



# Cascading good governance:

## The FA Code of Governance for County Football Associations

Chris Pringle • Essays in sports governance series: 2

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If you have any feedback on the content of these resources or additional questions that you'd like to discuss, please contact the SGA:

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## Foreword

This series of essays aims to provide a deeper dive into topics of interest and relevance to the Sports Governance Academy (SGA) community. Authored by experts in particular disciplines and by practitioners in sports governance and management, they will give the reader a closer look at current themes, best practices and initiatives in the sector.

By inviting authors to present their topics in essay form, we want to give them the scope and freedom to explore more deeply areas of governance affecting sports organisations, predominantly in the UK, but drawing on comparative international examples where appropriate. The approach taken will vary from essay to essay. Some will provide a case study to help the community get to grips with developments in the sports governance landscape. Others will present the results of original ongoing research. Others still will offer intriguing perspectives on governance debates, approaching familiar topics from a different angle.

We hope that you find plenty in the series to get you thinking and to help you and your organisations in your approach to governance and in facing the challenges ahead of us. Through the SGA website, you can access further essays in the series as they are released. There you will also find our knowledge base, a library of trusted, free resources to help you get to grips with governance and start to develop good practice. Visit <https://sportsgovernanceacademy.org.uk/>.

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In this essay, Chris Pringle from The Football Association provides an in-depth account of the implementation of the Code of Governance for County Football Associations. This presents to the SGA community an example of how a major national governing body is addressing the principle of 'cascading' good governance which became a requirement for publicly funded organisations under the revised Code for Sports Governance, published in full in December 2021.

Chris details the rationale behind the implementation of the CFA Code, explaining why it was felt it was needed and the benefits it seeks to provide to the County network. He provides a description of the process of implementing the initiative, the difficulties presented along the way, and the practical steps put in place to overcome these and to bring the network along on the journey to improved governance.

There are a number of fascinating projects underway which demonstrates the enthusiasm and ingenuity of the sector in ensuring that good governance practices reach all areas and levels of organisations' activities. As one of the nation's best-known NGBs, the leading role that The FA has taken in laying the foundations for its regional associations and providing support and direction for them can point the way to those seeking to cascade good governance throughout their own organisations. Theirs is a truly impressive initiative and is bearing fruit in the County FAs that are achieving compliance with the Code. This essay is a valuable account of how they got to where they are – and signposts to the future of the network.

**Craig Beeston**  
**Sports Governance Academy**  
**July 2022**

## Executive summary

It is now just over two years since The FA launched its Code of Governance for County FAs (CFAs), the first regional sports governance Code, and one which would stretch the boundaries of good governance in the game across the country. The period since the launch spans the Coronavirus pandemic, which stress-tested every organisation's business and governance practice like nothing before. The FA's grassroots strategy 20-24 is called 'Survive, Revive and Thrive'. The last two years have brought the first element of this into sharp focus as the game moves gently into the revive phase.

So, two years on, grassroots football structures have survived, and participation is recovering. There are at the time of writing six fully Code compliant County FAs: Wiltshire, Dorset, Surrey, Cornwall, London and Norfolk. Considering the challenges of the pandemic, and the fact that this Code is the equivalent of Tier 3 of Sport England's Code for Sports Governance – and in some areas exceeds it – this is no mean feat.

There is a whole governance story behind and beyond the six fully compliant Counties. Governance across all CFAs is beginning to be transformed. There will shortly be eleven compliant Counties, with five more meeting in excess of 80% of the Code's 65 requirements (84 elements in total) and expected to achieve compliance by the autumn. These eleven Code compliant CFAs will represent over a fifth of the network of 50 Associations. Momentum is building.

All 50 Counties have improved their governance. Boards have been transformed, with just under half of their collective members now independent. A quarter are women, almost double the figure from 2 years ago. Counties have launched Board-owned strategies and with better delivery and relevance. They are finding new and better ways to be inclusive, open, and transparent as well as fundamentally effective and resilient businesses.

Section 1 of this essay sets out the context and environment of how football is structured in England. This is key to understanding the interdependent but independent nature of the relationship between The FA and the 50 County Football Associations, and sets out why the regional Code of Governance was needed. Section 2 goes deeper into the issues the Code seeks to address. Section 3 sets out the seven essential steps taken to implement the Code, before Section 4 outlines how progress has been measured. Finally, the essay concludes with some reflections on lessons learned so far.

There is much still to do to cascade good governance across England's County FA network, particularly to drive diversity, although progress has been made in this area with the Code helping to connect Inclusion Advisory Groups to have a voice in the Boardroom. This is also supported by the launch of the Leadership and Diversity Code across both the professional and grassroots game.

Despite the challenges, the platform is well set. This essay outlines how we got to this point. By doing so, the aim is to present to the SGA audience an example of how The FA is addressing the principle of cascading good governance throughout a regional structure.

Though the CFA Code project was initiated prior to the revisions to Sport England/UK Sport's Code for Sports Governance, 'cascading' good governance is now a requirement (4.1) and so funded bodies (and others) will be interested to hear about the application of a strategy which serves this purpose, sharing experiences, lessons and learned so far, and most importantly what sort of support is needed at a regional level.

# Section 1: Introduction

## Context: FA/CFA relationship and structure

The structure of grassroots football and the relationship between The FA and the County FAs is well established. In fact, the first County FAs were formed over 150 years ago, with a clear role as the local football governing bodies, charged predominantly with administrative and regulatory functions, discharging FA rules, albeit with inconsistent approaches across the country.

The modern-day regional network of 50 English County FAs – 46 geographic CFAs, plus the three Services (Army, Navy and Air Force) and The Amateur Football Alliance – is based on this original structure and while these organisations continue to administer and regulate, the additional and defining difference is that they now develop and promote grassroots football in their respective areas.

The governance of the network became connected to the Companies Act with the CFAs' incorporation as Companies Limited by Guarantee between 1999 and 2002. A handful have since adopted charitable status. The key factor in their status is that they remain fully independent of The Football Association. The relationship is one of inter-dependence: The FA provides funding to the network in exchange for contracted delivery outcomes; the Counties rely on FA funding and support (training, IT systems, national programmes). The partnership is underpinned by this mutuality, but governance reform is absolutely in the interests of both.

The partnership has more recently been redefined within an operating model which outlines the ways of working, contractual arrangements, an updated funding formula and clear standards for CFAs to achieve. This approach commenced some four years ago in the vital area of safeguarding. Governance is a natural area to form part of this approach, and the creation of a regional Code of Governance for County FAs represents a clear move to cascade good governance across the network.

