



# KICK IT OUT'S SUBMISSION TO THE INDEPENDENT FOOTBALL REGULATOR

A golden opportunity to strengthen  
Equality, Diversity and  
Inclusion across football





## FOREWORD

The Independent Football Regulator's (IFR) aims are to protect the sustainability of its clubs, the financial resilience of the overall game, and preserve its heritage as the nation's most-loved sport. The IFR was born out of the Fan-Led review, which underlined how fundamental supporters are to football, and how its introduction "presents an opportunity to set clear Equality, Diversity and Inclusion (EDI) standards that clubs should be meeting as part of their licensing conditions."

That is why Kick It Out welcomes the IFR's creation and its commitment to embedding EDI at the core of the new Club Code of Governance. It recognises that good governance comes from diverse and accountable leadership, and why we now have a once-in-a-generation opportunity to reshape what that looks like across English football. As IFR chair David Kogan has stated: "EDI is part of our remit... helping clubs get to a point where they are taking much more account of it."

Despite progress in some areas, football continues to face significant challenges. Governance weaknesses, inconsistent commitment to EDI, and the absence of transparent workforce representation data have limited the pace of change. These shortcomings have led to persistent underrepresentation of Black senior coaches, very few South Asian professional players, almost no openly gay male players, and only a small number of women coaches in men's professional football. Workforce data further shows that club staff do not reflect the diversity of their communities.

Kick It Out's recommendations to shape the Club Code of Governance within the IFR's consultation draw on the following work:

- [A University of York review of UK regulator EDI models and club best practice](#)
- A Kick It Out-led cross-sector roundtable on 5 November 2025
- Kick It Out's analysis of club workforce diversity data under FA Rule N
- Legal advice from law firm Bates Wells
- Over 30 years of tackling discrimination and promoting inclusion in football

This briefing summarises three core recommendations submitted to the IFR for meaningful sector-wide progress and a golden chance to shape the game:

- Stronger governance and clear board-level accountability
- Transparent, rigorous and annual data reporting
- Inclusive fan engagement structures, and modelled sharing of best practice

Samuel Okafor  
Kick It Out Chief Executive



# 1. STRENGTHEN GOVERNANCE AND ACCOUNTABILITY FOR EDI ACROSS FOOTBALL

Football's slow progress on EDI is strongly linked to weak governance structures and a lack of strategic oversight from club leadership. Persistent under-representation across senior leadership and coaching roles is underlined by workforce diversity data published in June 2025 under FA Rule N.

Kick It Out's analysis shows that, among Premier League board and senior leadership teams (from 17 of 20 clubs), **22%** are women, **3.2%** are from ethnically diverse backgrounds, **0.9%** have a disability, and **0.3%** are from the LGBTQ+ community.

## IFR Licensing: A legal view

Legal advice by law firm Bates Wells concluded that the IFR's current proposals are inadequate given its duties under the Football Governance Act 2025 and the Public Sector Equality Duty, which require stronger, clearer and more measurable EDI obligations.

It endorses the view that there is a clear case for EDI to be embedded in the Club Code of Governance, and that it is an area the IFR is legally obliged to take on under the licensing regime.

Senior coaching role figures are worse, and regarding overall workforces across the 92 Premier League and EFL clubs, only a handful of clubs match local census data across these four demographics.

A review of other regulators by Kick It Out and the University of York shows that where regulators have clearly embedded EDI into their frameworks, this has helped drive transparency, accountability and cultural change.

## Key Governance Measures Required

### 1.1 Mandatory Board-Level EDI Governance

- Every club should have clear board-level accountability for EDI.
- Larger clubs should establish a dedicated EDI lead or committee; smaller clubs may share responsibilities, but accountability must be explicit.
- Principle 4 of the Club Code (related to EDI) should require measurable EDI objectives and integration of EDI into strategic decision-making.

### 1.2 Target-Setting and Leadership Development

- Clubs should set diversity targets for board and senior leadership roles.
- Regular skills audits and leadership pipeline development are required to support long-term cultural change.

### 1.3 IFR Oversight and Capacity

To ensure compliance and drive improvement, the IFR should:

- Embed EDI as a core regulatory objective.
- Establish an EDI advisory board to evaluate club performance.
- Provide clear guidance on inclusive senior recruitment.
- Introduce structured, evidence-based oversight mechanisms

These measures will ensure that EDI is not treated as an optional add-on but as an essential element of football governance, as originally prescribed in Dame Tracey Crouch's Fan-Led review.



