



Fan Led Review

**Football Governance:
Disabled Football Fans**

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1. Executive Summary

The provision of direct engagement and full representation of disabled supporters should not be something that the game of football believes is within its gift.

Football has no more right to withhold representation than it does to allow it. Representation of all supporters is fundamental to the fabric of the game.

The governance of the game should represent those who own the game. Individual owners may own clubs, but they do not own the game. If football is serious about this review, serious about enhancing its governance, then it has no option but to include representation from all supporter groups, including disabled people.

We welcome the opportunity to provide evidence and opinions, please find summarised points below:

a) Board representation of disabled people/fans

It is a clear feeling and fact that there is a lack of representation at board level. It is important to have an individual to represent disability at the most senior level.

b) Regulatory obligations and bodies

A fundamental issue across football is the inconsistency of commitment and infrastructure by clubs. Having a clear, monitored, and sanctioned regulatory infrastructure addresses this.

c) Fan voice/consultation

Fan voice is imperative in delivering representative governance and understanding the 'whole picture' of a disabled fans experience. The importance of having a structured communication process and ongoing feedback on actions raised allows for relevant feedback to shape governance and deliver appropriate Inclusion.

d) Finance

A common barrier raised by clubs on improvements to access and Inclusion for disabled fans is a lack of finance. There should be a commitment to delivering minimum standards with the appropriate allocation of funds throughout the football pyramid to achieve this.

e) Community impact

The community impact of clubs is significant. Ensuring this commitment is appropriately valued and protected through governance is essential. For some disabled fans, watching live sports can be their only meaningful connection with the community and it is essential that this is protected.

f) Developments

Disabled fan engagement and consultation in creating strategies, updating services and developing stadia (existing or new) is vital.

These key points are expanded on in the following evidence submission.

2. Introduction

"Belonging", "community", "family" all words that have been spoken many times during this review process.

For many disabled football fans, that sense of "belonging", that feeling of "community", and being part of a footballing "family" is not a reality because of the way that football is structured.

This review has the potential to change that. Disability is the largest minority group in the UK (with 14 million people); however, usually an afterthought or under prioritised in the world of football.

Therefore, this report can be critical in delivering better fan engagement and allowing governance to be representative and proactively included in areas directly relating to disability inclusion.

With over 50 Disabled Supporters' Associations (DSAs) across England and Wales who are there to support and represent their fans whilst also looking to drive standards at their clubs. It is often thought that they are on the outside looking in, asking for 'favours'. When in truth DSAs are vital for direct representation to inform decision making and to allow governance to be representative.

With disability being more prevalent with age and having an aging population it is critical that football governance accounts for this and builds for the future.

Level Playing Field believes that this is an opportunity to ensure that disabled peoples' voices are included and listened to. This review can facilitate representative governance, which will provide a platform to improve matchday experiences for disabled fans across the football leagues.

3. Level Playing Field and Disabled Fans Findings

a) Board representation of disabled people/fans

It is a clear feeling and fact that there is a lack of representation at board level. The importance of having an individual to represent and speak up for disability at the most senior level ensures governance is representative and drives club-wide accountability.

- It allows for disability matters to have a suitable and non-tokenistic platform that can be weaved into the overarching governance at a club and governing body level.
- All key decision-making processes (campaigns, policy, regulations, fan experience, etc.) should have senior representation with direct responsibility for disability.
- Adopt a 'comply or explain' requirement with clubs/governing bodies to ensure that disability issues are prioritised. A case of prioritising it, and it will get done.
- FA board level also needs to have greater disability representation.
- In addition to board representation having disability representation in club staff will continue to grow understanding and provide a pivotal action in being more representative but also shaping governance.

b) Regulatory obligations and bodies

A fundamental issue across football is the inconsistency of commitment and infrastructure by clubs. This is potentially borne from a lack of genuine awareness, perceived financial barriers and other considerations. It should not be a case that

disabled people are regionally or league by league excluded from attending. Having a clear, monitored, and sanctioned regulatory infrastructure addresses this.

