

Assessing the proposed changes to fan engagement in the 2023 UK Government White Paper on English football

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Assessing the proposed changes to fan engagement in the 2023 UK Government White Paper on English football

In February 2023, a football governance White Paper, titled '*A Sustainable Future – Reforming Club Governance*' was published by the UK Government. The White Paper acknowledged that it would act on a recommendation from a 2021 Fan Led Review to create an independent regulator to control the professional football pyramid in the UK. It has been broadly acknowledged that fans were central to the Review, and that their views should be listened to by football club owners and directors. This commentary focuses specifically on the issue of fan engagement outlined in the 2023 White Paper, analysing Section 8 titled 'Fan Engagement and Club Heritage', to ascertain the extent to which the planned reforms and the formation of an Independent Regulator for English Football (IREF) will change the nature of the relationship between fans and the governance of their clubs.

Keywords: football, fans, governance, regulation, fan engagement

Introduction

As the sport of football has become increasingly commercialised and globalised in the late twentieth century, the professional league governance and structures in various countries have been continually revised. An ongoing issue in the twenty-first century in the British football pyramid is the variety of professional football clubs facing financial ruin (see Hamil et al. 2013; Morrow 2015; Wilson et al. 2022) and, connected to this, the prospect of the clubs at the top of the English football joining a proposed European Super League (Aarons and Ingle 2021).

These factors have resulted in widespread protests at individual clubs, led by supporters - prompting the UK government to bring forward its plan to commission the 2021 Fan Led Review (hereafter, referred to as the 2021 FLR). Following this, on 23rd February 2023, a football governance White Paper, titled '*A Sustainable Future – Reforming Club Governance*' (hereafter, referred to as the 2023 White Paper) was published by the UK Government (DCMS 2023). This 2023 White Paper confirmed that it would act on certain (not all) recommendations from the 2021 Fan Led Review to create an independent regulator, which would be established to control the professional football pyramid in the UK. Titled the Football Governance Bill (DCMS 2024a, 2024b), this included issues related to professional football governance, ownership, and the financial sustainability of clubs.

The Football Governance Bill was delayed, owing to a change in UK government (from the Conservative Party to the Labour Party) following a snap election in the summer of 2024. A revised Football Governance Bill (UK Parliament 2024) had its first reading in parliament in October 2024 and is expected to progress through readings in the House of Lords and House of Commons in 2025. However, there have already been hold-ups within this process, with several Conservative peers, including West Ham vice-chair Baroness Brady, filibustering to delay the process and proposing hundreds of amendments to scupper the revised Bill. The

Culture Secretary, Lisa Nandy MP, has accused some members of the Conservative Party of trying to use a “wrecking amendment” to “kill off” the Bill altogether (Slater 2025). Added to this, Conservative Party Leader Kemi Badenoch stated in February 2025 that she thought that the planned football regulator was “going to be a waste of money” (Morgan 2025). The Football Supporters' Association (FSA) responded by highlighting that they found it curious that Kemi Badenoch now opposes the regulator, having witnessed correspondence she sent to a constituent a couple of years previously in which she supported the reforms (FSA 2025).

The revised Bill (October 2024) showed some amendments from the original Bill, but these were mostly centred on parachute payments, financial distribution and the owners’ and directors’ test. The recommendations regarding fan engagement remain broadly the same with only a couple of notable changes. For example, clubs will now be required to have an effective framework in place to regularly meet and consult a representative group of fans on key strategic matters at the club, and other issues of importance to supporters. The revised Bill also explicitly requires regulated clubs to consult their supporters on ticket prices as well as any proposal to relocate their home ground, prior to the IFR giving approval (DCMS 2024a). Given the revised Bill (October 2024) shows a strengthening of the measures regarding fan engagement rather than a re-write of the measures, we have chosen to focus our analysis and critique for this commentary on the original Bill (February 2023) as this provided the bulk of fan engagement recommendations that have been largely unchanged by the revised Bill (October 2024).

