



A New Era for Football Governance

Part 4: The IFR's Investigatory Powers

How supervision becomes evidence, intervention and consequence



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Why the IFR's Investigatory Powers Matter

The IFR is not only setting expectations for clubs. It is also establishing how it may **obtain information, test concerns** and **intervene** where necessary. That is one of the clearest signs that football is moving into a more formal supervisory environment.

→ A different kind of regulatory environment

For many clubs, investigatory powers may sound like something relevant only at the point of serious non-compliance.

But the IFR's own framework is broader than that. These powers help the regulator gather information it needs to carry out its functions and to investigate and address breaches where necessary.

→ The important distinction

The IFR's formal powers are not limited to full breach investigations.

The architecture includes **standalone powers** to **require specified information** and to **appoint an expert reporter** in relation to a regulated club.

That means formal scrutiny may arise well before any infringement is established.

These are standalone supervisory tools. The IFR's information-gathering powers can be used across its wider functions, including licensing and the ODSE regime, and a **formal information notice does not necessarily mean the regulator suspects non-compliance or is already considering enforcement action**.



→ Why this matters now

This changes the practical character of regulation in football. The regime is moving beyond expectation-setting alone and putting in place the evidence and intervention architecture that sits behind it.

Investigatory powers are not only about enforcement. They are part of what turns football governance into a supervised regulatory environment.

In simple terms: the significance is not just legal. It is operational.

How the Architecture Works in Practice

The IFR does not have a single investigatory lever. It has a **sequence of tools that may be used more informally at first, and more formally if concerns deepen or evidence is required.**

→ It may begin with a request

In practice, scrutiny may begin through routine engagement or an information request.

Where that is sufficient, the process may remain relatively light-touch. But if information is not fully forthcoming, or circumstances require it, the regulator can move to a formal request.

→ It can then become more formal

The formal architecture is broader than a single investigation power. It includes standalone information-gathering tools, expert review and, where relevant, enforcement investigation.



→ The progression matters

This is not a regime in which every concern immediately becomes a sanction issue.

The logic is progression: request, evidence, scrutiny, investigation, outcome. That matters because it shows how informal regulatory engagement can become formal scrutiny if concerns are not resolved.

Once that **threshold is crossed, the issue may also become public.** The IFR will publish investigation notices, warning notices, decision notices and closure notices, and in some cases may issue a warning notice at the same time as the investigation notice. That means formal scrutiny can carry an external reputational dimension before any final finding is reached.

This is a regulatory ladder: request, evidence, scrutiny, investigation, outcome.

→ Checklist A: Football Club Officers

- Would we know who owns an IFR information request?
- Could we pull together the right records quickly and accurately?
- Is there a clear internal escalation route if scrutiny becomes formal?

→ Checklist B: Risk & Compliance Professionals

- Where are the likely control weaknesses in record retrieval and response quality?
- How mature are governance logs, decision records and response protocols?
- Would the club's operating model withstand formal scrutiny if required?

What clubs should take from this

The real message for clubs is not simply that the IFR can investigate. It is that **clubs now need to be able to respond to scrutiny in a more disciplined, evidenced and coordinated way than before.**

→ The issue is readiness

For many clubs, the more immediate exposure may not be misconduct. It may be weak readiness.

Can the club retrieve information quickly? Is there clear ownership of regulatory engagement? Are governance papers, decision records and reporting lines coherent? Can senior people explain how decisions were reached?

That readiness extends beyond retrieval. Where a club knows or suspects that an IFR enforcement investigation is open or likely, relevant information must be preserved and routine deletion or destruction of relevant documents should be suspended. In practice, that brings document retention, record control and internal escalation into immediate focus.

→ Governance capability matters more

Good governance is no longer just about having policies, committees or formal structures. It is increasingly about whether the club can demonstrate how it operates in practice.

Nor is the formal route purely binary. In some cases, the IFR may accept commitments to address its concerns instead of proceeding straight to an infringement finding, but those commitments remain monitored and can trigger further action if breached or if the information relied upon was incomplete, false or misleading.



→ This is where the regime becomes more real

Taken together, the licensing regime, the ODSE framework and the IFR's investigatory architecture point in the same direction: a more supervised, more evidenced and more accountable regulatory environment for English football.

→ What comes next

Investigatory powers explain how the IFR may obtain information, test concerns and build an evidence base.

The next question is what follows if obligations are not met, failings are established, or cooperation breaks down. That takes the discussion into the IFR's sanctions powers — the next part of this series.

Investigatory powers explain how questions become evidence. Sanctions powers explain what may follow if issues are not resolved.

Appendix: IFR Investigatory Powers — Practical Snapshot

This appendix provides a simplified practical view of the IFR's investigatory architecture. It is designed to help readers understand, at a glance, the broad route from informal information requests through to more formal regulatory action.

It is not intended to suggest that every case will follow a linear path, nor that each step will arise in every situation. Rather, it illustrates the main tools available to the IFR, and how scrutiny may become progressively more formal where information is required, concerns deepen, or issues are not resolved.

