

LCP and LawDeb's joint response to the Independent Football Regulator's consultation on Internal Reviews

7 November 2025

This document sets out LCP and LawDeb's joint response to the Independent Football Regulator's consultation on Internal Reviews published on 13 October 2025.

Who We Are

LCP is a global firm of financial, regulatory, actuarial and business consultants, specialising in the sports industry (providing both analytics and advisory services), as well as pensions, investment, insurance, energy, health and business analytics. We have around 1,200 employees, including over 190 partners.

The Law Debenture Corporation plc ("LawDeb") is a FTSE250 company with extensive and long-standing experience in supporting organisations in dealing with corporate governance in regulated industries, and a history dating back to the foundation of the Football League. LawDeb provides governance and transaction services to numerous organisations involved with sports, including football, cricket, tennis and boxing.

In July 2025, LCP and LawDeb published a [joint report](#) "*Football Governance in Transition – Who's running the clubs in the English men's pyramid – and what needs to change?*". This looked into the governance provisions of the Football Governance Act, and analysed the make-up of the boardrooms of the 116 regulated clubs in the pyramid. Based on our analysis, we made three key recommendations:

- There should be a legal requirement for all boards of regulated clubs to have at least three directors.
- There should be a requirement for directors of clubs to have knowledge and understanding of the structure and culture of the game – and related training provided by the IFR.
- The IFR should have a target of improving diversity in football club boardrooms.

Overview

LCP and LawDeb welcome the opportunity to respond to the Independent Football Regulator's consultation on the Internal Review Function.

LCP and LawDeb are supportive of the IFR's commitment to improving the financial sustainability and governance of men's football in England, whilst providing adequate cultural and heritage protections for the sport. The introduction of the IFR provides an opportunity for the football industry to proactively engage with the financial and cultural challenges within football, whilst continuing to support the game's domestic and international economic value.

We are happy for both LCP and LawDeb to be named as respondents to the consultation and happy for our response to be in the public domain. We are happy for you to reference our comments in any response.

Responses to consultation questions

Q 3.1. Do you have any comments about the IFR's proposed approach to the timetable and procedural steps under section 6 of the procedural framework?

We welcome the rigour of the proposed internal review process, though we have concerns about some aspects of the legislative provisions in the Football Governance Act, which underlie it. These concerns are covered below under Q 3.2.

However, given the relatively tight timescales provided for in the Football Governance Act, we believe the proposed approach to the timetable and procedural steps outlined in section 6 is well thought through and pragmatic.

Q 3.2. Do you have any other comments on the proposed approach adopted in the procedural framework, or in the draft Costs Rules at Annex 2?

As noted under Q 3.1, we have concerns about some aspects of the legislative provisions in the Football Governance Act related to Internal Reviews, in particular:

- **Identification of Concerned Persons**

Under Section 81(2), a concerned person means a person “who appears to the IFR to be directly affected by the decision”. We anticipate the “appears to be” element of this phrase may leave the IFR open to challenge in some circumstances, so it will be important for consistency and transparency that it is a) clear how the IFR will make a decision on this aspect in each case (eg exactly who or what body within the IFR will make this decision); and b) what broad criteria they will apply (in addition to the statement in 2.10 of the consultation paper that it does not expect players and fans to be included in the majority of cases).

- **7 day deadline for requesting a review**

The requirement under Section 82(2) for a concerned person to request a review within 7 days of being notified of their right to do so is, as acknowledged in 4.3 of the consultation paper, a “relatively short period of time”, given the likely need in many cases for legal advice to be sought, provided and considered by the concerned person prior to making such a request. While this deadline is unavoidable under the legislation as currently framed, we believe the amount of detailed information which paras 4.5 to 4.7 require the concerned person to provide within this timescale appears unnecessarily onerous, along with the statement that permission for the concerned person to provide supplementary information after 7 days will only be granted by the IFR in “truly exceptional circumstances”. We believe implementation of this approach could leave the IFR open to challenge in some circumstances, and could also result in reputational issues for the IFR if concerned persons with legitimate complaints are timed out from the internal review process for reasons beyond their control.

