



Department
for Culture,
Media & Sport

Baroness Twycross
Minister for Gambling
1st Floor
100 Parliament Street
London SW1A 2BQ

E: enquiries@dcms.gov.uk

www.gov.uk/dcms

13 January 2025

Lord Moynihan
House of Lords
London
SW1A 0PW

INT2024/00275/DC

Dear Lord Moynihan,

I am grateful for your contributions during the 16 December Committee debate of the Football Governance Bill. During the debate you raised a number of important points, which I promised to write to you on.

Appointments to the Independent Football Regulator (IFR)

In relation to your queries regarding appointments to the Regulator. I have set out each point in turn below.

1) The process which has been followed to date on each and every appointment to the senior levels of the Shadow Regulator, including when and how the legal requirements for Civil Service recruitment have been implemented.

All appointments have followed the Civil Service Commission Recruitment Principles.

2) Who has been on the appointments board and how many appointments have been made from outside DCMS officials.

Recruitment decisions relating to Shadow Regulator staff are taken by officials in line with Civil Service guidance and Civil Service Commission principles. This includes running fair and open competitions.

The process to appoint a Chair and Non-Executive Directors of the IFR is ongoing and appointments will be announced in due course. It is a fair and open competition, run in accordance with the Governance Code on Public Appointments, as overseen by the Commissioner for Public Appointments. In line with the Code, the process includes an Advisory Assessment Panel, chaired by the DCMS Policy Directors General Ruth Hannant and Polly Payne. The Panel consists of Hedley Finn OBE as Senior Independent Panel Member, who was approved by the Commissioner for Public Appointments, as well as Tracey McDermott CBE and Tony Burnett. The Chair will be subject to pre-appointment scrutiny by the DCMS Select Committee before the appointment can be confirmed.



3) How many from the Bill team and the paid advisors are going on from Government to join the Shadow Regulator and in due course the full regulator.

The Shadow Regulator team operates independently from the Bill team. Therefore there is no expectation or requirement for any of the Bill team to transfer to the IFR.

The Shadow Regulator has its own team of staff who will transfer to the IFR taking into account the application of the Cabinet Office Statement of Practice on Staff Transfers in the Public Sector (COSoP), which provides transferring employees with TUPE-like protection.

4) Are there any of the Shadow Regulator contracts tied to the jobs to be appointed to the full regulator.

Everyone currently working for the Shadow Regulator is interim. This includes a mix of existing DCMS staff, staff on secondments from organisations outside DCMS, and fixed term contracts.

The Shadow Regulator team is designing an organisational framework that is efficient and proportionate; and has the right mix of skills to enable the IFR to make a positive impact as soon as possible.

The Chair and CEO will need to approve the organisational model and until the IFR is legally established all external roles will be advertised as fixed term contracts only.

Definition of a season

You also raised a point regarding the definition of a football season. I appreciate the intent of the points you raised. This delegated power is required so that, in the event of any future changes to a football season and how it is structured, the Secretary of State is able to quickly make corrective amendments to the definition for the purposes of the Bill. While perhaps unlikely, the structure of seasons could feasibly change in the future. For example, we are already seeing changes to the footballing calendar as a result of European and international competitions, and broadcasting. If the current situation were to change, the Secretary of State should have the ability to alter the definition in a timely manner, so that the legislation remains effective.

You suggested some specific amendments to the wording of the definition in the Bill. The current definition of a football season within the Bill is accurate for the current format of football seasons in the industry. So we do not feel the need to make this definition either more or less precise. Your suggested deletion of the references to years would, unfortunately, not have the legal effect intended. Since the first match of, for example, the Premier League would technically be the first match ever played in the competition in 1992. And the final match will, until a specified competition is dissolved, always remain an unknown and uncertain future date when the last ever match in the competition is played.

I thank you again for raising these important issues, and I hope my response has given some clarity on these. During the debate, you also raised the consultation on ticket resale in the live events sector and a call for evidence on pricing practices in the sector. My colleagues, Sir Chris Bryant, Minister for Creative Industries, Art and Tourism, and Justin Madders, Minister for Employment Rights, Competition and Markets, have written to you separately on this issue.

Please do get in touch with my office if you would like to discuss these issues, or any other aspect of the Bill, further.

I am copying this letter to all of those who spoke at the 16 December Committee debate and I will place a copy in the library of both Houses.

With best wishes,

A handwritten signature in black ink, appearing to read 'Twycross', written in a cursive style.

Baroness Twycross
Minister for Gambling