



ARGUS PRO

Regulatory Intelligence | Football Governance

IFR Governance Readiness Self-Assessment

A structured, domain-by-domain diagnostic for English football clubs preparing for the Independent Football Regulator's licensing regime

Published: March 2026 | For: Chairs, CEOs, CFOs, Heads of Governance

Club name: _____

Completed by: _____ Date: _____

Division: _____

About This Assessment

The Independent Football Regulator's licensing regime requires clubs to demonstrate sound governance, financial sustainability, effective fan engagement, and suitable ownership. The provisional licence application window opens in November 2026. For most clubs, that is less time than it looks.

This self-assessment is designed to give senior decision-makers: Chairs, Chief Executives, CFOs, and Heads of Governance a structured, honest picture of where their club stands across the five areas the IFR will assess. It is not a compliance checklist. It is a diagnostic tool, designed to surface gaps, prioritise action, and provide a baseline for tracking progress.

Important: This assessment is not an audit. It does not constitute a compliance opinion or regulatory submission. Argus Pro LLP is not an auditor. The purpose of this tool is to help your club understand its current position and focus its efforts where they will have the greatest impact.

How to score each question

Each question is scored on a four-point scale:

Score	Description
1 - Initial	This is not currently in place, or we are unaware of the requirement
2 - Developing	Some foundations exist, but practice is inconsistent or incomplete
3 - Established	This is in place and generally followed, but documentation or depth could be stronger
4 - Advanced	This is fully embedded, consistently practised, and documented to a standard capable of withstanding regulatory scrutiny

Score each question honestly based on your club's actual practice, not what is intended, planned, or aspired to. The value of this tool comes from accuracy, not optimism.

Each domain contains five questions, giving a maximum domain score of 20. There are five domains, giving a total maximum score of 100.



Domain 1: Financial Sustainability | What the IFR will scrutinise most closely

The IFR takes a forward-looking, risk-based view of financial sustainability. It wants to understand not just whether your club is currently solvent, but whether it can remain financially resilient under foreseeable adverse conditions, including relegation.

<p>Q1. Does your club have a documented multi-year financial plan (covering at least three years) with clearly stated assumptions?</p>	<p><i>One-year budgets alone are insufficient. Plans must show forward visibility and transparency in assumptions.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q2. Does your financial plan include downside and stress-tested scenarios, as well as a formal relegation analysis?</p>	<p><i>The IFR will expect to see modelled scenarios, not just a single base case.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q3. Is there documented evidence that the board has genuinely challenged, reviewed, and approved the financial plan, rather than ratified it?</p>	<p><i>Board minutes should record the questions asked, not just the outcome.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q4. Does your club have a documented process for monitoring financial performance against its plan, with escalation triggers if variances arise?</p>	<p><i>Variance monitoring and escalation processes should be documented and tested in practice.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q5. Are funding sources (owner loans, broadcast rights, commercial income, player sales) documented with realistic sustainability assumptions?</p>	<p><i>Optimistic funding assumptions without documented rationale are a common IFR concern.</i></p> <p>Score: 1 2 3 4</p>	
<p>Domain 1: Financial Sustainability — Total Domain Score</p>	<p>/ 20</p>	<p>Maturity rating:</p>



Domain 2: Corporate Governance | Board effectiveness and the Football Club
Corporate Governance Code

The IFR will assess whether your governance statement reflects actual practice rather than just intended practice. The Football Club Corporate Governance Code sets out minimum standards for board composition, accountability, and decision-making.

<p>Q6. Does your club have a published governance statement that accurately describes how the board actually operates?</p>	<p><i>Statements that describe aspirational rather than actual practice are a significant regulatory risk.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q7. Do board minutes record not just decisions taken but the reasoning behind significant decisions, including alternatives considered and questions raised?</p>	<p><i>Thin minutes that record outcomes without deliberation are a common weakness found in regulatory examinations.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q8. Are terms of reference for the board and any sub-committees documented, reviewed at least annually, and accurately reflect how committees operate?</p>	<p><i>Terms of reference that have not been reviewed since their creation are a governance risk.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q9. Is there a maintained and regularly reviewed conflicts of interest register, with a documented process for managing conflicts as they arise?</p>	<p><i>Conflicts should be recorded at each meeting and managed proactively, not retrospectively.</i></p> <p>Score: 1 2 3 4</p>	
<p>Q10. Does your board have documented succession planning, including skills and diversity assessments for director roles?</p>	<p><i>The IFR will assess whether governance structures are sustainable, not just currently functional.</i></p> <p>Score: 1 2 3 4</p>	
<p>Domain 2: Corporate Governance — Total Domain Score</p>	<p>/ 20</p>	<p>Maturity rating:</p>



Domain 3: ODSE Compliance | Owners, Directors and Senior Executives - continuous suitability

The ODSE test came into force on 12 December 2025. Assessments for new owners and senior managers begin from May 2026. Every club must understand who is in scope and ensure that disclosure and monitoring processes are in place.