- The implementation and empowerment of an independent regulator to oversee all aspects of governance which should include responsibility for ensuring all aspects of diversity and inclusion (including disability) are appropriately regulated. Specific considerations of any independent body:
 - **Structural:** Ensuring the voice of governing bodies, clubs and fans is representative and accounts for all.
 - **Financial:** Club finances are reviewed in line with key obligations, including delivering access and inclusion for disabled fans.
 - **Club Custodianship:** Owners are reviewed and deemed 'fit and proper' in line with the diverse requirements and standards expected. Protection of fundamental changes that would impact all fans (including disabled fans) and the wider community is also monitored.
 - **Community Impact:** Drive standards and increase diversity and inclusion at clubs (fans and employees).
- Level Playing Field believes that the most significant catalyst to change for disabled football fans in recent time has been the Premier League pledge. It highlighted a case of what gets measured gets done, which was monitored by the EHRC.
- Having both a set of clear, measurable minimum accessible standards along with a regulator/regulatory system would deliver greater access and inclusion and, more so, a fundamental human right.
- Accountability with governing bodies to maintain standards and guidelines relating to disability access.

c) **Fan voice/consultation**

Fan voice is imperative to delivering representative governance and understanding the 'whole picture' of a disabled fans experience, connection and more with the Club and football. When a voice is listened to and acted on or constructively reviewed, appropriate change and inclusion will be delivered, and fans are empowered. Often, fans feel that their voice is listened to simply as a token gesture or, in some instances, not at all. The importance of having a structured communication process and ongoing dialogue on actions raised, allows for relevant feedback to shape governance and deliver appropriate inclusion.

Across England and Wales, there are 50+ Disabled Supporters Associations; these important representative organisations need to be utilised, empowered, and have a strong working relationship with clubs. Owners, the board and senior managers are custodians of the club; football clubs are the hub of the community in which they operate, and clubs are nothing without fans.

- The greatest level of success in addressing disability matters comes from 'decisions for disabled people being made by disabled people' and not from patronising assumptions.
- Having board involvement with disabled fan engagement further demonstrates a commitment to matters relating to disability and should be included in the overall governance framework.
- A formal recognised process implemented by the board is essential for delivering representative governance.
- Structured dialogue needs to be an ongoing process, inclusive and varied (meetings, at matchdays, surveys and other formats).
- Disabled fan engagement at clubs and governing body level needs to be standalone.

- Leagues/governing bodies to implement disability working groups made up of disabled fans and DSA representatives.
- In our experience the most successful relationships are driven from the top.

d) Finance

A common barrier raised by clubs on improvements to access and inclusion for disabled fans is a lack of finance. There is a disparity of income between the Premier League and League 2 and below; however, there should be a commitment to delivering minimum standards at all levels. The appropriate allocation of funds throughout the football pyramid to achieve this is therefore essential.

- Annual budget agreed for staff, infrastructure development, fan engagement and experience.
- A potential solution to ensure access is consistent across the leagues would be the introduction of a levy (similar to the apprenticeship levy) which all clubs contribute to and can subsequently apply for development work funding from the levy after meeting a set of minimum accessible standards.
 - It is important that models like this are dealt with appropriately and do not act as a 'progress stopper' to access.
- Fans who support clubs in the lower leagues have the same right to access as those in the Premier League.

e) Community impact

The community impact of clubs is significant. They represent a beacon for the people they immediately (fans) serve, along with the wider community. Ensuring this commitment is appropriately valued and protected through governance is essential. For some disabled fans, watching live sports can be their only meaningful connection with the community and it is essential that this is protected.

- Long term plans are created to key services and provisions to future proof and protect in the case of change of income.
- Potential impact – 50% of disabled people do not take part in physical or recreational activity (including watching live sport); understanding this – and delivering a service to address this – will ensure that clubs are representative of the community they serve.

f) Developments

Disabled fan engagement and consultation in creating strategies, updating services, and developing stadia (existing or new) is vital. In some instances, it is only towards the end of developments (or not at all) that the view and voices of disabled fans are heard. As a result, these contributions, based as they are on 'lived experience', sadly have little or no impact.

