



LondonFA



RevolutionEDI

A report commissioned by London FA and led by Revolution EDI, to explore the extent of racism across grassroots football in London and propose what actions the London FA should take in response.

September 2021

***“You could almost hear the racism
without them saying it”***

Anonymous Participant, ‘Exploring racism in grassroots
football in London’ consultation

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Executive Summary

Since the Black Lives Matter global movement in 2020, organisations have been forced to honestly reflect on how racism persists and manifests, to question if there are equitable outcomes for all their employees, clients and stakeholders, and to take meaningful action. In 2020, the London Football Association (London FA) took action by setting out and delivering a number of racial equality actions. These actions included working with the Football Association to strengthen the reporting of discrimination incidents, updating recruitment practices to appoint a new, more diverse Board and Council and racial equality training delivered to the staff team, the new Board and the new Council.

Alongside these actions the London FA also established a Racial Equality Group. This group agreed that it should engage in a detailed consultation with its clubs and leagues, to explore the extent of racism across grassroots football in London. This consultation would lead to a report and form the basis of a detailed racial equality action plan to tackle the issues raised.

This report is the outcome of that consultation and reveals that racism exists within grassroots football and is manifested in a multitude of ways, affecting players, volunteers, employees, fans and other participants in grassroots football. Whilst this study provides some stark and depressing findings, it also provides a unique opportunity to set out plans to create real and meaningful change across the game in London, led by the London FA. These cultural and organisational changes take time but with the support of the grassroots football community and a refocusing of priorities, transformation can and should be achieved.

The following is a summary of the main issues and findings of this research:

- There is consensus that racism exists in football and that it has a significant impact on Black and other racially minoritised groups in the London area and beyond.
- Football remains a predominantly white institution, especially within positions of influence and decision making, and some spaces felt hostile to Black and other racially minoritised people.
- Most participants believed that overt racism was less likely to take place in London but more likely when the teams play in the Home Counties.
- Racism manifests itself in subtle ways and as such permeates the structures through which grassroots football is organised and governed.
- Black and racially minoritised players continue to be stereotyped, for example as being more aggressive, and this has implications on their opportunities in football.
- Participants highlighted the feeling that Black and racially minoritised players were not treated equally or fairly.
- Institutional racism exists and is manifested in the lack of representation of Black and other racially minoritised people in positions such as coaching and other senior roles within football.
- Some groups do not feel welcome to play in 'mainstream' leagues.
- There is an urgent need to create safe spaces where Black and racially minoritised people feel comfortable and where racism can be reported and discussed.

- There is a serious lack of confidence in existing mechanisms for reporting racism and especially in disciplinary processes.
- There is a perception that racists face no consequences or sanctions and that therefore racism is implicitly condoned.
- Black and racially minoritised individuals have to be able to negotiate 'white' spaces in order to progress or merely survive in football.
- There is a need for people working and involved in football to have a range of diverse lived experiences.
- There is nepotism in football which perpetuates racist and discriminatory practices and attitudes.

This research is unique and should underpin how racism in grassroots football in London is addressed by the London FA. The London FA should continue to learn and challenge the existing ways of thinking whilst remaining open to constructive criticism and feedback on the approach they implement to make sustainable and meaningful change.

Introduction

Revolution EDI was appointed to research how racism manifests itself within grassroots football in London. The work was initiated by the London FA, following a desire amongst the staff and the Board to respond to the Black Lives Matter movement in 2020. The London Football Association took action by setting out and delivering a number of racial equality actions in 2020, most notably working with the Football Association to strengthen the reporting of discrimination incidents, updating recruitment practices to appoint a new, more diverse Board and Council and racial equality training delivered to the staff team, the new Board and the new Council.

Alongside these actions the London FA also established a Racial Equality Group. This group agreed that it should engage in a detailed consultation with its clubs and leagues, to explore the extent of racism across grassroots football in London. This consultation would lead to a report and form the basis of a detailed racial equality action plan to tackle the issues raised. This work is a key focus of London FA's new strategy – Harnessing the Power of Grassroots Football and the organisation has made a commitment to strengthen and improve their race equality work.

This report:

- Outlines the findings of the research undertaken which sought to establish the prevalence and manifestation of racism in grassroots football in London.
- Provides recommendations for the London FA to consider as part of its journey to address racism and racial inequalities in grassroots football in London. These are intended to inform London FA's detailed action planning and therefore the recommendations are, by design, broad in nature.

Language

Throughout the report players, employees and others involved in football who are mentioned from minoritised backgrounds are referred to as Black and racially minoritised. This terminology is used instead of contemporary terms such as Black, Asian and minority ethnic (BAME) because this emphasises certain ethnic minority groups (Asian and Black) and excludes others (dual heritage, white ethnic minority groups). Equally, 'minorities' and 'minority ethnic' are also not used because they are vague. It is also recognised that often the people that are defined as 'minority ethnic' within the above terms, are likely to form the majority of the global population. However, where participants in the interviews or focus groups have used different language to describe people or incidents this has not been changed. In this manner the voice of the participant is used directly to highlight the issue they are discussing and their particular perspective.

Method

The first step in the work was the launch of a race survey open to all members of the London FA. This included London FA affiliated clubs and London FA affiliated leagues. This sought to understand the various forms of racial inequality that is enacted in football across London at a quantitative level. There were two surveys, one focused on clubs and the other on leagues. Both had a good response rate with 38 responses to the club survey and 11 respondents in the league survey. Revolution EDI and the London FA followed up

the questionnaire with more detailed qualitative research through focus groups and in-depth interviews. These were with stakeholders and respondents to the survey who had provided consent to participate in this part of the research.

The focus groups were centred around semi-structured questions that were informed by the survey data. The nature of the focus group enabled participants to draw upon and outline their experiences. Two focus groups took place on the 13 July and the 19 July each lasting up to two hours with four participants in one group and three in the other. The focus groups were facilitated by the London FA CEO, Paul Bickerton and, in addition to the invited participants, each group had one member of London FA Race Equality Group in attendance who were also invited to contribute to the discussion. The Racial Equality Group had agreed that direct participation by senior staff from the organisation and from group members was important, to enhance London FA's learning and so they could better understand the issues. One member of Revolution EDI was also present to observe and prompt further lines of discussion where they felt it relevant for the purpose of the research. The focus groups were recorded with the consent of the participants and then transcribed for analysis.

