



School for Business
and Society

UK regulators and equality, diversity and inclusion: **A desk-based review**

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FOREWORD

In 2025, we set out to understand how equality, diversity and inclusion (EDI) are currently embedded and enforced across UK regulatory bodies, and what this means for the future of regulation in English football. With the introduction of the Independent Football Regulator, “Regulators and Equality, Diversity and Inclusion: A Desk-Based Review” examines that landscape at a critical moment for the game.

As the Independent Football Regulator is established, there is a rare opportunity to learn from how other sectors have approached EDI through regulation. To support this, Kick It Out worked with the University of York to conduct a desk-based review of how EDI is addressed across twelve UK regulators, alongside existing arrangements within English football.

The findings reveal significant variation. Some regulators treat EDI as integral to good regulation, embedding it within objectives, oversight and enforcement. Others address it inconsistently or at the margins. This variation matters: where regulators have clearly embedded EDI within their frameworks, regulation has helped to drive transparency, accountability and cultural change.

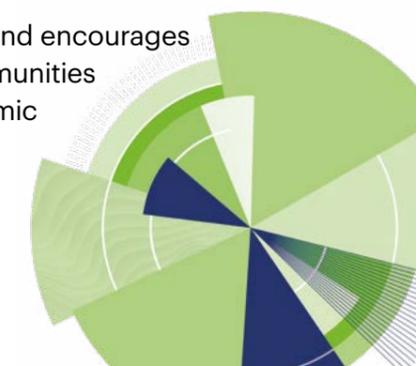
Football is distinct, meaning it would be inappropriate to lift and shift a regulatory regime from another industry. However, this does not mean football exists in isolation. It shares many characteristics with other sectors, and there are important insights to be learned from regulatory approaches used elsewhere.

Football routinely promises to reflect the people who love the game. It seeks to monetise this as a core part of its brand value proposition as The People’s Game. But is it truly everyone’s game? If football continues to monetise this promise, it should be held accountable to it. Football has positioned itself as a market leader on inclusion, and its regulatory regime should reflect this by going further than other industries and acting as a beacon for everyday inclusion. This begins with governance. As the IFR takes shape, the choices made now will determine whether equality, diversity and inclusion are treated as foundational to good governance and whether they help address the persistent issues of discrimination and under-representation on and off the pitch.

We believe this report provides an evidence base to inform those decisions and encourages a more ambitious, accountable approach to regulation that reflects the communities the game claims to serve. Thank you to the University of York for their academic support and collaboration in the production of this report.

Sanjay Bhandari
Chair, Kick It Out

Samuel Okafor
CEO, Kick It Out



EXECUTIVE SUMMARY

This report presents findings from a research collaboration between University of York academics and Kick it Out, undertaken between 2023-2026. The objective was to provide an evidence-based resource to support influencing change around Equality, Diversity and Inclusion (EDI) regulation within English Football, including the EDI remit of the independent regulator for English football (IFR).

This report provides a desk-based review of the presence of EDI within the remit, activities and policies of UK regulatory bodies. This means secondary analysis of publicly available documentation on, and through, the websites of regulators¹. A longlist of 98 regulators was scaled down to 12, to include only those which were assessed as having potential relevance to the football case. Subjects for analysis included the ways in which regulators oversaw EDI within their remit and had EDI policies within their own and constituent/member organisations.

Given the rich diversity in the game, across players, fans and communities, the IFR has a real opportunity to set a new standard and be a best practice regulator in the UK. Football clubs should be, and regularly promise to be, representative of their communities and accordingly should be held accountable. Implementing EDI mandatory reporting and monitoring of targets is a way that low trust cultures in football could be addressed by requiring transparency for all.

Professor Anne-marie Greene², Dr Kevin Tennent and Dr Alex Gillett, University of York, January 2026.

¹ Disclaimer: This report is not a comprehensive view of practice and impact, beyond that which has been presented in those publicly available fora at the time of the review. We make no claims here to the presentation of facts or 'truths' but an informed interpretation of the material easily available.

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Key findings include:

- EDI is a common feature of the work of regulatory bodies, but the status of this varies highly.
- EDI governance is an area of weakness for most regulators. The majority have little specific or dedicated structures for EDI governance, often with no clear EDI plans at senior level.
- Access to and transparency of EDI data is crucial, yet extensive data gaps exist for most regulators. Only a small minority collect, report, and publish EDI data on an extensive basis for workforce, members/providers, and wider users. It is crucial that existing data gaps are closed.
- Paying attention to and monitoring EDI progress can make a difference to positive outcomes and progress.
- Ofcom and the Office for Students regularly emerged as being beacons of good practice on almost all measures with: EDI as a topline concern; comprehensive mandatory reporting on the widest range of characteristics; monitoring of the impact of EDI initiatives and reporting; and fines and sanctions for lack of progress/ non-compliance by membership organisations.

1. REVIEW BRIEF AND CONTEXT

In 2023, a team within the School for Business and Society at the University of York was commissioned by Kick It Out to provide an evidence-based resource to support KiO’s activities around Equality, Diversity and Inclusion (EDI) regulation within English Football, including the EDI remit of, the independent regulator for English Football (IFR).

This research activity was funded by the University of York’s Impact Accelerator Account (Economic and Social Research Council).

This review analyses the inclusion of EDI within documentation publicly available on, and

through, the websites of a sample of regulatory bodies in the UK. Subjects for analysis included the ways in which regulators oversaw EDI within their jurisdiction and the ways in which they had policies for EDI within their own and constituent organisations.



2. REGULATORS SAMPLED

A longlist of 98 regulators was identified with statutory or voluntary oversight of their respective sectors. Some of these organisations had functions in particular sectors, fields, law, or geographic focus. We removed those with a focus on specific parts of the UK such as Scotland or Northern Ireland.

This sample was then scaled down to include only those which seemed to have potential relevance to the football case – either they have regulatory oversight of a sector which receives public funding or have functions in some way considered to be in the public interest, have voluntary oversight over their sector as a membership body, or are Professional, Statutory and Regulatory Bodies (PSRBs) with oversight of the membership of a profession. All of these bodies act as potential ‘gatekeepers’ to participation within a sector and as a provider as they have roles which involve the specification of provider activities and/or ‘quality assurance’ requirements around the activities of providers. Some further regulate the governance arrangements of providers (therefore having immediate relevance to the proposed football regulatory body) or set down expectations around the relationship of providers to specific stakeholders including their staff or the beneficiaries of their services, which again has the potential for an EDI remit. These ‘regulatory objectives’ are considered in more detail below.

The bodies finally chosen were:	
1.	Office for Students (OfS)
2.	Ofcom
3.	Care Quality Commission (CQC)
4.	General Medical Council (GMC)
5.	Office of the Regulator of Community Interest Companies (CIC)
6.	Bar Standards Board (BSB)
7.	Fairtrade Foundation (FTF)
8.	Engineering Council (EC)
9.	Chartered Institute for the Management of Sport and Physical Activity (CIMSPA)
10.	Financial Conducts Authority (FCA)
11.	Financial Reporting Council (FRC)
12.	Competition and Markets Authority (CMA)



3. REGULATORY OBJECTIVE/S

3.1 Focus of analysis

To identify the regulatory objective/s

3.2 Findings

Objective	Number	Regulators
Quality of Service	12	OfS, CQC, EC, GMC, BSB, FTF, EC, CIMSPA, Ofcom, FCA, FRC, CMA
Good Governance	8	OfS, CIC, FTF, CQC, Ofcom, FCA, FRC, CMA
Education/Training/Qualifications	3	BSB, GMC, EC
Guidance/Advice	3	CIC, Ofcom, CMA
Financial Sustainability	1	OfS
Livelihood Improvement	1	FTF
Promote Effective Competition/ Economic Growth	1	FCA

The most common regulatory objective was concerned with quality-of-service provision, accounting for all regulators except CIC. The three professional bodies had core objectives around education, training, and qualifications. Only one regulator (OfS) had a core stated aim around financial sustainability.

4. STATUS OF EDI

4.1 Focus of analysis

To identify where EDI appeared within the remit of the regulator, this being a potential proxy of the status of EDI issues.

4.2 Findings

4.2.1 Topline

Two regulators have EDI issues present as an explicit part of the statement of regulatory objectives (OfS, OfCom).

4.2.1.1 OfS³

The four primary regulatory objectives

All students, from all backgrounds, and with the ability and desire to undertake higher education:

- 1 Are supported to access, succeed in, and progress from, higher education.
- 2 Receive a high quality academic experience, and their interests are protected while they study or in the event of provider, campus or course closure.
- 3 Are able to progress into employment or further study, and their qualifications hold their value over time.
- 4 Receive value for money.

The OfS also includes an Equality Impact Assessment as part of its Regulatory Framework which underpins the conditions of registration for higher education providers.

4.2.1.2 Ofcom

Within the stated objective of 'Ofcom is the regulator for the communications services that we use and rely on each day'⁴ there are core EDI aspects:

What we do

We make sure:

- people are able to use communications services, including broadband;
- a range of companies provide quality television and radio programmes that appeal to diverse audiences;
- viewers and listeners are protected from harmful or offensive material on [TV, radio and on-demand](#);
- people are protected from unfair treatment in programmes, and don't have their privacy invaded;
- online services do their best to protect users from harm;
- the universal postal service covers all UK addresses six days a week, with standard pricing; and
- the radio spectrum is used in the most effective way.

Ofcom has a duty under section 27 of the Communications Act 2003 to take all such steps as considered appropriate for promoting equality of opportunity in relation to employment by all those providing television and radio services and the training and retraining of people for such employment, between men and women, people of different racial groups and disabled people⁵.

4.2.2 Priority

Five regulators do not include EDI issues in the topline of their statement of regulatory objectives but have EDI as an important part of core ambitions/mission or the part of fulfilling those regulatory objectives (CQC, GMC, BSB, EC, FCA).

4.2.2.1 CQC

While its core regulatory purpose is to 'make sure health and social care services provide people with safe, effective, compassionate, high-quality care and we encourage care services to improve',⁶ there are EDI issues overt within core ambitions:

Core ambitions

Running through each theme are two core ambitions:

- **Assessing local systems:** Providing independent assurance to the public of the quality of care in their area
- **Tackling inequalities in health and care:** Pushing for equality of access, experiences and outcomes from health and social care services

We'll look at how the care provided in a local system is improving outcomes for people and reducing inequalities in their care. This means looking at how services are working together within an integrated system, as well as how systems are performing as a whole.

We're committed to our ambition of regulating to advance equality and protect people's Human Rights. Everyone in health and social care has a role to play in tackling the inequalities in health and care for some people. This strategy sets out our ambition for how we can help influence change.

4.2.2.2 FCA⁷

Work on D&I in the financial services sector is an FCA Business Plan priority. We believe that improving D&I in financial services firms will help us achieve our objectives:

- Ensuring markets work well and market integrity: We want to reduce groupthink by encouraging firms to promote diversity of thought and an inclusive culture where people can contribute, challenge and question. We think this will drive better, more robust decision making, which will protect and enhance the integrity of the UK financial system. We also want to advance our market integrity objective by increasing transparency about demographic diversity for investors about the companies they invest in.
- Protecting consumers: we will drive greater diversity and more inclusive cultures in regulated firms to promote better

understanding of the needs of diverse consumers, which will reduce consumer harm and improve outcomes.