- Consultation to take place at the earliest planning stage possible.
- Consultation is not a token gesture and is not seen as a way to pass a substandard process or development.
- Ongoing and regular consultation tied into any form of development that impacts disabled people and fans.
- Everyone benefits from good access.

4. Consultation, Case Studies, and other information

We have captured the views and opinions of our membership base and other disabled fans using their verbatim accounts in the following. Member/disabled fan contributions outlined below are by way of responses to questions raised by Level Playing Field for the purpose of this fan led review. NB these members/disabled fans have agreed to have their contributions placed before you and, if you would like further contact, this can be arranged through our office.

Fan 1 – Premier League

How can football governance improve disability access and Inclusion (club/more generally)?

All leagues should sponsor bodies similar to the Premier League Disability Advisory Group. All Clubs must sponsor an independent Disabled Supporters Association with one member sitting on the League DAG.

The FA should be made accountable for interpreting and maintaining second and third party guidelines, including SGSA, and be directly involved with all Leagues in creating compulsory minimum standards / requirements for disability access, Inclusion and facilities. All Clubs to be audited against required standards with penalties for failure to comply. Non compliances to be assessed for the cost of corrective actions and commensurate monies withheld from Clubs until compliance is achieved.

In your opinion, how prioritised is access and Inclusion at the board level/ senior level in football (club or, more generally)?

It isn't prioritised. Given that DSAs should be mandatory. All club boards should be required to include DSA "chair's" on the main board with related voting rights. It must be mandatory for clubs to include disability access, Inclusion, and provision of facilities in club Policy, procedures and processes.

What improvements would you suggest to clubs to deliver greater access and Inclusion through governance?

As above. club management structures must include responsibilities for disability inclusion and access et cetera with clear reporting lines to the CEO and main board. An internal club audit system should also be mandatory in order to achieve and maintain primary, secondary and tertiary standards. DSA's to be directly involved in the process, with outside expertise brought in as required.

Is there anything specific about the governance of your clubs or, more generally, you would like to say?

Yes. The International approach has been neglected for far too long, and as such is fragmented. UEFA and CAFE have some excellent standards, but where is the international cooperation on a set of international standards for disability access inclusion and facilitation (FIFA / FA et al)? There needs to be a set of third-party auditable standards that clubs must comply with, dependent on their relative size and sophistication. This would likely be an ISO Standard (International Standards Organisation) or EN Standards (European Nomenclature). Not sure about BSI Standard (British Standards Institute) the former would

be more likely to succeed. Clubs would then have the honour of proudly displaying their compliance certificate at the ground. These days everything, we touch, more or less, has an international standard complied with globally. So where are the ISO's for football stadia?

Fan 2 – Premier League

How can football governance improve disability access and Inclusion (club or more generally)?

Greater encouragement, support and direct involvement for the DSA

We believe it would improve understanding of disability concerns and specific needs if the Club directly involved the DSA in relevant decision-making processes.

A regular dialogue (mandated?) at a high level.

In your opinion, how prioritised is access and Inclusion at the board level/ senior level in football (club or more generally)?

This varies greatly from Club to Club and is dependent upon the extent of Board involvement and upon the relationship with its Disability Supporters Association (DSA). The key to a successful relationship appears to be the attitude and direct involvement of the Club's CEO.

Disability issues only appear as a Board priority if an incident occurs affecting a disabled supporter and the Club is under pressure (particularly if the EHRC or Media are involved!)

PL are 20 individual businesses and prioritise the bottom line. Often the provision of disability amenities require "seat kills" which directly impacts revenue and profit and such decisions are therefore often deliberately delayed. The clubs under these circumstances do not want disabled supporters involved for obvious reasons.

What improvements would you suggest to clubs to deliver greater access and Inclusion through governance?

Greater encouragement, support, and direct involvement for the DSA.

Direct representation at board level would be ideal but I feel impractical and probably unworkable!

Perhaps Level Playing Field could suggest a set of guidelines for DSA inclusion.

Is there anything specific about the governance of your clubs or, more generally, you would like to say?

Consider whether giving the Independent Football Ombudsman an enhanced role and powers to oversee and investigate clubs to ensure compliance with the Accessible Stadia Guidelines significantly extending the present role of dealing with individual supporter complaints.

