



A New Era for Football Governance

Part 1: Football Governance Act 2025



Football Governance Act 2025

2025 CHAPTER 21

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The Arrival of the Independent Football Regulator

One of the privileges of working as an independent consultant is having the opportunity to explore subjects that sit somewhere between professional curiosity and personal passion.

Over the past few months, mine has been football governance.

Most football supporters spend their time debating referees, transfers and tactics — as I do most weekends. I have also been doing something slightly less glamorous: reading regulatory statutes.

With the **Football Governance Act 2025 and the establishment of the Independent Football Regulator (IFR)**, English football has entered a new chapter. For the first time, a statutory regulator will oversee the governance and financial sustainability of clubs, while also bringing formal oversight to the competition organisers that shape the professional game.

That is a significant moment. It reflects a growing recognition that football clubs are not only sporting organisations, but also civic and financial institutions with responsibilities that extend far beyond the pitch.

The challenge now moves from legislation to implementation. What will this mean in practice for clubs, regulators and the wider football community?

→ Football Governance Act

The Football Governance Act introduces a new regulatory framework designed to **strengthen the sustainability and governance of English football**.

At its core, the framework introduces:

- A statutory regulator for the professional game
- A **licensing regime for clubs** in scope of the new regulatory framework
- **Ownership and officer suitability assessments**
- Oversight of **financial sustainability** and risk
- Measures to **protect club heritage and safeguard** the interests of fans and communities
- New powers of supervision, investigation and enforcement

The legislation sets out the architecture of the regime; its practical implications are now beginning to take shape as the IFR develops its supervisory approach.

One point already seems clear: football governance has often operated behind closed doors. The IFR will bring it into the regulatory daylight.

The New Football Governance Framework

Football Governance Act 2025

Independent Football Regulator

Key Regulatory Pillars

- 🏆 Club Licensing
- 📋 Ownership & Officer Suitability
- 📈 Financial Sustainability
- 🛡️ Heritage Protection
- 🔍 Investigations & Enforcement

→ Initial Reflections

A few early observations stand out from reading the legislation and the materials published by the IFR so far.

- The regime focuses heavily on **financial sustainability**, both at the club level and across the football system.
- Governance responsibility sits squarely with **club owners, boards and senior officers**.
- The regulator appears designed to operate with **proportionality and pragmatism**, recognising the unique ecosystem of football.
- Many clubs may find that compliance is less about agreeing with the principles and more about building the governance capability required to demonstrate them.

As with most regulatory frameworks, the true impact will ultimately depend on how the regime is implemented in practice.

⚽ Checklist A: Football Club Officers

For club boards and senior executives, a few questions may already be worth considering.

Governance and oversight

- Does the club have a clearly defined governance structure?
- Are board members confident they understand the new regulatory expectations?

Ownership and leadership

- Are ownership structures and senior management responsibilities clearly documented?
- Could the club demonstrate governance accountability if required?

Financial sustainability

- Is the club able to clearly articulate how its financial model supports long-term stability?

Regulatory engagement

- Who within the club will be responsible for managing the relationship with the regulator?

📊 Checklist B: Risk & Compliance Professionals

For governance professionals and regulators observing the regime, a different set of questions may emerge.

- How mature are governance frameworks across the football pyramid?
- How will proportional regulation operate between large Premier League clubs and smaller clubs lower down the pyramid?
- What governance capabilities will clubs need to develop over time?
- How will the regulator balance oversight with the competitive and cultural realities of football?

What the New Regime Means for Football Clubs

At the centre of the new framework sits a simple requirement: **clubs participating in regulated competitions must obtain and maintain an operating licence from the Independent Football Regulator**, with the pilot phase and initial rollout expected during the 2026/27 season.

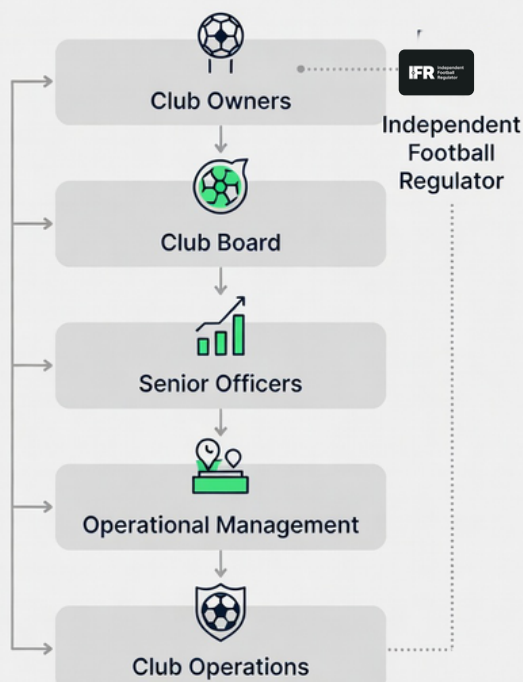
Licensing regimes are not unusual in regulated industries. They are used in sectors such as financial services, utilities and aviation.