The FA's initiative in this regard pre-dates Requirement 4.1 of the Code for Sports Governance to cascade minimum standards of good governance throughout a funded organisation, and it is satisfying to see this alignment and to see The FA in the vanguard of its implementation.

## Drivers for the project

The drivers for cascading good governance are set out perfectly by the mission to 'set a gold standard for governance that is football specific'. This is taken from the introduction to the CFA Code, which was launched to the network in February 2020 (and publicly in May<sup>1</sup>) as the first regional Code in the sports sector, designed to enable football and County FAs to thrive in the future. At the heart of this is the need to ensure that diversity, both in terms of representation and thought, is addressed and improved.

While this essay will focus more on the implementation of the Code, it is worth setting out an overview of how the Code was created. This process is significant as it represented a productive exercise in partnership work between The FA and the Counties, supported expertly by Sport England.

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<sup>1</sup> <https://www.thefa.com/news/2020/may/18/regional-code-of-governance-introduction-james-kenda180520>

Back in 2018, consultation had shown that there was widespread support for a Code of Governance for County FAs, effectively covering how the game is led at the grassroots level. A working group consisting of CFAs, FA Executives and Sport England was formed with a brief to craft a Code that represented the Gold Standard required, exemplified by Sport England's endorsement of the CFA Code as a proxy for Tier 3 of the Code for Sports Governance, with some variations to ensure football specificity. It is important to emphasise the importance of CFA involvement in the working group – a Code for CFAs which was developed by peers was vital for its credibility.

In many respects the creation of the CFA Code is the (relatively) easy part. Given the nature of the relationship and structures between The FA and CFAs, and given the highest standards set out within the Code's requirements, adoption of the CFA Code, unlike that of the nationwide Code for Sports Governance for publicly funded organisations, had to be voluntary.

The principal reason for this is that it is more positive for County FAs to recognise the need to change themselves than to have the Code thrust upon them, which may have led to stronger resistance. In addition, it is recognised that each of the 50 County FAs is at a different stage of evolution in terms of its governance and a significant number would require time to achieve compliance with the Code. This had to be balanced with the need to make progress, and to be able to accelerate the process of adoption of the Code, with 2024 seen as a significant milestone, representing the end of the current strategic cycle.

The final driver was to ensure that the implementation strategy be demonstrated as effective by a small number of early adopters who could achieve compliance with the Code and become Champions and Ambassadors for it. The aim here was to provide a strong lever and an incentive to influence and encourage other Counties, creating and sharing best practice examples along the way.

### **Drivers for the project**

While this essay is a practical account of the regional implementation of the Code, the need to facilitate change has been the basis for considering how best to position the Code's value proposition, with a particular focus on making the first steps easy, to ensure that all CFAs started on their individual governance journey within a safe and supportive collective network that all faced similar challenges.

The broad methodology for the successful, voluntary adoption of the Code is structured around the **Beckhard-Harris change equation**:

$$D \times V \times F > R$$

- **D** – dissatisfaction with the status quo
- **V** – a vision of what is possible
- **F** – knowledge of the first practical steps
- **R** – resistance to change

Value proposition design, in other words the ability to clearly describe the benefits that CFAs (and the wider game) could expect from the Code, was important in understanding whether the Code had a compelling offer, which would then lead to voluntary adoption. This represents the compelling Vision element of the change equation.

The vision which drives this project is the pursuit of ‘a gold standard for governance for all 50 CFAs’. The initial objective was to activate the CFAs on this journey. If articulation of the benefits of a project, coupled with clear and achievable steps, can outweigh inertia then the project stands its best chance of success.

Many inherent principles or values underpin the Code of Governance. These are:

- **Serving the needs of the game** - putting all participants first by making great decisions for the whole game
- **Openness** - delivering great communications
- **Transparency** - providing access to information as well as the opportunity to get involved in decision-making structures
- **Fairness** – creating genuinely equal opportunities for everyone
- **Integrity** - doing the right thing all of the time
- **Excellence** - being the best we can be, with a commitment to continuous improvement
- **Compliance** - doing things right within legal and regulatory frameworks

To be able to clearly describe the benefits of the Code of Governance to the County FA network, it is useful to identify the main areas of the five sections of the Code itself:

### Structure

The primary areas of the CFAs’ structure which will benefit from the Code relate to Boards and Councils - where CFAs still have them - in particular, establishing the principle of Board primacy. Prior to incorporation, all CFAs started with Councils as the main decision-making bodies. Subsequently, Boards were established. Some CFAs have removed Councils and where others have retained them, it has been a struggle to identify their clear role and purpose. Boards were largely populated by football representatives from Council and therefore exhibited no independence, little diversity, had no reference to the skills a CFA Board needs, and usually operated at an operational rather than strategic level.

With the adoption of the CFA Code, Boards should be better equipped and suitably skilled to lead in a fast-moving, constantly changing environment, enabling the CFAs to make better decisions to drive and deliver their strategic objectives.

Councils (where CFAs retain them) should be re-positioned. No longer the primary decision-making bodies, some retain practices which have become outdated. The Code sets out how to transform a Council into an effective forum which is representative of its stakeholders. The benefit will be a vibrant, refreshed group which is able to support delivery and challenge the CFA Board to better represent the needs of the wider game in each area.

The wider structure extends to committees, with the aim of ensuring full alignment to the work of the executives and Boards of the CFAs to maximise the chances of success in delivering objectives in serving the game.

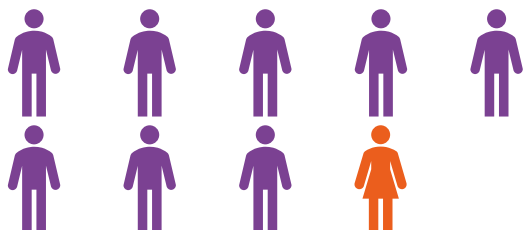
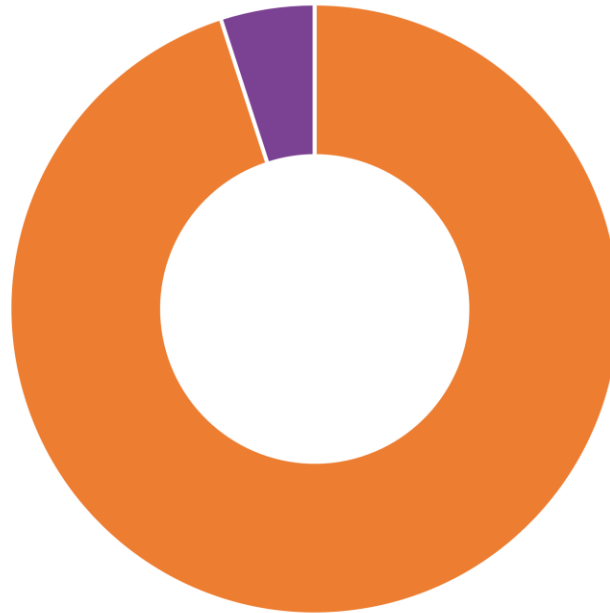
## People

The profile of volunteers across the CFA network was largely homogenous, predominantly characterised by being male, aged 50 plus (and in many cases much older) and mainly white and whose active participation in football was much earlier than the incorporation of CFAs as Companies Limited by Guarantee.