Fan 3 – National League

How can football governance improve disability access and inclusion (club or more generally)?

Separate entrance for disabled, exclusive disabled/carers space, ie able-bodied supporters not allowed in the area even if for access to and egress from the stand.

Speaking of my experience as a Notts County disabled season ticket holder, I feel there is little that they can do other than what they already do, and I would say that the disability stewards at Notts are excellent. When it is cold, they distribute blankets and when it is wet they issue rain coverings which cover the head, body and legs. The only improvement that could be made is at the end of the game ensuring that able-bodied supporters are not able to exit the match via the disabled area.

Fan 4 – Premier League

“Pan disability voices need to be heard not only in this review but also in the higher echelons of football. Having one wheelchair user and thinking you have done enough is not enough. Having disability representation is not a tick box exercise its should be the norm.”

Fan and Former Employee 5 – Championship

I certainly think it is probably more important than ever to raise awareness and lobby for disabled supporters particularly as clubs navigate their way out of the pandemic.

We have seen something similar in other sectors where to make a building Covid safe procedures have been put in place that place disabled people at a big disadvantage (e.g inaccessible one-way systems or disabled parking repurposed for queuing systems).

Now, there could be a similar fear within football that leads to facilities either shutting down or not effectively promoted to reduce uptake etc. I am thinking of things like a sensory room where it may be shared with more than one family – although, as you know this was not a Swansea City issue.

As football looks to recoup the substantial losses from the pandemic my fear is that if disability is not adequately represented in both club and national decision-making processes it will inevitably slip under the radar and be seen as a costly exercise. This will undo the great work in recent years and lead to more disabled people and their families missing out on live sport.

Representations, reviews, and standards are vital in creating an inclusive environment. If football clubs and NGBs continue to actively engage with disabled supporters to understand why certain facilities are so important. It places disabled supporters high on that priority list to let them know they are welcome and valued within the beautiful game.

Fan 6 – Championship

How can football governance improve disability access and Inclusion (club or more generally)?

Include someone with disabilities in/around the boardroom. Listen to those who are experiencing the difficulties.

In your opinion, how prioritised is access and Inclusion at the board level/ senior level in football (club or more generally)?

Not very much. Majority of clubs do the minimum as possible.

What improvements would you suggest to clubs to deliver greater access and Inclusion through governance?

Just speak with your disabled supporters

Is there anything specific about the governance of your clubs or, more generally, you would like to say?

Enforce changes to increase Inclusion and reduce isolation.

Fan 7 – Championship

The value of human life is not measured in years, it is measured in moments. Those moments of happiness and connection, where circumstance and will lift us and others. Those moments of sadness and strife, where we will ourselves on in a fine charge of spirit.

Many people with disabilities feel isolated and alone in society. Their daily lives can be an unrelenting struggle, reminded daily of their exclusion. For a good number of those people, following the football team they support provides them with their only sense of belonging, a sense of shared ambition, joy and pain in triumph and defeat. Supporting their Club provides them with a community that they feel that they can belong to, a community where their support is valued, a community where they feel valued.

Those lucky enough to be able to attend matches can suspend their own worries for ninety minutes and share in the moments that bind all football supporters. For those ninety minutes, they can feel equal, identified by the thing that they share with their fellow supporters, the things that bring them together, and for once not identified by their differences. For those ninety minutes, we are all just football fans.

There is much talk of how much the game of football means to large groups of people. For many disabled people, football provides their only moments of connection.

Their football club is just that, a club that they feel they belong to, and that they are part of. So please understand that when we hear how a club reaches out to its fans, it is much more than simply a way of identifying their customers; the owners of the clubs are custodians of the dreams of their supporters.

The value of those dreams, and the club's part in fans lives, cannot be measured on the Club's accounts, but it is the most precious asset they will ever own. Please ensure that the

clubs are never allowed to forget this, that they are custodians of a community of connections, and the success of that community is the best trophy they will ever win.

Having disabled people working in football clubs is also vital in understanding 'the carrot' so you do not need to use the stick.

Perhaps what needs to happen is that the provision of these facilities is funded centrally, so each club can provide excellence, regardless of which division they are in.

