

The FA – Written evidence (NPS0135)

About The FA

1. The Football Association (FA) is the not-for-profit national governing body of football in England, which in recent years has put more than £180m back into the game annually. It grows participation, promotes diversity and regulates the sport for everyone to enjoy.
2. 13.5 million players of all ages, approximately 400,000 volunteers, over 200,000 coaches, and over 27,000 qualified referees help The FA keep the grassroots game going.
3. The FA runs 28 England teams across men's, women's, youth and disability football - utilising the world-class facilities of Wembley Stadium and St George's Park. It has oversight of football at every level and works to ensure that the 13.5 million people who play football in England have a positive and safe experience of doing so.

Questions:

How can local delivery, including funding structures, of sport and recreation be improved to ensure that people of all ages and abilities are able to lead an active lifestyle? For example, how successfully do local authorities and other bodies such as Active Partnerships, Leisure Trusts, local sports clubs and charities work together, and how might coordination be improved?

4. The FA's focus on local delivery looks to address the number one concern from players: poor local football facilities. Across England, on average, one in six affiliated football matches are cancelled each year- with over half of games postponed due to pitch conditions.
5. Despite over £1bn being invested by the Football Foundation (which is funded by The FA, Premier League and Government) over the past 20 years, our facilities lag well behind nations such as Germany, France and the Netherlands - where the provision of sports facilities falls entirely on the state.
6. In November 2020, we completed an audit of football facilities in every local authority – which highlighted that approximately £2bn of investment is needed in order to bring our facilities up to standard.
7. The FA is committed to redeveloping all of these facilities and received a boost when the Prime Minister announced during the 2019 General Election campaign that an additional £550m would be invested into grassroots football facilities over the next 10 years – as part of a wider £2bn plan (Government funding will be matched by external funding from the football authorities and local partners). This transformation of the grassroots football infrastructure across England would be the centrepiece of a potential bid for the 2030 World Cup, and our pre-legacy for the tournament.

8. The way in which this funding will be utilised has been refined through pilot projects in recent years. The FA's approach to supporting community football is delivered via our 'Hubs' programme - which delivers accessible facility hubs at the heart of urban communities in partnership with local authorities. Hub sites increase the number and flexibility of playing opportunities. Each site contains multiple FTPs (3G Football Turf Pitches), which can accommodate more than ten times the volume of football compared to a well-maintained grass pitch, as well as supporting multi-sport options in every area.
9. There are currently 13 hubs across the country, with 10 more in development. The first 9 hubs have recorded 189,000 registrations and over 1.1m football visits since opening. Two of the more established hub networks are located in Sheffield and Liverpool and drive significant benefits to local communities. In 2019, the hubs in these two cities generated £16.2m in socio-economic value for local communities through football provision.
10. These hubs are designed to counteract the huge losses in grassroots participation caused by poor facilities and weather. By the end of the first year of operations, the number of cancellations in Sheffield dropped from 146 to zero, meaning no lost fixtures due to poor weather.
11. The new Hub model not only ensures good facilities, but by creating partnerships across local authority sites which cross-subsidise themselves, ensures that the business models are sustainable - including sinking funds for future investment.
12. While the Government was understandably unable to commit to the £550m investment as part of the Comprehensive Spending Review in Autumn 2020, we would welcome the Committee's support in ensuring the commitment is revisited for the Budget in March 2021.

How can children and young people be encouraged to participate in sport and recreation both at school and outside school, and lead an active lifestyle? If possible, share examples of success stories and good practice, and challenges faced.

13. In order to create a habit for exercise for life, it is critical that we encourage regular participation in sport and recreation amongst children and young people - both at school and outside school. We believe that this should be delivered in tandem across three main settings: school, community and home.
14. The FA has established a *Football For Fun and Fitness* programme offer, targeted at school-age girls. The principles of the offer meet the physical, emotional, psychological and social needs of each unique individual. This is achieved by developing an appropriate environment based on the stage of development. For example, *The FA Shooting Stars inspired by Disney* programme is delivered in schools and incorporates physical activity through imaginative play and storytelling. This has the prime aim of developing confidence in bodily movement, followed by working with a ball. We

recognise that for girls to transition from this school environment to a community setting, consistency in the experience is essential. This is now a flagship programme and is being delivered across Europe, supported by UEFA.