Data collected in 2018 showed the following position with regard to the composition of the network's boards:

- 5% of Board members from BAME backgrounds
- 95% of Board members from White British/Other backgrounds



**87% of Board members were men**

**13% of Board members were women**

The challenge was to shift this position by demonstrating the benefits to the organisation of improving diversity. Diversity is defined in terms of different skills, backgrounds, experience and thought, all of which combine to meet the requirements as defined in the Code's section on structure. The need for this is captured in Matthew Syed's work on diversity of thought, *Rebel Ideas*:

'Harnessing the power of cognitive diversity is set to become a key source of competitive advantage, and the surest route to reinvention and growth...we are entering the age of diversity'.<sup>2</sup>

### Communications

Transparency is essential to a County FA's communications. Stakeholders and interested parties should have access to readily available key CFA information. The Code seeks for this to extend beyond the legal duties of CFAs to produce reporting information such as

<sup>2</sup> M. Syed, *Rebel Ideas: the power of diverse thinking*, (London, 2019), p. 16.

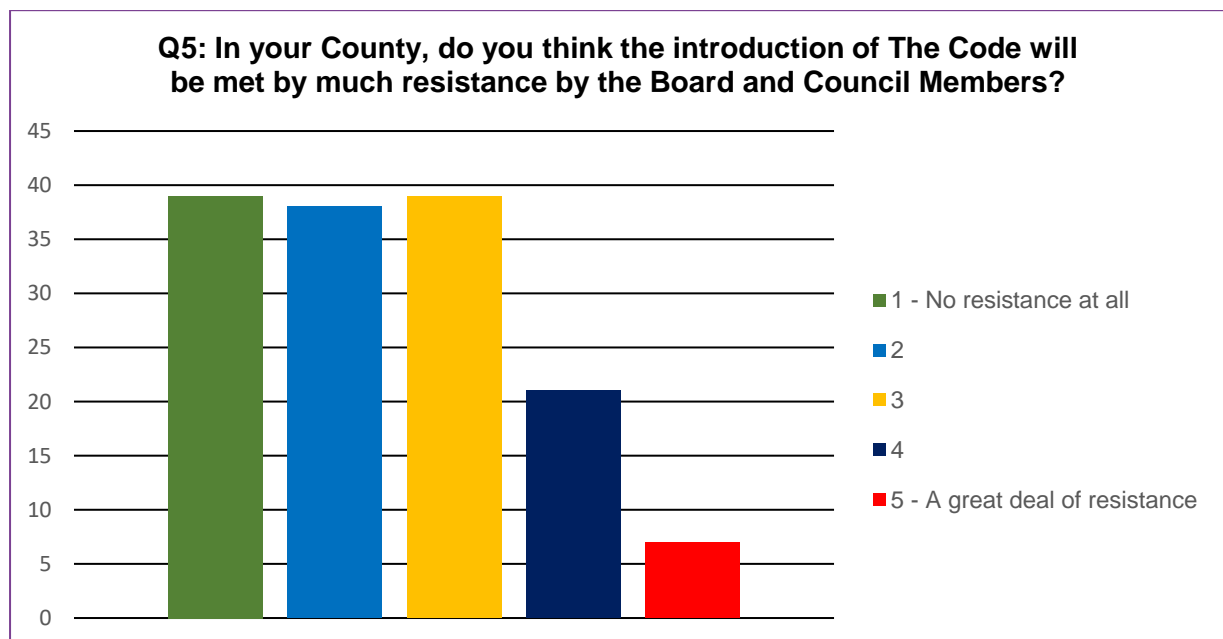
financial accounts. Engaging communications via websites and social media, well-designed strategies, and an informative and relevant Annual Report will all contribute to this.

**Standards & Conduct** and **Policies and Processes** are the final two sections of the Code, designed to provide consistency and high standards in operational matters, as well as ensuring a continuous approach to organisational improvement and providing a focus on compliance and risk management. This has proved timely with the Coronavirus pandemic hitting just a few weeks after the CFA Code was launched.

### Potential obstacles and barriers

While it was clear that good governance practices would deliver positive benefits to CFAs, before implementation could begin, potential areas of resistance needed to be understood. The focus in terms of the implementation of the Code has been to build a collective approach and positive attitude to good governance. However, it would be naïve to think that governance reform would be easy and instantaneous. So, to be able to focus on ‘what can we do?’, it was also important to listen and to anticipate areas of resistance, again framed within the change equation.

To fully understand where resistance might exist, a survey of attitudes towards the Code was carried out (see an example of this below):



The survey had shown that the specific areas within the Code that would be likely to attract resistance were:

- term limits for Board and Council members.
- the Board as the governing body - Board primacy.
- the consideration of the Chair of the CFA Board to be independent.

The results of the survey were consistent with the expectations of the governance Project Group. The question of term limits had been raised at the Regional Briefings when the CFA Code was launched. Council term limits were considered more challenging than those for Board members by the CFAs, largely because long service had previously been rewarded

and acknowledged within the CFA structure. It would take time for some to shift views on this.

While Board primacy is a clear principle of good governance, the legacy of the role of Council for some CFAs required clarification and re-positioning from the historic governing body to an effective stakeholder group with updated powers to check and challenge the Board. In some cases CFA Articles of Association included ambiguously worded clauses giving Council 'powers to make a decision on any matter referred to it'. These would need to be removed to ensure Board primacy.

When the Code was launched, very few CFAs had an independent Chair, London FA being one notable example. Therefore it was natural that the concept of recruiting an independent Chair was not widely considered. The wording of this requirement is clear, however, to impress that serious thought is given to this rather than making it a formal requirement. CFAs may consider this in the future to ensure that the role of the Chair is to run the Board. Surrey FA has adopted this approach, moving from a Council nominated Chair to one who is independently elected.