- Promoting competition: by encouraging regulated firms to look more closely at the needs of a diverse customer base, they will develop products and services which are better tailored to customer needs, thereby promoting greater innovation and competition. We think that increased transparency regarding the D&I of firms will facilitate consumer choice by enabling people to make comparisons between firms, which will again foster greater competition.

4.2.2.3 GMC

The GMC has EDI as a core part of its overall strategy⁸ and the topline of its 2030 Vision is "We will foster a culture of equality, diversity and inclusion in everything we do as a regulator and employer."

4.2.3 Limited

Five regulators do not specifically address EDI issues (CIC, FTF, CIMSPA, FRC, CMA) although the general concern for fair treatment amongst suppliers by the FTF could be viewed as connected broadly to EDI and FRC have 'valuing diversity' as part of their 'Influential' value.

4.2.3.1 FTF

What Fairtrade does

Fairtrade works with farming co-operatives, businesses and governments to make trade fairer.

Together with Fairtrade farmers and workers we have a vision: a world in which trade is based on fairness so that producers earn secure and sustainable livelihoods.

Fairtrade has a network of dedicated supporters who help to raise awareness of the issues of unfair trade and fundraise to support us in our work. Find out more in [Get Involved](#).

³ <https://www.officeforstudents.org.uk/media/qzqblugo/securing-student-success-regulatory-framework-for-higher-education-in-england-2022.pdf>

⁴ <https://www.ofcom.org.uk/about-ofcom/what-is-ofcom>

⁵ https://www.ofcom.org.uk/_data/assets/pdf_file/0020/42770/ch2.pdf

⁶ <https://www.cqc.org.uk/publications/annual-report-and-accounts-202122/who-we-are-and-what-we-do>

⁷ <https://www.fca.org.uk/about/how-we-operate/diversity-equity-inclusion/our-role-regulator>

⁸ https://www.gmc-uk.org/-/media/gmc-site/about/how-we-work/corporate-strategy/corporate_strategy_document_final_en_04122020.pdf

5. FOCUS OF EDI STRATEGY

5.1 Focus of analysis

To identify the target stakeholder for EDI-i.e. the regulator as an organisation, members, users/providers, or wider community/society.

5.2 Findings

Most regulators were concerned with EDI for both their own organisation, members/providers, and/or wider users (OfS, GMC, FTF, OfCom, BSB, CQC, FCA), commonly involving:

- An EDI strategy for their own organisation (as an employer), often with targets.
- EDI consideration of members/providers, which could take the form of registration conditions (e.g. OfS for higher education providers, GMC for practitioners on the medical register, Ofcom requirements for broadcasters, FCA for registered financial institutions and individuals), or EDI targets (BSB for registered barristers).
- EDI consideration of wider users/communities: for example, OfS assessments/targets for access by student population; Ofcom for audiences; and FTF extending EDI concerns beyond user/member organisations to wider local communities and their wellbeing; FCA for consumers.

Four regulators were exclusively concerned with the regulator as an organisation and specifically on the workforce within the regulatory organisation (CIC, CIMSPA, FRC, CMA).

One regulator was exclusively concerned with EDI issues relating to registered members (EC).



6. EDI GOVERNANCE STRUCTURES

6.1 Focus of analysis

To identify how EDI is governed within the regulatory organisation.

6.2 Findings

Four regulators (OfCom, OfS, GMC, FCA) had what could be considered to be fairly extensive governance structures around EDI, particularly involving accountability for EDI issues.

- Ofcom has specific diversity targets for its Board and EDI performance objectives for Directors.
- OfS has a specific EDI Executive Board appointment being the Director for Fair Access and Participation.
- GMC has EDI responsibilities within Council, Executive Board and has set up a Strategic EDI Advisory Group as part of EB which acts as a sounding board to inform the development of the ED&I strategy and GMC activities. The EB approves the ED&I strategy and monitors progress at a high level. An ED&I Steering Group ensures that ED&I is

integrated into the GMC's core activities and is responsible for considering the equality duties and monitoring and delivering appropriate actions. There is a Head of ED&I, and a number of ED&I Managers.

- FCA has EDI targets for its Board of Directors and has established a DEI Programme Board to drive change. The Board is made up of leaders from across the FCA and DEI network group sponsors. Each representative is supported by DEI delivery groups, who are responsible for implementing the programme at a divisional level.

The majority of regulators seemed to have few specific or dedicated structures for EDI governance, often with no clear EDI plans at senior level. This is an interesting area of weakness for regulators, including some of those which have more developed EDI strategies and data reporting mechanisms. For example, CQC has no explicit EDI Plan published for its Board in terms of composition of members, or dedicated EDI positions or EDI committees within its organisation. Governance of EDI appears to often be delegated to providers or sectoral bodies.

7. EDI IN ACCREDITATION OR STANDARDS

7.1 Focus of analysis

To identify if EDI issues formed part of accreditation to or membership of the regulatory body and/or standards relating to activities of relevant stakeholders.

7.2 Findings

Most regulators (8 out of 12) do not have EDI factors as part of registration or licensing standards. Exceptions to this are OfS, CQC, FCA and Ofcom.

7.2.1 OfS

OfS has EDI requirements as part of the registration processes for educational institutions.⁹ For example, all registered providers are required to comply with the OfS Regulatory Framework. This sets the registration conditions; equality of opportunity and access are referenced throughout; how providers achieve this in terms of access, participation, success for students, and ways in which it might be measured and breached by providers. Satisfying the registration conditions, including the equality measures, is also a condition for OfS granting degree awarding powers to a new provider.

7.2.2 CQC

CQC rates each provider according to its standards which includes some EDI elements. Its code sets out a 13-point list of 'fundamental standards' of care which are enforced through inspections and visits etc. It asks five key questions¹⁰ – is it safe, effective, caring, responsive and well-led. Well-led includes promoting an 'open and fair culture'. Providers are rated from inadequate to outstanding. EDI is factored in by consideration of the responsive criteria 'Equity in access' and 'Equity in experiences and outcomes', and 'workforce equality, diversity and inclusion' under 'well-led'.

7.2.3 FCA

Firms and individuals must be authorised or registered by FCA to carry out certain activities and firms must demonstrate that they meet a range of requirements. FCA then supervises these firms to make sure they continue to meet FCA standards and rules after they are authorised. If firms and individuals fail to meet FCA standards, it has a range of enforcement powers that can be used, including bringing criminal prosecutions to tackle financial crime.

Changes have also been made to the FCA supplier code of conduct in 2021 to include a wider consideration of D&I. This sets a baseline expectation from FCA to suppliers around values, behaviours, and deliverables from a D&I perspective. The Financial Services Qualification System (FSQS), a sector-wide

database on commonly used suppliers in financial services over the last year is utilised. This database allows suppliers to upload information that is regularly requested before awarding contracts and streamlines many supply chain processes. Using the FSQS, the FCA can filter questions, data, and information in relation to D&I and view ratings and feedback on prospective suppliers. This has opened up new options for FCA to conduct due diligence and assurance actions for D&I pre and post contract awards.

7.2.4 Ofcom

Ofcom has a section on CSR in procurement¹¹, expecting suppliers (and their subcontractors) to share their approach to corporate responsibility and commitment to equality and diversity through their policies, including modern slavery/human trafficking in the supplier chain, equality of treatment for all the diversity strands including making reasonable adjustments for disabled workers and to have policies, where appropriate, and to actively monitor performance against such policies.

Ofcom's broadcast licensees who employ more than 20 people in connection with the provision of their licensed service and are licensed to broadcast for more than 31 days a year, are required to make arrangements for promoting, in relation to employment, equality of opportunity between men and women, people of different racial groups and for disabled people. They are also required to make arrangements for training people employed in, or in connection with, the provision of the licensed service or the making of programmes to be included in the service. They are required to take appropriate steps to make those affected by the arrangements aware of them, to review them and to publish observations on their operation and effectiveness at least annually¹².

Ofcom can impose sanctions, which include financial penalties. For example, see a recent fine imposed on a broadcaster judged to be antisemitic¹³. There are specific sanctions to the BBC, including imposition of fines.

⁹ <https://www.officeforstudents.org.uk/for-providers/registering-with-the-ofs/registration-with-the-ofs-a-guide/conditions-of-registration/>

¹⁰ <https://www.cqc.org.uk/about-us/how-we-do-our-job/five-key-questions-we-ask>

¹¹ https://www.ofcom.org.uk/_data/assets/pdf_file/0018/54216/procurement_overview.pdf

¹² <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/diversity-and-equality/guidance-diversity-in-broadcasting?v=323925>

¹³ <https://www.ofcom.org.uk/about-ofcom/bulletins/content-sanctions-adjudications/decision-islam-channel-ltd>

8. EDI DATA COLLECTION, REPORTING AND PUBLICATION.

8.1 Focus of analysis

To identify what EDI data is collected by the regulator and how this data is reported and published.

8.2 Findings

There is large variability within the sample. Using the terminology from Kirton and Greene (2022: 233¹⁴) the regulators were categorised as either Comprehensive/Proactive; Compliant or Minimalist/Partial.

8.2.1 Comprehensive proactive (OfS, OfCom, FCA)

This group included three regulators who collect, report, and publish EDI data on an extensive basis for workforce, members/providers, and wider users. This typically includes regular (annual) reporting on a mandatory basis and comprehensive statistical and qualitative data on wide demographic characteristics, beyond the legal protected characteristics.

8.2.1.1 Ofcom

Since 2016 Ofcom has had seven 'EDI in Broadcasting Reports'¹⁵ and in 2022 overhauled the reporting process with a new qualitative self-assessment tool to provide