For readers not necessarily au fait with English football, it is worth contextualising these issues by outlining the current situation and the wider angle of commercialisation linked to fan engagement. English professional football is considered unique within European football as it is the only European league to have four tiers of professional football. The English Premier League (EPL) is the top tier of men’s professional football, which has clubs, and below this is

the English Football League (EFL) which includes 72 clubs and is split into the three tiers: the Championship (tier 2), League 1 (tier 3) and League 2 (tier 4). Movement between leagues is facilitated through promotion and relegation. The financial gap between the leagues is considerable, which impacts competition. The average revenue per EPL club is c.£300m whereas in the EFL the average revenues per club are £31m (Championship), £10m (League 1) and £5m (League 2) respectively for the three leagues (Deloitte 2024). The best performing EPL teams can also qualify for lucrative European competitions such as the UEFA Champions League. Owing to substantial broadcasting deals throughout its history, the EPL has established itself as the world leading league in terms of revenue and exposure and at the time of writing is c.£2bn clear of its nearest rival leagues in Spain and Germany (Deloitte 2024). The EFL clubs, by comparison, tend to operate more locally. Both the EPL and EFL are self-governing and this in part has led to the financial gap between teams and leagues over the last three decades.

The financial and governance gap created has exacerbated issues surrounding the impact of commercialisation on sports fans. Many academic studies have explored this, but the evidence is mixed. For example, Winell et al. (2022) investigates the impact on elite sports fans through a literature review of 42 papers and concludes that commercialisation is a threat due to factors such as supporters feeling they are treated as customers, and a conflict between commercial and traditional fan ideologies (Fritz et al. 2017). However, the same papers also identify several positives in commercialisation such as better infrastructure, a more professional approach, and a better-quality product. Further, Giulianotti (2005) studied Scottish football supporters and found a simultaneous acceptance and denouncement of commercialism, with supporters seeing it as a diminution of the modern game, but an inevitable consequence.

Thus, the broader context of football, commercialisation and its impact on fans is important in our positioning piece. Fan engagement is a crucial aspect of modern-day sport, but it is heightened in English football owing to its cultural uniqueness. In many ways, this is how we arrived at a critical juncture in the sport's history with the implementation of an independent regulator never seen before.

This commentary critically examines the 2023 White Paper by focusing on a key section specifically related to fan engagement. We discuss the concept of fan engagement, aiming to position it in the context of the objectives covered in Section 8 of the 2023 White Paper, titled 'Fan Engagement and Club Heritage'. We then explore the extent to which the planned reforms and the formation of an Independent Regulator for English Football (IREF) might shift the nature of the relationship between fans and the governance of their clubs. As we posit in this commentary, it might not be the silver bullet to football's problems that many think it will be.

The 2021 Fan-Led Review and the 2023 UK Government White Paper

The 2021 FLR included 47 recommendations about the future of English football (DCMS, 2021). One of the key recommendations was for the UK Government to create a new Independent Regulator for English Football (IREF), and that the IREF should oversee more stringent governance requirements for clubs, including tighter financial regulation and establishing a newly strengthened owners' and directors' test. It should be noted here that calls for a regulator are not new (see Brown 2000; Serby 2014; Sutcliffe 2000; Welsh 2023). Perhaps unsurprisingly, given the review was fan-led, the report also recommended strengthening the engagement of supporters in the governance of football clubs so they could be more meaningfully consulted and part of the decision-making processes at clubs. Fans were also identified as being among the best placed stakeholders to ensure the protection and maintenance of the 'cultural heritage' of their football club – heritage that may not necessarily

always be a consideration to owners and governance directors of clubs who may have competing priorities. Significantly, the 2021 FLR outlined how:

“the recommendations should be considered holistically and not as a set of individual options from which football can cherry pick. Stronger regulation, better corporate governance, and enshrined protection on heritage issues all lead to greater confidence in the redistribution of finances. Only if taken together can we ensure the long-term sustainability of football” (Crouch 2021)

As the above quote highlights, the 2021 FLR strongly recommended its full implementation – and stressed that a partial uptake of the Review could weaken the overall impact of change. The UK Government initially responded to the 2021 FLR in a policy document published in April 2022 (DCMS 2022) headed by MP Nadine Dorries, (then the Secretary of State for Digital, Culture, Media and Sport). The policy document confirmed that the UK Government would take forward significant reform of English football through legislation, in that they would formally make certain commitments against strategic recommendations as outlined in Table 1. According to the report (DCMS 2022, p. 9) ‘Accept’ meant that the government agreed with and will implement the strategic recommendation, whereas ‘Support’ meant either that the government agrees in principle with the recommendation (and not necessarily the specifics of the recommendation), or that it is a recommendation for another organisation so the UK Government did have control over the action, or would not actually recommend the regulator enforce these changes. Given our focus on fan engagement in this commentary, it is notable that after endorsing the 2021 FLR, the recommendations related to fan involvement – point F and also point G in Table 1 – were not fully accepted but came with a number of significant caveats.

