



Lewes FC response to the Women's Football Review

July 2023

Introduction

Lewes FC warmly welcomes the Independent Review into Women's Football, entitled "Raising the Bar: Reframing the opportunity in women's football" and commonly known as the Karen Carney review. We will refer to it as "the review".

It is clear from the depth and breadth of recommendations and analysis that very meaningful conversations have been had with a range of stakeholders from across the game. Concerns, challenges and needs from a wide range of stakeholders have been aired and listened to perhaps for the first time.

Significantly, the review has a vision for English women's football of "a world leading sport that...generates immense economic and social value". We welcome the focus on sport's social value, and impact on the community. As stakeholders seek to grow the game, our understanding of what we are aiming to create can be dominated by placing professional men's football on a pedestal. Men's football dominates our default understanding of what professional football is and can be, but Key Performance Indicators (KPIs) drawn up to monitor success in the men's game are often based on viewing figures, social media metrics, player sales and commercial numbers, without tracking social value. Finding a way to understand and monitor social value could provide new KPIs for investors and partners to track their return, for which women's football would already arguably fast exceed men's football.

We also warmly welcome the centering of financial sustainability within the review. The irony and risk in raising standards fast, requiring funding from men's clubs, is that, even as the quality and professionalism of women's football grows exponentially, women's teams' finances and therefore salaries and standards are likely to be dependent on the on-pitch fortunes of the men's team. Relegation for a men's team could prove suddenly traumatic for a women's team - whereas it remains to be seen whether promotion from say the Championship to the Premier League has the reverse impact on a women's team.

Dependency can also mean women's teams have less autonomy and less opportunity to be distinctive in how they drive their own visibility, character and personality which has a knock-on effect on commercial opportunities, especially if driven by the men's side of the club as a small component of their workload.



The review sensitively handles a lot of significant issues.

In particular we warmly welcome:

1. The placing of financial sustainability at the heart of the recommendations, with an acknowledgement that whilst “lots of the recent success in the top two tiers of the women’s pyramid has been dependent on investment from affiliated men’s teams... the game now needs to grow in its own right to reach its true potential and stand on its own two feet.”
2. The emphasis on the need for shared representation and voting rights between WC clubs and WSL clubs to grow the game together, and sustainably to reduce the gap that is growing between the two tiers and the recommendation for increased support to Tiers 3 and below to develop and grow within the whole ecosystem.
3. The dismissal of closed leagues as an engine for investment.
4. The emphasis on closing the gap in FA Cup prize money to allow women’s teams to earn money through on-pitch success.
5. The recommendation to lower barriers to international talent whilst investment is sought to dramatically support the development of the domestic talent pool.

At the same time, we have concerns that:

1. Financial sustainability is set as an “ultimate objective” rather than a here and now priority.
2. The call for standards to rise immediately runs counter to the emphasis on financial sustainability and could put some clubs, especially those that are not dependent on large men’s clubs, at risk.
3. An introduction of multi-year “Financial Guarantees” in the licence criteria in the near future, if not weighted, could prevent small or independent clubs from their rightful place within the leagues, even though they may actually provide the best opportunity and vehicle for new, fresh investment to enter into the leagues and a shift away from existing men’s clubs as the main funding stream.
4. The rich culture and history of women’s football, its inclusivity and (current) absence of toxic tribalism, and its spirit of collaboration, resilience, joyfulness and fight is not always captured. This culture, whilst intangible and hard to measure, is certainly a valuable asset that is at the core of much of the recent growth and interest in the game and should be preserved.

There are many issues that are covered in the report, and we are not always best placed to address all of them. Below we give our reflections and responses, with particular focus on the areas where we have direct experience of growing a club and professionalising over a short amount of time, within the current frameworks and contexts of elite women’s football.



Recommendation 1: The new entity tasked with running elite women's football should not settle for anything less than world leading standards for players, fans, staff, and everybody involved in the women's game.