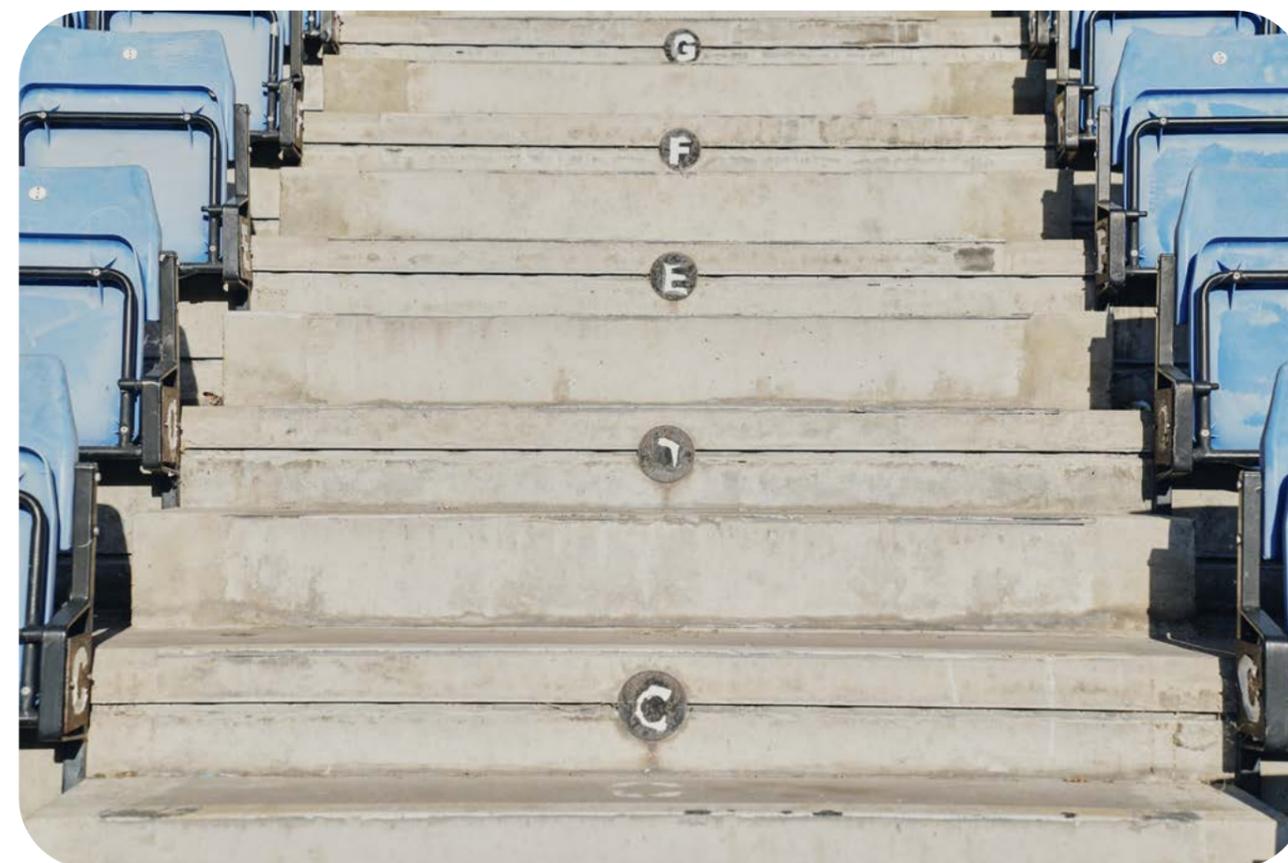
broadcasters with feedback on progressing their EDI strategies.

There is mandatory reporting for all broadcaster licensees over 20 employees and broadcasting for more than 31 days per annum which includes a range of mandatory and voluntary characteristics, moving beyond usual protected characteristics.

Note that in reporting the data from the quantitative workforce survey, the percentages recorded for broadcasters' employees are based only on the employees who have disclosed information about their characteristics and consented to share this with Ofcom. Ofcom believes that consistent reporting on visible data only is likely to give a more meaningful picture of the makeup of the industry overall. Their reporting utilises a number of national and regional benchmarks for each category of data for comparison¹⁶.

Ofcom also has detailed and extensive reporting and evaluation of EDI in its own organisation (1300 employees¹⁷). Demographic characteristic data is cross referenced with job related data such as pay, job level, working patterns, recruitment, promotions, and leavers.

Finally, Ofcom also commissions reports on wider industry EDI characteristics such as 'Five-year review: Diversity and equal opportunities in UK broadcasting' (2021)¹⁸.



8.2.1.2 OfS

The OfS publishes annual data on sector-level trends in student outcomes and populations for a wide range of student characteristics for those studying at English higher education providers¹⁹. Student characteristic data includes Equality Act 2010 protected characteristics but also a broader range including parental responsibilities, care, estrangement, free school meals, household income, participation of local areas (POLAR), socio-economic background, service personnel parents.

The OfS requires all registered providers to submit a Transparency Return each year based on qualifications received by students, split by gender, ethnicity, and English Index of Multiple Deprivation (EIMD) quintile1. The OfS also

produces an annual report on student outcomes and experiences that is cross referenced with demographic data²⁰. Data from the student characteristics data release is used to inform the Equality of Opportunity Risk Register (EORR), in particular to identify at national level which student groups were most likely to be affected by risks to equality of opportunity across the higher education lifecycle.

The OfS also produces an annual report on EDI for OfS staff (400), appointments and leavers²¹. This includes reporting on protected characteristics of existing staff, non-completion categories. This annual report also provides evaluation of progress against EDI targets.

14 Kirton G. and Greene, A.M. (2022) *The Dynamics of Managing Diversity and Inclusion: A Critical Approach*, Routledge: Exhibit 8.1 'Types of EDI Organisation' p233.

15 https://www.ofcom.org.uk/_data/assets/pdf_file/0023/273326/Equity-Diversity-and-Inclusion-in-Broadcasting-2022-23.pdf

16 https://www.ofcom.org.uk/_data/assets/pdf_file/0024/273327/Methodology-report.pdf

17 https://www.ofcom.org.uk/_data/assets/pdf_file/0028/265492/2022-23-diversity-inclusion-progress-update.pdf

18 https://www.ofcom.org.uk/_data/assets/pdf_file/0029/225992/dib-five-years-2021.pdf

19 https://www.officeforstudents.org.uk/media/0568cbe3-02d7-449c-b3d4-1691233cb4df/sc_data_populations.pdf

20 https://www.officeforstudents.org.uk/media/5a7f71fe-4870-42c4-a610-0a4ae512ff60/sc_technical_document.pdf

21 <https://www.officeforstudents.org.uk/media/ce08c403-1954-4e7c-864f-afef72e1f1e5/ofs-staff-edi-report-2023-final.pdf> and <https://www.officeforstudents.org.uk/media/758179b6-f6e6-426c-8ca8-6abe6b11bcfb/web-bd-2022-july-71-equality-at-the-ofs.pdf>

8.2.1.3 FCA

The FCA publishes annual pay gap data on gender, ethnicity, and disability (although no requirement to publish ethnicity and disability).²²

It also produces an Annual Diversity Report (currently ninth version) on the FCA as an organisation²³. This utilises a comprehensive D&I dashboard, reporting data across diverse representation, progression of colleagues, recruitment, and turnover, all of which has fed into the FCA current D&I strategy review. All data is voluntary except age which is mandatory.

In March 2022, there was a transition of the D&I dashboard from a static reporting platform to one which shows historic trends and offers additional functionality to drill down for intersectional analysis and greater insight. The intention is to publish the high-level version of this dashboard (protecting individuals from being identified) so that the FCA is better informed and transparent on progress on D&I.

With regard to registered organisations there is a focus on D&I on company boards and executive management: in 2021 the FCA committed in its Business Plan to consider our approach to diversity in listed firms. On 28 July 2021, the FCA published consultation proposals on *'Diversity and inclusion on company boards and executive management'*²⁴ FCA proposals in this consultation included: requiring listed companies to make annual disclosures against 'comply or explain' targets; requiring companies to disclose an accompanying numerical table on the breakdown of their board and executive management by gender and ethnicity; changes to disclosure guidance and transparency rules (DTRs) to indicate that board diversity policies

could consider wider diversity characteristics (including disability, sexual orientation and socio-economic background), addressing diversity on key board committees, and encouraging companies to publish more data on the outcomes of their policies, if appropriate. Rules were finalised and published in April 2022. While the final rules were similar to those consulted on, the FCA decided to provide more flexibility for companies on:

- how they collect and report data relating to the representation of women
- the data reporting requirements for companies with board members or executive management situated overseas, where feedback noted that local privacy and data protection laws may prevent companies asking for the relevant data which is required to be reported.

With regard to wider users/sector, the FCA produced 'The 2021 Women in Finance Charter Annual Review' in 2021²⁵. In addition, in December 2021, the FCA consulted on proposals for their flagship new Consumer Duty (CP21/13)²⁶. The proposed Consumer Duty will be a significant shift in expectations of firms and how the FCA regulates. It will build on FCA guidance on the fair treatment of consumers with characteristics of vulnerability and requires firms to consider the broad-ranging diverse needs of their customers and avoid disadvantaging customers on the basis of any protected characteristic. The FCA also produces the Financial Lives Survey²⁷ involving 18,000 consumer respondents and includes D&I characteristics: age, sex, sexual orientation, trans status and gender identity, marriage or civil partnership, disability, ethnicity, religion.

²² <https://www.fca.org.uk/data/fca-pay-gap-data-2022-23>

²³ <https://www.fca.org.uk/publication/corporate/diversity-annual-report-2021-22.pdf>

²⁴ <https://www.fca.org.uk/publication/consultation/cp21-24.pdf>

²⁵ <https://www.gov.uk/government/publications/new-financial-women-in-finance-annual-review-march-2021>

²⁶ rules <https://www.fca.org.uk/publication/consultation/cp21-36.pdf>

²⁷ <https://www.fca.org.uk/financial-lives>

8.2.2 Compliant (CQC, GMC, BSB, CIMSPA, FRC, CMA)

This group of regulators reports on EDI data but not in an extensive or systematic way, relying on collation of data from other sources and being based around more qualitative assessments rather than statistical data. Often, this data was not transparent and only reported in collated or summary ways.

8.2.2.1 FRC

Annual reporting across staff group on gender, ethnicity, age (all voluntary) and cross referenced with pay and seniority²⁸.

8.2.2.2 CQC

The CQC produces two annual reports:

- A broad-brush 'The state of health care and adult social care in England'²⁹ which includes sections on inequalities but in qualitative terms not quantitative. For example, the latest Annual Report features a section on inequalities and how they affected care – including languages, and mistakes care providers made in treating people of diverse characteristics wrongly. There is no collating of annual reports from care providers with any EDI data.
- An Annual Report on the regulator as an employer reporting on their progress against Equality Objectives. The Annual Report includes statistical data on the legal protected characteristics, and the gender pay gap relating to around 3000 employees³⁰.

8.2.2.3 GMC

The GMC collect data on both their workforce (annual)³¹ and the wider membership (3 yearly) across protected characteristics (disability,

sexual orientation, religion added as voluntary questions to Medical Register in 2019) but often reported in summary terms and not cross referenced with other considerations such as leavers and joiners^{32,33}.

8.2.2.4 BSB

Produces an annual report on 'Diversity at the Bar'³⁴ which covers all registered barristers. This is voluntary reporting only and the data is gathered through official registration to practise or pupil registration mechanisms. Uses census categories but these are wide-ranging including educational and socio-economic as well as caring responsibilities categories. Response rates are good but less than 60% respond to 'Caring responsibilities for others', 'First generation to attend university', 'Gender identity', 'Religion or belief' (response rates for other socio-economic data categories such as free school meals is also very low).

On where members are employed, there is no legal requirement for barristers' chambers to collect and publish diversity data, however the BSB has regulatory requirements set out in their Equality Rules which require reasonable steps to be taken to ensure each chambers has a written policy and plan and requirements are complied with including having at least one E&D Data Officer, R&S EDI training, data collection (normally at least every 3 years), harassment policy, parental leave, flexible working, reasonable adjustments, fairness of work opportunities. The provision of diversity data from barristers is always voluntary. It is unclear how Equality Rules are enforced.

