A New Era for Football Governance

Part 5:
Sanctions

When non-compliance becomes consequence

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2025 CHAPTER 21

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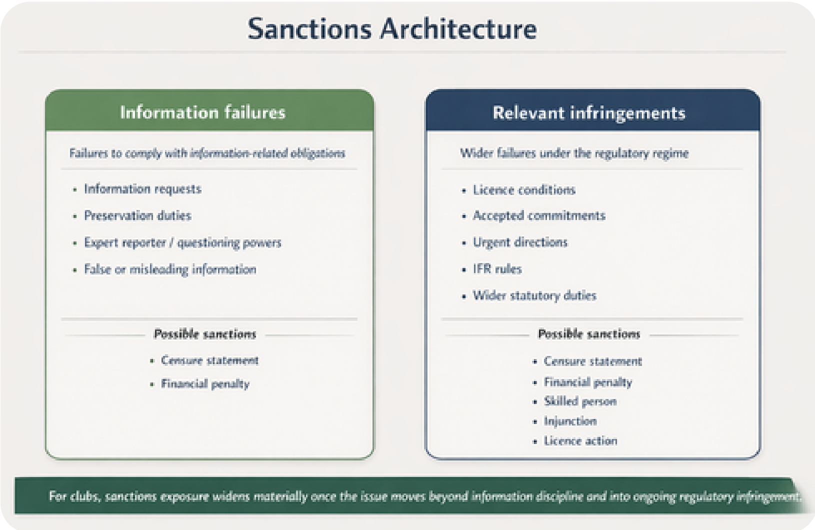
The IFR's Sanctions Framework

A cooperative regime — but with real enforcement power

The IFR's regime is not designed to be enforcement-first. Its guidance emphasises cooperation and early engagement, but it is equally clear that where clubs and other persons fail to comply, the regulator has a defined sanctions framework available to it.

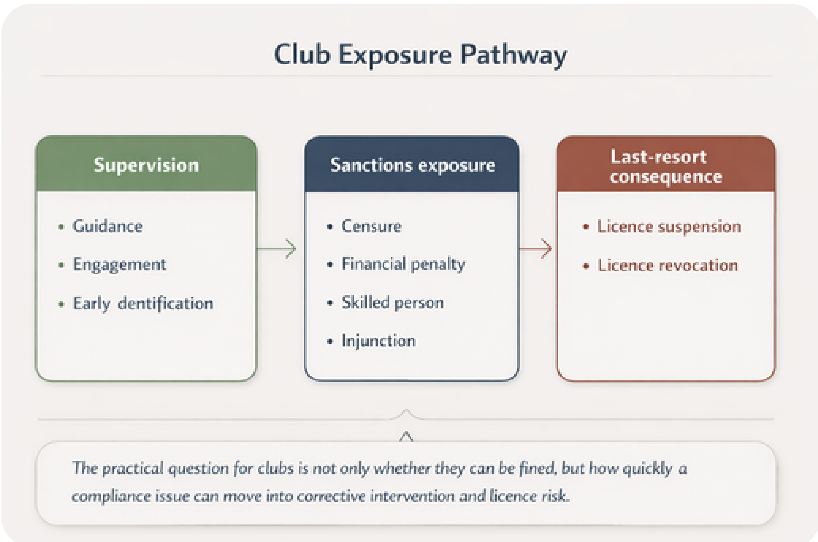
TThe sanctions framework operates across two categories: **information failures** and **relevant infringements**. Information failures such as weak record discipline, delay, incomplete responses or misleading information can attract censure and financial penalty. Relevant infringements can expose clubs and others to a broader sanctions toolkit.



Why this matters for clubs

For clubs, that matters particularly in the licensing context. Sanctions exposure can arise from failures around licence conditions, accepted commitments, urgent directions, certain ODSE-related requirements, and IFR rules.

The real issue is not simply whether a club can be fined, but how quickly supervision can become public censure, corrective intervention, court-backed action and, ultimately, licence consequences.



Checklist A: Football Club Officers

Do we know which failures could move us from supervision into sanctions?

Checklist B: Risk, Legal & Compliance Professionals

Are our records, escalation routes and response ownership strong enough to withstand formal scrutiny?