- **Default decision and 14 day extension period**

A similar concern relates to the provision under Section 83(6) that, if the applicable reviewer is not able to make a decision with 28 days (or 42 days if a 14-day extension for “special reasons” is agreed by the IFR under Section 83 (5)), then the applicable reviewer is deemed by default to have upheld the original IFR decision. As with the first bullet above, we believe it is important for consistency and transparency that it is a) clear how the IFR will make a decision on whether to grant an extension in each case (eg who within the IFR will make the decision on “special reasons”); and b) what broad criteria they will apply. There is here too a risk that this could result in reputational issues for the IFR if concerned persons with a reasonable complaint are timed out from the internal review process for reasons beyond their control, whether this is after 28 or (after an extension) 42 days.

Publication of internal review decisions and their reasons

Given the significant interest that is likely to arise in relation to cases which are referred for internal review, we suggest that, as well as publishing the decisions on internal reviews carried out by the IFR, details of the main reasons for those decisions should also be published.

As has been argued from a variety of stakeholders, there are several benefits for broader sports disputes to be held in public. We believe these arguments also reflect the position of internal reviews in respect to the IFR. There are two predominant reasons this is the case: accountability; and public understanding and confidence. This will be particularly important in the early days of the IFR, as a new statutory regulator in an industry that has previously only experienced relatively light-touch industry-organised regulation.

In relation to the concept of ‘accountability’, it has been argued by Nick De Marco KC that, in relation to sports arbitration, “open justice encourages fair and proper decision making” and guards against neglect and corruption. While we are not calling for the reviews themselves to be conducted publicly, the accountability and credibility of the IFR more widely may be well served by publishing details of both the decisions made and their reasoning.

This is particularly significant given the unique set of stakeholders with which the IFR will be dealing. The emotional investment within football, in addition to the significance of football clubs to local communities, places both a particular responsibility and scrutiny upon the IFR, and by extension, the Expert Panel or Board committee conducting the internal review.

Whilst it may be prudent for the IFR to keep certain details of decisions redacted – such as those that contain personal information – the overall premise of having a register of decisions and their reasoning would be a beneficial one. We would therefore recommend that the internal review process looks at establishing a measured way in which such information may be made publicly available.

Full Public Review after 12 months

We note that the consultation has not outlined any plans for a formal review of the internal review function and how it has operated since inception. Given the nascent nature of the IFR, our concerns over certain aspects of the legislation, and the criticality of the internal review function in promoting transparency and fairness, it would seem advisable to conduct an initial 12-month review of the review functions operation. This might cover:

- i. The strengths of the internal review function
- ii. The challenges faced by the internal review function
- iii. Any perceived weaknesses of the internal review function

We would propose that the results of this review be released publicly, to promote the IFR's accountability and credibility.

Disclosure of Indicative Costs

The consultation paper has noted that there are several costs incurred by the internal review function which may be recovered by the IFR from the concerned person should the initial decision be upheld. This being the case, we recommend that the IFR should provide an indication of the anticipated costs of a typical 28-Day review process. Given that the majority of the clubs the IFR will be regulating are small-to-medium size businesses, having a clear cost framework is crucial to promote transparency – so that clubs or other concerned persons are not hit with costs substantially higher than they may have anticipated for making a review request.

Furthermore, under paragraph 11g of Annex 2 of the consultation, the IFR's recoverable costs include "Other reasonable costs incurred by the IFR on a case-by-case basis necessary for the purpose of conducting an internal review." For the purposes of clarity and transparency, the IFR should provide an overview of what may constitute "reasonable costs", to ensure that there is no asymmetry of information for stakeholders looking to launch an appeal against a decision.

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About Lane Clark & Peacock LLP and The Law Debenture Corporation p.l.c.

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