Four semi structured interviews were recorded with participants from key stakeholder organisations, those being Kick it Out, Sporting Equals, The Rio Ferdinand Foundation, and a leading London referee/referee-tutor. Semi-structured interviews allow the interviewer to guide the interview to some extent, but the flexibility they provide does allow new information or unintended themes to be examined in greater depth. The interviewers allowed the participants the space to set out their experiences with particular reference to the London FA and grassroots football. The interviews were analysed thematically to identify repeated issues (Braun & Clarke, 2006).

Each interview lasted up to one hour and they were facilitated by a Revolution EDI consultant. A member of the London FA Race Equality Group attended one of the interviews and did, on occasion, ask questions. The questions were informed by the focus groups and survey material and the facilitators encouraged the interviewees to draw on their experiences of working and engaging with the London FA through a race equality lens. Although the number of participants may appear to be small, qualitative methods such as semi-structured interviews and focus groups generate rich, detailed content.

The interview and survey material revealed that often there is a lack of distinction over incidents and responsibilities of the national FA and the London FA. This report tries to focus upon the London FA, but some examples and incidents referred to by the participants may allude to areas of responsibility by the national FA. It will be for the London FA to determine which issues/areas are within their remit to action and they will explain this in the action plan.

Racism in Football

Racism in football has dominated the headlines for decades, but the issue has re-emerged over the last few years with an increase in online racist abuse of high-profile Premier League players. Racism takes many forms - overt, subtle (including micro aggressions) and institutional or structural. Historically, football has been associated with overt racism perpetuated by football fans at matches against Black players in the 1960s and 1970s. There has perhaps been an assumption or belief that, due to the achievements of high-profile Black footballers, that football has become inclusive and offers greater opportunities for career progression. However, whilst there has been greater involvement of different ethnic and religious communities playing football, there is an under-representation of Black and racially minoritised groups in coaching and leadership roles (Kilvington 2020).

Burdesy (2007) has highlighted a lack of cultural understanding and stereotyping of South Asian players whilst Agergaard and Sorenson (2009) have examined negative stereotyping associated with Black footballers. Lawrence and Davis (2019) have also explored the stories and experiences of Black and Asian football fans and the importance of trust building. There has also been some research by Burdsey (2009) that draws attention to the reluctance of football clubs and authorities to tackle racist abuse incidents swiftly. Attention has also been paid to how institutionally racist practices operate and manifest within the sport (Regan & Feagin 2017).

Differences exist between on- and off-field representation. Approximately one quarter of the 3,700 professional football players are Black, with Black British players accounting for 15% of all professionals since the mid-1990s. However, British Asians account for just 0.25% of professional players (Kilvington, 2018). Racism is a wider societal issue and exists outside of football but is brought into the game by players, staff, fans, and other participants.

It is within this broader context that this report is set, and as will be demonstrated, many of the issues echo those which have been highlighted through previous research relating to racism in football.

Findings from Interviews and Focus Groups

This section of the report summarises the main themes which were expressed by participants in the focus groups and interviews. An overview of each theme is outlined and is illustrated with examples and quotations from participants in the interviews and focus groups, followed by recommendations from Revolution EDI.

The issues fell into 3 broad areas:

- Theme 1 – Manifestations and Impact of Racism
- Theme 2 – Accountability for Taking Action
- Theme 3 – Suggested Participant Actions

Across the focus groups and interviews, the data revealed a broad consensus that racism exists in football and that it has a significant impact on Black and other racially minoritised groups in the London area and beyond. Whilst there were some differences of opinion regarding how racism manifests itself, there was a clear and consistent message expressed by participants that racism is insidious and widespread in the game and permeates the structures through which grassroots football is organised and governed.

Overall, however, London FA were looked upon favourably by recognising that there was a problem and trying to take positive steps to address it. Participants described the London FA in terms of being more open and progressive.

“I think with London FA they tend to be, it seems, that they're more progressive.”

“Recently we have been involved in Board recruitment [for London FA]... and how they did it I think it was exemplary...”

It is clear that London FA have support from members, employees and other stakeholders to make positive changes. This is clearly something to build upon and ensure that words are translated into progressive actions and outcomes for Black and other racially minoritised groups in football in London.

Theme 1: Manifestations and Impact of Racism

All of the participants spoke about how racism manifested in football broadly as well as within London. Participants drew upon their own experiences and gave examples of incidents of racism as well as the impact which racism had. Participants also spoke about how they navigated predominately white spaces and the strategies they utilised in order to try and protect themselves from racist violence and harm.

This theme is broken down into the following sub-themes:

- Overt Racism
- Racist Stereotyping/Unconscious Bias and Institutional Racism
- Navigating White Spaces and Creating Safe Spaces

Overt Racism

Most participants felt that overt racism was still a significant issue in grassroots football. Participants highlighted that they had experienced or witnessed racism in the stands, from parents, and child to child at youth games, player to player, from the touch line, from officials, on disciplinary panels, in meetings and, with increasing prevalence and impact, on social media.

Examples of such overt racism took the form of statements such as “The ref is a Schwartzer”, monkey noises, Black players being more harshly sanctioned, and challenging Black and racially minoritised staff and asking for ID, for example when travelling to away clubs on match days.

There was, however, one participant who felt that overt racism was not an issue in the grassroots game:

“When you're dealing with clubs and grassroots football, you're dealing with, entry level, and there's never usually issues of clear constant racism or systematic oppression.”

The vast majority of participants suggested that the London area was distinct from the rest of the country when it came to experiencing racism and, due to the diverse and multi-cultural nature of London and its clubs, overt racism was less likely to occur, and that often instances of racism were experienced when games were played outside of the London area.

“When teams from, say London go and play teams out in other areas, that's [when] they have those racism incidents.”

“We probably face more race issues outside London than in London, so when I have been to many football clubs in Kent, Essex we face much more issues there.”

The racism described was also not limited to being directed at the Black players and staff. Some participants gave examples of associative racism which was experienced by white parents and players who were involved with multi-cultural or predominately Black teams.

“Now, the parent was a white parent that was attached to a multicultural team, almost as if, how dare you, you be amongst that lot... even as a multicultural team, if you are connected with it, you are judged as well.”

Recommendation 1 (Training/Education and Awareness Raising): Consider how clubs/players can be prepared for potential experiences of racism when playing outside of the London area and to re-emphasise appropriate support and reporting mechanisms.