15. The FA has also established a *Wildcats* programme for 5 to 11 year olds that is delivered in the community, and matches the age and stage of development approach in school.
16. Both programmes are complimented with an 'at home' offer, to support the child's holistic development and create a positive relationship with sport and exercise for life. We are currently piloting another community offer for 12-14 year old girls to ensure consistency and progression. All The FA programmes include bespoke training for teachers, school staff and community deliverers.
17. The FA is very keen to work with the Department for Education in order to encourage young people to participate in sport and recreation and to lead an active lifestyle. Football has a unique power to change lives for the better and we would very much welcome the opportunity to work alongside the Department for Education on this agenda – particularly on the drive to encourage young people to be more active post-Covid-19, which will be a big challenge. We stand ready to help in any way we can.

How can adults of all ages and backgrounds, particularly those from under-represented groups, including women and girls, ethnic minorities, disabled people, older people, and those from less affluent backgrounds, be encouraged to lead more active lifestyles? If possible, share examples of success stories and good practice, and challenges faced.

18. The FA is committed to playing a leading role in actively enhancing equality and diversity across English football. It is a key pillar of 'Time for Change', The FA's new strategy for the 2020-24 cycle that was launched in January 2021. As with many organisations across the country, The FA is on a journey – but significant strides have been made on this agenda in recent years.
19. In 2018, The FA published its three-year equality, diversity and inclusion strategy: '*In Pursuit of Progress*'. An annual report is delivered each year, and a new strategy for the next three years is under development. This strategy sets clear and ambitious targets to drive meaningful change within The FA and across the game, including:
 - Targets for BAME and female senior management, staff and coaches;
 - Better recruitment processes;
 - Training for all staff, Board and Council members;
 - 885 BAME and female coaching bursaries over three years;
 - 12-month coaching placements for BAME males and females with England teams;
 - Partnership with Stonewall and Rainbow laces.
20. In addition, The FA launched its new *Football Leadership Diversity Code* in October 2020. Over half of the professional clubs (including 19 Premier

League clubs) across the Premier League, EFL, Barclays FA Women's Super League and FA Women's Championship have signed up to the Code. The FA, Premier League and EFL are also signatories. The Code commits clubs to the following targets:

- 15% Black, Asian and Mixed Heritage new hires and 30% female new hires in senior leadership and team operations;
- 25% Black, Asian and Mixed-Heritage new coaching hires and 10% in senior coaching positions; and
- 50% of new coaching hires will be female and 5% of new hires will be Black, Asian or Mixed-Heritage in the women's game.

21. The FA believes that football, the national game, has a unique power to engage under-represented groups and to encourage them to lead more active lifestyles. Evidence has also shown that football can achieve significant positive change for individuals, through improving physical, mental and social wellbeing.
22. The FA published its new four-year strategy for women's and girls' football – 'Inspiring Positive Change' – in October 2020. We want to ensure there is access and opportunity for every girl and woman to play, coach, spectate, officiate, manage or administer.
23. Our goal is that every primary school-aged girl should have equal access to football in schools and clubs by 2024. Giving girls the enthusiasm to be active and to move with confidence is a vital building block. We want to help girls develop holistically and to fall in love with football at a young age. Providing a positive first experience is essential. At a practical level, this means embedding football for girls in schools, as part of the PE curriculum and in after-school sessions. As well as introducing a healthy lifestyle at an early age through football, we also want to create an appetite and an environment in which girls carry on playing the game into and through their teenage years – and beyond.
24. The FIFA Women's World Cup in 2019 inspired a nation and demonstrated massive growth potential in adult female recreational football, with thousands of older women from our 'missed generation' expressing an interest in the game. By 2024, we want to see leadership programmes for young women from every background, with a marked increase in ethnically diverse women being introduced to our game. We also want more coaches completing the free-to-access FA Education modules introducing disability football, in order to increase the awareness, confidence and skills required to engage females with health conditions or impairments. Finally, by 2024, we want to see all County FAs offering FA-developed 'fun' football opportunities so that adult women can experience the game recreationally and/or competitively – e.g. Walking Football, Soccercise and Small-Sided.
25. The FA is also passionate about encouraging disabled people to play football. We know that disabled people experience significant barriers to sports participation, and that disabled people are twice as likely to be physically inactive (43%) compared to non-disabled peers (21%).