Fan 7 – Championship – Case study

Finance Case Study

Supporters in League 2 are entitled to the same level (of access) as those in the Premier League.

There should be a central fund available to the clubs to improve and maintain facilities and services specifically for disabled fans.

This in turn shows the commitment of the Premier League clubs to the game, by providing tangible financial support to the supporters of the game, in all divisions.

The centralisation and ring-fencing of this funding ensures that the provision of facilities is removed from the direct control and responsibility of individual clubs.

This funding could be provided by a specific committee of the FA, or whatever organisation is created to oversee the running of the game in England.

It is important the committee is made up of disabled supporters and access professionals who are then put in a position to have the ability to directly address the facilities and services for all disabled fans.

This committee should be specifically and solely established for the provision and maintenance of facilities and services for supporters with disabilities.

Although this is about much more than improved facilities, it is a tangible real way to demonstrate to all fans that the club's value their support.

This central funding should be part of a committee which has real teeth.
There should be a carrot and stick approach.

If clubs fail to reach minimum levels of facilities, then they should be hit in their prize money. Clubs which provide excellence in facilities and services should be recognised within the game and across the media.

Excellence should be recognised by awards.

Fan 8 – Social Media Comment

I think the most important thing is to consult disabled fans as part of the planning for any decisions rather than consulting them as a requirement before implementing the decisions.

Fan 9 – Premier League

How can football governance improve disability access and Inclusion (club or more generally)?

I feel it is very important that disability access and Inclusion is considered at Governance level because it informs the rest of the organisation. If the people at the top who set the tone of the organisation, it's priorities and infrastructure take the time to consider disability access and Inclusion then it will cascade down to the rest of the employees and departments and become part of the fabric of the Club.

My Club are very good at seeking the views of their disabled customers through the DSA who in turn speak to members about what the Club are doing and seek opinions.

In your opinion, how prioritised is access and Inclusion at the board level/ senior level in football (club or more generally)?

I think historically, it has not really been prioritised, but it is getting better. The DSA are actively in communication with the Club at a high level currently but even so, some things still slip through the net that should really be thought about more thoroughly prior to implementation.

What improvements would you suggest to clubs to deliver greater access and Inclusion through governance?

To engage with the DSA at a high level. The earlier the club can engage with disabled customers through the DSA, the easier the implementation of policies and procedures that are inclusive and accessible will be and it will save problems down the line.

Is there anything specific about the governance of your clubs or, more generally, you would like to say?

I do feel that my Club are trying to get it right but can also do better. Disability and Inclusion should be part of the Governance process alongside consideration of other minority groups. All too often, disability is forgotten and underrepresented.

Fan 10 – League 1

Each Club need to be speaking to its disabled supporters and making sure that disability is represented at all levels of football.

Disability needs to be more visible in football to bring about "normality".

Fan 11 – Premier League

How can football governance improve disability access and inclusion (club/more generally)?

General. To me all football clubs need to survey disabled members, compile results of both ambulant and non-ambulant supporters because the needs are very different across the disability spectrum. The results once complete need to be discussed at an senior level within the club and acted upon.

I think in many ways it comes down to "what does good look like", where do we sit against that, how do we get there, it's my belief that until we understand these questions improvement will not happen.

Club. (PL Club) have already embarked on this process with surveys taking place before Covid brought everything to a stop, preparations for surveys are already in place for next season which I have assisted with.

In your opinion, How prioritized is access and inclusion at the board level/ senior level in football (Club or, more gen)

General. It's difficult for me to comment because I do not have detailed knowledge of other clubs, personally I would like to see one board member at all clubs have responsibility for disability in a similar way that one board member has responsibility for Health & Safety or Environmental matters

Club. (PL Club) has a Disability Liaison Officer who I meet with to discuss disability on a regular basis. We work very closely together on match days, in addition as a Canaries Trust board member disability is discussed at quarterly meetings with senior officials at the club along with many other subjects. My view is that it has high priority.

What improvements would you suggest to clubs to deliver greater access and inclusion through governance?