We welcome the call for "world leading standards" but believe that **financial sustainability should be the here and now objective, not the "ultimate" objective.**

Many clubs, as identified in the report, are financially dependent on the men's side of the club, not least since, for several years there has been public pressure from the FA on large men's clubs to fund the growth of the women's game. Driving higher standards without requisite revenue growth has seen a number of independent women's clubs with rich history fall out of the elite leagues, unable to keep up with the pace of change of licence criteria.

We welcome the call to unlock additional investment and funding streams and believe that **fresh, new investment** can be easier made into smaller, independent clubs that do not have to work through the men's club hierarchy and existing ownership structures. However, if we cannot centre financial sustainability in the immediate term, then this fresh new investment may not enter the league, meaning that the only investors into the space are existing players, financing large men's clubs. This does not feel like growing the investment pool, it feels like burdening the existing one, which can lead to women's teams being perceived as a burden rather than an opportunity.

We are concerned that the report believes "it is likely that some form of **additional funding guarantee** will be required to ensure the sustainability of the game". This funding guarantee, if not weighted and if introduced at short notice, would only serve large men's clubs since the guarantee would likely consist of a negligible percentage of their overall club revenue and not threaten the existence of their club. Should this become a requirement, and a requirement needing fulfilling in the short term, it would once again negatively impact smaller and independent teams, which provide a rich longer-term investment opportunity and are part of the unique fabric of women's football.

We strongly welcome the recommendation to keep leagues open with **promotion and relegation**, a hallmark that sets the competition out as distinctive over the NWSL, one of the leagues' greatest comparators. In our mind there are no positive reasons for a closed league. Whilst owners of some WSL clubs may believe it protects their investment and allows for longer term planning, it immediately cuts investment incentives to those in leagues below. Without the jeopardy of relegation, there are no guarantees that clubs would innovate too generate more revenue.



We believe there are other ways to **control costs and generate financial sustainability** that should be investigated, such as salary caps that are connected to revenue, absent of the resources allocated by the parent club, or by establishing a timescale by which to reduce solidarity payments from a parent club to a less significant amount. This would ensure that investment is made into the revenue generating parts of the club, not just into wages which then drives unsustainable salary inflation across the whole game. The report notes that investment “has the potential to unlock revenues that start flowing down from the Women’s Super League into the Women’s Championship and into grassroots football”, but the reality of trickle down economics in women’s football is that costs trickle down faster than revenue.

We welcome the recommendation to **clarify the level clubs’ “solidarity funding”** from the men’s side so that a true picture of the health of the leagues can emerge. These kinds of cost controls and transparency can only help drive attention into achieving sustainability.

We warmly welcome the recommendation to close the gap in **FA Cup prize money**. Whilst the review outlines some concerns around funding the increase to the women’s prize pot, in 2022, Lewes FC developed and proposed two distribution models that could be used for the FA Cup Prize money which required no additional funding but which would see 95% of clubs better off [1]. We continue to believe that further equalisation and redistribution could provide vital lifeblood into the men’s and women’s pyramid.

We warmly welcome the review’s recommendation that the governance of the WSL and Women’s Championship remains combined with **full and equal representation and voting rights** of Championship clubs. This can only help encourage ecosystemic ways of thinking with developing the women’s game and as the report notes, avoid some of the challenges in men’s football around influence and models of financial distribution.

Recommendation 2: The FA needs to fix the talent pathway in order to create generation after generation of world beating Lionesses.

We warmly welcome the acknowledgement that the **underinvestment in the talent pathways and high barriers to entry for international players is a particular challenge for Championship clubs** and encourage the implementation of the recommendation to lower the criteria for international players which will enhance training and playing environments and support domestic talent too.