²⁸ <https://media.frc.org.uk/documents/FRC%20Annual%20Report%20and%20Accounts%202022/23.pdf>

²⁹ <https://www.cqc.org.uk/publications/major-report/state-care/2022-2023>

³⁰ <https://www.cqc.org.uk/publications/annual-report-and-accounts-202122>

³¹ https://www.gmc-uk.org/-/media/gmc-site/about/how-we-work/annual-report-2022/gmc_2022_annual_report.pdf

³² https://www.gmc-uk.org/-/media/documents/workforce-report-2022---full-report_pdf-94540077.pdf

³³ https://www.gmc-uk.org/-/media/documents/somep-2021-full-report_pdf-88509460.pdf

³⁴ <https://www.barstandardsboard.org.uk/static/8e1b9093-b2f7-474f-b5faa3f205d26570/BSB-Report-on-Diversity-at-the-Bar-2022-FinalVersionv2.pdf>

Also produces a report on its own workforce (around 100 people)³⁵: gathered through anonymous and voluntary diversity surveys at least every three years, and by encouraging our workforce to update their details whenever their circumstances change.

8.2.2.5 CIMSPA

Annual reports on Board and Staff EDI Characteristics-gender, age, disability, sexuality³⁶. Not religion or broader categories. Not cross-referenced with any other job-related factors. Does not report on member organisations.

8.2.2.6 FRC

Conducts annual gender and ethnicity pay gap reporting³⁷ and an annual return to the Women in Finance Charter relating to targets on female representation in senior management, Executive and Board level positions³⁸ There does not appear to be reporting on any other EDI data.

8.2.2.7 CMA

Has an annual data dashboard showing the diversity profile of the CMA as an organisation across the 9 protected characteristics. It has a declaration rate of over 90% in all categories with the exception of disability which stands at 84%. Only a very small number (an average of 3%) of those that completed the data have indicated they would 'prefer not to say'. There is a lack of cross referencing with broader occupational data (e.g. promotions, leavers starters etc.)

8.2.3 Minimalist/partial (CIC, FTF, EC)

This category of regulators had minimal or no reporting on EDI data.

8.2.3.1 CIC

Despite having an Equality Scheme and aspirations to ensure equality of opportunity within their own organisation, there is no collection or reporting of EDI data.

8.2.3.2 FTF

The FTF have no EDI data reporting on their own organisation (i.e. does not appear within the charity annual reports) and while the 2021 Annual Report³⁹ noted that attention must be given to the diversity of trustee recruitment and an audit would be conducted, this has not been published nor taken through to subsequent reports⁴⁰. An anti-racism audit was also conducted in 2022 but again no published report is available.

8.2.3.3 EC

The EC does not appear to have any mandatory or voluntary requirements for data capture and reporting, though targets for data reporting are mentioned in the D&I key theme in the strategic plan. Lack of reporting mechanisms on D&I for EC as an employer or for members. The Annual Reports detail initiatives such as the setting up of a D&I working group in 2021 and guidance on neuro-diversity in 2023⁴¹ but no data representation. The EC participates in the Royal Academy of Engineering and the Science Council D&I Progression Framework Report 2021⁴². This commented on paucity of data reporting especially beyond gender and age. Any reports use Labour Force and ONS statistics not internally collected data.

9. POSITIVE ACTION EXAMPLES

9.1 Focus of analysis

To identify initiatives, interventions and policies that indicate an intention to move beyond monitoring of EDI towards promoting EDI.

9.2 Findings

There is large variability within the sample. Using the terminology from Kirton and Greene (2022: 233) the regulators were categorised as either Comprehensive/Proactive; Compliant or Minimalist/Partial.

9.2.1 Comprehensive/Proactive (OfS, Ofcom, FCA)

9.2.1.1 OfS

In relation to the sector there are multiple initiatives designed to promote EDI including: its approach to access and participation; the identification and monitoring of sector wide risks to equality of opportunity for students⁴³., UniConnect⁴⁴; and a good practice material hub including for estranged students⁴⁵.

9.2.1.2 Ofcom

An in-house partnership with a specialist inclusive recruiter⁴⁶; participation in the DigitalHer⁴⁷ programme enabled more young women across Greater Manchester consider careers in digital and technology through mentoring in their early careers;

new partnership with Women and Data⁴⁸ implemented by the launch of Data Analyst apprentice role; working with Business in The Community exploring the challenges associated with increasing the representation of women in the technology sector⁴⁹.

9.2.1.3 FCA

In 2019, the FCA launched its Race and Ethnicity Sponsorship Programme. The programme aims to:

- tackle the under-representation of minority colleagues in our leadership pipeline.
- support the progression of minority ethnic colleagues to manager grade and above.

The programme helps participants build and enhance their leadership skills and secures development opportunities to raise their profile across the organisation.

The FCA also commissioned an objective inclusivity audit, which reviewed all the elements of our recruitment process against all protected characteristics and supported the creation of a prioritised action plan in relation to DEI.

FCA Early Careers Attraction Strategy continues to target under-represented groups. This has a particular focus on increasing participation from minority ethnic groups. The FCA introduced an additional partnership to target support for those from lower socio-economic backgrounds through their application process.

35 <https://www.barstandardsboard.org.uk/static/680e5004-7d2d-4714-876898a237cc8f7e/e64fd460-deda-4c73-b517cecb8f5add56/BSB-Board-and-Staff-Diversity-Report-as-of-December-2023.pdf>

36 <https://www.cimspa.co.uk/wp-content/uploads/2025/07/cimspa-annual-report-2022-2023.pdf>

37 <https://www.frc.org.uk/about-us/governance-reporting/equality-reporting/gender-and-ethnicity-pay-gap/>

38 <https://www.frc.org.uk/about-us/governance-reporting/equality-reporting/women-in-finance-charter/>

39 <https://www.fairtrade.org.uk/wp-content/uploads/2022/09/Fairtrade-Foundation-signed-accounts-2021.pdf>

40 <https://www.fairtrade.net/en/get-involved/library/2023-annual-report.html>

41 <https://www.engc.org.uk/media/Otrnbmlp/annual-review-2023.pdf>

42 https://raeng.org.uk/media/dq4n2wwf/rae-di-prog-framework-joint_reports_-2021_final_9-9-21.pdf

43 <https://www.officeforstudents.org.uk/for-providers/equality-of-opportunity/equality-of-opportunity-risk-register-eorr/>

44 <https://www.officeforstudents.org.uk/for-providers/equality-of-opportunity/uni-connect/>

45 <https://www.officeforstudents.org.uk/advice-and-guidance/promoting-equal-opportunities/effective-practice/estranged-students/>

46 https://www.ofcom.org.uk/_data/assets/pdf_file/0028/265492/2022-23-diversity-inclusion-progress-update.pdf

47 <https://digitalher.co.uk/>

48 <https://womenindata.co.uk/ofcom/>

49 https://www.ofcom.org.uk/_data/assets/pdf_file/0028/265492/2022-23-diversity-inclusion-progress-update.pdf

There are also projects around disability: Supporting Accessibility Needs (SAN) project⁵⁰.

The FCA also conducts Equality Impact Assessments to ensure, in pursuing regulatory objectives, the FCA considers, embeds, and supports equality of outcomes for all consumers. In 2021 the FCA introduced Equality Impact Champions⁵¹.

9.2.2 Compliant (CQC, GMC, BSB FTF, CIMSPA, FRC, CMA)

Most regulators were making some efforts to promote EDI within their own organisations and sectors.

9.2.2.1 CQC

Equality Impact Assessments⁵².



9.2.2.2 GMC

Interventions are in place to support the retention and progression of staff who face

inequalities, for example, a development programme for BME colleagues⁵³ and measures to help improve pay parity – on gender and ethnicity – and BME staff retention, progression, and representation at senior levels⁵⁴.

9.2.2.3 BSB

The second part of the Anti-Racist Statement⁵⁵ sets four anti-racist actions for barristers' chambers and BSB-regulated entities to implement suggesting how practitioners, chambers and entities can embed an anti-racist approach in their work to fulfil those requirements. Positive discrimination is explicitly prohibited within Bar Standards Handbook.

9.2.2.4 FTF

During 2020, the organisation set up an Anti-racism Steering Group who have identified five key areas to focus on:

- Area 1 – Anti-racist recruitment and development.
- Area 2 – Creating an anti-racist staff culture.
- Area 3 – Anti-racist procurement.
- Area 4 – Building anti-racist public communications and campaigns.
- Area 5 – Becoming an anti-racist role model.

The Fairtrade Foundation continues to be a Living Wage employer and an equal opportunities employer, committed to attracting, appointing, and retaining a diverse workforce at all levels of the organisation, and aims to have a workforce that is representative of all sections of society.

9.2.2.5 CIMSPA

Attention to diversity on Board and workforce⁵⁶.



9.2.2.6 FRC⁵⁷

All FRC staff are required to have a D&I performance objective. Their D&I network groups all have an allocated executive sponsor.

The FRC provides a range of learning and development opportunities on D&I including active bystander training which is mandatory training for all employees. In addition, inclusive language and career development training to all staff is offered and disabled staff are encouraged to blog about their own lived experiences. A partnership with Business Disability Forum in 2022 aims to provide more support to managers, where they are faced with questions from disabled employees. In 2020, the FRC created a working group on disability, which recently became the Enable Network. In 2023, training was extended to include learning on neurodiversity and deaf awareness.

9.2.2.7 CMA

2020 saw the implementation of diverse interview panels to provide different perspectives and help to break down some of the barriers to progression for those from under-represented groups. Training

for hiring managers incorporating unconscious bias and promotion of flexible working practices through the launch of new guidance and workshops for all colleagues and managers. The CMA has also developed a Mutual Mentoring pilot which is offering colleagues from under-represented groups insight into senior decision-making and thought processes whilst providing opportunity for senior colleagues to be exposed to the barriers that staff from under-represented groups may face.

9.2.3 Minimalist/partial (EC, CIC)

These two regulators show no evidence of positive action initiatives designed to promote EDI and lead to change. This is despite the EC recognising the gender and ethnicity disparities in the engineering workforce in different reports it collates on its website. The EC acts more as a repository for external organisations working in the EDI space.

50 <https://www.fca.org.uk/about/how-we-operate/diversity-equity-inclusion>

51 <https://www.fca.org.uk/publication/corporate/diversity-annual-report-2021-22.pdf>

52 <https://www.cqc.org.uk/about-us/our-strategy-plans/equality-impact-assessments>

53 https://www.gmc-uk.org/-/media/documents/how-to-support-successful-training-for-bme-doctors-20201127_pdf-84687265.pdf

54 <https://www.gmc-uk.org/-/media/gmc-site/about/how-we-work/edi-targets---progress-and-priorities-for-2023.pdf>

55 <https://www.barstandardsboard.org.uk/about-us/equality-and-diversity/anti-racist-statement.html>

56 <https://www.cimspa.co.uk/wp-content/uploads/2025/07/Diversity-and-Inclusion-Action-Plan-April-24.pdf>

57 <https://media.frc.org.uk/documents/FRC%20Annual%20Report%20and%20Accounts%202022/23.pdf>

10. EDI VOICE MECHANISMS

10.1 Focus of analysis

To identify processes and mechanisms of voice for underrepresented groups within the sector of relevance to or the workforce of the regulator and the extent to which EDI policy is influenced by these voice mechanisms.

10.2 Findings

It is relatively hard to find information about such voice mechanisms.

10.2.1 Comprehensive/Proactive (OfS, GMC, Ofcom, BSB, FCA, CMA)

This group of regulators have extensive voice structures with evidence of mechanisms by which they influence policy and practice.