I have mentioned some areas which I believe would be worth pursuing such as surveys, feedback from Trust's or supporter groups or indeed from organisations like Level Playing Field and of course the disabled fans themselves.

It's crucial that the right people are recruited to clubs who want their clubs to excel in this area and the commitment of the people they report to is in place.

The clubs also need to allocate funds in their budgets to look towards continual improvement.

They need to understand where they sit on their journey against "what does good look like".

Is there anything specific about the governance of your clubs or, more generally, you would like to say?

Personally, I'm in a fortunate position (at my club), we talk about disability on a regular basis including one to one meetings and meetings through the Canaries Trust. I also feel I can ring or mail the club at any time if I want to discuss anything I consider important.

I have an excellent relationship with the DLO and other senior people at the club, I considered it a great honour to be asked by the club to host yourselves Liam when you came to Carrow Road, I'm not sure that this would have happened at many other clubs and to have been given that level of trust.

The club are very transparent with all their dealings, much more than many other clubs, this is because the club has the right values and as a self-funded club it is not dictated by an owner who sees the club as their personal plaything.

I think to sum things up (the club) is on a positive journey with its work on disabled matters, it's trying to do the right things, it's an area it sees as very important and is doing its best to give disabled fans the best match day experience by looking at a process of continual improvement. One I'm very pleased to be part of.

5. Level Playing Field – Conclusion

This review is a once in a lifetime opportunity to create real change in football. We must provide a clear picture of the impact of governance on existing and potential disabled fans and employees at clubs.

Disabled people are one of the most underrepresented minority groups when talking about football; therefore, this report can be critical in delivering better fan engagement and allowing governance to deliver clubs and governing bodies obligations.

With this in mind, we have summarised several key points we recognise that need to be reviewed and re-developed to tackle the common problems.

Effective (and representative) governance, along with a determined commitment to access and inclusion is essential to ensure that clubs do actually serve their disabled supporters (the largest minority group in their local community).

When good governance is practiced effectively, disabled voices are heard, listened to and responsible positive action is taken. In many ways, football as an industry can set the agenda in the wider community, enabling governing bodies/clubs to lead the way in bringing about social change in their community. Football can – and should – genuinely act as a beacon in terms of tackling inequality, injustice and bringing communities closer together, but this cannot simply be a tick box exercise.

It is not purely about physical access improvements; it requires a clear understanding and empathy so that decision-makers are able to plan appropriately, implement clear accountability and proactively dealing with the requirements of their disabled fans. Good governance cannot be just an afterthought or a symbolic gesture. It needs real teeth, and we firmly believe that the appointment of a genuinely independent regulator will be a positive move for our national sport, combined with a multiplier effect on our society.

6. About Level Playing Field

Level Playing Field is a registered charity in England and Wales that works within sport to bring about greater access for disabled supporters. As a campaigning and advisory organisation, we exist to support both fans and organisations across all sports to improve accessibility.

The charity, originally established in 1998, is now recognised as the representative and co-ordinating body of disabled sports fans. We have a team of dedicated staff with specialist knowledge, skills, and experience.

Key Pillars

We want to ensure that whenever disabled fans attend live sport, their matchday experience is equivalent to that of any other fan. We do this through our four key pillars of work:

For the fans

For the clubs

**Knowledge
centre**

Campaigns

We adopt (and promote) the 'social model of disability', the most commonly accepted model in the UK. It states that disability is created by barriers in society and encourages removing or reducing these barriers rather than trying to 'fix' an individual's 'impairment' or health condition.

We focus our efforts on identifying solutions (reasonable adjustments) to these barriers in order to remove or reduce their impact on disabled people. Specifically, there are three key barriers:

- Environment
- Attitudes
- Organisations

We look to take a proactive and reactive approach to our work. Proactively we work with clubs to enhance their access provision for disabled fans. Reactively, we listen to the experiences of disabled supporters, whether positive or negative, to help us understand what more can be done. We are guided in our work by the following principles:

- Increasing independence and choice for disabled people
- Equality of opportunity in every aspect of a matchday
- Opposing discrimination against disabled people
- Recognising individual requirements and human rights
- Including disabled fans, particularly in decision-making

