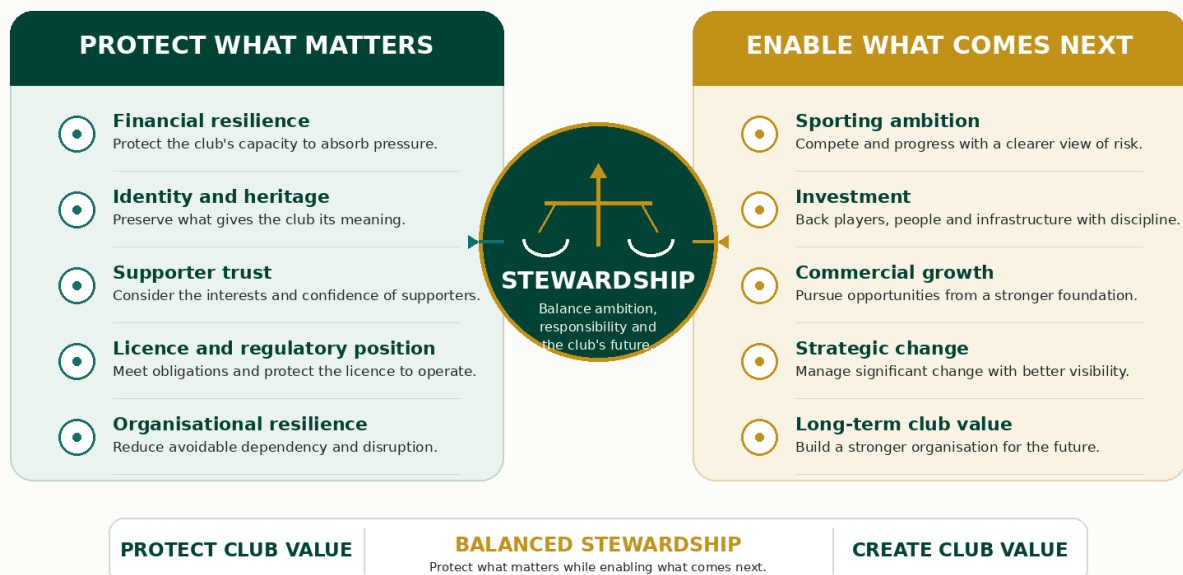
### Stewardship, ambition and club value

A football club needs to compete, invest and grow, but it also carries history, identity and meaning that extend beyond the people running it at any one time. That makes stewardship a practical leadership responsibility.

Good stewardship means pursuing ambition with an understanding of the club's longer-term position. Sporting objectives, financial sustainability, supporter interests, staff, communities, heritage, organisational resilience and regulatory responsibilities can all come together in significant decisions. This is not only about protecting the club from downside. Better stewardship can preserve trust, strengthen resilience and leave leadership with more room to invest, adapt and pursue opportunities over time. The aim is to protect what matters while creating what the club needs next.

#### FIGURE ES.7 | STEWARDSHIP, AMBITION AND CLUB VALUE

Stewardship means protecting what must endure while creating what the club needs next.





## 13.0 PRACTICAL START

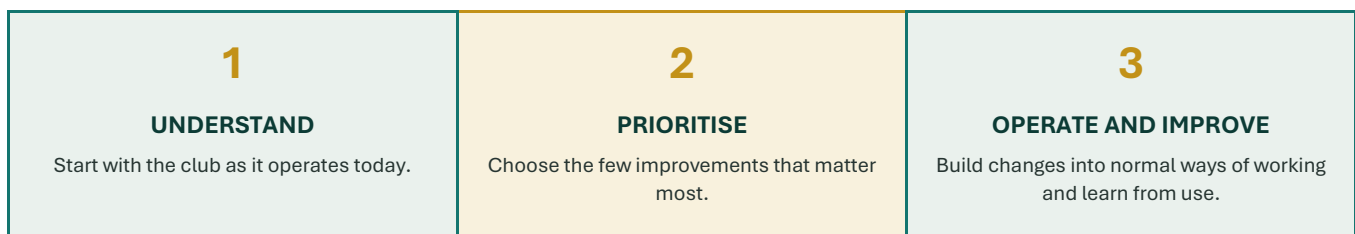
### Where to start

A club does not need to redesign everything at once.

