

Raising the Bar: FA Response

December 2023



The FA welcomes DCMS's independent review of the Future of Women's Football: Raising the Bar. We will continue to discuss the wider recommendations from the Review with Government, but this paper provides a short summary of key points.

1. NewCo and FA Governance structures

It has been agreed that Women's professional football is being migrated from The FA to a new company (NewCo) which will have a club owned structure. We welcome the Review's support for the FA's creation of NewCo and the Governance structures are being designed to reflect the principles outlined in the Review.

The Review also recommends that The FA reviews its governance structures such that representation of the women's game exists at all levels of its governance. We have already implemented the Board changes recommended in the Fan Led Review including Board and Council governance and the next stage of this review is to create a plan to integrate the governance of women's football with the wider game as recommended by the Review.

2. Financial regulation of the women's game

We broadly agree with the Review's assessment that the women's game need not be brought under the remit of the forthcoming Independent Regulator, subject to certain qualifications. Firstly, the NewCo has powers to set financial sustainability rules. Secondly, the Government, in creating the new Independent Regulator, must make sure that an unintended consequence of better sustainability in the men's game is not that clubs disinvest in women's football. Thirdly, legislation for the Independent regulator should also support the women's game by ensuring the same enhanced proof and provenance of funding checks; the power to prevent breakaway leagues; and legislative requirements for the sharing of financial information can apply to both the women's and men's games.

3. Finding additional investment for the game

The Review asks for additional investment into the women's game, but does not recommend where this comes from. The FA is continuing discussions with future strategic partners, but before then additional seed funding is likely to come from within football. The FA doesn't necessarily recommend that the women's game should receive solidarity payments from the men's game for the running of the League, however we would support specific solidarity payments to support the player pathway. The women's professional game receives no ongoing solidarity payments as the EFL and NLS do from the Premier League.

4. Increasing FA Cup Prize money

We have doubled the overall Women's FA Cup prize money for 2023/24. This is The FA's second consecutive year of increases in prize money, with the 2023/24 fund well over 10 times greater than in 2021/22. We are also actively reviewing equal prize money in the men's and women's FA Cup and we have previously announced our intention to work towards equal prize money. The Review

recognises there are significant challenges in pursuing this change; it is not completely straightforward as the competitions are structured differently with a different number of teams and different rounds.

Certainly, in order to match the current prize money in the men's FA Cup, new investment would be needed. We have just announced a new title sponsor in Adobe, but we would naturally welcome an uplift in support from broadcasters and other sponsors which could help us equalise prize money more quickly.

5. A dedicated broadcast slot for women's football

Women's football is on an exciting growth trajectory and we have secured landmark media rights and sponsorship deals over the last three years. The future development and sustainability of the women's game is dependent on its ability to unlock its full commercial potential. UEFA's report on the 'Business Case for Women's Football' estimates that the commercial value of the women's league and club game is set to reach €686M by 2033.

We firmly support the proposal that the women's game needs a regular, dedicated broadcast slot at weekends and, with 80% of followers of the women's game being new to football, it is an opportunity for growth which the clubs cannot achieve through the men's game.

6. Continued professionalisation of BWSL and BWC

The Barclays Women's Super League (BWSL) and Barclays Women's Championship (BWC) are already professional leagues and we have a full plan to continue to raise standards across both. We are reviewing all the recommendations for changes to minimum standards outlined in the Review and, while many are being implemented already, changing requirements for clubs needs a phased approach so that we make sure investment is sustainable. Naturally, if we achieve accelerated growth, changes can be implemented more quickly- this starts with the game being migrated from the FA to NewCo.

We also agree with calls for Union representation in the BWC which is already a professional league and we believe that players should already be represented by the PFA. Indeed, it is important to recognise the difference between Union representation and player support; only the former must be provided by the PFA, whereas the PFA need not be the focus for delivering player support. We continue to consider who is best to provide the support programmes to players and we have recently recruited a dedicated Player Care Manager who will work closely with Clubs in both Tier One and Tier Two and will be responsible for developing a player care strategy.

7. Improving the pipeline of talent

We have recently undergone a full review of the talent pathway in order to ensure it is able to provide a wide and diverse pool of players ready for senior football. The new model replaces the 28 existing Regional Talent Centres with 73 Emerging Talent Centres, increasing both the number and diversity of players in the system. This is proving successful, for example, with diversity of England age-group camps having increased from 7% in 2017/18 to 17% so far in 2022/23.

The Review recognises that, ultimately, the clubs will have to pay for the talent pipeline as they do in the men's game. But currently the women's game does not have the same economic model as the men's game, where some recouping of academy investment can be derived from transfer fees and compensation payments. The central investment from the men's game into academies via the Premier League is £88M pa, whereas the FA's overall budget for women's academies is £3.25M pa.

For transformative change, solidarity payments into the women's game from the men's game could help bridge the gap until women's academies too can become financially sustainable through transfer fees.

8. Equal access for girls in schools and at community facilities

We welcome the Government's commitments that schools are expected to deliver a minimum of two hours of PE per week and to ensure that girls have equal access to all school sport, including football.

We agree with the Review that Government must now deliver on these commitments. Non-statutory guidance due out later in the year needs to provide a clear steer for schools on how to deliver against the new priorities and we would still recommend that school sport and the equality of its provision is measured by Ofsted.

We are also working with the Football Foundation on the recommendations for facilities in the Review and are delighted to have been able to announce the new £30m Lionesses Futures Fund with Government which provides support for facilities which will specifically support the women's and girls' game.