Recommendation	Government response
(A) To ensure the long-term sustainability of football, the government should create a new independent regulator for English football (IREF).	Accept the recommendation to introduce an independent regulator.

(B) To ensure financial sustainability of the professional game, IREF should oversee financial regulation in football.	Accept , with further detail on the precise model to follow in the White Paper.
(C) New owners' and directors' tests for clubs should be established by IREF replacing the three existing tests and ensuring that only good custodians and qualified directors can run these vital assets.	Accept , with further detail to follow on a strengthened Owners' and Directors' Test.
D) Football needs a new approach to corporate governance to support a long-term sustainable future of the game.	Accept
E) Football needs to improve equality, diversity and inclusion in clubs with committed EDI Action Plans regularly assessed by IREF.	Accept the need for action, and support clubs' commitment to improving equality, diversity and inclusion focusing on improving outcomes while remaining flexible on plans for action.
F) As a uniquely important stakeholder, supporters should be properly consulted by their clubs in taking key decisions by means of a Shadow Board.	Support , with further consider of the mechanism.
G) Football clubs are a vital part of their local communities, in recognition of this there should be additional protection for key items of club heritage.	Support , with further detail on options to follow.
H) Fair distributions are vital to the long-term health of football. The Premier League should guarantee its support to the pyramid and make additional, proportionate contributions to further support football.	Support , with an expectation of further action from the football authorities ahead of the White Paper.
I) Women's football should be treated with parity and given its own dedicated review.	Accept
J) As an urgent matter, the welfare of players exiting the game needs to be better protected—particularly at a young age.	Support as a matter for the football authorities.

Table 1 – The 2021 FLR Recommendations and UK Government Responses (DMCS 2023, p. 10)

The 2023 White Paper, therefore, has acknowledged the call from the 2021 FLR to change the way that clubs engage with their supporters. However, by 'supporting' points F and G in table

1, rather than ‘accepting’, there is a danger that this item becomes significantly diluted under any future IREF. It is this notion specifically that we will critique in this commentary, but first we need to consider the theoretical concept of fan engagement.

Understanding Fan Engagement

Fan engagement (FE) has become central within the sports sector (Fathy et al. 2022). Yoshida et al. (2014) defined fan engagement as a consumer’s spontaneous, interactive, and co-creative behaviours with the sport organisation and/or other consumers to achieve individual or social purposes. Fans are a unique type of customers who manifest distinctive behaviours; for example, managerial decisions such as player acquisition and game strategies do not go unnoticed by the fan, who often consider themselves as an expert on running the football team/club (Fathy et al. 2022). Actively contributing to value co-creation (Popp, Germelmann, and Jung 2016), sport fans are a classic example of loyal supporters of their clubs in good and bad times, maintaining an enduring and unique relationship with a team they regard as their own (Abosag et al. 2012). The ‘psychological state’ of fans, which occurs by interactive customer experiences with a focal agent/object (Brodie et al. 2011) reflects their in-role engagement and extra-role engagement with the club that fundamentally represents the state of an organism that is proposed to get activated through a perceived relationship due to fan–brand personality congruence (stimulus) (Pradhan et al. 2020).

According to Bond et al. (2022), a football club co-exists in a symbiotic relationship with its spectators. The greater the loyalty, the more resources will flow from them to the football club. In return, the football club provides an identity, a cultural icon, escapism, and a focus for social interaction. The 2023 White Paper outlined fans as being the most important stakeholders for any football club. However, a variety of scholars (Bond et al. 2022; Cleland 2010; Foster 2022; Plumley et al. 2017) have highlighted how the market growth and acceleration of

commercialisation and globalisation of football since the inception of the English Premier League in 1992 has created a chasm like disconnect between supporters and football elites, nurturing hierarchies and distinct boundaries between competition organisers, leagues, clubs, athletes, and spectators (see Ludvigsen 2020; Parnell et al. 2022; Rookwood and Hughson 2017).