Racist Stereotyping/Unconscious Bias and Institutional Racism

All participants highlighted that racism also manifested itself in more subtle ways, and this was sometimes more difficult to name or challenge.

Participants spoke of Black and racially minoritised players being stereotyped by officials as being more aggressive or unable to regulate their emotions. It was felt that this led to certain behaviours being punished more harshly compared to white players.

“If a dark-skinned player expresses themselves in a way they normally do, they would be seen as that isn’t the way to do it e.g. players singing and dancing when celebrating, an official ran over and said that they needed to get off and they would be fined for it.”

“Within a Caribbean family they are a bit rowdier and this is part of the culture, it’s friendly and social not at all aggressive. But if you are a white person, things might not be understood and therefore it’s seen as aggressive and this is why those players are treated more harshly, but they’re only expressing themselves in a way which is normal within their family and social groups.”

“There’s a perception that a Black player can be, or is, uncontrollable compared to a white player because of their background... Now, where I’ve seen it ...is most of the time the regulation comes for players with educational healthcare plans where they... have ADHD or autism and I have seen it where a white player gets support and gets asked if they are OK, is there anything we can do to help? Whereas a Black player would be asked to remove themselves from the scene or not come back or giving them a fine without giving them that fair opportunity. Yeah, it is very deep racism and unconscious bias.”

The stereotyping of racialised minorities was also described by participants in terms of whether, and where, Black players would be chosen to play. It was felt that this had potential implications for their career progression as footballers, as they were not able to play to their full potential.

“The Afro Caribbean community paved the way it’s more acceptable, but they got the stereotype – he or she has to be quick, can’t play certain positions because they lack creativity, etc. The Somali community have raw talent but get a raw deal.”

“I have seen that stereotyping of players playing positions, I can go watch a team, I can close my eyes and see where the Black players are going to play. I see that with many managers, Black players are put into some positions are we being fair to our players getting the best from them. I am seeing boys of colour quick strong blah blah not in central midfield...”

Participants highlighted the feeling that Black and racially minoritised players were not treated equally or fairly and that they were being judged on the basis of race as opposed to their playing ability or merit.

“A lot of it is not even rocket science is just to be treated fairly, to be judged on who we are, to be judged on our contributions. If we make mistakes, if we’re outlandish, if I don’t know, if we’re vocal, and we’re causing issues, then of course, deal with us appropriately. But it’s almost like we we’re never on that level. I’ve never felt like I’ve been on a level footing.”

“The most important thing to know that they’re in a league on merit, and to know that they’ll be judged on merit.”

Recommendation 2 (Training/Education and Awareness Raising): Consider how to incorporate racial awareness, addressing racist stereotyping and micro aggressions into training provided to coaches, referees, and other officials.

Recommendation 3 (Culture Change): A culture which is seen to value the contributions of Black and racially minoritised staff, players, fans, coaches, referees and other participants in football is important to achieve long term change. London FA should consider what 'culture change' within grassroots football in London means and consult, include, and listen to Black and racially minoritized staff and other stakeholders.

It should be noted that one participant rightly highlighted the problematic nature of asking those who have to live with the day-to-day trauma of racism to provide solutions. This point has to be balanced with the need to ensure that racialised and marginalised communities and those with lived experience of racism are actively involved, consulted and listened to, with regards to the setting of any agendas, priorities or actions. In the work which London FA takes forward to achieve culture change, it should consider the extent to which Black and racially minoritised communities have a presence in the process but may not have a voice or, may have a voice but have limited or no influence in moving the agenda forward or participating in the decision-making processes.

As the participant suggested, it is therefore worth the London FA reflecting on the following:

- a) who are London FA asking and for what purpose?
- b) what are London FA asking and is it necessary?
- c) what will London FA do with this information and will action follow?

Revolution EDI would add:

- d) have London FA created the necessary safe spaces so that those being asked feel able to express their views and experiences?

Participants also offered examples of institutional racism which manifested in the lack of representation of Black and other racially minoritised people in positions such as coaching as well as other senior roles within football.

“Obviously it is well known the disproportionate number of Black players compared to Black coaches and even at senior management level, the numbers just don't add up and I think that's a huge problem.”

“One of the biggest things we are concerned with and ...we're trying to address the idea of creating more Black leaders in football ...there seems to be an expectation that's the limit for you there's no real recognition to progress because there is no one who exists in that position for you to relate to.”

Recommendation 4 (Representation): Ensuring that there are a range of diverse and visible role models in areas such as management, coaching, refereeing. See also recommendations 17 and 18.

The descriptions of racism, both overt and subtle/insidious, which the participants articulated, indicated that behaviors appeared to be normalised and cumulative. Participants explained that often it was not possible to specifically identify some behaviour; instances were often perceived as trivial or amounted to a 'feeling', but that these built up over time and felt like a constant battle.

"And know that we will be being judged the minute we got out of our cars, or our mini buses... and you have to have a unique way of understanding what that feeling is...the amount of times I've gone oh here we go..."

"There's a suggestion it's like your spidey senses tingle it's not an exact science I understand what is transpiring..."

"You could almost hear the racism without them saying it."

"You're fighting a battle, you're not just fighting, the football... is not just a game on the football pitch, you're actually fighting a battle."

One participant highlighted that one impact of racial abuse (and in this case specifically anti-Semitism) was that people from those communities did not feel welcomed to play in 'mainstream' leagues. Although the comment below was made relation to the Jewish League, similar issues may be applicable to other racially minoritised communities.

"There are not many Jewish people who are not refugees, and they play in this league because they can't play in other leagues because they are Orthodox and are not comfortable in other leagues because of the abuse."

The impact of racism clearly has profound effects. Participants having to deal with ("battle") racism daily, whether overt or covert, has implications for wellbeing and mental health. In addition, there are implications for the participation and progression of Black and racially minoritised participants in football.

Recommendation 5 (Support Mechanisms): Provision of appropriate support for those who experience racism.

Navigating White Spaces and Creating Safe Spaces

The final element in the section on manifestations and impact of racism pertains to how Black and racially minoritised people feel navigating what are perceived to be white spaces.

Participants highlighted that football is still predominantly white, especially in the senior positions. It was recognised that this had not changed over time, and it had an impact on how Black and racially minoritised people navigate their positions in football. Participants explained that a lot of spaces in football felt hostile to Black people and people from other racialised minorities and that it was necessary to know and understand how to navigate these spaces in order to get on. Navigating these spaces safely was also required as a means of protecting themselves from experiencing racism or being re-traumatised.