10.2.1.1 OfS-

The OfS Student Panel is a key mechanism, comprising 8 students including from underrepresented backgrounds reporting directly to the OfS Board⁵⁸. The Panel has helped shape policy on blended learning, cost of living, TEF, anti-sexual harassment. Genuine influence of the Panel has been subject of recent debate in the review of OfS.

As an employing organisation, the OfS has five staff networks based around EDI characteristics: black, Asian and minority ethnic; carers and parents; disability equality; LGBT+; and women's.

10.2.1.2 GMC –

The GMC has a Strategic Equality, Diversity, and Inclusion Forum⁵⁹ which is intended to inform Board strategy and policy. Membership consists of doctors who share protected characteristics. In addition, in 2021, the GMC launched its Black and Minority Ethnic Doctors' Forum⁶⁰

However, it is less easy to identify how the work of these groups is taken forward into policy and practice.

10.2.1.3 Ofcom –

Ofcom has a Culture and Voice section of its guidance⁶¹. It recommends the establishment, development and funding of staff forums or networks within the broadcaster organisations, where issues and ideas from across the business can be communicated to the senior leadership team and open and honest discussions can take place. Also, use of surveys or employee forums to gather qualitative data on whether under-represented groups feel included and heard. It should be clear to employees how their responses will be used, and broadcasters should point to action that has been taken in response to employee feedback. Broadcasters should also consider providing personal development training programmes that encourage employees to develop their skills and experiences. For example, training to help develop public speaking or presentation skills.

Ofcom also carries out its own research looking at what audiences think about diversity and inclusion in broadcasting, including a Representation and Portrayal Research Hub,

and Audience Expectations in a Digital World⁶² research provides an insight into how people feel about what they see and hear on TV and radio, including discriminatory content. It also has centralised fora for feedback, including a Communications Consumer Panel and an Advisory Committee for Older and Disabled People (ACOD)⁶³. It has no other specific groups around EDI characteristics for users.

Within its own organisation, Ofcom has a range of staff networks⁶⁴ including Affinity LGBTQ+; RACE; Women's; SOUND-Disability; parents and carers; faith; and social inclusion.

10.2.1.4 BSB –

The Strategy gives an update on equality objectives and sets five equality objectives for the period to April 2025, which the Equality and Access to Justice Team co-produced with over 30 internal and external stakeholders. There are also Race Equality⁶⁵, Disability⁶⁶ and Religion and Belief⁶⁷ Task Forces. There are also regular public consultations on EDI topics⁶⁸. There is also the Equality and Diversity Officers' Network⁶⁹ offering voice and support for those individuals in these roles in chambers.

10.2.1.5 FCA

The FCA claims to work with their diversity networks, DEI divisional delivery groups and other key stakeholders, to develop 12 targeted interventions to help progress against DEI priorities. These include:

- enhancing our DEI data reporting to inform action.

- the development of progression programmes to support minority ethnic and female representation.
- putting in place provisions to support the progression of, and improve the experiences of, colleagues with physical or mental-health conditions and disabilities.

A DEI programme board was established to drive change and is made up of leaders from across the FCA and DEI network group sponsors. Each representative is supported by DEI delivery groups, who are responsible for implementing the programme at a divisional level.

Within the FCA as an organisation it has network groups covering:

- physical and mental health
- LGBT+
- gender
- race and ethnicity
- nationality
- faith
- social mobility
- carers and parents
- age

These groups provide a space for peer-to-peer connection, and support those with shared lived experiences and identities. They also raise awareness of the issues and experiences that affect different demographics.

58 <https://www.officeforstudents.org.uk/for-students/ofs-and-students/our-student-panel/meet-the-panel/>.

59 <https://www.gmc-uk.org/about/how-we-work/governance/advisory-forums/strategic-equality-diversity-and-inclusion-forum>

60 <https://www.bma.org.uk/news-and-opinion/voice-of-unity-bma-launches-bame-forum>

61 <https://www.ofcom.org.uk/tv-radio-and-on-demand/equality-and-diversity/guidance>

62 <https://www.ofcom.org.uk/news-centre/2020/audience-expectations-in-a-digital-world>

63 <https://www.ofcom.org.uk/about-ofcom/how-ofcom-is-run/committees/acod#:~:text=ACOD%20advises%20Ofcom%20about%20both,to%20older%20and%20disabled%20people>.

64 <https://careers.ofcom.org.uk/culture-2/ofcom-colleague-network/>

65 <https://www.barstandardsboard.org.uk/about-us/equality-and-diversity/race-equality-taskforce.html>

66 <https://www.barstandardsboard.org.uk/about-us/equality-and-diversity/disability-taskforce.html>

67 <https://www.barstandardsboard.org.uk/about-us/equality-and-diversity/religion-and-belief-taskforce.html>

68 <https://www.barstandardsboard.org.uk/resources/press-releases/bsb-seeks-views-on-its-strategy-for-2022-25.html>

69 <https://www.barcouncil.org.uk/support-for-barristers/equality-diversity-and-inclusion/equality-and-diversity-officers-edo-network.html>

10.2.1.6 CMA

The CMA WIDE (Wellbeing, Inclusion, Diversity and Equality) Steering Group was formed in 2019 and now steers the strategic direction of progress towards equality and more effective inclusion, by providing challenge where it is needed and ensuring that all voices are heard. The WIDE Steering Group brings together representation from the Board, Executive and Senior Director champions, representatives from each of the CMA's staff networks and other key stakeholders to act as the formal governance for EDI activities. An EDI Working Group remains a driving force in implementing its ambitious strategy – by generating ideas, acting as a sounding board and critical friend, and taking on tasks that advance the EDI agenda.

The CMA already has in place networks dedicated to the support of a variety of colleagues including Rainbow, Race, Multifaith, Women's, EU Nationals, Christian, Dyslexia, and our Mental health action group. It has continued to build the strength of its existing staff networks, including launching Carers and VisAbility networks. Networks have led or supported many of its programmes and have enriched the CMA with high-profile guest speakers, training, and internal events.

10.2.2 Compliant (FTF, CQC)

10.2.2.1 FTF-

The FTF set up an Anti-racism Steering Group in 2021 but as noted elsewhere in this report, there is no further information about its makeup or activities.

10.2.2.2 CQC

The CQC have no obvious voice mechanisms for EDI policy, although consideration of diversity and inclusion is considered important in terms of well-run organisations, and there are some initiatives to engage with providers run by ethnic minorities. A review in 2021⁷⁰ highlighted weaknesses in staff voice within the organisation, including specifically around the public sector equality duties and the involvement of the equality networks which do exist around disability, race equality, LGBT+, equality and human rights, gender equality and carers. It is of note that little progress appears to have been made in ten years given a 2023 report⁷¹ stating the same concerns around lack of voice and influence of the equality networks. There is limited information about the activities of the equality networks, but there are some high-profile campaigns, such as that around race equality⁷²

10.2.2.3 FRC

Staff diversity networks: LGBTQ+, Embrace (race and ethnicity), disability, social mobility. All have an allocated executive sponsor.

10.2.3 Minimalist/partial (CIC, EC, CIMSPA)

This group of regulators have no voice mechanisms or ways in which underrepresented groups can influence strategy and policy generally or EDI policy specifically.

EC does not have any D&I networks or groups/committees but a working group on reasonable adjustments was developed in 2021 but as noted elsewhere, there is no further information.

70 <https://www.cqc.org.uk/publications/listening-learning-responding-concerns/4-reviewing-how-we-listen-our-staff>

71 https://www.cqc.org.uk/sites/default/files/documents/edhr_annual_report_january_2014final.pdf

72 <https://www.cqc.org.uk/about-us/our-strategy-plans/equality-human-rights/data-standards/wres-report-2021>

11. EDI COMPLAINTS PROCEDURES

11.1 Focus of analysis

To identify the inclusion of EDI issues within complaints procedures of the regulators.

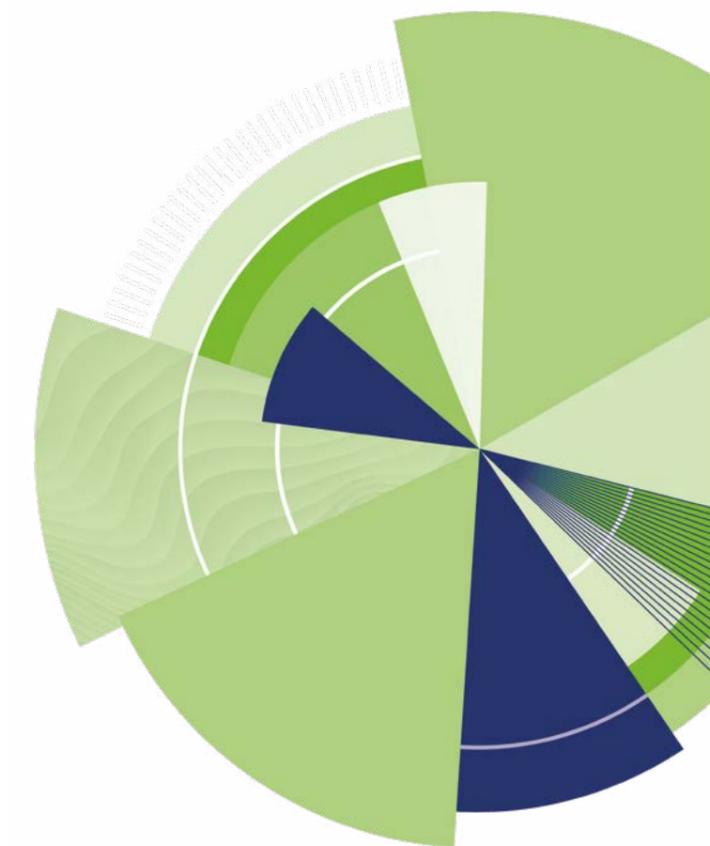
11.2 Findings

Most regulators do not have EDI issues specifically mentioned in relation to complaints procedures including CIC, GMC, BSB, FTF, EC, FCA, FRC, CMA and CIMSPA.

Three regulators do have EDI issues connected to complaints:

- Within OfS, complaints mechanisms exist against higher education providers, which could include breaching their equality of access and provision requirements, or against OfS itself⁷³.
- CQC procedures allow complaints about CQC not following procedures or acting professionally but not about evidence collected in their inspections or action taken around regulation – e.g. enforcement or action taken by the CQC against a care provider. In principle, individuals could make a complaint about a care provider on an issue relating to EDI with regard to the care received.

- Ofcom has complaints procedures in relation to TV, radio, on-demand, mobile and wireless, phone or internet, postal, websites etc. Most EDI related complaints related to TV, radio content etc by audiences, including viewers and listeners being protected from harmful or offensive material on TV, radio, and on-demand. Unfair treatment is specifically covered in the complaints procedure⁷⁴ as is content standards in programmes which could cover EDI concerns⁷⁵. There have been some high-profile public complaints around racism in programmes⁷⁶.



73 <https://www.officeforstudents.org.uk/for-students/ofs-and-students/complaints/>

74 https://www.ofcom.org.uk/_data/assets/pdf_file/0031/57388/fairness-privacy-complaints.pdf

75 https://www.ofcom.org.uk/_data/assets/pdf_file/0020/55109/breaches-content-standards.pdf

76 <https://theconversation.com/diversity-ofcom-complaints-audiences-consume-black-culture-but-dont-want-to-engage-with-the-realities-146263>

12. EDI IMPACT REPORTING AND MONITORING

12.1 Focus of analysis

To identify mechanisms by which regulators monitor and report on the impact of EDI initiatives. In particular we were interested in any reporting which identifies the positive (or negative) difference that EDI regulation makes.