Beyond the survey attitudes, in practical terms the main **challenges** were:

- **Overcoming the fact that the Code is not mandatory**  
The absence of mandatory compliance initially meant that influencing and persuasion were key elements of the strategic approach to launching the Code in order to build momentum and gain consensus. It is natural for some to resist change and it was recognised that resistance to some aspects of the Code may well come from those in influential leadership roles. This led to the approach - outlined later - of a 'soft' launch, and a strategy of focusing on where progress could be made, as opposed to hitting the wall of a significant area of resistance too early.
- **Ensuring all CFAs completed the self-assessment**  
The approach was to 'nudge' CFAs to carry out the self-assessment by making the process simple. Ensuring that the first steps were easy made positive change more likely. Both the objective and the catalyst would be to encourage all CFAs to self-assess against the Code's requirements to establish their current position (a baseline) and begin an action plan to work towards providing evidence against the requirements.
- **Encouraging all CFAs to work towards adoption of the Code by producing a clear action plan**  
Some CFAs will argue that this is 'extra work'. It is recognised that to achieve the Code would require time and resources. CFA Boards are predominantly made up of volunteers, who often will oversee areas such as rule changes and revisions to the Articles of Association. Any administration to achieve the Code would therefore be on top of business as usual and would most likely fall to senior executives. To overcome this, The FA built an online self-assessment that, when completed, pre-populates an action planning sheet to get the Counties started and activated. The aim was to reduce the time burden of manual input.
- **Agreeing with each CFA on a forecasted or planned compliance date**  
The aim was for each CFA to commit to an indicative date of completion of compliance, in the absence of a fixed deadline. This was important as it would indicate factors such as how long a CFA thought they would need to achieve the Code, indicating what stage they were at in terms of governance maturity and evolution. These discussions also revealed individual attitudes towards the CFA Code which were useful for Regional Managers to be aware of to determine how and where to focus attention and support.

## Specific dynamics to the resistance

In accepting that each CFA is at a different stage in its governance journey, it was clear that there would be differing views and attitudes across the network to the Code. The dynamics would vary from CFA to CFA, and even within each organisation there would be different views internally between the CEO, Chair, Boards and Councils.

Councils present an interesting dynamic here. As noted, many CFAs retain their Council, although some have moved to other structures such as a Football Board or specific stakeholder-based Working Groups. The Code has sought to clarify and redefine the role of the Council. For some, these changes have been difficult to accept.

Some CFAs might be focused on matters of importance to them and may have perceived the Code to lead to their Council's loss of power, particularly for those with a view that Council was losing its relevance.

There were many types of **issues** posed by the introduction of the Code that may have led to resistance. These include that CFAs are independent companies, or are registered charities and which may argue that the Code is not relevant for them. In addition, to date there have been no organisational failures, which might have prompted them to ask why a code was needed? The pandemic soon challenged this view, demonstrating the benefits of robust governance structures, sound risk management and professionally-run organisations.

To counteract some of these issues The FA aimed to ensure that the Code was:

- a guidance document that was optional for County FAs and not mandatory.
- expected to be adopted by County FAs as a mark of achieving good governance.
- acknowledged as presenting some challenges for County FAs to achieve it.
- without a timeframe for adoption, accepting that County FAs may need several AGMs to achieve compliance.
- an applicable model for all County FAs, whether they have a Council or not.

## Section 2: Key aims – what challenges we were we trying to address with the regional Code?

### Excellent Leadership

It is to be expected that the leadership across 50 independent organisations will vary, not least due to the experience, skills, and professional background of each leader. Much of the focus here is on the CEO and Chair. However, the whole leadership team, made up of the Board, the wider executive management team and the associated governing structure all comprise the leadership for that individual organisation. The leadership's collective alignment, consensus and clarity of purpose are required to enable each CFA to thrive. While it would be wrong to say there was anything like widespread organisational failure in the regional network, there have been notable challenges that can be traced back to governance issues. For some, the introduction of a minimum operating standard in safeguarding children and vulnerable adults revealed that improvements were required, particularly within the people and process areas of governance.

In addition, grassroots football was no different in facing **significant financial difficulty** caused by the Coronavirus pandemic. While many were not in an immediate position of vulnerability, without some change and improvement to the leadership's focus and governance capability, the network would at best underperform and therefore be unable to deliver to its full potential.

The CFA Code is seen as the glue to bind the collective leadership together to navigate both risks and opportunities, and the process to achieve Code compliance was designed to make this as effective as possible.

### Representation as diverse as the game's participants

The combined elements of the Code that drive improvements around equality, diversity and inclusion allow CFAs to address under-representation across the network.

The Code will contribute to The FA's wider work on Inclusion and Diversity. The FA's strategy, 'In Pursuit of Progress'<sup>3</sup>, recognises the need for more diverse leaders on Boards and Councils across the County FA network.

This remains the driver to attain the benefits of the inclusion outcomes of Sport England's Code for Sports Governance, which is clear that 'diverse skilled and experienced decision-making bodies which contain independent voices and engage in constructive and inclusive debate enable good decision-making and help create trust with stakeholders'.<sup>4</sup> The FA's CFA Code is designed to support this work.

### Changing perceptions and building trust

The Code has an important role to play in the 'bigger picture' of the CFA Operating Model, designed to ensure an effective partnership between The FA and the Counties, underpinned by interdependence, shared goals and trust.

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<sup>3</sup> <http://www.thefa.com/news/2018/aug/14/fa-announces-new-equality-diversity-and-inclusion-plan-140818>

<sup>4</sup> A Code for Sports Governance, p. 33.

Without the essential steps contained in delivering the Code, The FA may not be fully able to deliver its wider CFA Operating Model and Grassroots Strategy. The purpose of the CFA Operating Model is to:

*‘Support the (FA’s) National Game Strategy objective to simplify, standardise, modernise and encourage innovation across the County FA network’*

The CFA Code is one of the cornerstones of this Operating Model. Compliance with the Code will have benefits for The FA in the following areas:

- establishing consistently high levels of delivery across the CFA network
- establishing effective ways of working with CFAs
- delivering on the Inclusion and Diversity targets
- dovetailing with the FA’s Corporate Strategy 2020-24

The early phase of the Code’s rollout brought all 50 CFAs to a consistent position: that all were self-assessed against the Code, produced a Board Tracker, and agreed a clear action plan to start the journey to compliance. This would go a long way to address the inconsistencies between the 50 organisations.

There is a direct correlation between the high-performing CFAs and those with effective Boards, appropriate structure, and the right culture, all of which are integral to the Code. While the speed at which CFAs will go on to achieve compliance with the Code will vary, this early phase established a benchmark to enable all CFAs to move into a strong starting position.