“Every time we look up... we see the same people, the same people, judging our journey, judging our pathways ...and I think, where we're at is that we never felt that we've been treated equal.”

“Women’s football as it is, is a very white space.”

“Those who are better able to assimilate into white spaces and they are more able to stay in grassroots women’s football, which is still more white than male football.”

“My privileges mean I can navigate those spaces safely, whereas some of my colleagues and friends can’t do that. The darker you are the lower down you are seen and the more seriously you experience racism.”

“I have to navigate around different scenarios to create these opportunities that will mean taking myself away from situations whereby I am totally the odd person out.”

“I never went to the AGM, etc, because I wasn't comfortable in those environments, and honestly, my club secretary was a white woman. And it would just be better for her to go to be the representative, I could have gone with her. But I just wasn't comfortable in those environments.”

Conversely, the need to create safe spaces where Black and racially minoritised people feel comfortable and where racism can be reported and discussed, was also mentioned by participants. There was a feeling that players, for example, could not progress because they were afraid to step out of familiar and safe surroundings into what would be far more hostile spaces.

“Most athletes want to compete at grassroots or professional levels and have a ceiling where they limit themselves because they can’t step out of those safe spaces.”

“It should be fun a safe environment where they are free to play, there shouldn’t be aggression or abuse or judgment.”

Recommendation 6 (Safe Spaces): Create safe spaces for racism to be discussed.

Recommendation 7 (Safe Spaces): The London FA to review meeting spaces, training areas and provision, office environments and, where possible clubhouses, pitches, stands, to understand how whiteness and racism manifests in those spaces. What are the physical and non-visible barriers to how spaces are used, the people who access them and what can be done to address this?

Theme 2: Accountability for Addressing Racism

The second theme was that of perceptions of action (or inaction) to address racism within football. It is worth noting here that some of the issues which participants spoke about extend beyond the remit and responsibility of London FA, but for completeness all the issues raised by participants under this theme are reported here.

Participants spoke about the following sub-themes:

- People in Positions of Responsibility and Decision Making
- Policies, Procedures and Processes
 - Managing Racist Incidents
 - Recruitment, Conventions and Culture
- Education and Training

People in Positions of Responsibility and Decision Making

Across the focus groups and interviews, participants spoke about the dichotomy of the challenge; the belief that change had to come from the top of the organisations within football (leagues, clubs and county FAs and the FA nationally; versus the limited faith in those in positions of power and with responsibility to enact change.

“There's just a real negative attitude around football and the people that manage the football, and that includes you London, that's all the FAs, that's across the whole country.”

“It's a club problem and it needs to be at a high level at the director level so you're sitting with you with the owners and you're sitting with the decision makers and your monitoring senior management what they're doing and needs to be taken seriously right at the top level ”

“To really believe it from the top and if the board believe in it the CEO will hopefully believe and influence the organisation.”

“The issue starts at the top as, if you are responsible for football and you have members who have to set up separately to feel comfortable and you don't do anything to help and support them, this is where the problem starts.”

“The people at the top need to stop talking and act.”

The lack of representation of Black and other racially minoritised people occupying senior positions, purportedly as a result of institutional and systemic racism, resulted in a perception that those in senior positions will do little to change the status quo.

“Do I have trust and faith going into a league Board that has existed for 30 plus years and has never actually enhanced people that look like me. ”

Participants also questioned whether people in senior positions understood the realities and impact of racism, given that they have no lived experiences, whether overt or systemic. This also cast doubt on their ability to make the changes necessary to address racism.

“I don't think they've got the empathy within their organisations. I don't think they've got the expertise internally or lived experiences and expertise on a diverse range of people from different backgrounds.”

“It goes back to empathy and lived experiences of the decision makers, they just don't get it, they have never lived that experience. They never understood what it feels like, they just don't have the empathy and the understanding of those communities and cultures. So, they don't even know where to start.”

As one participant mentioned, if you are from a Black or racially minoritised background the option to challenge racist behaviours or decision making may only be open to you once you occupy senior positions within football, and even then, confronting such behaviour or decisions remains a challenge.

“I'm quite fortunate.my status in football. So, I understand it, I get it. So, no one's pulling the wool over my eyes, let's say. I would always be prepared to challenge it. So, I'm in two very unique positions that not a lot of people have that.”

Although representation and diversity at the top levels of football were deemed important, a number of participants pointed out that having diversity in, for example, the Board or disciplinary commissions, was not sufficient on its own to ensure that racism would be understood and actions would be taken to address it.

“With no empathy, no understanding. And I'll tell you now, there was a black woman on there, there was an Asian guy on there as a chairman, and there was a white guy on there, three-person panel. ...Black woman never said a word The white guy never said a word. Everything was through the chair. Now I'm looking at the woman ...who on social media talks up about racial inequality and who didn't utter a word.” [participant was discussing a disciplinary commission involving a racist incident].

“The problem is you might get diversity but at the board it's lived experiences most of the time, these are volunteers, they are not experts. Now what you need are people who actually get it.”

A strong sentiment was expressed that Black and racially minoritised staff feel they must conform to 'white' ways of working. As a consequence, change is not enacted because everyone continues to work within the existing frameworks. If the current systems, which appear to result in discriminatory outcomes, are not overhauled, then even where you have diversity in senior management and decision makers, there will be limited impact. This is because Black and racially minoritised people will still be operating within a racist system and therefore outcomes will not change.

“They're trained in the FA ways, right? So, it's almost like the minute you walk through the door, here's your jacket, bam, put the jacket on. This is how we do things. This is how we conduct hearings. This is what we'd like from your contribution.”

“If the FA is going to continue to do what they are doing, don't put an Asian person or a Black person in a role but not change anything. They will leave.”

One participant recommended that where there were less diverse Boards or senior decision makers, external people should be brought in to assist the organisation in making the cultural changes necessary over time.

“If you can't change the board then you've got to bring in experts to help the organisation slowly change its culture...”

Ultimately, participants suggested that the goal of any changes should be to ensure that outcomes for Black and racially minoritised staff, particularly in relation to career progression, are significantly improved.

“We want to ensure that the next generation do not have a ceiling set against what their progression will be.”

“An opportunity to look at progressive ways I can increase opportunities for all the people involved in football. That's the major objective of a football plan ... it's not just about performance but opportunities across the board.”