The most useful starting point is to understand how the club operates today.

- **What already works?**
- **Where are responsibilities clear?**
- **Where does leadership have confidence?**
- **Where is the organisation overly dependent on individuals, manual coordination or arrangements that have simply grown over time?**

From there, leadership can decide what matters most. For one club the priority may be regulatory readiness or clearer ownership. For another it may be financial resilience, Board information, evidence, key controls or reducing dependence on particular people.



There is little value in producing a long improvement list that the club does not have the capacity to deliver. A smaller number of changes, properly owned and built into existing ways of working, will usually achieve more.

Implementation is only part of the job. New controls, responsibilities or systems become useful when people use them, leadership challenges them and the club learns from experience. The model also needs to change when the club changes.

#### A SENSIBLE STARTING QUESTION

What are the two or three things that, if they worked better, would make the biggest practical difference to this club now?



## 14.0 LEADERSHIP DISCUSSION

### Ten questions for club leadership

These questions are intended to support a Board or executive discussion. They are not an IFR readiness assessment or compliance score.

#### FIGURE ES.8 TEN QUESTIONS FOR CLUB LEADERSHIP

These questions support a Board or executive discussion. They are not an IFR readiness assessment or compliance score.

##### OWNERSHIP AND VISIBILITY

- 1 Can we explain clearly who owns our most important governance, risk and compliance responsibilities?
- 2 Does leadership have a clear enough view of the principal risks, controls, commitments, actions and issues across the club?
- 3 Where do we depend heavily on individual knowledge, memory or intervention?

##### DECISIONS AND OPERATION

- 4 When we make a significant decision, do we bring together the opportunity, financial capacity, key risks and possible consequences?
- 5 Are important controls and reviews happening reliably through the way the club normally operates?
- 6 Can we produce the evidence we need without reconstructing what happened afterwards?

##### RESILIENCE AND PROPORTIONALITY

- 7 Do concerns and emerging problems reach the right people early enough to act?
- 8 Are our arrangements proportionate to this club's ownership, resources, complexity, risks and ambitions?
- 9 Would important parts of the model continue to work if a key individual or adviser changed tomorrow?

##### WHAT NEXT?

- 10 Which two or three improvements would make the biggest practical difference now?

#### Uncertainty is useful if it starts the right conversation.

The aim is to see where leadership already has confidence and where greater clarity or reliability would help.







## 15.0 ABOUT THE STANDARD

### Status, review and independence

The COPA Operating Standard has been developed and published by The GRC Group as a practical framework to help professional football clubs.

It draws on more than 25 years of executive governance, risk and compliance experience in mature regulated sectors, adapted for football through regulatory analysis, football-sector research, stakeholder discussion and multidisciplinary challenge.

The Full Standard provides the complete 13-chapter reference framework, including the underlying reasoning, operating principles, maturity approach, decision-making, operating effectiveness, stewardship, methodology and sources.

The Foundational Edition has been through independent multidisciplinary review.

The COPA Operating Standard is independent of, and not endorsed by, the Independent Football Regulator or football authorities. It is not statutory or regulatory guidance and does not replace current legislation, IFR requirements, football and competition rules or appropriate specialist advice.

Clubs remain responsible for their own governance, decisions, regulatory submissions and compliance.

COPA GRC is The GRC Group's separate commercial proposition for clubs that choose external support in applying or strengthening the capability described. Clubs do not need to use COPA, its technology or its services to use the Standard.

#### FOUNDATIONAL EDITION 2026

Better operating capability builds better football clubs and helps them operate confidently in a regulated environment.