Fan engagement and fan group collectives increased post the 1989 Hillsborough Disaster, with Liverpool FC fans lobbying for engagement with the UK Government for over 30 years regarding the reasons for the Disaster (see Conn 2016; Doyle 2018; Scraton 2016; Turner 2021; Williams 2012). As highlighted in the previous paragraph, fan engagement also intensified during the commodification of British football in the 1990s and 2000s (Conn 1997; Giulianotti 2002; Kennedy and Kennedy 2012; Redhead 1997). These changes led to the amalgamation of the Football Supporters' Association (FSA) and the National Federation of Supporters' Clubs (NATFED) into the Football Supporters Federation (FSF) in 2002. The turn of the millennium also saw the rise of independent fan groups engaging with the changing nature of the football clubs and how they treated fans (Cleland 2010; Davis 2015; King 2002; Brown 1998, 2000, 2007). More recently, the field of FE has stretched further into underrepresented groups in football including disabled supporters who have lobbied for better engagement and support from clubs (Southby 2011, 2013) and for greater inclusivity and safety in stadiums (Brown 2022; Penfold and Kitchin 2020). There has been further FE lobbying with regards to stadia attendance more general and the importance of fans to generate atmosphere for their clubs including reviews regarding the return to safe standing at various British football grounds (Turner 2021, 2022; Turner and Ludvigsen 2023).

Theory tells us that fans are important as stakeholders of their club. However, it does not tell us the best way to engage with fans as stakeholders as each one is unique and has different

requirements and perceptions as to what denotes ‘engagement’. The IREF will have a significant challenge on its hands when considering the position of equality through fan engagement, owing in part to the splintered ecosystem of professional football driven by financial growth of individual leagues and clubs.

Critiquing FE in the 2023 White Paper and the IREF

According to the 2023 White Paper, the benefit of an effective engagement strategy between a football club and its fanbase is two-fold. Clubs can receive valuable insight into their decision-making process from the perspective of their most important stakeholders, and they can also communicate the rationale behind their preferred choices for those decisions. This includes any changes to the heritage assets identified in the 2021 FLR. However, such benefits are still largely based on assumptions and are yet to be tested empirically. A further issue is that although the 2023 White Paper believes that the fans are the most important stakeholders, the reality is much different. We only need look at examples such as the initial responses to the Football Supporter Federation’s ‘Twenty’s Plenty’ Campaign (2013 - 2016) (see Gibson 2015) and the ‘proposed’ European Super League in 2021 (see Brannagan et al. 2022) which demonstrated that the fans are not the most important stakeholders. Rarely do club owners and senior executives communicate the rationale behind decisions they make that fans often view as not being in the interests of the club. The disconnect in communication further fuels the narrative that fans are ‘perceived’ as important rather than ‘actually’ being important.

The 2023 White Paper (DCMS 2023, p. 54) stated that the regulator would require a level of “dialogue between a football club and its fans, ensuring that the views of fans are listened to and acted upon”. This was in response to the 2021 FLR which found variable standards of fan engagement across clubs. While some clubs have effective structures in place, others have

shown limited progress in delivering the standards set out by the English Premier League and English Football League. The results from the 2021 FLR was that fans feel that they are not consulted as part of the strategic decision-making process at some clubs. It was noted in the 2023 White Paper that issues related to the cultural heritage of a club – specifically mentioning the club badge, home team kit colours, the name of the club, the stadium location, and the competitions the club plays in – are seen to be areas that fans should have a particular say on.

However, there is no information on how that ‘say’ might look and how it might be applied in practice. Additionally, we suggest there are several difficulties in implementing a fair and meaningful system of fan engagements. Problems arise with what we would define as a ‘representative’ group of fans and how much dialogue there needs to be. This group could include people from the supporters’ trust (if there is one), community trust, women’s team (if there is one), disabled supporter groups and those that represent other marginalised groups (such as LGBTQ+, ethnic and religious minorities etc) and fans that relate to local media through columns or blog sites. Far from a homogenous group with shared values and views, fan groups are likely to have quite different and competing positions on aspects of their club and how it should be run. There is no ‘one-size-fits-all’ approach here that would work for all clubs – and this point is recognised in the 2023 White Paper, which provides flexibility in the way that clubs approach such fan engagement. This is likely to be something that must become club specific. Stakeholder engagement planning and integration, via a regulator, may support the fan voice but some of the narrative concerning fans having a place on the Board of the club, directing decision making, and/or having power to directly influence strategy is highly unlikely.