How the IFR decides sanction — and what fines may look like

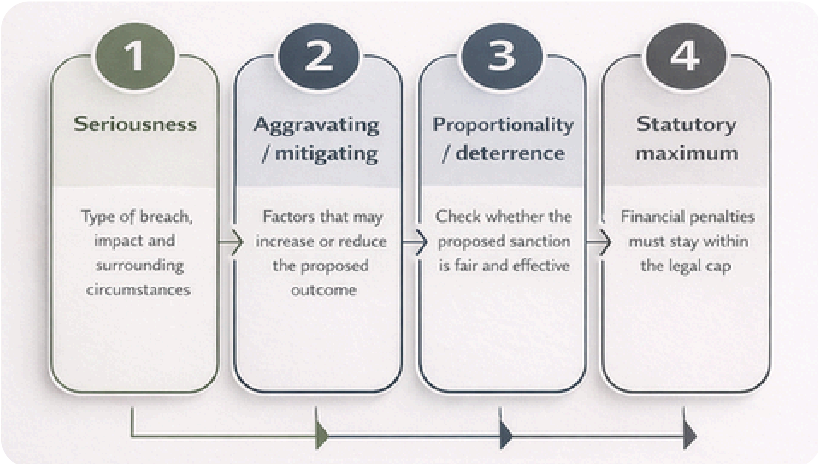
A structured approach

The IFR has not published a simple tariff card. It has set out a structured methodology for deciding both the type of sanction and, where relevant, the level of any financial penalty.

Four-step methodology

The IFR's approach works through four steps: seriousness, aggravating or mitigating factors, proportionality and deterrence, and finally the statutory maximum where a financial penalty is proposed.

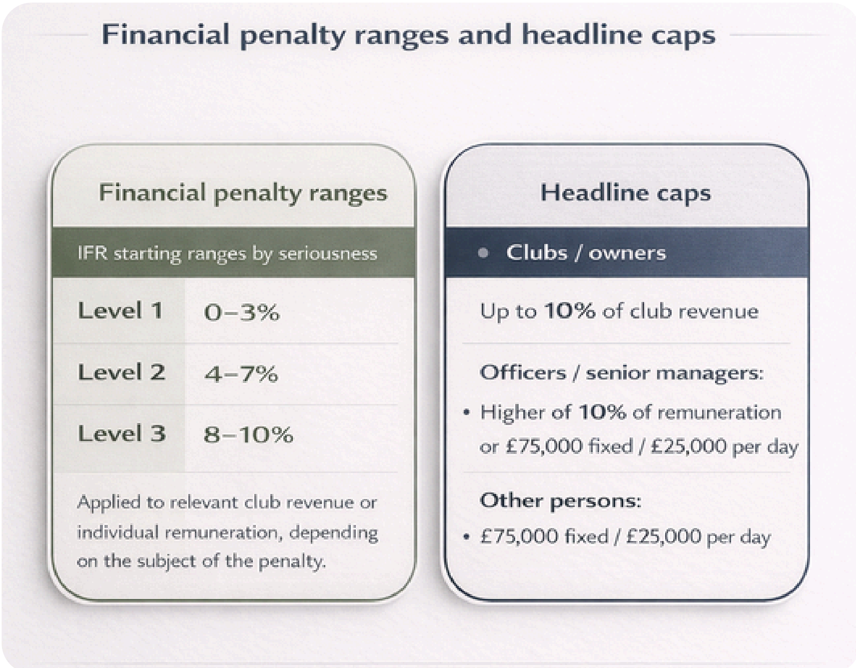
At the first step, the IFR looks at the type of breach, its impact and the surrounding circumstances, before categorising seriousness as Level 1, Level 2 or Level 3.



Financial exposure

Where a financial penalty is appropriate, the IFR's **starting ranges** are clear: Level 1: 0–3%, Level 2: 4–7%, and Level 3: 8–10%.

For clubs and owners, the statutory maximum is tied to 10% of club revenue; for officers and senior managers, it is the higher of 10% of remuneration or £75,000 fixed / £25,000 per day; for other persons, it is £75,000 fixed / £25,000 per day.



