



Department
for Culture,
Media & Sport

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5 June 2025

Joe Robertson MP
House of Commons
London
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INT2025/05662/DC

Dear Joe,

I am writing to follow up on the question you raised during the first Committee session on 3 June 2025 of the Football Governance Bill. You sought clarification on the Bill's definition of an "ultimate owner".

The Owners' and Directors' test is there to keep harmful owners out of the game. Whoever is really pulling the strings at a club, whether it is a major shareholder with formal legal control or someone exercising significant influence behind the scenes, the Regulator must have the tools to test them. Owners, as custodians of football clubs, have the ability to significantly impact a club's survival. That is why the Bill empowers the Regulator to uncover who owns a club and to test them at the point of entry or as an incumbent owner.

The Bill sets out a clear definition of an owner. Clause 3(1) and Schedule 1 together define who will be considered the "owner" of a club under this regime. This is the definition which matters for the Owners' and Directors' tests. It includes anyone who exercises significant influence or control over the activities of a club.

As you pointed out in Committee, clause 3(2) also defines the "ultimate owner" of a football club. The ultimate owner(s) are just the owner(s) with the *most* influence or control over the activities of the club. That might be one single person or several. This might be straightforward to identify, if someone simply has the large majority of a club's shares. On the other hand, it might be more complex, coming down to a combination of shareholding and formal or informal arrangements, or relationships which give influence. The Regulator will have to assess case by case.

The only way ultimate owners are treated differently than other owners is that they are singled out in the club's personnel statement. When a club applies for a provisional operating licence, it has to identify both its owners and its ultimate owner(s) to the Regulator in a personnel statement. Licensed clubs then have to publish their personnel statements. That will be a crucial step to improving transparency and accountability in the game.

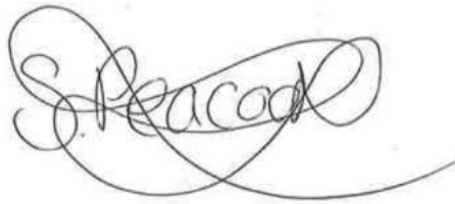


Including a definition of ultimate owner therefore increases transparency for fans and stakeholders. It will let them understand who has the most control over their clubs. It will not allow any owners to evade testing or accountability.

If you would like to discuss this further, I would be happy to arrange a meeting for you with officials.

I thank you again for raising this issue, and I hope my response has given some clarity on this. I have placed a copy of this letter in the Library of the House.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Peacock', with a large, looping flourish extending from the end.

Stephanie Peacock MP
Minister for Sport, Media, Civil Society and Youth