It is notable within the 2023 White Paper that there are no specific requirements for any fan involvement in this type of direct decision making – probably because it would be heavily

resisted by club owners and directors. There is a question that needs to be posed as to why football should be different to mainstream business if financial sustainability is a key objective? Ultimately, giving fans a voice is a good idea, but it only really works if fans have an ownership stake in the club. This type of ‘golden-share’ arrangement has been strongly rejected by clubs in the past and, while it was a feature of the 2021 FLR, a standardised form of fan engagement (which was highlighted in the Review to not be working currently) is problematic with different sizes of football clubs and the ownership structures being markedly different in all of the 92 clubs in the professional English football pyramid. Even providing fans with a voice has not sufficiently affected the changes that the ownership ultimately makes.

Meanwhile, it is likely that many clubs will seek to pre-empt many of the proposed changes and try to get ahead of any potential regulatory oversight by installing their own systems of fan engagement. For example, in 2023, Tottenham Hotspur FC established a formal Fan Advisory Board which includes club executives and elected fan representatives and meets four times a year to discuss ‘club issues’ (Tottenham Hotspur 2023). The Premier League have also developed a ‘Fan Engagement Standard’ (Premier League 2023) to help clubs shape their interactions with fans in the future. There is always a risk that this type of thing happens with any legislation, particularly one that is often slow going through parliament. Under a self-governance model, the clubs and leagues themselves may look to get ahead of the regulator before it is even in place, which may dilute the overall power of the regulator in the future.

It is also possible that clubs will say that they are already facilitating effective fan engagement, particularly with recent changes made to football stadia including safe standing and better disability / accessibility provisions, which were requests from fans (Penfold and Kitchin 2020; Welford et al. 2022). This may appease certain fans, but it does not solve the wider problem of club mismanagement. The 2023 White Paper outlines how the regulator would work with the

relevant league, the club, the fanbase, and the Football Supporters' Association to help identify any issues and share best practice across clubs. With the different finances of clubs, and the different levels, it would be hard to ascertain how equitable this is in practice. Although the regulator would have the power to review fan engagement at clubs and make recommendations, would owners be required to implement the regulations? The report urges collaboration between parties, and that the regulator would have power to sanction individual clubs. What are these sanctions? Are they enforceable? Will any sanctions ultimately be challenged and end up with the Court of Arbitration? The 2023 White Paper outlines how the regulator's role should be to ensure that all clubs meet a minimum standard of engagement with their supporters while providing flexibility to implement solutions which suit each club's unique fan base. We question what the minimum standard is going to be, and how is engagement defined? There is a risk that under the current proposals, such fan engagement could be tokenistic, with fans being reduced to meetings that are characterised as either information sharing opportunities with no room for negotiation or consultation.

The 2023 White Paper also refers to the above aspect of FE potentially feeding into a wider club licensing system. This can be an effective method of regulating clubs, but we are not convinced it will impact FE directly. Additionally, this creates wider challenges on reporting methods and, ultimately, enforceable sanctions. A regulator must have the power to intervene, but what if such an intervention requires the removal of a club license? How does that affect the broader aspects of FE within the club that the same regulator is trying to promote? The Bundesliga licencing system is a good model to use as an example, and has a better track record of financial sustainability, but that is not to say that such a model can be lifted directly into English football given the current make-up of ownership models prevalent in the English game. Again, a drastic shift to another system that works in one country is not the silver bullet answer.