Participants stressed the need for there to be visible and meaningful actions taken by those in positions to bring about changes in football in order to build trust with communities. Some pointed out that in the past progress and actions were far too slow or lip service was being paid to addressing racism and that this had to change.

“It's small steps or no steps.”

“I think it is really hard to trust because so many clubs failed in the past and if you want a statement on the back of Black Lives Matter then I trust them to do that. It will be a cracking statement but do you expect them to follow through on real commitment and real change.”

Recommendation 8 (Increasing Confidence in Processes and Accountability): The Board/CEO to periodically (for example every 12 months) re-emphasise the London FA’s commitment to achieving racial equality and provide an opportunity to demonstrate progress as well as acknowledging continuing shortcomings.

Recommendation 9 (Lived Experiences): The London FA to actively seek the inclusion of lived experiences across the organisation for policy development, culture change and to ensure equitable and just outcomes. Processes and systems should be considered to enable and ensure that there are genuinely influential Black and racially minoritised voices in:

- reporting/investigations/disciplinary panels
- policy development
- recruitment
- management/Boards
- other key decision-making positions.

The consideration and involvement has to be authentic and not place undue burden on Black and racially minoritised communities. See recommendation 3.

[Policies, Procedures and Processes](#)

All the participants highlighted in both the interviews and focus groups frustration and anger at the process and systems which they perceived to be unfair, lacked transparency and were designed to exclude, thus perpetuating inequalities and racism. This related to processes on the pitch and subsequently, and also the London FA’s own processes, for example, reporting racism, processes for player progression and recruitment. It was not always clear which processes the participants were alluding to and often the systems and processes which are described are set out by the national FA.

Equally, the people who manage and create such process were perceived by the participants to not have the lived experiences that the participants do (as outlined previously). Consequently, it was felt that those responsible for them do not see how and why such processes are inadequate or falling short. This appears to be the crux of the problem; the two groups have different perspectives and neither group can resolve the issue without the other. It was felt that the processes primarily maintained the status quo and benefitted white people.

The quotes below give an insight into the problems perceived by the participants.

“I’ve never heard anyone say, oh my, that was dealt with really well.”

“I had an experience with the FA – the FA had already taken a position without hearing the full story.”

“To have almost like the whole process is there not for you, they're not for you.”

Ultimately participants felt that there needed to be a whole scale review and changes to policies and procedures to ensure that they are fit for purpose and not discriminatory. This extended to recruitment, disciplinary and reporting mechanisms within clubs, the London FA and the FA nationally.

“Good internal review of what they've got, staff numbers, what support mechanisms are in place, how are they supporting scouts, stewards, all of this its needs a proper EDI review...”

“You've got to review [and] ... change the governance and recruitment processes...”

“They've got to look at their policies and processes, practices, unwritten practices all of these things. I am not saying no clubs are doing this, some are, and I would say they are best practice examples but we need more consistency across clubs.”

“We're going by the FA rules. I'm telling you now. The FA rules are not fit for Purpose. They're not fit for purpose.”

Recommendation 10 (Increasing Confidence in Processes and Accountability): To engage with the national FA to discuss areas of this report relevant to national FA policies, procedures and processes.

Recommendation 11 (Increasing Confidence in Processes and Accountability): To review the range of policies in place in terms of recruitment, complaints, reporting racism, disciplinary processes (staff and players), promotion and progressions etc to review for transparency and to develop methods to clearly communicate change, outcomes and demystify how such procedures operate to address the perceptions they favour or benefit white people.

- **Use a stakeholder informed approach to investigate this further and take appropriate action.**
- **The London FA could consider setting out policies step by step on an internal internet – including making obvious how people can appeal decisions.**
- **Consider giving responsibilities to key senior staff as a point of contact for people who need advice to follow the process.**

Managing Racist Incidents

A number of issues were raised in relation addressing racist incidences covering knowledge and awareness of how to report, confidence that reports would be taken seriously, confidence that investigations were fair, lack of 'lived experience' in determining whether racism had occurred, transparency of the management of incidences, timescales involved, the lack of appropriate sanctions being applied, lack of communication throughout the process, offenders being able to re-offend (through not being barred) and the provision of a safe space to report incidences.

Many participants of the focus groups and interviews reported confusion, or a lack of understanding on how to report incidences, where they did know there was a significant lack of confidence in the processes available to report racist incidents. This was exacerbated by having a lack of understanding over who was accountable for investigating and taking necessary action and having faith that reports would be taken seriously.

When asked about where participants would report a racist incident, responses were varied and there was some confusion about who to report to and how. Responses ranged from participants not knowing where to report at all, reporting to the London FA as they would be obliged to report to the FA nationally and so action would have to be taken, to participants feeling that reporting to the London FA was not appropriate and that it was easier to report to an external organisation, such as Kick it Out.

“We have occasions where parents report things they hear because they know mechanisms exist.”

“I would report to London FA because London FA would be duty bound to report to the FA and they should be taking action.”

“Kick it Out was easy to report to, not sure if everyone knows how to report.”

Recommendation 12 (Increasing Confidence in Processes and Accountability): Clarify and promote the appropriate means of reporting methods these could include:

- **Understanding the prevalence, location and nature of incidences is an important step to tackle racism. Consider the mechanisms that you have available to do this, alongside the role of the London FA in managing places where racism is manifesting.**
- **Setting out how incidents are handled step by step for transparency on how the procedure should work.**
- **How people appeal (and identify the composition of the appeal panel).**
- **Consider how the London FA can affirm its belief that racism exists and is a fact and how it is perceived and is informed by individual real-life experiences and that it is taken seriously.**
- **Ensuring the feedback loop is closed.**

Participants spoke of their perception that no action would be taken, or the racism they had experienced was downplayed or explained away and therefore reporting incidents was pointless.

“They did monkey chants behind the goalkeeper, but someone filmed it, we heard the chanting but didn’t see the spitting. This video was sent in, nothing was done. “

“Most of the time people say it's not worth reporting it because nothing gets done about it.”

“I feel that the teams have lost a bit of faith in the way that the FA deal with it. They don't... deal with it swiftly enough, that they don't find solutions for the problems and it is still ongoing.”

“This guy was calling [him] a monkey and the N word. The cross examination was, what sound does a monkey make? And when she said that, I said, do not answer that question. She went well I think it's a perfectly good question. You know, because... at our club we do a lot of ooh ahh [noises], and I think that's what you heard. The fact that the question was, even allowed... stinks of privilege.”