What is unusual is their arrival in professional football. For many clubs, this will represent a shift in mindset.

Football governance has historically been shaped by league rules, financial guardrails (i.e., PSR) and internal governance structures. The IFR introduces something different, a statutory regulatory model with formal supervisory powers.

This is not simply another compliance requirement. It represents a **structural change in how football governance operates**.

Governance Structure for a Regulated Football Club



→ Governance Accountability

One area likely to attract particular attention is the role of club owners and officers, an area already subject to scrutiny by competition organisers.

Under the legislation, **individuals seeking to become owners or officers of a regulated club must satisfy IFR suitability criteria**, including requirements relating to integrity, competence and financial soundness under the **Owners, Directors & Senior Executives (ODSE) regime**.

This approach mirrors governance models seen in other regulated sectors.

In practice, this means:

- club leadership decisions may receive greater scrutiny
- ownership changes will likely involve regulatory engagement
- governance documentation will become increasingly important

For some clubs with mature governance frameworks, these developments may feel relatively familiar.

For others, they may represent a period of adjustment.

→ Financial Sustainability

Another central theme of the legislation is financial sustainability.

The **IFR's objectives include protecting the financial soundness of clubs and promoting the financial resilience of English football** as a whole. This is a response to a reality that many football supporters know well.

The Act also introduces a statutory backstop mechanism designed to resolve disputes over revenue distribution between competition organisers where agreement cannot otherwise be reached.

Over the past two decades, football has experienced extraordinary growth, but also a number of financial crises, ownership disputes and club failures.

The regulator's role is not to manage football finances directly.

Rather, it is to ensure that clubs operate within governance frameworks capable of sustaining the long-term health of the game.

→ The "Monday Morning" Test

For a club board sitting down on Monday morning, the IFR regime raises a few practical questions.

- Do we fully understand the expectations of the new licensing regime?
- Who within the organisation is responsible for governance and regulatory engagement?
- Do we have the internal capability to demonstrate compliance if required?

The answers will likely vary significantly across the football pyramid.

But the direction of travel is becoming clear.

Governance capability may increasingly become part of the competitive landscape of football.



Reflections for Risk & Compliance Professionals

For governance and risk professionals, the IFR regime represents a fascinating regulatory experiment.

Football has long operated in a hybrid environment where sporting regulation, commercial pressures and public interest intersect.

The creation of a statutory regulator introduces a new dimension: formal regulatory supervision.

→ Regulatory Design

Several features of the legislation stand out from a governance perspective.

First, the regulator has been designed with **clearly defined statutory objectives**, including financial soundness and the protection of football heritage.

Second, the legislation emphasises **proportionality and regulatory principles**, suggesting that the IFR will seek to balance oversight with the realities of the football ecosystem.

Third, the framework provides the regulator with **investigatory, enforcement and sanctions powers**, including the ability to investigate potential infringements and impose sanctions where necessary.

These are hallmarks of modern regulatory regimes.

→ The Governance Maturity Gap

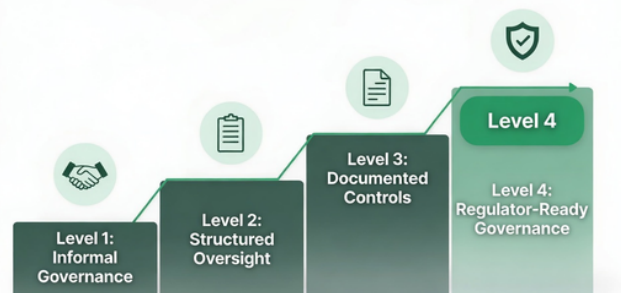
One of the more interesting questions for the coming years may be the **governance maturity gap across football clubs**.

Large clubs with sophisticated corporate structures may already operate governance models comparable to regulated industries.

Smaller clubs, however, often operate with lean management teams and limited governance infrastructure.

The challenge for the regulator will be ensuring that regulation remains proportionate while still advancing the broader objectives of sustainability and accountability.

Football Governance Maturity



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→ A Moment of Change for Football Governance

Football is an industry built on emotion, tradition and community identity.