26. We believe that appropriate opportunities – both formal and informal – should be made available to all people, whatever their level of ability. We firmly believe that disabled people should have the opportunity to play in mainstream football, should they wish to do so. However, we acknowledge that some disabled players might be better provided for in settings such as 'pan disability' or impairment-specific football on a temporary or permanent basis. The FA also aims to provide player development pathways to the elite level for various impairments such as Blind and Cerebral Palsy, and the resulting competitions needed to support the player's development.
27. Participation has been on a long-term upwards trend across the disability football pathway. 2019-20 saw 25,246 players within the pathway, which represents a year-on-year increase of 6% compared to 2018/19.
28. However, it is important to note that the Covid-19 pandemic has presented a substantial challenge to disability football. Disabled people and people with long-term health conditions are more adversely affected by Covid-19 than other populations, which is directly impacting upon participation rates across the disability football pathway. The FA is currently looking at ways to keep disabled footballers connected and active through football (whilst understanding the concerns and considerations around Covid), and to raise awareness of football opportunities for disabled people.
29. Finally, The FA is also passionate about engaging people from less affluent backgrounds in football. The additional £550m that the Government has pledged for grassroots football facilities will be directed to where it is needed most. At least 40% of the funding will go to the 20% most deprived parts of the country. Our investment will help to level-up and reconnect communities after Covid, help to address health inequalities, and ensure that no one is more than 15 minutes away from a quality football pitch. This funding will also bring jobs and local investment.

Sporting Future: A New Strategy for an Active Nation, the Government's 2015 sports strategy, outlines five outcome priorities: physical health, mental health, individual development, social and community development and economic development. Are these the right priorities and how successful has the government been in measuring and delivering these outcomes to date?

30. These outcome priorities are a fair balance between the directly attributable physical benefits, the broader direct benefits for mental health or individual development, and the wider social, community and economic development impacts that sport offers. The FA is keen to acknowledge the broader impact of football participation, and we will shortly be communicating a revised purpose within the grassroots game: "To harness the power of football to unite communities and improve the health of the nation".
31. Whilst there is general consensus on these benefits, there is limited qualification or measurement available - particularly as the focus moves away from direct benefits. The FA has looked to establish the broader benefits of football, aligned to the five outcomes, through our publication The Social &

Economic Value of Adult Grassroots Football in England. An updated and expanded report is due to launch in the coming months.

Is government capturing an accurate picture of how people participate in sport and recreation activities in its data collection? How could this be improved?

32. Due to current research practices, there will always be a shortfall in accuracy and breadth of research in comparison to user behaviour insight. The way to improve the accuracy of participation data is to incentivise participants to use technology products which record activity or participation, such as Strava, through engaging user functionality that returns value to their experience through digitally identifying their activity. There is no single solution that will do this, so it makes far more sense to use Open Data practices to pool insight centrally. This relies on a value proposition to both parties in the data sharing proposition - this will look different to each data partner.
33. The challenge to this is standardisation in data and a government team specialising in Open Data management. With so many potential providers of data, there will be vast amounts of time and effort spent cleansing and aligning multiple different sources if this is not done. This is where government has a role to lead the standardisation across participation sport (we understand that Sport England and the Open Data Institute have been looking into this and would welcome further conversations with The FA on this) by creating a standard list of data points and categories that must be used by all sports when recording participation. The benefits of doing this will be delivering a significantly more accurate picture of sport and recreation activities nationwide.
34. There is also an additional point to be made on the participation of children and young people. The FA would be keen to work with the Government to help to address the clear decline in young people's health and wellbeing – and this can best be achieved through schools. A children's wellbeing framework could be introduced in schools to track, monitor and address issues proactively. Sport can provide solutions and interventions for schools to implement and could also support the design of such a framework. We also believe the playground activities freely chosen by children are key indicators of their relationship with physical activity and wellbeing. If this playground activity is tracked, a better understanding of the emerging sedentary issues can be gleaned on a national scale and interventions (such as our *Shooting Stars inspired by Disney* scheme) can be utilised to change habits.

How can racism, homophobia, transphobia, misogyny and ableism in sport be tackled?

35. As the nation's number one team sport with around 18 million fans (aged 16+), 13.5 million participants and over 100,000 grassroots teams, football has the incredible power to bring people together, pull down barriers and act as a force for good.