## Section 3: From theory to practice – seven essential steps to implement a voluntary Code

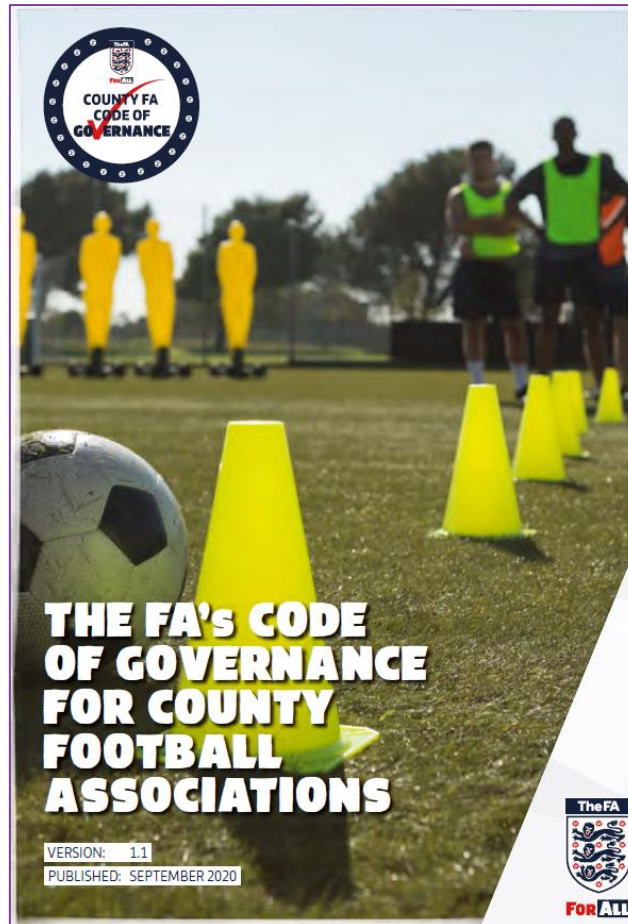
Moving the Code from the creation of a guidance manual to its implementation would mean encouraging CFAs to identify how they might use the Code to solve their existing problems. This required soft skills, good judgement and careful planning, and above all, a supportive and collaborative mindset. This section will outline the journey from theory to practice in the form of the following seven essential steps:

1. Deliver an effective 'soft' launch of the Regional Code of Governance (February 2020)
2. Create a toolkit of resources designed to make the first steps of change easy (March 2020)
3. Design an effective self-assessment process to benchmark CFAs against the Code's requirements and to begin an action plan (Launched in May 2020, completed by November 2020)
4. Create, in partnership with Sport England, an approved compliance framework to act as a proxy for Tier 3 of the Code for Sports Governance (approved by Sport England May 2020)
5. Design an effective Communications Plan (July 2020)
6. Deliver appropriate and bespoke training and support for CFAs (June and ongoing)
7. Design a suite of clear measurement tools to show progress for individual CFAs and the wider national picture for The FA (in place by November 2020)

The steps were designed at the outset to be integrated, anticipating the needs of the network, and suggesting an approach that was logical and relatively pain-free. It would have made the process much more difficult to launch the Code without a plan to activate, support and communicate with the CFAs.

### Step 1 – Devising and launching the Code

Work to create the Code began 18 months before the launch. The process was collaborative, with CFAs consulted on the need for a Code in the first place. Feedback indicated that there was a strong appetite for a regional Code. The working group tasked with producing the Code involved members of the Affiliated Association Committee to ensure buy-in from the CFA network, as well as FA executives and colleagues from Sport England. The result was this document:



Due to the relationship between The FA centrally and the CFAs as independent organisations being one of inter-dependence, and the voluntary nature of the Code, the approach to leading the CFAs into the Code of Governance progressed carefully and in a structured way.

It was also for this reason that the launch of the Code was 'soft', taking the form of issuing the Code and the accompanying toolkit to the network and allowing it to land with the CFAs and giving them the time and space to digest it. This was followed up a month or so later with a series of regional briefings to which CFA leaders were invited and given an overview of the Code, outlining why it was needed and highlighting some of the risks of poor governance. CFAs were able to challenge, ask any difficult questions and debate any areas of the Code.

It was clear that CFAs would want to know where they stood against the Code's requirements. Therefore the briefings also shared how the (pre-developed) self-assessment tool worked and how it automatically led to the creation of an action plan.

Following the launch of the Code, attention focused on the next essential steps towards the voluntary adoption of the Code. Therefore, the self-assessment process and Compliance Framework needed to incorporate the lessons learned in order to best engage with and influence the network of CFAs.

## **Step 2 – Toolkit of resources**

Launched as an integral part of the Code, the toolkit comprised 50 resources in the form of templates, presentations, and partner documents to support and clarify aspects of the Code.



An example of this is a set of 'Model Articles', produced and funded by The FA to act as reference point for CFAs.

The approach here is also important. Again, there was no compulsion for the Counties to use the Model Articles or any other toolkit resources; rather, they were persuaded that it made sense. By being provided with the resources at the outset, CFAs could navigate around the toolkit as the need arose, opting into suggested processes and by doing so, moving a step closer to engaging and ultimately complying with the Code.

The toolkit has been updated since the launch, with new materials created based on identified needs. For example, a policy tracking tool was produced, setting out when, how and who would manage policy updates and acting to facilitate how approvals are managed at the Board level. To assist the user, this tool sits within a series of Smartsheets, all cloud-based, that make up each CFA's Code of Governance workspace. The self-assessment tool and the compliance framework all sit within this resource, which is a familiar platform for the County FA network.

In addition, certain processes used in the early phase of the Code's implementation were enhanced or improved. For example, the Board Skills Diagnostic Questionnaire was moved from its original PDF format to an online form. This was to save the user time and to allow for easier collation of the results, leading to more time spent on each Board reflecting on its skills gaps and how it operates to identify improvements.

### **Step 3 – Self-assessment process**

The **compliance framework** and **self-assessment process** were both cornerstones of the regional implementation. The first and vital piece of work was the self-assessment process, which enabled each CFA to understand its own current position against the Code and, as a result, to undertake a gap analysis. In doing so, they were identifying their first clear actions towards compliance. CFAs were encouraged by the design of the self-assessment to establish a Steering Group (typically, but not exclusively, consisting of the CFA's CEO, Chair, Vice Chair and Senior Independent Non-Executive Director) to oversee this project. This self-assessment process also benefited The FA, enabling it to set benchmark levels of CFA governance. There had never been a clear picture around this previously, only anecdotal observations, and the tools used in the project provided rich data for The FA to be able to set targets, provide bespoke support to drive levels of compliance, deliver training where needed, and shape support and communications to address the areas of weakness and resistance.