On June 14 2023, the Home Office approved a proposal from the FA to alter the GBE requirements for players in the men’s professional game [2]. We believe that an easy action to take forward would be to **apply the same additional GBE rules announced for the men’s game to the WSL and Women’s Championship** i.e., that clubs in the WSL and Championship, as in the equivalent men’s game, can now sign up to 4 overseas players (if they match the criteria stated in the new GBE rules, Appendix 3).

The experience with the men’s national team as the number of overseas players has increased has been positive, with England now genuine contenders at major championships. The England Women’s national team now consistently ranks in the FIFA top four and has become a title winning team too. This has been achieved as the top four clubs, who supply 65% of the players, already have large overseas players squads.

[1] <https://lewesfc.com/football-for-good/equal-prize-money-campaign/>

[2] <https://www.thefa.com/news/2023/jun/14/new-gbe-criteria-140623>



Importantly, the *Home Grown Player Rule*, ensuring at least eight squad members are qualified to play for England, already creates a limit to overseas players at WSL clubs. Indeed, Championship clubs would also still be bound by the 60% HGP rule, equating to 14 players in a squad of 24. So, protections are already in place.

At the same time, talent development investment must go beyond solely focussing on nurturing young emerging playing talent, instead it needs to elevate towards a multi-faceted strategy based on the realities of today and the opportunities of tomorrow for the entire football ecosystem.

Furthermore, players who turn professional deserve continual development as inspiring and empowering role models, societal change-makers and future leaders. Structured support through holistic development that prepares players for career transitions, retains experience within the pyramid that directly supports the development of future generations.

The commitment to fixing the talent development pathway should also incorporate the development of emerging talent with aspirations of becoming match officials, physiotherapists, sports psychologists, coaches, analysts, CEOs, football agents; evolving the investment blueprint that directly contributes towards the enhancement of talent that goes beyond the white lines of the pitch.

The review omits to recommend lower barriers to entry for talented international technical and performance staff. Women's football is an ecosystem but English football has a very limited pool of talented medical staff, technical staff and sports science experts who understand female physiology and psychology and coaching methods. The current requirements also pose a challenge to acquiring talented international staff, especially women, since requirements often outline a number of years of work within professional leagues, which is a challenge with the global game being at a nascent stage. By not lowering those barriers to entry, we make it extremely hard for talented staff to enter the country to support us transform our domestic ecosystem.

Recommendation 3: Both the Women's Super League and Women's Championship should become fully professional environments designed to attract, develop and sustain the best playing talent in the world.

We acknowledge that standards must increase across the leagues for players. We also welcome the finding that "failure to address the gulf in standards between the leagues ultimately risks continuing to stretch the competitive gap amongst teams, which will be damaging to the league's commercial value."

We believe this is not only a question of investment, but one of governance. It is inevitable that there is a growing gap in WSL and WC training and playing environments and standards, because, in adopting the 75-25 split of revenue and broadcast fees between the two leagues (75% for WSL clubs and 25% for WC clubs), the league has baked in a gulf that will continue to grow. If the league better considered equity in its distributions, and considered how to grow the entire football ecosystem, the split would be reversed (with some finances reserved to support lower tiers), not least since the added exposure of the WSL allows greater opportunity to win commercial contracts.



We also welcome the recommendation that Women's Championships are represented by a Union, whether the PFA or other body that can help provide necessary support

We would also welcome the establishment of a **salary floor within the Women's Championship**. Not doing so, but establishing one for the WSL would compromise the integrity of ambition to increase the playing quality and commercial appeal across both leagues. Further measures should be taken to address the growing inequalities between the two leagues. As previously mentioned, we believe that evening up the broadcast distribution between both leagues would create a much stronger, wider football ecosystem and would help speed up the adoption of salary floors further down the pyramid.

Recommendation 4: The FA should urgently address the lack of diversity across the women's game - in both on and off pitch roles.

We welcome the recommendation for the FA to adopt a national workforce strategy including on multiple areas of expertise and ensuring diversity. This would help build an ecosystem that is representative of the people it serves and can further the goals of our entire community not part of it.