<p>Q11. Has your club identified all individuals who fall within the scope of the ODSE regime, including those who exercise significant influence or control, even informally?</p>	<p><i>The definition of 'owner' is broad. Informal influence can bring individuals within scope.</i></p> <p>Score: 1 / 2 / 3 / 4</p>	
<p>Q12. Do employment contracts and service agreements for in-scope individuals explicitly reference ODSE obligations, including ongoing disclosure requirements?</p>	<p><i>Contracts that predate the Football Governance Act 2025 are unlikely to include these provisions.</i></p> <p>Score: 1 / 2 / 3 / 4</p>	
<p>Q13. Is there a documented internal process for reviewing the ongoing suitability of individuals in scope, including a mechanism for individuals to report material changes to their circumstances?</p>	<p><i>The IFR expects clubs to monitor suitability on an ongoing basis, not just at appointment.</i></p> <p>Score: 1 / 2 / 3 / 4</p>	
<p>Q14. If your club is planning ownership changes or senior appointments, is the IFR approval timeline (up to 150 days) factored into planning?</p>	<p><i>Clubs that do not build regulatory timelines into commercial planning face avoidable complications.</i></p> <p>Score: 1 / 2 / 3 / 4</p>	
<p>Q15. Does your board have clear ownership of ODSE compliance as a governance matter, rather than treating it solely as an HR or legal issue?</p>	<p><i>The board has a responsibility to ensure appropriate oversight of ODSE compliance at club level.</i></p> <p>Score: 1 / 2 / 3 / 4</p>	
<p>Domain 3: ODSE Compliance — Total Domain Score</p>	<p>/ 20</p>	<p>Maturity rating:</p>



Domain 4: Fan Engagement | Meaningful consultation on heritage matters

The Football Governance Act 2025 requires clubs to conduct meaningful consultation with supporters on heritage matters, including ticket prices, stadium changes, and club identity. Engagement must be genuine, documented, and demonstrably taken into account.

<p>Q16. Does your club have established, documented processes for consulting supporters on heritage matters, rather than one-off events organised before a decision has already been made?</p>	<p><i>Performative consultation, where fan views are gathered but not genuinely considered, is a specific IFR concern.</i></p> <p>Score: 1 2 3 4</p>
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<p>Q17. Are consultation processes documented, including methodology used, level of participation, key themes raised, and outcomes?</p>	<p><i>Records must demonstrate that engagement was meaningful and that fan views were genuinely considered.</i></p> <p>Score: 1 2 3 4</p>
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<p>Q18. Is there documented evidence that fan views have been presented to and considered by the board, with records of how they influenced relevant decisions?</p>	<p><i>Board consideration of fan views should appear in board papers and minutes.</i></p> <p>Score: 1 2 3 4</p>
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<p>Q19. Does your club have an established fan liaison structure with documented terms of reference and meeting records?</p>	<p><i>Ad hoc fan engagement is unlikely to satisfy the IFR's expectations of a structured, ongoing process.</i></p> <p>Score: 1 2 3 4</p>
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<p>Q20. Are fan engagement processes reviewed and improved over time, with documented learning from each engagement cycle?</p>	<p><i>The IFR will look for continuous improvement, not a static process that never evolves.</i></p> <p>Score: 1 2 3 4</p>
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<p>Domain 4: Fan Engagement — Total Domain Score</p>	<p>/ 20</p>	<p>Maturity rating:</p>
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Domain 5: Evidence and Documentation | The foundation of every other domain

The IFR will assess what clubs can demonstrate, not what they assert. Strong governance in practice, but poor records leave a club in a weaker regulatory position than it deserves. Documentation is not bureaucracy; it is decision protection.

