



EVERTON  
FAN ADVISORY  
BOARD

## All Members of UK Parliament

### By Email

23 April 2024

We are writing to you to seek your support in strengthening the Football Governance Bill which has its Second Reading in Parliament today. We write in the knowledge that you will have Everton supporters within your constituency.

The Bill represents a unique opportunity to ensure that our game is managed fairly for the benefit of all clubs, supporters and communities. It includes provisions for the establishment of an Independent Football Regulator (IFR) to promote the financial sustainability of clubs, as well as requirements for consultation with supporters to ensure that the heritage of clubs is protected. Whilst we welcome the direction of travel, the Bill doesn't go far enough.

### **Financial Sustainability and Profit & Sustainability Rules (PSR)**

The Bill currently gives the IFR only partial oversight of financial sustainability, with no authority or oversight of Profit and Sustainability Rules (PSR). Football supporters want a *predictable, transparent, principled, proportionate, fair & timely* system. The chaos and confusion caused by the Premier League's handling of PSR has proven that it is not able to meet these requirements. We believe that the IFR should therefore have full authority for financial sustainability, including the oversight of PSR. In line with the recommendations of the Fan Led Review, this should include:

- Full authority in applying sanctions
- Published guidelines on how sanctions will be applied
- A guiding principle that sanctions do not unfairly impact fans, but instead target Club ownership/leadership/management
- Full consideration and involvement of fan representation as part of any sanctions process

## **Enhancing Fan Engagement**

On fan engagement, it is notable that the word “fan” only appears 16 times in the entire 140-page Bill. We believe it is critical that the IFR understands the perspectives of supporters and the implications its work can have on them, football clubs, club employees and local communities as it carries out its duties. The Bill is currently silent on how the IFR will engage with supporters, how issues can be referred to it with no clarity on how it will develop or measure effective supporter engagement.

In order to ensure that the interests of supporters are adequately factored into the governance and strategic decision making at the highest levels of the game, the Bill should ensure that the IFR includes:

- Independently elected fan representation on the IFR Board and Expert Panel
- Independently elected fan representation on the Premier League Board
- Implementation of published standards and guidance on effective fan engagement and representation, developed in consultation with independent fan groups

We thank you in advance for considering the issues we have raised above, which we believe can help ensure the right safeguards are in place to protect our beautiful game, a game that is enjoyed by millions across the country. We can't let this opportunity pass and look for your support to ensure that the regulator has real teeth and the power to rebalance self-interest and deliver in the interest of all fans.

Yours sincerely,

Dave Kelly

**Chair, Everton Fan Advisory Board**