The perception that racism and racist incidents are not addressed and dealt with adequately, appear to have the impact that racism is accepted and condoned and therefore perpetuated.

“Racial abuse is accepted. If it goes to a steward, nothing is done. It feels like people are condoning it as you never see people getting punished for racism and therefore people think it’s alright.”

“You don’t see punishment or consequences for the actions, and this normalises it and it filters into grassroots sports.”

The views on whether participants felt London FA would act were mixed.

“I'd go straight to the CEO, because he is very, he's very reachable, very reachable. And I do have every confidence in him and in the senior management team that that would be effectively reported and very thoroughly investigated.”

“London FA responsibly take control of the situation, particularly as an opposition club (I see) they are responsible and have had positive experiences.”

“Might consider reporting to London FA if serious enough but at the moment I don’t see the action being taken and therefore wouldn’t report it to London FA.”

Another reason for the lack of confidence in the system was that participants did not feel those involved in racism were held to account and there were no consequences for racist behaviour.

“There is stark evidence that no one is being held accountable or repercussions. Has to be transparent, football is a typical iceberg in how it is administered. Someone has to be accountable.”

“If there is a club or coach repeatedly reported, there has to be consequences they face.”

“When it comes to the old guard and problematic and deep-rooted racism in older groups, we spend too much time looking at how we can improve these people rather than excluding them or registering them so when instances come up there is accountability and punishment. Need to see action and consequences for people’s behaviour.”

Recommendation 13 (Addressing Racism): Adopt a ‘zero-tolerance’ approach to racist incidences. If someone feels they have experienced racism then it is racism.

Recommendation 14 (Increasing Confidence in Processes and Accountability): Consider how outcomes of incidents of racism are communicated and reported to demonstrate that action is taken, and how people engaging in racist behaviour are held to account.

It was felt that often incidences of racism were not addressed swiftly on the pitch, which led to the victim retaliating against the perpetrator and finding that they themselves were charged with offences. The racism which they had endured was not adequately considered when it came to mitigation and it was often questioned whether it was appropriate to charge the victim in the first place, particularly where the racism had been reported and no action taken at the time of the incident.

“My lad said that he told you in the first half, the referee said yeah, he did. I said, why didn't you do anything? (The referee said) I didn't know what to do. What should I have done? I said what do you mean ... you've exposed him to continued racial abuse.”

“Then my lad got charged, by the way for being honest enough when the London FA officials came down, to tell them that his reaction to the multiple incidents of racial abuse that he faced was to tell the lad “Go back to your own country.””

Recommendation 15 (Training/Education and Awareness Raising): Everyone involved in volunteering or working for the London FA (referees, coaches, stewards, team managers), and in particular in relation to disciplinary processes (disciplinary commission members, investigators etc) should understand what racism is and the impact this has on those who experience it, as well as how this can affect behaviour and responses to racist incidence experienced.

Understanding racism and its impact should be everyone's responsibility.

A further area highlighted by participants as being problematic was that of disciplinary processes. The lack of people who possessed lived experiences of racism involved in administering these processes was highlighted as a concern.

"I tend to find the country FA's, I am not saying all of them, are less likely to listen, because they don't understand the experiences."

Recommendation 16 (Lived Experiences and Representation): Those investigating and involved in disciplinary processes should be from diverse backgrounds and lived experience should be present.

Recruitment, Conventions and Culture

Participants highlighted that recruitment and progression processes within grassroots football lacked transparency. They indicated that the processes appeared to discriminate, with a propensity for people in senior positions (who are mainly white), to recruit people who looked like them. It was felt that this meant that talent and good people were being missed and overlooked.

"You're significantly reducing the possibility of finding those who are either available, have the qualifications, and have the right sort of mindset... And then before you realise it, you are reducing your pool so much that you are only basically allowing white males to successfully apply, and have any chance of success... there are a lot of people with personal power who have never hired anyone who isn't a white male"

Connected to this view was the perception that the football sector operates primarily upon a system of who you know. Several participants indicated that there was a lot of favouritism and nepotism.

"There is a lot of nepotism in football - it's who you know not what you know. So the owners bring in the coach that they want. The coach ... brings in people they want like the kit man all of these are not vacancies you see in the newspaper. You end up bringing in your mates. Now if your club is 95% white, and your circle of friends are white and there's nepotism you're gonna get white."

“League committee members have come down to our games before because as far as they're concerned, there could be a bit of trouble. They're sitting next to them. They're standing next to the opposition. They're calling them by their first names. They're having a cup of tea and communicating with the referee. What is going on? First Name terms? Cups of tea? How are you doing fella? ...they don't even stand impartially, they stand within, so I'm looking thinking, you know what's going on here today? ...a rep from the league has come down and has gone straight to their friends.”

Recommendation 17: (Increasing Confidence in Processes and Accountability): Processes that are transparent, and which have defined criteria for appointment can help overcome perceptions of unfairness. The design of the criteria can also result in unintended racism. Therefore, effective practice is to co-design recruitment processes and consult a broad range of stakeholders, including those that are not represented, to understand the barriers faced.

Recommendation 18 (Lived Experience and Representation): Recruitment processes should also have a number of diverse people involved. This allows different perspectives and the identification of talent which can manifest in different ‘non-traditional’ ways. The London FA should review its processes, and in doing so, should consider involving groups that are not represented in the senior and middle management roles.

Recommendation 19 (Representation and Increasing Confidence in Processes and Accountability): Consider the creation of a central recruitment pool (who are trained) to place into roles such as referees and coaches instead of traditional contacts networks.

- The promotion via social media or website of new upcoming opportunities to allow new people to apply.
- Local processes could be introduced that requires a diverse shortlist and a process to appoint.
- Explore other progressive ways to promote the pool and make contact with people who may not traditionally be involved in football

The final point, which was made by one of the participants, was around the culture in football and concepts of fair play and sportsmanship.

“Abandonment of sportsmanship is reflected on what happens on the pitch on a Sunday. This is also intersectional. There is racist abuse but there is a lack of sportsmanship and fair play which the FA claims underpins what we do and stand for as English people, and this is quickly got rid of. The lack of care of thought for the opposition, but actively taking the time to bring down the opposition, is something which needs to be called out and has undertones and is a face of football which is not a nice one and calling this out is part and parcel of any wide racial agenda. Dismantle structures and behaviours which allows racist behaviour.”