In practical terms, the self-assessment was designed in Microsoft Excel by one of the CFAs themselves. Each of the Code's 84 requirements were entered onto the platform, allowing CFAs to register progress against them:

Proposed Key to Scoring		Structure (31)	People (15)	Communication (4)	Standards & Conduct (6)	Policies & Processes (9)	Total (65)
1	Not communicated, Not Started						
2	Communicated, Not Started						
3	Reviewed and Plan in place to implement						
4	Implementation within the next 6 to 12 months						
5	Compliant/Completed						
		0	0	0	0	0	0

This process was then replicated into a Smartsheet:

Criteria	Requirements	CEO Score	CEO RAG	Chair Score	Chair RAG	Vice Chair Score	Vice Chair RAG	Senior NE Score	Senior NED RAG	Combined County FA score (post RM Workshop)	Combined County FA RAG
<b>Structure</b>	<b>County Football Associations shall have a clear and appropriate governance structure, led by a Board which is collectively responsible for the long-term success of the Association and exclusively vested with the power to lead it. The Board shall be properly constituted, and shall operate effectively.</b>	<b>Score 1 if this requirement is Not Started or Don't Know therefore no action plan- this will turn red</b>		<b>Score 2 if this requirement is started and an action plan is in place. This will turn amber</b>		<b>requirement is completed and you have evidence to upload in the Compliance Framework sheet. This will turn green</b>				<b>combined CFA score forms a position statement for this requirement against the Compliance Framework</b>	
1.1a	The Board of the Association shall be the ultimate decision-making body and accordingly exercise all of the powers of the Association	3	Completed and Evidenced for Approval	3	Completed and Evidenced for Approval			3	Completed and Evidenced for Approval	3	Completed and Evidenced for Approval

The process was designed to meet the need for the CFA to understand its current position. The design meant that a collective approach would be needed across the Board, involving the CEO. It also prompted the identification of possible evidence (or the lack of it), and the final column (not shown) enabled the CFA to write its own action against each requirement, which would automatically pre-populate in the Compliance Framework sheet.

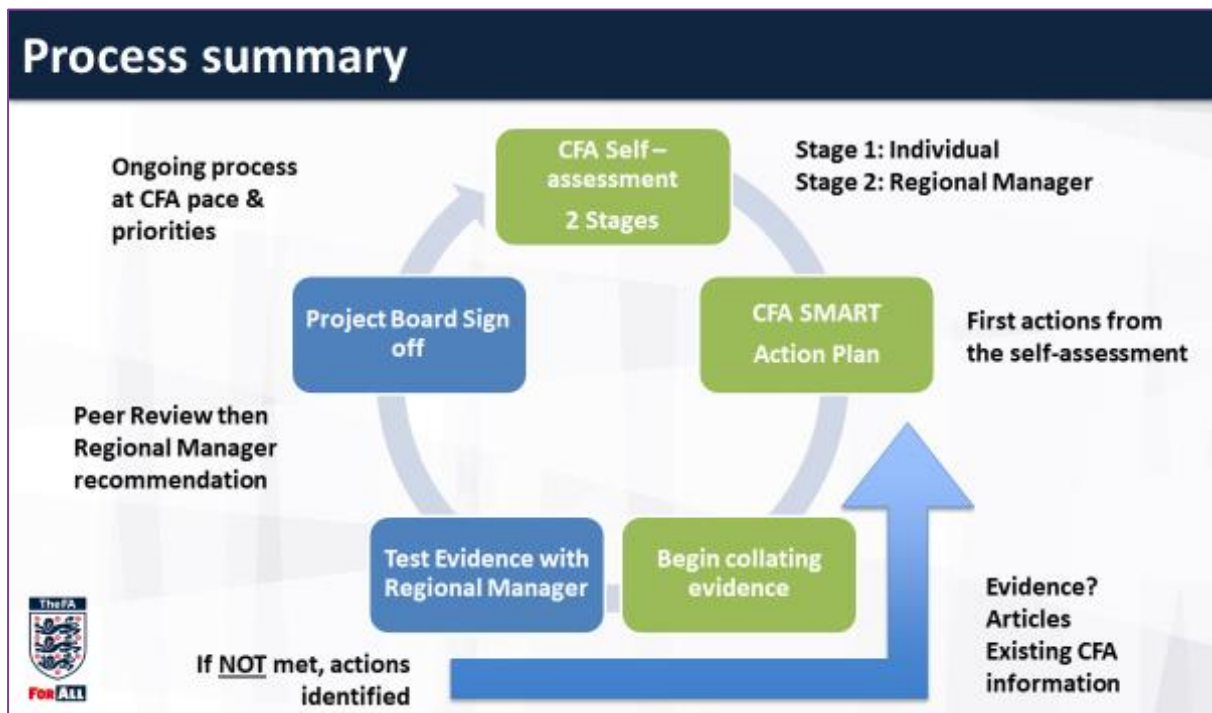
#### **Step 4 – Designing a compliance framework**

The design of the Compliance Framework itself was equally important, not least in order to ensure that it was considered a proxy for Tier 3 of the Code for Sports Governance and thus meeting the standards required by Sport England, but also to ensure that the process would be easy to work with for both the CFAs and FA staff supporting the work. The key factors were that

- It utilised a familiar process, following the evidence-gathering process on an online Smartsheet which CFAs have used for many years for the Safeguarding Operating Standard
- The assessment process is flexible and can be carried out over time. Allowing assessment section by section, for example, encourages CFAs to proceed with the process rather than wait for all of the requirements to be met before uploading evidence. This was possible as the CFA Code is assessed by FA Regional Managers initially, followed by a peer review process and finally Project Board sign-off. Therefore the process, once agreed with Sport England, does not require external assessors.
- Perhaps the biggest benefit to the CFAs of the framework is that it is, for the time being, not mandatory and no fixed timeline was set, although implicitly progress would be measured against the CFA's own indicative completion date, with the 2024 milestone considered a sensible review point at it represented the end of the current funding cycle.

The framework is also part of the suite of Smartsheet resources. The design was based on Sport England's process for NGBs, enabling each requirement to be 'met' or 'not met' dependent upon the evidence offered. The initial action identified from the self-assessment was automatically populated in the sheet, again making the first steps as easy as possible to submit evidence.

The overall process is a collaborative and iterative one, as shown below:



### Step 5 – Communicating value creation for CFAs

Communications on the Code focused on the areas of positive value to CFAs, such as establishing them as better performing businesses, measured by performance against FA Key Performance Indicators, their local priorities, financial performance, improved management of risk, and better stakeholder engagement.

At the heart of this is CFAs operating with better performing Boards, measured by a skills audit and annual performance reviews, both of which are requirements of the Code.

These are all significant pieces of work. Therefore, constant reference to CFA perspectives and their respective pains and gains had to be addressed to ensure a positive response to the Code and the subsequent move to the Compliance Framework.