## **2. MAKE EDI DATA RIGOROUS, TRANSPARENT AND PUBLISHED ANNUALLY**

Current proposals for biennial reporting are inadequate. Kick It Out's cross-sector roundtable with 22 organisations showed strong support for mandatory annual reporting, which is critical for accountability, visibility and consistent progress. It also mirrors best practice seen in regulators such as Ofcom and the Office for Students, as per Kick It Out desk-based review with the University of York.

We encourage the regulator to adopt the role of an 'observatory', empowering fans and other stakeholders to hold clubs to account. The Football Leadership Diversity Code showed an appetite among clubs for target-setting on recruitment, with about two-thirds signing up. However, when publication of EDI data was made mandatory under FA Rule N, there were differences in the detail provided by the Premier League and the EFL, and very few clubs openly publicised the data itself. As a result, few fans would even know that it is in the public domain.

### **2.1 Annual EDI Reporting Requirements for Clubs**

Annual publications should include:

- Standardised workforce diversity data
- Narrative reports on progress against EDI objectives
- Year-on-year analysis of trends, gaps and challenges

Annual cycles would also align with the Premier League and EFL's existing financial reports, the publishing of fan-engagement rules, and mirror best practice with other regulators such as Ofcom and the Office for Students.

### **2.2 IFR Sector-Wide Annual Benchmarking Report**

The IFR should publish an annual EDI benchmarking report including:

- Disaggregated data at board, executive, coaching and workforce levels
- Trends in discrimination incidents (stadium and online)
- Comparative analysis across clubs and against other industries
- Examples of leading practice and areas requiring corrective action

### **2.3 Add Transparency and Accountability as a New Regulatory Principle**

A new principle should require clubs to:

- Publish workforce diversity and progress data consistently
- Report annually on EDI objectives
- Make information accessible to fans
- Enable external scrutiny mechanisms

Transparent data is essential to building trust and enabling fans, communities, and stakeholders to hold clubs accountable.



### **3. EMBED INCLUSIVE FAN ENGAGEMENT AND SECTOR-WIDE BEST PRACTICE**

Fan engagement is a central part of club accountability. The IFR's principles must explicitly embed EDI into all aspects of supporter engagement. It should also facilitate the sharing of best practice, support smaller clubs that might have fewer resources, and embed continuous improvement into regulatory processes.

#### **3.1 Inclusive Fan Engagement as a Core Principle**

Clubs should be required to consult fans, especially underrepresented groups, on:

- EDI strategy and objectives
- Inclusive matchday experiences
- Anti-discrimination policies
- Community outreach and representation

#### **3.2 Fair and Inclusive Election Processes**

Election processes for fan representatives must ensure diverse participation and remove barriers for marginalised groups.

#### **3.3 Sector-Wide Knowledge Sharing**

The IFR should facilitate:

- Best-practice sharing across clubs
- Regular evaluation of what works in EDI
- Capacity-building support for smaller clubs with limited resources

#### **3.4 Model Best Practice in Regulation**

The IFR must demonstrate the standards it expects from clubs by embedding evidence-led regulation, clear compliance mechanisms, and continuous improvement cycles.

### **Conclusion**

Transformational change in football requires:

- Stronger governance and clear board-level accountability
- Transparent, rigorous and annual data reporting
- Inclusive fan engagement structures, and modelled sharing of best practice

The IFR has a golden opportunity to raise standards across the football pyramid and ensure clubs truly reflect the communities they serve, which, in turn, will help the long-term sustainability of the game. Kick It Out stands ready to support the IFR in delivering this vision, which will benefit communities for decades to come.



**THE FOLLOWING PEOPLE ARE SUPPORTIVE OF KICK IT OUT'S RECOMMENDATIONS:**

Aji Ajibola - CEO BAMREF

Shaista Aziz, Co- Founder and Director, Three Hijabis

I Atta - Director, Tell MAMA

Simon Blake OBE, CEO, Stonewall

Paul Ian Campbell - Associate Professor Sociology, Criminology and Social Policy, University of Leicester

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