“We are asking the sector to increase the evaluation work they do, so it is important that we lead by example. We are evaluating the effectiveness of our reforms in reducing the risks to equality of opportunity.”⁷⁷

A theory of change model is used and summarises how the OfS anticipates its reformed approach to regulating EDI will lead to improved equality of opportunity for all students.

As part of this impact monitoring, in 2021, the OfS published an independent evaluation of the effectiveness of their regulatory reforms to the five-year access and participation plans that ran/will run from 2020-21 to 2024-25⁷⁸. This evaluation concluded that

“OfS engagement has been a driver for change, and that the regulatory reforms have accelerated a shift in culture at the sector level, with the five-year plans providing a framework for a more ambitious and strategic approach.”

In other words, that regulation of EDI had made a qualitatively positive difference. A particular area of improvement included the reduction of the overall race/ethnicity attainment gap. The report also pointed to areas for improvement, such as engaging more with students, being clearer in OfS communications and continuing attainment gaps (e.g. carers, some ethnic groups)⁷⁹. The report includes the OfS response to this independent evaluation⁸⁰.

12.2 Findings

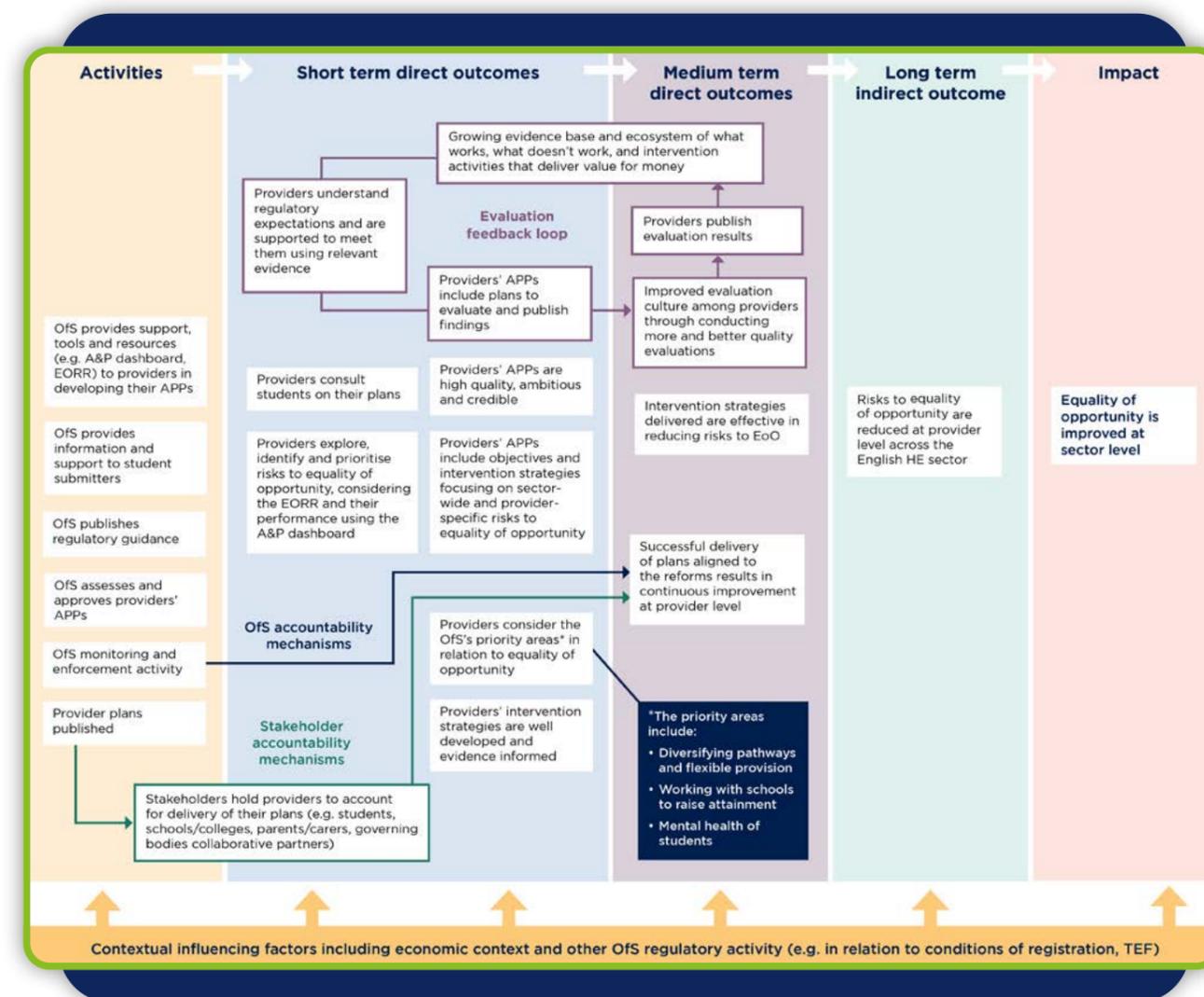
We only looked at the seven regulators identified as having EDI as part of their regulatory objectives or within their strategy (see Section 4). Two of these regulators could be classified as having comprehensive engagement (OfS, OfCom), three as compliant/partial (GMC, CQC, BSB) while the EC and FCA did not seem to have paid specific attention to monitoring the impact of EDI requirements.

12.2.1 Comprehensive/proactive (OfS, OfCom)

Two regulators reported specifically on the impact of their regulatory activity around EDI.

12.2.1.1 OfS

The evaluation demands on providers have been increased since 2020 by the OfS and accordingly alongside this there is explicit recognition of the OfS’s responsibility as a regulator:



12.2.1.2 OfCom

OfCom increased the demands for EDI data reporting that it made of providers from 2022 (and which is a condition of licensing of providers). Latest reports on progress within the organisation can be found in their *Diversity and Inclusion Progress Update 2022/23 and Work Programme 2023/24*⁸¹. Reporting on progress of broadcasters can be found in *Equity, Diversity and Inclusion in Broadcasting 2023/24*⁸². This report details progress against EDI targets and objectives across the sector and areas for

improvement. There is an explicit emphasis on how important data is to being able to assess EDI progress and the need to close the data gap across broadcasters.

12.2.2 Compliant/partial

Here, regulators did not explicitly report on the impact of their regulatory activity but certainly reported on the progress of their members/constituents on EDI issues. Implicitly, this is information on the impact of EDI reporting back to the regulator.

77 <https://www.officeforstudents.org.uk/for-providers/equality-of-opportunity/our-approach-to-equality-of-opportunity/evaluating-our-approach/>

78 https://www.officeforstudents.org.uk/media/6075/evaluation-of-ap-plan-reforms-part-2_nous.pdf

79 <https://www.officeforstudents.org.uk/annual-review-2021/equality-of-opportunity/>

80 <https://www.officeforstudents.org.uk/media/5561/ofs-response-to-nous-part2-finalforweb.pdf>

81 <https://www.ofcom.org.uk/siteassets/resources/documents/about-ofcom/diversity-and-inclusion/diversity-and-inclusion-progress-update-202223-and-work-programme-202324/?v=330020>

82 <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/diversity-and-equality/reports/2024/report-equity-diversity-and-inclusion-in-broadcasting.pdf?v=386356>



12.2.2.1 CQC

The CQC does not have specific reporting which evaluates the effects of their requirements as a regulator for EDI data reporting and EDI plans in the way that the OfS and OfCom do.. However, there is a lot of publicly available data analysis and annual reports detail progress against wider objectives and EDI improvements-within *State of Care Reports*⁸³, *Equality Impact Assessments*⁸⁴ and *Annual Reports*⁸⁵.

12.2.2.2 GMC

Annual reports on EDI have a focus on progress against objectives and identification of areas for future improvement and future KPI forecasting. Indeed the 2023 report is entitled *Equality, diversity and inclusion Targets, progress and priorities*⁸⁶

12.2.2.3 BSB

In a similar way to the GMC, the BSB looks at progress against objectives within its *Diversity at the Bar* annual report⁸⁷. The commentary by the Director General on the 2023 report alludes to the importance of the EDI work of the regulator:

*“This underlines the importance of the work we are doing to review our equality and diversity rules and to work proactively with the profession to support barristers and chambers in meeting those rules. I would urge all barristers to respond to the questionnaire we include when barristers renew their practising certificates, so that we can obtain the most accurate picture of the diversity of the Bar.”*⁸⁸

12.2.2.4 FCA

In Section 8 it was reported that the FCA had undertaken a sector-wide consultation exercise on a new regulatory framework on Diversity and Inclusion (D&I) in the financial sector. This consultation closed in December 2023. Proposals consulted upon would have set minimum standards and place more regulatory reporting and action requirements especially for larger firms. However, in March 2025, the FCA reported that ‘In light of the broad range of feedback received, expected legislative developments and to avoid additional burdens on firms at this time, the FCA and PRA have no plans to take the work further.’⁸⁹ Therefore, any planned improvements have been halted for the time being.

83 <https://www.cqc.org.uk/publications/major-report/state-care>

84 <https://www.cqc.org.uk/about-us/our-strategy-plans/equality-impact-assessments>

85 <https://www.cqc.org.uk/publications/major-report/annual-report-accounts-201819>

86 <https://www.gmc-uk.org/-/media/gmc-site/about/how-we-work/edi-targets---progress-and-priorities-for-2023.pdf>

87 <https://www.barstandardsboard.org.uk/resources/bsb-publishes-its-annual-report-on-diversity-at-the-bar.html>

88 <https://www.barstandardsboard.org.uk/resources/bsb-publishes-its-annual-report-on-diversity-at-the-bar.html>

89 <https://www.fca.org.uk/news/statements/update-fca-enforcement-transparency-proposals>

13. THE CHARACTERISTICS OF ENGLISH FOOTBALL

13.1 Focus of analysis

To explore the specific characteristics of English football and how these characteristics affect the consideration of EDI within this sector.

13.2 Football clubs and their supporters

The financial pressures on clubs and the companies which own them have become more complicated and increasing amounts of capital are invested as owners pursue success, to satisfy their supporter-base, grow the club, achieve a media profile, or in some cases to simply sustain the professional status of the club. In this way, professional soccer clubs can be considered to follow their own institutional logic, that of professional sport.⁹⁰ The sport's consumers do not behave as predictably as those of fast moving consumer goods brands.⁹¹ The brand loyalty of supporters means that no matter how lousy the product, a hardcore of customers will continue to purchase:

'Soccer is more than just a business. No one has their ashes scattered down the aisle at Tesco.' Taylor, R. (1998)⁹²

Football clubs are defined geographically and as such they are considered representative or 'flagships' for their communities. For this reason, there is sometimes local authority political interest or support for their survival, but they are bound by the restrictions of public finance as well as social and environmental factors to consider, because they must also represent and protect their communities.⁹³

13.3 The characteristics of football supporters as consumers

Pick and Gillett found some relevant characteristics of football supporters.⁹⁴ Their research found that owning a season ticket, attending away games and knowing details of their teams' next match could all be used as indicators of a fan's loyalty to their team. On the other hand, there was no significant relationship with a fan's level of loyalty: having a family history of supporting their team, buying club memorabilia, choice of activity on a Saturday or going to watch other teams live. Their most significant finding was that the percentage of life spent supporting their team was found to represent a strong indicator of a fan's loyalty. However, for fans of English clubs below the Premier League family history does not increase

a fan's level of loyalty in later life. Clubs have been relatively unsuccessful in attracting families. Some rebalance in the marketing budget towards casual fans, who would pay full price for a ticket might be beneficial. It is not too far of a leap to suggest that some of these casual fans might be from the as yet under-represented EDI protected communities. Pick and Gillett suggest that a sense of fan and team togetherness using emotional attachment to the local community could help to align the behaviour and attitudes of fans. It is clear that social-awareness is important to fans and marketing targeting this would increase the value of each fan type and potentially improve fan retention / attendance following relegation.