Microsoft Teams was the vehicle for communications, enabling practice to be shared, questions to be answered, and any updated resources or training to be shared in this collaborative way.

### Step 6 – Bespoke training and support

Providing training is part of The FA's tactic to make the first steps easy. Specific training for Chairs was delivered at the time of the launch, recognising the importance of the impetus for governance reform coming from the Board leadership.

In addition, an online 'surgery' session was delivered every two weeks initially and subsequently monthly, featuring a specific area of the Code and showcasing the success of CFAs in making progress in an identified area, showing that it is achievable and demonstrating the value to other CFAs. Wherever possible the content was CFA-led; in fact, the idea for the surgeries came from the network. The FA's role was to facilitate, lead and coordinate the sessions with the needs of the network in mind.

To date almost 30 sessions have been delivered across all areas of the Code. An example of these sessions is shown below outlining some of the topics covered in the early stages:



# Code of Governance CFA Surgery #9

11<sup>th</sup> November 2020

**1pm start**



## Plotting a course to a gold standard of governance

			
<b>Effective Boards</b>	<b>Board Recruitment</b>	<b>Local Demographics</b>	<b>Board-Led Strategy</b>
			
<b>Articles</b>	<b>Board Induction</b>	<b>Support for Chairs</b>	<b>Board Development</b>
			
			<b>Today's session</b>

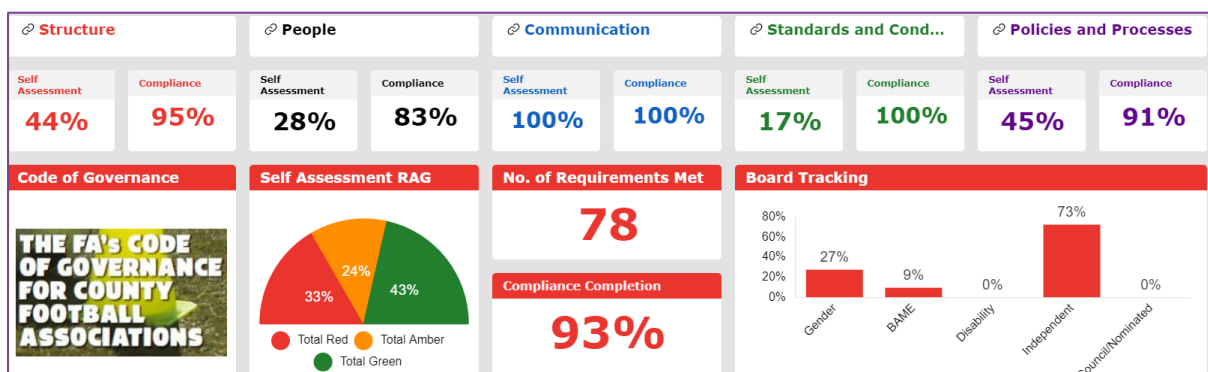
Several partners have been part of the delivery of training, either via the surgeries or leading specific sessions. A different voice is often valuable and we acknowledge the expertise of The Chartered Governance Institute, the Association of Chairs, Perrett Laver, The Sport & Recreation Alliance and The FA's Company Secretary, Richard McDermott, all of whom have delivered valuable insight on the Code and its application.

The other vital area of support for CFAs has been through the existing team of four Regional Managers. While the perception may be that football as a well-resourced sport might have a separate team for governance, the regional leads embraced the support role expertly, providing ongoing support specifically in testing the evidence provided by the CFA and highlighting where more was needed to guide CFAs to discover solutions. The team also stepped up to provide Board Skills Audits.

### Step 7 – Measurement tools for each CFA

The final of the essential first steps was to design an effective measurement process to enable CFAs to answer the question, ‘How compliant are you with the Code?’

The use of Smartsheets meant that a dashboard could be created for each CFA to be able to access this data at the touch of a button. The primary measures were based on the CFA’s completion of the self-assessment, the level of compliance moving up as requirements were signed off:



The dashboard also reported on key data drawn from the CFA’s own Board Tracker (extracted from a separate sheet), outlining gender balance, diversity, independence and collective Board skills and succession insight, all of which was valuable to each CFA Board in any case.

The tool and the measures it provided all combined to encourage CFAs to adopt essential practices such as reflecting on their representation, their performance as a Board, making their skills gaps clear to see and considering succession planning more actively, traditionally a weakness of Boards.

In isolation, each of the essential steps would perform a specific, individual task or role. Taken together, the seven steps form a coordinated, collective, and collaborative approach towards voluntary adoption of the Code.

## Section 4: Measuring local, regional, and national progress

While the system provides each CFA with its own dashboard, the design and functionality of the chosen software mean that each CFA's data could be collated into a national Code of Governance dashboard.

The FA had previously been unable to measure how effective CFA governance is. This Code changed that and provided a national benchmark from the initial self-assessment process, against which to subsequently measure the evidenced levels of compliance within the Compliance Framework. The addition of a Board Tracker also provided important measures of progress.

These national measures provide metrics such as:

- % compliance based on each CFA's individual self-assessment
- % evidenced compliance against the Code of Governance for all 50 CFAs
- % female members of CFA Boards. This now stands at 24%, having nearly doubled from the baseline of 13% in 2018
- Levels of other measures of diversity on CFA Boards. For example, BAME representation currently stands at 7% against the national picture of 17%
- % of independent Board members. This is currently 49% which is well above the Code's target of 33%.

The headlines for 21-22 look like this:



The Board Tracker has delivered a clear picture of the composition of all 50 CFA Boards for the first time, and in doing so has identified the gaps around representation. This process has encouraged all CFAs to map their current skills and has led more than a quarter of CFAs to undertake Board skills audits with FA Regional Managers or external consultants.

Current areas of collective strength are strategy and performance management, with commercial and marketing also having seen an increase through the recruitment of independent non-executive directors. Legal, HR and digital media are areas that the network would like to strengthen. Understanding these gaps in this way means that recruitment can be targeted to close these areas, based on the best practice recruitment process gained from Sport England's pilot initiative.