Recommendation 20 (Culture Change): Fair play was understood by this participant to be fundamental to the game of football. Re-invigorating and re-emphasising these could go some way to changing cultures which facilitate and enable racist behaviours and practices.

Education and Training

Many of the participants highlighted that football does not operate in a vacuum and therefore there were some things London FA and the FA nationally did not have control over. Participants spoke about issues such as the lack of education in schools etc around race issues, the impact of racism and Black history broadly. They also indicated that big influences on young people in football were their home life, role models and experiences outside of a footballing context. These experiences spilled over onto the pitch and the terraces.

“For some people football is the only place where they get an inter-racial encounter. They may have people of different races around them, but football is the only time when they are interacting. They may not have different races where they work. Maybe that is why this is a place where racism vents itself.”

However, participants also highlighted grassroots football could change and challenge prejudices and racism and help young people (and participants of all ages in football more broadly) to understand the repercussions of racism.

“Can’t underestimate how much grassroots could change. Starts at the bottom with kids and young people. London is the most diverse, so most kids have exposure at school.”

Many of the participants recommended education programmes, particularly working with larger clubs and role models and innovative ways of getting the message to young people, using social media, videos and engaging with the National Youth Council.

It was also acknowledged that training needed to be offered more broadly to people in positions of influence and decision making. The importance of mandatory training programmes for coaches due to the contact and influence they have on young people.

“There are a lot of coaches who are not interested in educating themselves about race equality or developing skills to create inclusive spaces and this puts a ceiling on them becoming top level coaches, but they are still very prevalent in the grassroots and youth football – have influence on impressionable young people who don’t feel in a position to challenge.”

Participants also felt that more support was needed to empower people making complaints of racism, as well as ensuring adequate support for people in positions that are well placed to challenge racist behaviour.

“If you are a lone person in a club, you don’t feel empowered that you have somewhere you can go or that something will be done.”

“There’s not enough support for stewards at a football match with the sort of language which spurts out... I think the pressure of a game, the more people just say what they want to say. I think your stewards just don't have enough support to deal with those situations.”

The point was also made that any training needed to be carefully thought through and appropriate. There was some consensus that it was important to involve people with lived experiences of racism and that any training should be practical and immersive and not theoretical.

“I think, in regards to racial inequality training overall, that really, really needs to change. ...that sort of training shouldn't be in a classroom, that sort of training also really shouldn't be delivered by other white people.”

Recommendation 21 (Training/Education and Awareness Raising): Training and education provision should be reviewed and developed with the involvement of those with lived experience. The format of the training and identity of people that deliver it should be considered to allow the lived experience to be discussed and better understood.

It is also worth noting that while training and education were regarded as important elements to tackle racism, they were not regarded as sufficient on their own. Changes to the other areas mentioned in this report were noted as being required to dismantle the perception that the structures are racist.

Theme 3: Suggested Participant Actions

During the interviews and focus groups, participants offered suggestions of things they felt could be done to address overt, covert, and institutional forms of racism. Revolution EDI have considered these alongside the discussions of the focus groups, interviews and survey results to develop the following recommendations, in addition to those that are provided throughout the report, so as not to remove the voice of the participants. These recommendations are at times quite specific and could therefore be used to inform the more detailed action plans.

These suggestions have been grouped into broad areas below.

Representation

Developing a more diverse staff base, and more diverse representation in all positions where power is perceived to manifest itself (from referees to Board members) will help address many elements of concern raised in this report.

- Consider the full recruitment processes lifecycle to ensure that they are equitable, transparent and the outcomes better represent the wider London FA membership. Related to this, consider how roles are advertised and made attractive to encourage a more diverse audience to apply.
- Develop opportunities for Black and minority staff or stakeholders to progress, for example, by using positive action initiatives, apprenticeships and trainees and mentoring for coaches and referees and creating management opportunities at the grassroots levels where Black and racially minoritised people are better represented.
- Consider fixed term positions for Council and Board members and require diverse shortlists when appointing.

Lived Experiences

Ensuring that the voices of those with lived experiences are listened to was a recurring theme from all of the participants.

- Develop empathy by listening to those with lived experience.
- Ensure the right people are in the right positions and that the people at the top of the organisation understand the lived experiences of others.

Culture Change

The culture of the organisation sets the tone for how racism is perceived and dealt with and how safe and supported Black and racially minoritised staff feel.

- Consider how Black and racially minoritised colleagues, staff, players, fans, coaches, referees and other participants in football are valued and how this is demonstrated.
- Consider the use of language and not using the term BAME, as it does not reflect the diverse experiences of racism.

Increasing Confidence in Processes and Accountability

This was a significant area of concern for participants as has been outlined in the report. Participants made the following suggestions to address issues of perceived and real unfairness and resulting discrimination as well as a lack of transparency. This will help to build confidence in the processes.

- Swift communication of decision making and outcomes to increase confidence.
- Internal review of support mechanisms when someone makes a complaint of racism, particularly for scouts, stewards when dealing with such complaints.
- Dedicated person to report racist incidents to. Maybe part of the role of welfare officers but requires specific training.
- Safe spaces for reporting racist incidents - reporting portal on the London FA website
- London FA led actions through clubs, so the burden does not fall too heavily on the shoulders of the volunteer network.
- Mechanisms for monitoring racist incidents without having to formally report to the FA.
- Accountability and monitoring of players by the London FA, including registering and tracking them to ensure those who have been found to have engaged in racist behaviour cannot just join another club.
- The London FA to have visibility at clubs where there are known issues regarding racism and racist incidents.

Training/Education and Awareness Raising

Understanding what racism – explicit and institutional – looks like, and the steps that can be taken to tackle it, are crucial.

- Consider the training that is provided within the London FA, leagues, clubs and for volunteers, and whether that training should be compulsory. Levels of understanding vary between areas, clubs and leagues. A nuanced approach is therefore likely to be required to ensure engagement. The format of training and information provided should be authentic and seek to build understanding of the lived experience and the impact of racism. The modes/models of training may therefore span from traditional briefings through to immersive experiential training.
- Develop an information campaign that raises awareness of racism and its impact. This could build on existing work outlined by organisations such as the Rio Ferdinand Foundation. Regular information sessions, for example on micro-aggressions, may prove helpful to address low level insidious racist behaviour.
- Develop an approach to equipping all London FA staff and members with the skills to safely call out racism when they see or hear it.
- Showcase the London FA's work in relation to race equality and providing examples of best practice may support grassroots football to take local steps to address racism.