36. At the FA, equality, diversity and inclusion means valuing and celebrating our differences. Nurturing the right working environment and culture means everyone thrives and can be themselves. For the game, it means everyone's welcome, ensuring differences between us do not create barriers to getting into football and staying involved. Differences can be something tangible like gender, race and ethnicity. Less obvious differences include heritage, religion, sexual orientation, unseen disabilities, family or social status and age.
37. We continue to fight against discrimination of all kinds across the game, from grassroots to professional football. We want to make our 'beautiful game' for everyone.
38. As set out above, in 2018, The FA published its three-year equality, diversity and inclusion strategy: '*In Pursuit of Progress*'. A new strategy for the next three years is currently under development. We also launched our new *Football Leadership Diversity Code* in October 2020.
39. As an organisation, The FA is proactively aligned and in solidarity with the Black community. We have developed a Black Lives Action Plan to accelerate our culture change and create an environment where everyone thrives and belongs.
40. Effective action is always based on genuine insight, and so in 2020 we undertook a wide-ranging research programme into discrimination in grassroots football. In the continual quest to eradicate all forms of discrimination in the game, we wanted to know how we could make the reporting process more widely known, and thereafter how investigations and hearings could be streamlined to achieve swift outcomes. As a result, The FA is now embarking on a programme to create greater awareness of the ways to report a discriminatory incident; to improve the process so that it is not over-lengthy; more training for everyone involved in the process; and improved communication with all those involved – with greater emphasis on a more empathetic approach.
41. In August 2020, The FA published new charging policies and sanctioning guidelines for discrimination by individual participants and spectators, following consultation with Kick It Out, the PFA, the League Managers Association and representatives from clubs and leagues. The fact that an incident of discrimination by an individual took place in private or outside of a standard football setting will no longer be a barrier to The FA issuing proceedings, following agreement from all football stakeholders that these measures are appropriate. A key achievement of The FA's Inclusion Advisory Board in recent years has been the introduction of mandatory education for those found proven at fault in a discrimination charge. This continues to be effective and is an important part of the process to help people better understand why their words or actions may be deemed wrong.
42. The FA strongly believes that more needs to be done to tackle discrimination, hate and racism online. We have significant concerns about the abuse that footballers, and others, receive online. While football (through the Premier League) monitors social media for abuse and investigates and bans supporters from grounds where it can, it is proving very difficult to ensure

that social media companies prevent or take down offensive content, or that authorities take prosecutions forward. At present, it unfortunately appears that online hate goes largely unpunished.

43. The FA believes that online hate must have real-world consequences for offenders. We are keen to engage with the Government on two key proposals on this vital agenda:
- 1) Making sure that social media companies are held accountable, and footballers are protected from harmful online abuse, through the forthcoming Online Safety Bill;
 - 2) We have recommended that the Government should pilot a special unit to look at hate crime in football – with a particular focus on social media. This would mean that the police, Crown Prosecution Service and football would be working together in a special unit to tackle online hate – which is a model that is used in the Serious Fraud Office.

What can be done to improve and implement effective duty of care and safeguarding standards for sports and recreation actives at all levels?

Legislation:

44. Sports coaches – both male and female - have an enormous influence over their athletes, particularly at the elite level. So do other professionals such as medics, sport psychologists and fitness specialists. It is illegal for teachers, care workers, youth justice workers, doctors and social workers to have a sexual relationship with a child aged 16-17 who is in their care. The omission of sports coaches means it is not currently against the law for these roles to have a sexual relationship with a 16- or 17-year-old in their care. The Government should re-look at whether there is a need to strengthen legislation in this area. The NSPCC has been pursuing a 'Close the loophole' campaign on this for some years now.
45. We note that the Home Office has recently announced its intention to bring in 'Kay's Law' to reform pre-charge bail, which will provide measures that afford better protection for victims and witnesses in cases of violent and sexual offences. We strongly advocate for the police to a) have the powers they need to be able to proportionately manage those who are being investigated for sexual offences against children and who may have access to children in public spaces, whilst the investigations are ongoing and b) for these powers to be used consistently across the 43 Police Forces.

Strategic Leadership and Governance of Sport:

46. Sport England should continue to fund the NSPCC Child Protection in Sport Unit (CPSU) and the Ann Craft Trust over the long-term in order to support the governing bodies of sport to continue to deliver on their safeguarding responsibilities at grassroots and elite levels.
47. SE/UKS Code of Governance should be strengthened to more fully embed safeguarding in all aspects, as it currently only focuses on Tier 3 organisations' responsibilities to comply with legislation. In addition, UKS &

SE should ensure that the sports they fund demonstrate how they are delivering on their responsibilities to support players/athletes - and ensure that a proportion of a sport's funding is allocated to duty of care and safeguarding interventions.