13.4 The characteristics of football in the experience of Kick It Out

In discussions with our colleagues at Kick it Out, they identified a number of characteristics of football which should be taken into account when setting appropriate requirements around EDI in the Code for Football Governance. In their experience:

1. Football is not like any other industry. It is not like banking. Your bank does not routinely promise to look like and represent its relevant/local communities. Football clubs routinely make that promise. But do they? For several clubs, the local communities go indoors when the fans come to the stadium in their communities. For some clubs, what they represent is more like the communities that used to live near the stadium 30 or 40 years ago.
2. That promise to look like and represent relevant/local communities confers a

benefit on clubs which participants in other industries do not receive. Regulators in most industries are quite rightly reluctant to use ultimate enforcement sanctions and effectively put a regulated entity out of business. In football, administrators are even more reluctant to take actions that would have such effects. The place that clubs hold in the heart of communities creates effective political pressure. Football receives this benefit as a windfall. It pays no price to receive this benefit. The price it should pay is that it should be properly held to account on its promises to reflect relevant/local communities.

3. The pace of change in delivering fair representation of under-represented or minority communities in football is glacially slow. There are areas of stubborn under-representation that have persisted for decades and initiatives such as the PLEDIS and FLDC have made no significant impact. For example:
 - a. Players of Black heritage make up around 40% of professional players in the men's game. Around 14% of those qualified to hold coaching positions through possession of UEFA A/B coaching licences are of Black heritage. Yet only 4% of coaches in the elite professional game are of Black heritage⁹⁵.
 - b. Football is by far the most popular sport amongst South Asians in the UK, the largest ethnic minority grouping in the UK. They play the game at a rate above their proportion of the population. Grassroots participation is in the range of 10-18% for boys and girls (depending on age groups). Yet, only 0.5% of elite professional players in the men's game are of South Asian heritage and only 1.5% of the academy (from age 7 upwards) are of South Asian heritage⁹⁶. Elite

90 Gillett, A.G. and Tennent, K.D., 2018. Shadow hybridity and the institutional logic of professional sport: Perpetuating a sporting business in times of rapid social and economic change. *Journal of Management History*, 24(2), pp.228-259.

91 Neale, W.C. (1964) 'The peculiar economics of professional sports'. *Quarterly Journal of Economics*, LXXVII:1.

92 Kuper, S. and Szymanski, S. (2012). *Soccernomics*. UK: Harper Sport.

93 Gillett, A.G. and Tennent, K.D., 2018. Shadow hybridity and the institutional logic of professional sport: Perpetuating a sporting business in times of rapid social and economic change. *Journal of Management History*, 24(2), pp.228-259.

94 Pick, C. and Gillett, A.G., 2018. Segmenting consumers of professional soccer: Identifying the 'enthusiast'. *Journal of Services Research*, 18(2), pp.7-36.

95 <https://api.blackfootballerspartnership.com/wp-content/uploads/2023/03/BFP-SzymanskiReport2023-1.pdf>

96 <https://explore.thepfa.com/view/188813732/36/>

representation has grown over recent years but, even at those accelerated rates, it will take 20-30 years for representation in the elite game to match the proportion of participants at grassroots football. In other words, it will be over a century since South Asian communities were encouraged to emigrate here to support the post Second World War rebuild of the UK before they are fairly represented on the pitch in our national game⁹⁷.

c. While the women's game is out of the remit of the Independent Football Regulator (see section 14), it is an area which it is hoped will come under regulatory remit in the future and is therefore worth commenting on here. During the 2021/22 season, the PFA estimated that only 10% of players in the WSL were from Black, Asian or ethnic minority backgrounds. While this figure appears to have increased slightly, a visual lack of any non-white players in some WSL line-ups this season has sparked a wider conversation about the need for diverse talent in the women's top flight.⁹⁸

4. Football is the world's favourite sport with over 3.5 billion fans and 2.5million players from over 200 countries across the globe. It is also one of the UK's most successful industries. Every week, the Premier League is broadcast to 800 million homes globally across 40 channels. It is one of Britain's most recognised and iconic brands. The EFL Championship (the second tier of English football) is the fourth most watched league in Europe – it is more popular than the top leagues in Italy and France.

5. Football thus has very high public engagement and very high public/media scrutiny – every day, every hour, every minute.

6. For an industry with such high public scrutiny, compared to other industries its back office systems and processes are relatively immature. HR systems and functions are not invested with resources in the same way as other industries of similar impact or size.

7. For an industry with such high public engagement and scrutiny, and which is increasingly data-driven for performance on the pitch, it has relatively low public accountability on EDI and is data poor off the pitch. Data is not transparent, it is opaque and there is no singular source of key data for representation in football (for example, to compile the data for this report, it is necessary to triangulate several sources).

8. Football is not currently regulated. It is a series of member associations each of which is administered by its members. The central administrators (the FA, Premier League or EFL) may use powers that look like regulatory powers but they are not truly regulatory, they are purely administrative. Their powers derive not by statute but by contractual consent from the members. Like a committee that runs a private golf club, if the members do not like what the administrators are doing, they can threaten to change the administrators to more pliant ones. This acts as a significant inherent fetter to the power of the administrators. A true regulator is not constrained in that way by the regulated entities.

9. It is trite to say that football is ultra-competitive. Some in football have argued that this competitiveness can be relied upon in football to drive fairer representation as initiatives such as PLEDIS and the FLDC would trigger the competitive spirit between clubs who would then compete to be the

most inclusive. Sadly, this is not supported by the data and this has not proved to be the case. If anything, the reverse is more true. Notwithstanding assurances to the contrary, football clubs have resisted data transparency for fear that league tables of performance would be produced. Although by definition, only half of any clubs would be in the bottom half of any such putative league table, the majority would fear they would be in the bottom half. So they have historically declined to agree to effective data transparency. Indeed, they have only recently agreed to an FA rule change to mandate data transparency with the motivation of the incoming Independent Football Regulator. This rather proves how a regulator might be more effective than the current system of self-regulation by member consent.

10. Perhaps because of these and other factors, football is an ultra low-trust environment. As a recent example, the wording in the draft Football Governance Bill which triggered the Code For Football Governance mirrors the wording in the Companies Act under which the Corporate Governance Code was created. As highlighted in Section 13, that Code now covers EDI issues. Notwithstanding that context, several witnesses giving evidence to the Public Bill Committee suggested that the wording of the Bill could be improved to specifically reference EDI. Kick It Out suggested at the Committee that this was evidence of the ultra-low trust environment. Having seen the glacial pace of change over decades, those representing under-represented or minority communities would naturally seek greater assurance – experience has taught them that football will not volunteer for change.



97 <https://www.thefa.com/news/2025/jan/30/south-asians-in-football-plan>

98 <https://www.thepfa.com/news/2023/10/10/fern-whelan-athletic-lack-of-diversity-wsl#:~:text=Fern%20Whelan%2C%20former%20Lioness%20and,female%20talent%20in%20the%20game.>

14. THE INDEPENDENT FOOTBALL REGULATOR (IFR)

The IFR has been created as a result of the Football Governance Act receiving Royal Assent on 21 July 2025. The Act and subsequent establishment of the IFR represents the biggest change to the governance of English club football since the creation of the Premier League in 1992⁹⁹.

14.1 Objectives of the IFR

The IFR will be a public body tasked with regulating football clubs in the top five English leagues. The IFR will have three primary objectives:

- Protect and promote the financial soundness of regulated football clubs
- Protect and promote financial resilience of English football
- Safeguard the heritage of English football

The IFR will operate independently, with powers to enforce regulations, conduct investigations, and issue sanctions when necessary. This will be operationalised through the granting of ‘licences’ to clubs.

The Act is clear that the IFR will not have a role in regulating sporting matters or in clubs’ specific commercial decisions¹⁰⁰.

14.2 Scope of the IFR

The IFR will regulate all football 116 clubs in the top 5 leagues including:

- Financial Regulation
- Owners and Directors Tests
- Fan engagement requirements
- Corporate Governance Code
- Protections for club heritage
- Prohibited competitions
- Distributions (via a ‘backstop’ mechanism)

Importantly, what is not in scope includes:

- Women’s football
- Match scheduling
- Ticket pricing
- Sporting sanctions
- Customer service

14.3 Progress of the IFR

In October 2025 the first Chair and CEO of the IFR were appointed.

The IFR has launched a major consultation on its proposed licensing regime, separated into several phases. Between September and December 2025¹⁰¹ public consultations on the proposed activities of the IFR have occurred on:



- Owners, Directors and Senior Executives Regime.
- Approach to information gathering and enforcement powers.
- Sanction powers and approach.
- Internal Review Function framework
- Licensing regime, including proposals on Corporate Governance

The IFR will publish licensing requirements in 2026, requiring clubs to hold a provisional license before the 2027/28 season. Additional guidance will be issued to accompany this process.

14.4 An EDI perspective on the role of the IFR

The primary public harm that the IFR is set up to protect is around financial stability and good governance. However, within the statements around ‘club heritage protection’ and ‘fair and meritocratic and would threaten the heritage and sustainability of English football’, it is obvious that EDI considerations should be applied here. The requirement for the establishment of a

Corporate Governance Code for all football clubs, includes ‘Equality, Diversity & Inclusion’ as one of its five key principles. This indicates specific responsibilities to monitor EDI strategy.

It will be important that sufficient safeguards are in place within any Corporate Governance Code including EDI considerations to avoid inaction around what is considered to be ‘specifically proportionate’ and not ‘unnecessarily burdensome’: The IFR licensing system also only currently applies to men’s football, and not women’s football – arguably a significant omission and there is a hope that this may be rectified in the future.

Existing understandings of club heritage seem to be oriented around protecting historical facets of the club and ensuring its authenticity – especially protecting team colours and ground. There is potential to strengthen this perhaps by adopting the Premier League’s aspiration that clubs should in both governance and staff demographics attempt to reflect the make-up of their local communities. It is already envisaged that the representative group of fans should in some way also reflect these demographics.

⁹⁹ <https://www.footballregulator.org.uk/>

¹⁰⁰ <https://www.lw.com/en/insights/key-elements-of-the-football-governance-act-2025>

¹⁰¹ <https://engage.footballregulator.org.uk/>

15. NEXT STEPS

At the time of publishing this review, the Independent Football Regulator has invited further feedback and submissions from organisations as part of its consultation process. We are awaiting a response and the regulator’s next update, which is due in March 2026.