<p>Q21. Does your club maintain a document register, a current index of governance documents, financial records, and regulatory submissions, with clear ownership and retention periods?</p>	<p><i>A document register transforms an information request from a chaotic search into a structured retrieval.</i></p> <p>Score: 1 2 3 4</p>
<p>Q22. Are governance documents held in a single authoritative location, with version control, clear naming conventions, and access controls?</p>	<p><i>Documents scattered across personal drives and email chains create a specific risk under regulatory scrutiny.</i></p> <p>Score: 1 2 3 4</p>
<p>Q23. Is there a structured review calendar for key governance documents, with clear ownership and completion recorded, to ensure documentation remains accurate and current?</p>	<p><i>Outdated documents are as much a risk as missing ones. Reviews must be documented, not just done.</i></p> <p>Score: 1 2 3 4</p>
<p>Q24. Is there a clear traceability chain between regulatory requirements, the club's policies and procedures, and the board decisions and records that demonstrate compliance?</p>	<p><i>Traceability — the ability to trace a decision from its regulatory basis to its outcome — is the most powerful documentation principle from financial services regulation.</i></p> <p>Score: 1 2 3 4</p>
<p>Q25. Could your club respond quickly and coherently to a formal information request from the IFR, producing well-organised, accurate records within a tight timeframe?</p>	<p><i>The speed of response and the quality of records together determine how the regulator perceives your governance culture.</i></p> <p>Score: 1 2 3 4</p>

<p>Domain 5: Evidence and Documentation — Total Domain Score</p>	<p>/ 20</p>	<p>Maturity rating:</p>
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Summary Scorecard

Transfer your domain scores here to build your overall readiness picture.

Domain	Max score	Your score	Maturity rating
Domain 1: Financial Sustainability	20		
Domain 2: Corporate Governance	20		
Domain 3: ODSE Compliance	20		
Domain 4: Fan Engagement	20		
Domain 5: Evidence and Documentation	20		
TOTAL	100		

Interpreting your overall score

Score range	Maturity rating	What it signals
1 – 5	Initial	Limited awareness of requirement; significant gap between current practice and IFR expectations
6 – 10	Developing	Some foundations in place but inconsistently applied; key documentation or processes missing
11 – 15	Established	Core requirements met; processes documented and generally followed; gaps in depth or consistency
16 – 20	Advanced	Strong governance in this domain; documentation is accurate, current, and capable of withstanding regulatory scrutiny

Your total score is a starting point, not a verdict. It tells you where to focus. A low score in Domain 5 (Evidence and Documentation) will undermine a high score in Domain 1 (Financial Sustainability), because good practice that cannot be demonstrated carries little regulatory weight.

The IFR's supervisory approach is risk-based and proportionate. Clubs at earlier stages of maturity that engage openly and demonstrate a credible improvement trajectory will be treated differently from those that appear to have done nothing.



Priority Action Planner

Use your scores to identify the three to five areas that require the most urgent attention. Record them here.

Priority	Domain / Question	Current score	Target score	Action required	Owner	Target date
1						
2						
3						
4						
5						

What to Do Next

This self-assessment gives you a baseline. What it cannot give you is the independent perspective and structured methodology that comes from a formal assessment, or the confidence that what you have built will stand up when the IFR examines it.

Argus Pro helps clubs move from self-assessment to structured readiness, using the same analytical approach that underpins our work with regulated financial services firms. Our Aegis Compass platform translates IFR requirements into a clear, comparable view of where your club stands, and what to prioritise next.

Three ways to take this further:

1. Book a Confidential Assessment - a structured session with Argus Pro to validate your self-assessment, identify blind spots, and build a prioritised improvement plan.
2. Explore Aegis Compass, our structured assessment platform that gives you a comparable view of maturity and effectiveness, mapped to IFR licensing conditions.
3. Read our white papers, 'From City to Stadium' and 'If You Cannot Evidence It', which set out the strategic and practical dimensions of IFR readiness in detail.

"There *before* you need us."

Argus Pro works with senior decision-makers across financial services and football to build regulatory intelligence that works in practice, not just on paper.

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Disclaimer: This self-assessment tool is produced for general guidance only. It does not constitute legal or regulatory advice and should not be relied upon as a substitute for professional advice specific to your club's circumstances. Argus Pro LLP is not an auditor and does not provide audit opinions, compliance certifications, or regulatory submissions on behalf of clients.