The 2023 White Paper also noted that off-pitch decisions regarding the heritage of the football club need to be considered in FE recommendations. This includes items such as the badge, home team colours, name of the club, the stadium and the club joining a new competition if one were to arise. What is revealing here is the aspect of the club's heritage (badge, home team colours, and name of the club) being more critical than the scrutiny of the business operations within the specific club. Protecting the club badge and heritage is important, but will the regulator ensure that these elements cannot be changed during the process of a contractual takeover or buyout by new owners? There will also be some challenges over the stadium sale and relocation aspect. Many clubs have moved in line with spatial issues and/or have created a new stadium in line with the recommendations from the Taylor Report (1990), so queries must be considered as to why this is an issue now. In terms of a sale of a stadium, there must be a genuine financial reason. Clubs have mostly looked to sell their own stadiums to circumvent football finance regulations such as Profit and Sustainability Regulations. So, if the regulatory loophole is removed then stadium sales potentially become less of an issue (which is now the case). In our view, it is always preferable for a club to own its own stadium to be able to generate income from it. The wider aspect of FE is also important in this regard. Thus, the question for a stadium sale that the regulator needs to consider is 'why?'. There needs to be a clear business case put forward for this from the owner, which also requires meaningful dialogue with fans. Clearly, tensions are likely to arise between club owners who are driven by financial reasons and fans who are more concerned with the cultural and identity aspects of the stadium. In the case of a move to a new stadium, for example, it is easy to see how unresolvable conflict could arise from club owners and senior executives seeking a move to increase the long-term financial viability of the club coming up against fans who place much more value on the tradition and cultural heritage of the existing stadium and location. Such a position,

would also dilute meaningful FE with club decision-making, leading us back to the critique of the 2023 White Paper ‘supporting’ FE rather than ‘accepting’ it.

The future of football fandom will also be a factor as the IREF comes into being. We have discussed wider considerations regarding FE, but we must also be aware that fandom itself will change in the future alongside governance changes in the sport. Hooliganism, as an example, is not as prevalent as it was in the 1980s due to the gentrification and commercialisation of football (King 1997), yet there is still evidence of racism and prejudice in football crowds (Burdsey 2020) and minority groups are still battling with access issues to the sport as we have stated previously. Middling, Plumley & Wilson (2025) outlined how football club supporters think they should ‘behave responsibly’ toward the club and wider society but history tells us that does not always play out in practice. As football club legislation evolves, so too will football fandom, and that could have impact that is both positive and negative. Once again, the uniqueness of English football culture will be a vital part of the process in shaping future direction.

Concluding Thoughts

Many of the items in the 2021 FLR and the 2023 White Paper link back to issues and challenges regarding the governance problem that the sport currently faces. Conversations of finance, ownership, club heritage and fan engagement are embedded in the governance structures of the leagues that each club compete in. Naturally, any issue presented in sections relating to FE needs a broader mention of governance. There is a lot to like about the proposals, but sport has often battled with governance frameworks and is yet to find one that works effectively and efficiently. Consequently, governance fails and clubs/organisations experience financial distress – though this is compounded by owner/executive behaviour and decision making. In English football, leagues have effectively self-governed which has meant decision making

within individual leagues and clubs has tended to be driven by self-interest over wider collective goals or values. This creates a particular tension because of the importance of competitive balance to drive the product with clubs effectively being joint economic partners (Plumley and Wilson 2022). In addition to this, financial failure at club level is often a product of attempting to circumvent financial regulation in the sport (e.g., Profit and Sustainability Regulations). The challenge of a governance system therefore is to make sure that governance is applied consistently across the board and is joined up with any financial regulation that is in existence. It needs to place the joint nature of production at its core, ensuring competitive integrity, against the backdrop of a 'winner takes all' mentality.

Like many, we will look on with interest what the fall-out from the 2023 White Paper will be during the rest of the 2020s and beyond. While there appears to be a clear political commitment to seeking significant reform of English professional football clubs at this time, there are still many hurdles to overcome before we see it being a reality. As of February 2024, there is no draft bill for MPs to vote on, and with a UK general election due in 2024, it could well be that legislation to enact the recommendations of the 2023 White Paper is far from a done deal.

Given the focus of this commentary, we accept that we have limited the analysis to one section of the 2023 White Paper in this commentary. Future research could explore the 2023 White Paper as a whole (via documentary analysis for example) or analyse any subsequent revisions when plans are confirmed or enacted regarding the IREF in the mid-2020s. Moreover, it is highly likely that many clubs will seek to pre-empt many of the proposed changes and try to get ahead of any potential regulation as the bill continues to make its way through parliament to actual legislation. oversight by installing their own systems of fan engagement. Any stalling with the implementation of a regulator allows the leagues and clubs to get one step ahead. We may just be meandering slowly towards more of the 'status quo' in a slightly different format.

A silver bullet answer is perhaps required, but this is far from it. Indeed, the more things seem to change, the more they stay the same.

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