Recommendation 5: The FA, Premier League, English Football League and broadcasters should work together to carve out a new dedicated broadcast slot for women's football.

We welcome the recommendation for a new dedicated broadcast slot and believe the 3pm blackout should not apply to women's football, where the needs and requirements of women's football were absent from decision-making at the time it was introduced for football as a whole.

Recommendation 6: Clubs must better value and support their fans - the FA should raise minimum standards to enforce this.

In addition to the blackout, there are other such **laws and requirements in place, designed for men's football** without considering the needs or realities of women's football that affect the experience of fans. This includes the ban of alcohol consumption during games that should be equally reviewed and addressed.

County Football Associations should be open to changing league kick-off times for women's teams so as to allow them to play and support their local teams. This has proved a blocker in some instances.

We welcome the encouragement in the report for clubs to schedule more of their games in Main Stadia. One of the key benefits from playing in main stadia is **full control of the matchday experience and environment**, which is not always possible when renting a ground from a third party. It also hampers the ability for clubs to receive grants to invest in infrastructure improvements as per later recommendations in the review.

We welcome the centering of the fan in the matchday experience and club engagement strategies. We believe clubs can achieve this through different means suitable to their fanbases. Enhanced financial grants and resources should be encouraged to help facilitate outdated infrastructure that has been built for men's football, that is now being used by female players, staff and fans.



Recommendation 7: Government must deliver on recent commitments around equal access to school sports for girls.

We support efforts to deliver **equal access to school sports for girls**, but also note the need for this to be delivered by teaching or coaching staff and not rely on volunteers. Teachers should be provided with support to realise this provision. Where football is provided as an after school activity there should be no discrepancy in price between boys and girls.

Recommendation 8: Everyone involved in funding grassroots facilities must come together to increase investment in order to accommodate meaningful access for women and girls.

We welcome the need to focus on widespread **safe and appropriate facilities and access** for women and girls to cope with demand.

Recommendation 9: The FA, Premier League and Football Foundation should work together to make sure that women and girls are benefitting from funding flowing into facilities across the pyramid.

We warmly welcome the recommendation to focus on **funding into facilities** especially the emphasis on contributing to and **monitoring meaningful commitments** from local authorities and providers. This could be enhanced by wider programmatic funding that elevates the use of facilities into being multi-purpose and able to be used for off-pitch character and leadership development as well.

Recommendation 10: The FA should leverage the handover of administration of the top two tiers of women's football to even more acutely focus on grassroots clubs and the Women's National League.

We share concerns that the funding models between tiers risks not growing the game sustainably and as a whole. We believe there should be **meaningful representation of National League clubs** and representatives within the top tier decision-making structures to ensure we collectively build coherence into the ecosystem.

We believe that there is good cause for the UK government to introduce an **equivalent Title IX equivalent** as has been so transformative in women's sport in the US, especially now we have the benefit of lessons learned and hindsight. Title IX mandated any organisation receive state funding to provide equal expenditure for men and women, or girls and boys. Even though not directly targeting sport, this transformed the sporting environment, where it was so far behind that provided for men and boys in most educational institutions.



Conclusion

Lewes FC warmly welcomes the “Raising the Bar: Reframing the opportunity in women’s football” review and the depth and breadth of recommendations and analysis that meaningful conversations have been had with a range of stakeholders from across the game.

We believe that a dedicated team of experts and practitioners from across the game should come together to work on and publish a plan for implementation and identify ways to monitor progress and success across the different chapters and recommendations. Lewes FC would be pleased to be part of that process. Only with dedicated and widespread ownership and accountability will we see the transformative progress that this review has the capacity to make.

We would like to place on record our thanks to Karen Carney for her dedication and hard work to realise this report, and extend that gratitude to her team of colleagues at the Department for Culture Media and Sport and her expert group. We would also like to thank all those who contributed to the review through written contributions or via meetings. Only collectively, through dedicated action can we take the game forward.