Regulation, by contrast, is designed to introduce structure, accountability and transparency.

The arrival of the Independent Football Regulator represents the point where those two worlds formally meet. It will take time for the new framework to settle.

But one thing seems certain, English football is entering a new era of governance.

And the conversation about how the game should be governed has only just begun.

→ What I'll Be Exploring Next

Over the coming weeks I will be sharing further reflections on specific aspects of the new regulatory framework, including:

- The IFR Licensing Regime
- Ownership and Officer Suitability
- The IFR's Investigatory Powers
- Enforcement and Sanctions
- What “good governance” may come to mean for football clubs

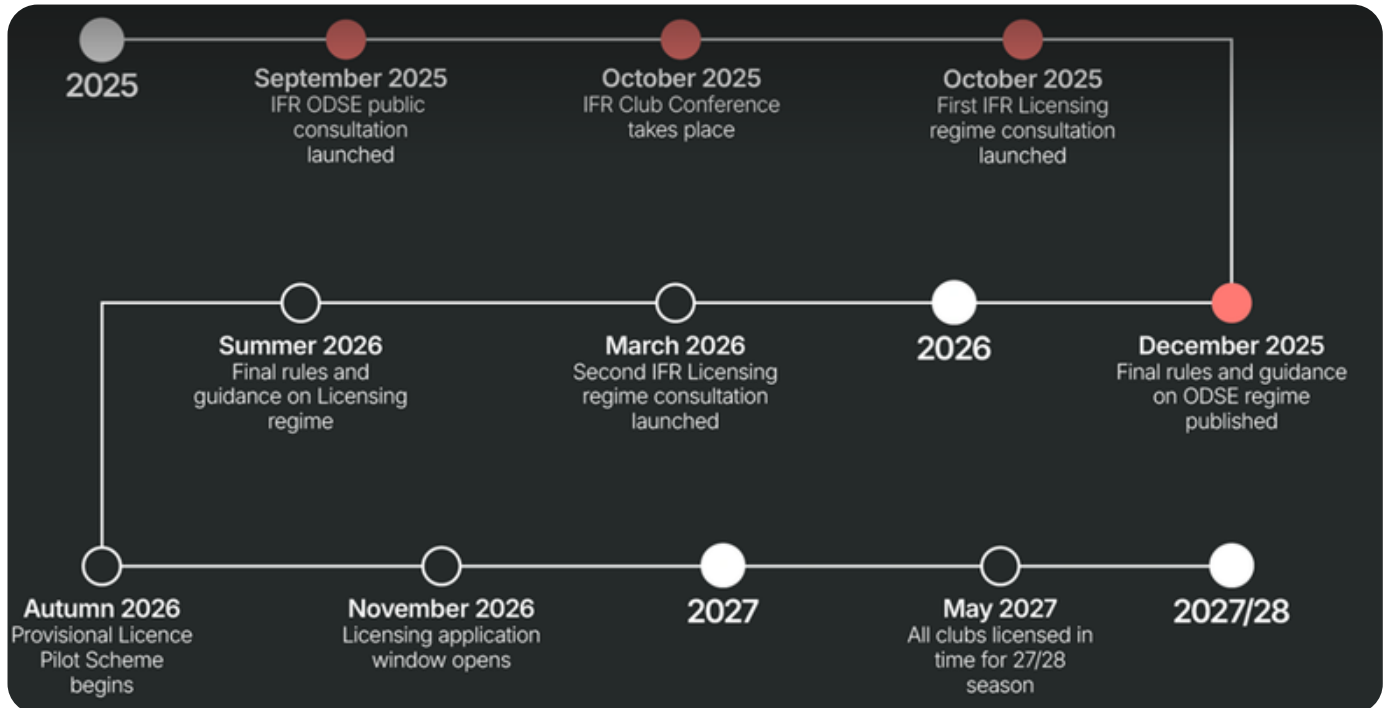
The real work of football governance has now begun.

Appendix: Implementation Timeline – The New Football Governance Regime



IFR Timeline

The introduction of the Independent Football Regulator framework will take place over several stages, moving from consultation and rulemaking through to full licensing across the professional game.



What This Timeline Signals for the Game

- The IFR regime will be implemented gradually, allowing clubs time to prepare for the new regulatory framework.
- Early phases focus on **consultation, guidance and pilot testing, before formal licensing begins.**
- Full licensing across the professional pyramid is expected ahead of the **2027/28 football season.**
- Once licences are issued, the IFR will operate as a **supervision-led regulator with ongoing engagement with clubs.**