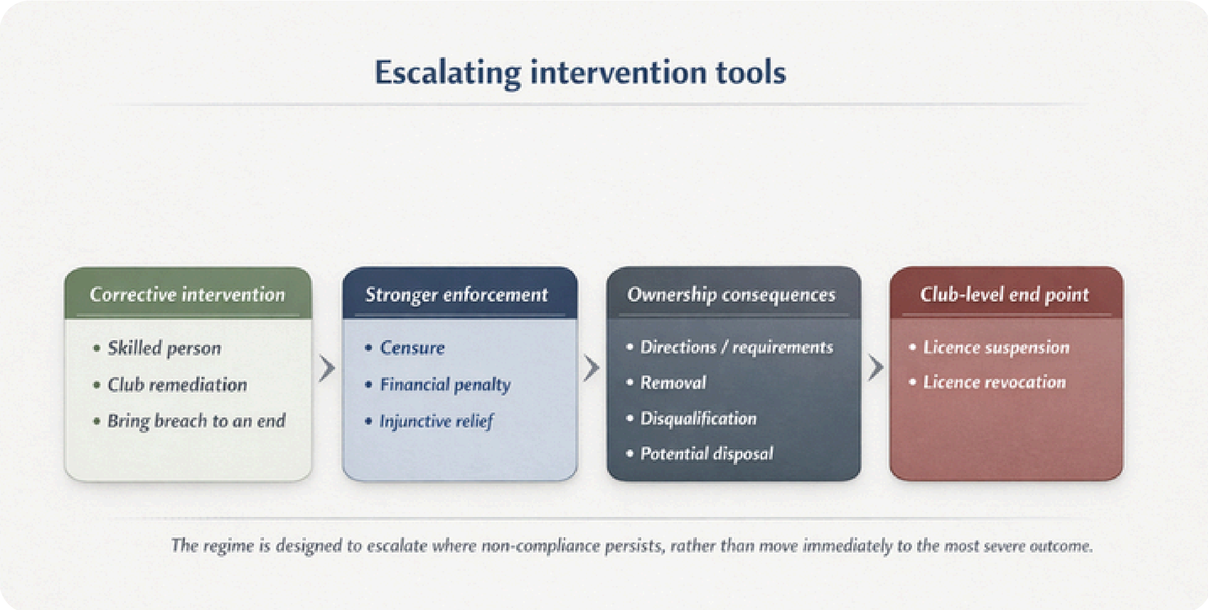
What changes the outcome

TThe final figure can move up or down for aggravation, mitigation, proportionality and deterrence. For clubs, cooperation, remediation, transparency and speed of response can be as important as the original breach itself.

When a club is in serious difficulty: what the IFR can actually do

Not a simple takeover model

The published sanctions guidance does not suggest a simple IFR “takeover” model. What it does set out is a range of escalating intervention tools that can become highly consequential where a club or its ownership fails to comply with the regime.

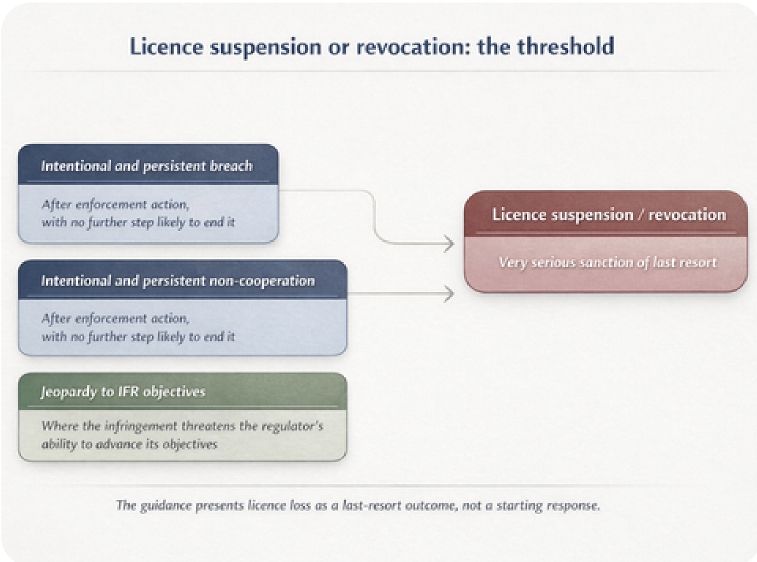


If an owner ignores the regime

IfIf an owner fails to comply with certain directions or requirements under the ownership regime, the IFR can act directly through censure, financial penalty and, in some cases, injunctive relief. That same non-compliance can also cause the club itself to fall into relevant infringement territory, exposing it to wider sanctions.

A last resort

The guidance is explicit that suspension or revocation is a **very serious sanction of last resort**. It would prevent a regulated club from playing matches and should only be used once other options have been exhausted.



TThe practical point is that the regime is built to escalate where non-compliance persists, rather than move immediately to the most severe outcome.

The next question is how the IFR regime will shape competition organisers in pursuit of its objectives, and how clubs will need to navigate the interaction between existing league rules and the emerging statutory framework.

Appendix: IFR sanctions framework — practical snapshot

This table provides a simple overview of who may be sanctioned, and the main sanctions available under the IFR regime.

Party	Censure statement	Financial penalty	Skilled person	Injunctive relief	Licence suspension / revocation
Club	Yes	Yes	Yes	In some cases	In some cases
Owner	Yes	Yes	No	In some cases	No
Officer	Yes	Yes	No	In some cases	No
Senior manager	Yes	Yes	No	No	No
Competition organiser	Yes	Yes	No	In some cases	No
Other persons	Yes	Yes	No	In some cases	No

For clubs, the sanctions toolkit is wider and can move beyond financial penalty into corrective intervention and, in serious cases, licence consequences.