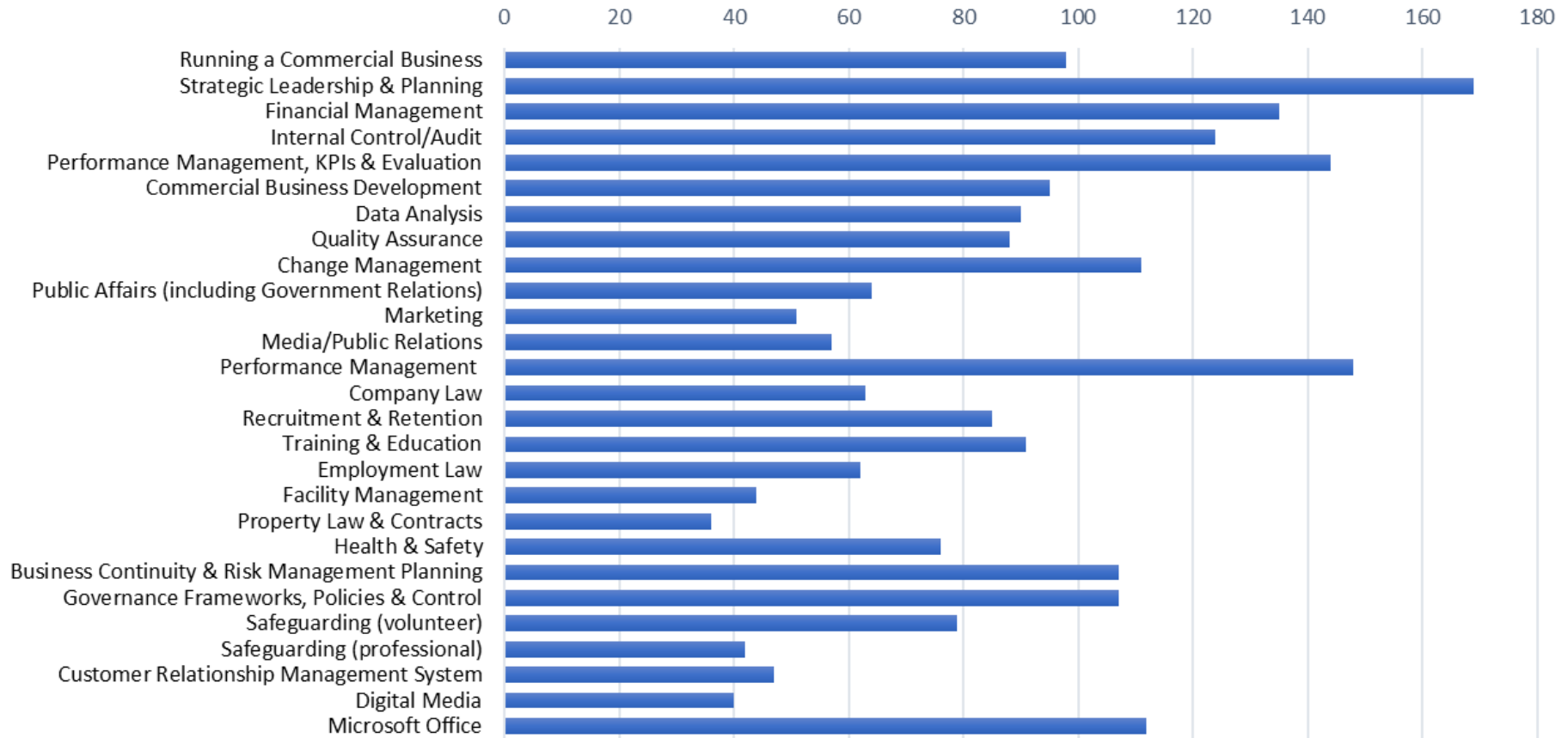
The recruitment of independent non-executive directors has been a particular strength of the Code's impact, and while the number recruited is easy to quantify, their individual contribution and the expertise brought to CFA Boardrooms are immeasurable.

The national dashboard provides an accurate picture of evidenced progress towards Code compliance. This means specific areas can be supported where progress is slow in any areas that are relatively easy to evidence. For example, all CFAs have websites and communications channels and already provide and publish information on strategy, finance and operations and are improving communications around governance. This means that all CFAs should be able to evidence section 3 of the Code, Communications.

The other benefit of the collated reporting process is that the total skills mix on Boards can be understood. This is shown below as an extract from the national dashboard:



## National Dashboard: Specialist Skills



## Next steps - evolving the Code and accelerating adoption (including lessons learned to date)

With the essential steps to good governance as defined in Section 3 now delivered or in progress, focus will turn to how County FAs progress to achieve the Code of Governance - the gold standard.

The elements outlined will underpin this next phase of achieving the Code which involves gathering and testing evidence against the Code's requirements. Foundations have been laid for this to be delivered successfully, with effective, empathetic and customer-focused leadership at its heart. CFAs will achieve the Code at different speeds. The first did so in 2021 and the longer-term milestone is to have all CFAs making significant progress by June 2024.

The task now is to accelerate progress, but also to adapt and evolve the Code just as Sport England has done with the national Code. While there were some small changes to the document and its toolkit in late 2021, the Code is currently under review to incorporate the revisions made to the Code for Sports Governance in 2021, but also to keep in line with the evolution of the Equality Standard.

The next phase for The FA looks like this:



## Lessons learned so far

It is always powerful to reflect on the journey so far and ask the question, 'what could we have done differently or better?' The honest answer is many things, but here are a few honest reflections:

### - Voluntary v. mandatory?

This is a question that will divide sports in their chosen approaches to cascading governance. Clearly the sector would like to progress as quickly as possible, but as with all pieces of change management, you have to take people with you. For The FA, the level of progress is encouraging, and the changes and improvements beyond the compliance metric itself are pleasing. The platform is set to accelerate compliance, and this platform is strong because of the approach taken to date. Arguably making the Code mandatory would have heightened resistance in the short term, and ultimately made the impact of the changes less effective.

### - Existing resource v. additional capacity?

Existing staff members and resources have delivered impressive results. Would additional resources have helped? Probably. And perhaps with a greater ability to tap into external knowledge and support on an ad hoc basis we could have gone quicker, although we have been able to draw on support from partners and colleagues where needed. Any other approach was cost prohibitive considering the significant pressures on budgets that the sector has faced throughout the pandemic.

### - The approach itself – nudge v push?

This relates directly to the question of mandating the Code. The right approach, in the end, is one where good governance is the choice for the network, and in making this choice, the support, knowledge and training are on hand to assist. It may be the case that a more direct approach will be needed in the future, but for now the people-centred approach has served well.

### - Did the change equation work?

The first steps were easy and familiar to CFAs, so this element was effective. Perhaps we could probably have focused more on the compelling vision at certain points along the way. This was the focus at the start, and the obvious opportunities of the need for good governance were seen during the pandemic. Attention was justifiably occupied on ensuring that finance, reserves and cash flow would all stand up to the unprecedented strain, but perhaps other areas could have been highlighted as well. While Board reform and recruitment have been effective, and strategy creation and stakeholder engagement also formed a key part of the 2021 period, diversity and inclusion remains an area where more progress is needed.

The quest for good governance is never done, and while progress is pleasing, the end goal is much further ahead.

## Timeline