Prevalence of Abuse Data:

48. Understanding the prevalence of abuse across sport is critical. The NSPCC CPSU has been working to gather anonymised data across sport, and Sport England is currently undertaking a prevalence study. Both projects are working with leading universities and The FA is supporting both workstreams. Long-term commitment to this work is essential to inform a sport-wide strategy in safeguarding and protecting children in sport and recreation. This could include guiding a standardised framework for the categorisation of concerns across sport and recreation.

Education:

49. Lessons from past and current cases in sport (and society) illustrate the need for more player/ athlete education on boundaries and behaviour towards them, what is acceptable and unacceptable and what to do if they have concerns. This is particularly true at elite level, where the NSPCC CPSU has identified that players/athletes are more vulnerable. UKS/SE should seek to develop and share best practice in this respect. This work could be developed and led sport-wide.

50. More needs to be done to support parent/carer education about safeguarding and how to recognise the signs and support their children to feel confident to talk to them if they are worried about something.

What are the opportunities and challenges facing elite sports in the UK and what can be done to make national sports governing bodies more accountable? For example, accountability for representing and protecting their membership, promoting their sport and maximising participation.

51. The most pressing challenge for elite sports at present is funding, given the significant impact of the Covid-19 pandemic on sports' business models. The FA will have lost £300m by the end of the season, because of the inability to host events at Wembley Stadium, and other sponsorship and commercial losses. The FA has taken out loans in order to re-finance, with £75m being removed from our spend in each of the next four seasons to pay back the loans. As a not-for-profit organisation that reinvests surplus back into the game, that represents a substantial reduction in investment in the game.

52. During the pandemic, we have strived to ensure that grassroots football clubs have been provided with as much support as possible. In May 2020, The FA, Premier League and Football Foundation launched the *Pitch Preparation Fund* to provide clubs with grant funding in order to prepare their pitches for the return of football. The £7m scheme has provided funding for 2,902 clubs and

organisations, which will allow 9,588 football pitches to be made match-fit - benefiting 33,153 football teams in the grassroots, non-League and women's game, as well as Welsh Cymru Premier League. Further funds - the £1.6m *Club Preparation Fund* and the £5.5m *Matchday Supporters Fund* - have also since been established for the same group of clubs. In total, over 7,000 grants have been provided via these three funds.

53. We also welcome the Government's Winter Survival Package, which will provide an additional £14m of grants and loans to clubs at this level, and which is being administered by the Football Foundation. The grants are available to clubs to ensure that they survive, rather than compensate for lost income - and we suggest that the Government should repurpose any unspent funds for football development in those clubs.

What successful policy interventions have other countries used to encourage people of all ages, backgrounds and abilities to participate in sport and recreation, and lead more active lifestyles?

54. Countries including France, Australia and the United States have introduced legislation to ensure a 'fair return' on betting. This model requires a portion of betting companies' profits to be returned to sporting bodies so that it can be invested back into grassroots facilities and to fund anti-corruption measures. The FA believes that betting operators that use football and its competitions in their commercial products should make a payment for the use of these services. This money could then possibly be invested into the Football Foundation and used to grow participation in sports at the grassroots level and promote more active lifestyles across the nation.

55. England's grassroots football facilities compare unfavourably with other top footballing nations. Artificial grass pitches (AGPs) can never supplant grass pitches, but they should be part of a blended approach to grassroots facilities, especially where pitch demand is high. However, England lags in investment in AGPs. Comparisons with Germany and the Netherlands, who share similar climates to that of England, are significant. There are around 639 3G (synthetic) AGPs in England compared with 5,000 in Germany. Even including old-style sand artificial pitches, England has one synthetic pitch for every 24,000 of the population compared with one for every 13,000 in the Netherlands and one for every 8,000 in Germany. Investment in these pitches has a substantial impact on involvement in grassroots football, as Germany and the Netherlands have significantly higher levels of grassroots engagement under the age of 18. Further investment in building and maintaining grassroots pitches across England - via the additional £550m pledged by the Government - would open doors for people of all ages, backgrounds, and abilities to participate in sport and recreation.

Should there be a national plan for sport and recreation? Why/why not?

56. We believe that a National Plan for Sport and Recreation could be beneficial. There are many challenges facing sport and recreation at the present time, particularly as a result of the Covid-19 pandemic, and it could be

advantageous to have a broad plan which lays out the road ahead. The FA, as the guardian of the national game, would be keen to help shape this plan, and we hope that this written submission contains a helpful overview of the key opportunities and challenges facing football – and many other sports.

29 January 2021