Kick It Out has submitted a set of recommendations informed by the findings of this review and hopes these will be considered in the development of the regulator’s approach to Equality, Diversity and Inclusion.

Organisations wishing to get involved or to better understand the consultation process are encouraged to contact Kick It Out for further information [info@kickitout.org].

APPENDIX: EDI and football: Case studies of best practices

Authors: **Alex Gillett** and **Kevin Tennent**, University of York

Club/organisation	Division in 2024/25	Average Attendance	Number of season ticket holders
Arsenal	Premier	60, 236	40, 000
Brentford	Premier	17, 250	11, 370
Middlesbrough	Championship	25, 339	21,000
Millwall	Championship	16, 540	8, 000
BAMRef	n/a	n/a	n/a

To gauge good practise, we interviewed representatives from four professional football clubs, and the organisation BAMREF. We were also able to visit several of these in-person. Overall, these case studies paint a positive picture of the good work already being done, and it is accurate to think of these as being pioneer clubs/organisations in the area of EDI.

What is significant here is that each of these organisations dealt with EDI in a different way. We could identify different model approaches, labelled here as Community Inclusion, Community Led, Community Adaptation, Club Inclusion and Grassroots Collaboration.



WE WON'T
STOP
UNTIL **IT**
STOPS



We now provide summaries, including interview quotations, to demonstrate.

Arsenal

This was by far the most supported club in our sample of cases. Arsenal's approach spans its work with supporters to create a space where they feel like they belong, its community programmes run through Arsenal in the Community, as well as a bespoke EDI strategy designed to support inclusion internally with the club's people.

Hannah Mansour (Director of ESG) –

"We want 100% of our Arsenal family to feel like they belong at our club and to us that means driving inclusion in our community, ensuring our supporter feel at home with us, and building an inclusive workplace."

Internally, Arsenal has worked with Kick it Out to protect its young black players. There is awareness of a need for more diversity in coaching and management, and Arsenal continues to improve inclusion and diversity within the club. Its EDI strategy is focused on four pillars: insights, awareness, inclusion, and opportunities.

Outwardly, the club champions inclusion with its supporters and local community, lifting voices and collaborating with them on programmes and campaigns to drive connection and tackle local challenges.

The club's connection to black culture stretches several decades, and was recently the subject of a new book – Black Arsenal – edited by Dr Clive Nwonka and launched in collaboration with the club in August last year. The club also works with Islington Council, supporters and other members of the community around cultural moments like Black History Month, LGBTQ+

History Month, Pride, and Women's History Month to celebrate diversity.

Through Arsenal in the Community, the club works with local partners to tackle local issues and drive social inclusion across the local area. It works with Freedom From Torture to support the integration of asylum seekers and refugees fleeing war in north London. The club also has strong connections to other groups, including the Somalian diaspora in Islington.

Freddie Hudson (Arsenal in the Community): We want to create a sense of belonging in our community, and social inclusion is one of the most important outcomes our programmes are designed to support. Our community is very diverse, and using our club and the power of football, we're able to connect with and inspire the most vulnerable and underrepresented groups to help tackle social challenges.

There are also positive actions of international outreach and addressing global issues. In 2018, the club set up a programme with Save the Children – Coaching for Life – in the Za'atari refugee camp in Jordan, home to displaced Syrians fleeing the civil war. The programme combines Save the Children's child protection expertise and Arsenal in the Community's sports for development experience to build vulnerable children's mental, emotional and physical wellbeing through football. Since it started, more than 5,000 children have graduated, and today an equal number of boys and girls are coming through the programme.

Brentford

The club seeks to improve decision making and reduce bias in every aspect of its business. That informs a club-wide approach to EDI. A team of three with professional backgrounds in inclusion leads this work for the club. They are working to a three-year strategy, starting with staff and then fans, and demonstrate great passion for

creating inclusive experiences for the club's staff, fans and local community. Unlike other clubs we spoke to this function is distinct from the community team.

Preeti Shetty – Non-Exec Director and Board Lead for EDI –

“the Board made a decision for inclusion to be led by an expert in the field, with the seniority to bring about real change.”

Their approach to staff includes players and coaches as well as office staff and seems truly ‘on and off the pitch’, and is data driven based on focus groups and surveys of staff and supporters. There is a deliberate effort to avoid doing this in a tickbox/compliance driven way. Various training programmes have been initiated to improve awareness of issues that affect the club's stakeholders such as mental health, accessibility, racism, sexuality and gender.

Nity Raj – General Counsel and Director –

“we choose our programmes based on need. For example some of our players and stewards are Muslim so we find ways to support them through Ramadan”

Considering fans and external stakeholders, Brentford seeks to ensure its communications reflect a thoughtful approach to inclusion. The club seeks to appeal to new fans including demographics traditionally ‘hard to reach’ by football marketing while maintaining a deep connection with its core fan base. Brentford is also very concerned about female inclusion and has had activities to coincide with International Women's Day, and with racial equity, and tries to be inclusive of local ethnic minorities. Brentford's marketing team seeks to collect data about its fans to inform its approach to inclusion for everyone, and the data Brentford is able to collect becomes richer and more informative each season.

Millwall

The approach at Millwall by contrast to Arsenal and Millwall more organic and community led.

A relational approach is taken whereby a small team works closely with staff and players. Underpinning this approach is a learning mentality centred around mediation, learning and education, to bring the club's diverse local demographics and fans together. There is focus on increasing respect for players and in turn using the players as beacons for the fans to get behind and celebrate the diversity.

Fan outreach has included events such as the ‘Black, Blue and White’ day, which focussed on racial unity and had the involvement of current and former black players.

Jason Vincent – Safeguarding and EDI lead –

“Black, Blue and White day was really good and impactful, everyone doing this together, not to be kind of like a tick-box exercise. It was meant, and it was thoughtful.”

An LGBTQ+ Sunday football team has also been adopted. A notable historic achievement was ‘Millwall for All’ which was the first anti-discrimination charity in football and has since evolved into Millwall FC Community Trust.

Jason Vincent –

“when you're training or teaching players or staff, its not meant to condescend or tell someone off, its getting them to buy into the awareness of someone's differences”

As well as specific initiatives though is a dedication to working with local residents and the club's fan base, and ensuring small-scale intervention when it is required, such as dialogue and achieving consensus between

the fans. Legally protected characteristics are important and compliance is evident, but first and foremost Millwall sees EDI work as being about people, and also focusses efforts on the young working class white men and families who live locally and are important to the club, within its diverse mix.

Jason Vincent stressed the importance of working with the history of the community and its dynamics.

Middlesbrough

Unlike the other three cases, Middlesbrough is not a London-based team. It is located in the North East of England and the demographics of its local fan-base are significantly different regarding ethnic background and other social conditions such as household income, and on unemployment to name just two.

The club itself has competed in the second-tier for the past few years although it has fluctuated between the top two tiers since the late 1980s.

Helena Bowman – Head Business Operations and Community –

“Upon relegation from the Premier League the club did still participate in PLEDIS even though it did not have to, although eventually withdrew.”

Brian Robinson – a member of the community team and Head of Safeguarding –

“an EDI steering-group has been established comprising 18 people. The group comprises the main EDI leads from the club, who are part of its Community Foundation, as well as a cross-section of managers from across the departments.”

Fan membership is designed to encompass a broad cross-section of the local community including ethnic minorities (particularly from the Asian community) and disability awareness. There are also external members, including two from the Crown Prosecution Service, a local community project and one from EFL in the Community. Gradually the EDI team would like the community to increase its activity, as it is still relatively new and as a group has not yet achieved the self-organisation that we observed at Arsenal. The group could play an important role as a pipeline-to recruitment at the club, and so it is hoped that the diverse members will be motivated by that.

The club does some interesting work around the EDI characteristic of disability, with strong work in the area of deaf awareness, some of which was player-led and sign-language has been the most requested skill to learn amongst staff according to internal surveys.

The club has included audio-head set commentary, particularly for the sight-impaired, to provide “the atmosphere and facility that everybody in the stadium can enjoy”.

The club follows ‘Level Playing Field's’ requirements by following the accessible stadia guide and undertaking an audit for accessibility.

The club also has an EFL innovation award-winning programme for people with dementia, including dances held at the stadium and in rural areas, and as a practical measure within the stadium on match days has created badges with ID information and carer details.

Mental health is considered as important, mental health and learning difficulties being the most commonly reported disability in fan surveys. Many staff are mental health first-aid trained.

Middlesbrough FC considers race/religion-relations as being important and sees the

benefit of reaching new fans through these activities. They have held visits by Academy players to mosques and have invited Muslim elders to games – these leaders previously opposed football for their own community as not being family-friendly – but upon attending games they enjoyed the experience and have returned.

Regarding gender, the club was one of the first to have breast-feeding stadium status, it has a women's team and promotes the 'her game too' campaign. At the level of local community the club has undertaken outreach activities to women's shelters.

The club has an LGBTQ+ group 'The Rainbow Reds'.

Overall, this is an exciting case that shows the benefit of allowing clubs to adapt and operate to their local communities, without the need for introducing new quotas or targets that are prescriptive in all aspects. This is important so that clubs such as Middlesbrough can adapt to their own local circumstances rather than those of the big cities such as London, Manchester or Birmingham.

BAMRef

BAMRef was formed by Aji Ajibola in 2019 to represent Black, Asian and Mixed Heritage referees as there had been no dedicated framework for it before. It is very much a grassroots network which emphasises both supporting existing Black, Asian and Mixed Heritage referees and encouraging and fostering the development of new referees. It enjoys informal support from Arran Williams, the PGMoL EDI manager, and Raj Randhawa, the FA's Refereeing EDI Delivery Management. It emphasises three 'rs' in its strategy – recruitment, retention and representation – with the realisation that once a referee is found, keeping them inside refereeing with a chance to advance to the professional ranks

is challenging, not just from an emotional perspective but also because it can cost up to £500 for a new referee to train and equip themselves through the two year mentoring process. Ajibola feels that this network was necessary because the FA and PGMoL were not doing enough to align refereeing with broader societal and demographic change in England. He is passionate that this is necessary to ensure refereeing is inclusive, and that the FA and PGMoL largely have hitherto placed the emphasis only on compliance or even a minimalist approach as far as refereeing is concerned.

The group has had a lot of success pushing County FAs to recruit new Black, Asian and Mixed Heritage referees and has itself worked to mentor them, and is attempting to influence attitudes in the game more broadly than just at the top levels – this includes influencing clubs also who have a duty of care towards referees when they visit them to officiate, as well as the behaviour of players on the pitch and spectators. BAMRef was the only body that we spoke to who suggested there should be some form of KPI or auditing approach – but it is possible that this might make sense for refereeing nationally where referees might be expected to reflect the football population at large.

This case differs from our others because it is not a football club, it is an organisation aimed at supporting Black, Asian and Mixed Heritage referees. It works with the FA and FA Refereeing Department, and with the PGMoL's EDI manager.

There is a collaborative approach to working between these bodies, and with clubs to improve relations with the FA. Indeed BAMRef works with the whole football pyramid with targeted initiatives to train referees.

The organisation focuses on retaining people within refereeing and making it affordable, including a bursary fund to attract and retain referees from more diverse backgrounds.



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