Community Engagement

In addition to challenging direct racism, providing opportunities for discussion and the building of understanding between, and within communities and clubs is important. These can range between spaces which are limited to particular communities or identities, through to activity that enables cross cultural understanding and engagement to develop.

- Engaging with Black experts.
- Ensuring big clubs are involved in community engagement activities.
- Consulting and involving children – listening to what they think and what they need in terms of support, by for e.g. involving the National Youth Council.
- Focus on grassroots projects and young people.

Summary Recommendations

This section summarises the recommendations made by Revolution EDI as provided throughout the report.

1. Recommendation 1 (Training/Education and Awareness Raising): Consider how clubs/players can be prepared for potential experiences of racism when playing outside of the London area and to re-emphasise appropriate support and reporting mechanisms.
2. Recommendation 2 (Training/Education and Awareness Raising): Consider how to incorporate racial awareness, addressing racist stereotyping and micro aggressions into training provided to coaches, referees and other officials.
3. Recommendation 3 (Culture Change): A culture which is seen to value the contributions of Black and racially minoritised staff, players, fans, coaches, referees and other participants in football is important to achieve long term change. London FA should consider what 'culture change' within grassroots football in London means and consult, include, and listen to Black and racially minoritised staff and other stakeholders.
4. Recommendation 4 (Representation): Ensuring that there are a range of diverse and visible role models in areas such as management, coaching, refereeing. See also recommendations 17 and 18.
5. Recommendation 5 (Support Mechanisms): Provision of appropriate support for those who experience racism.
6. Recommendation 6 (Safe Spaces): Create safe spaces for racism to be discussed.
7. Recommendation 7 (Safe Spaces): The London FA to review meeting spaces, training areas and provision, office environments and, where possible clubhouses, pitches, stands, to understand how whiteness and racism manifests in those spaces. What are the physical and non-visible barriers to how spaces are used, the people who access them and what can be done to address this?
8. Recommendation 8 (Increasing Confidence in Processes and Accountability): The Board/CEO to periodically (for example every 12 months) re-emphasise the London FA's commitment to achieving racial equality and provide an opportunity to demonstrate progress as well as acknowledging continuing shortcomings.
9. Recommendation 9 (Lived Experiences): The London FA to actively seek the inclusion of lived experiences across the organisation for policy development, culture change and to ensure equitable and just outcomes.
 - Processes and systems should be considered to enable and ensure that there are genuinely influential Black and racially minoritised voices in:
 - reporting/investigations/disciplinary panels
 - policy development
 - recruitment
 - management/Boards
 - other key decision-making positions.

The consideration and involvement must be authentic and not place an undue burden on Black and racially minoritised communities. See recommendation 3.
10. Recommendation 10 (Increasing Confidence in Processes and Accountability): To engage with the national FA to discuss areas of this report relevant to national FA

policies, procedures and processes.

11. Recommendation 11 (Increasing Confidence in Processes and Accountability): To review the range of policies in place in terms of recruitment, complaints, reporting racism, disciplinary processes (staff and players), promotion and progressions etc to review for transparency and to develop methods to clearly communicate change, outcomes and demystify how such procedures operate to address the perceptions they favour or benefit white people.
 - Use a stakeholder informed approach to investigate this further and take appropriate action.
 - The London FA could consider setting out policies step by step on an internal internet – including making obvious how people can appeal decisions.
 - Consider giving responsibilities to key senior staff as a point of contact for people who need advice to follow the process.
12. Recommendation 12 (Increasing Confidence in Processes and Accountability): Clarify and promote the appropriate means of reporting methods these could include:
 - Understanding the prevalence, location and nature of incidences is an important step to tackle racism. Consider the mechanisms that you have available to do this, alongside the role of the London FA in managing places where racism is manifesting.
 - Setting out how incidents are handled step by step for transparency on how the procedure should work.
 - How people appeal (and identify the composition of the appeal panel).
 - Consider how the London FA can affirm its belief that racism exists and is a fact and how it is perceived and is informed by individual real-life experiences and that it is taken seriously.
 - Ensuring the feedback loop is closed.
13. Recommendation 13 (Addressing Racism): Adopt a ‘zero-tolerance’ approach to racist incidences. If someone feels they have experienced racism then it is racism.
14. Recommendation 14 (Increasing Confidence in Processes and Accountability): Consider how outcomes of incidents of racism are communicated and reported to demonstrate that action is taken, and how people engaging in racist behaviour are held to account,
15. Recommendation 15 (Training/Education and Awareness Raising): Everyone involved in volunteering or working for the London FA (referees, coaches, stewards, team managers), and in particular in relation to disciplinary processes (disciplinary commission members, investigators etc) should understand what racism is and the impact this has on those who experience it, as well as how this can affect behaviour and responses to racist incidences experienced. Understanding racism and its impact should be everyone’s responsibility.
16. Recommendation 16 (Lived Experiences and Representation): Those investigating and involved in disciplinary processes should be from diverse backgrounds and lived experience should be present.
17. Recommendation 17: (Increasing Confidence in Processes and Accountability): Processes that are transparent, and which have defined criteria for appointment can help overcome perceptions of unfairness. The design of the criteria can also result in unintended racism. Therefore, effective practice is to co-design recruitment processes and consult a broad range of stakeholders, including those that are not

represented, to understand the barriers faced.

18. Recommendation 18 (Lived Experience and Representation): Recruitment processes should also have a number of diverse people involved. This allows different perspectives and the identification of talent which can manifest in different 'non-traditional' ways. The London FA should review its processes, and in doing so, should consider involving groups that are not represented in the senior and middle management roles.
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 - Local processes could be introduced that requires a diverse shortlist and a process to appoint.
 - Explore other progressive ways to promote the pool and make contact with people who may not traditionally be involved in football
20. Recommendation 20 (Culture Change): Fair play was understood by this participant to be fundamental to the game of football. Re-invigorating and re-emphasising these could go some way to changing cultures which facilitate and enable racist behaviours and practices.
21. Recommendation 21 (Training/Education and Awareness Raising): Training and education provision should be reviewed and developed with the involvement of those with lived experience. The format of the training and identity of people that deliver it should be considered to allow the lived experience to be discussed and better understood.

Acknowledgements

Revolution EDI and the London FA would like to thank all the participants who agreed to take part in this consultation. We appreciate the time and emotional labour which is involved in this work, particularly from Black and racially minoritised colleagues.

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