

Response to Debbie Sayers – Salisbury Rovers FC

Dear Debbie

Although we understand that you have previously been advised of the process undertaken by The FA since your letter dated 5 April 2019, we provide the summary below for your ease of reference.

Commented [ds1]: The original letter is set out in full below.

1. Your letter was passed on to The FA's Grassroots and Technical Divisions, as The FA considered that your queries largely fell into the jurisdiction of these departments. The FA's Safeguarding team has also reviewed and provide input into this response.
2. The FA's Grassroots and Technical Divisions decided that there would be value in The FA producing a series of position statements summarising its position on a range of issues (including those raised in your letter).
3. An FA Youth Advisory Group (the "**Advisory Group**") was therefore convened to bring together expertise across The FA's Grassroots and Technical Divisions.
4. The Advisory Group held its first meeting on 16 September 2019 and a first draft of the position statements was produced on 1 November 2019.
5. The draft position statements were shared with CFA Youth Football Development Officers and the FA's Youth Participation Committee in December 2019.

ROVERS: This is the first time the FA has summarised fully the work it has undertaken to date. A response was obtained in January but when we asked, out of courtesy, to release it publicly, we were told it was not a corporate response and the matter was referred to the legal counsel's office.

This letter follows intervention by the FA's legal counsel's office.

The position statements are still in draft form as the areas they address require the approval of a range of departments and stakeholders within the FA. Our internal consultation has also recommended some further amendments to format to ensure that the statements have the desired practicality. For this reason, work on the statements continues and we do not wish to distribute drafts of work in progress. We anticipate this work being completed by the end of March. However, although we are not yet able to share these statements some of the content is reflected in the responses to your queries set out below. Should you wish to publicise these responses then we have no objection if this is done in a fair and balanced manner.

ROVERS: To be fair and balanced, we believe it is appropriate to set out the full detail of our original requests for position statements.

The requests are below in red. They appear in purple where the FA does not appear to have given any kind of response.

(i) the rights and well-being of the child are paramount in every situation and at every age. The statement should explicitly refer to the UN Convention of the Rights of the Child (CRC). The FA should consider creating a set of FA guidelines on this as they have in other countries (for example, Norway). The statement should state clearly that The FA requires all regulated bodies to ensure their policies and practices are compliant with the CRC – templates and very simple, explicit examples of good practice could easily be provided. This should also include a commitment to The FA's own practice – e.g. in its delivery of 'workshops', courses and regional and national events. Action in respecting rights

is generally low cost/effort – it’s about awareness and attitude change. I would be happy to volunteer time towards this;

1. You have suggested that The FA require all regulated bodies to ensure that their policies and practices are compliant with the UN Convention on the Rights of the Child. The FA’s safeguarding policies are aligned with and reflective of the principles underlying a number of the Articles of the UNCRC (as relevant to The FA as a sports national governing body). Our safeguarding work is underpinned by recognised government guidance Working Together to Safeguard Children 2018 and informed by the NSPCC Child Protection in Sport Unit’s safeguarding and protecting children framework for sport, both of which have the child’s wellbeing and rights at their core.

We are working collaboratively with our partners across the game – the Premier League, EFL, PFA, LMA, PGMOL, CFAs, Leagues and Clubs, to drive cultural change in this regard. Part of this drive over the past 3 years has been to drive safeguarding standards for professional clubs and County FAs, and a key aspect of these standards relates to the ‘voice of the child’. The long-term cultural change is to embed these principles and practice (which align with the UNCRC) within our governance framework for the game, across technical, regulatory, discipline, and the Respect programme, all of which underpin the way we govern and facilitate youth football in England. We refer you to the section for children in the safeguarding section of The FA’s website:<http://www.thefa.com/football-rules-governance/safeguarding/section-7-children-and-young-people-under-18s>.

(ii) following on from the above, The FA should make a clear statement that children must be given a genuine voice in the running of every FA affiliated club – again, simple examples could be given. This should be a Charter Standard requirement at the very least. Listening to children is cost free and easy to do. This should also include a commitment to The FA’s own practice – e.g. in ‘workshops’, courses and regional and national events;

2. The FA actively supports and is driving the practice of children having a voice in the running of clubs with youth teams. The FA has well established and respected youth leadership programmes that promote the concept of youth integration. In the 2019 revision of the FA’s Governance Guidelines for County Football Associations the desirability of providing for a youth voice in the governance of a county FA is highly recommended. The Voice of a Child is also one of six overarching areas of the County FA Safeguarding Standard and driving practice in this area is mandatory for all County FAs (See Standard 3).
3. Extending this to grassroots clubs may be an appropriate next step, and we are currently considering whether this should be a requirement in order for clubs to apply for and obtain the Charter Standard. However, The FA believes that this is generally best achieved by working with clubs and educating them as to the benefits to be gained from involving young people as volunteers. At this stage, The FA is not seeking to mandate that all clubs do so.

(iii) The FA should condemn the trialling and selection of children (and their description as ‘elite’) at any level of the game (Academy, grassroot etc) at the age 4 or 5.

(iv) The FA should call for a broader and much more open discussion on the selection of children. This should include discussion of early specialisation. The FA’s position should be evidence based and not anecdotal (e.g. the suggestion that the ‘best need to play with best’ seems to be based on personal stories rather than any evidence base). By comparison, there is growing evidence that early performance has little correlation to senior performance and significant evidence of the risks

of specialisation. We would ask our national governing body to adopt an evidence-based approach to the issue;

(iv) all FA affiliated clubs, and especially Charter Standard Clubs, must be open access;

4. The FA has energetically promoted a philosophy of 'For All', which is best illustrated in the growth of disability and women and girls' football in recent years. We require clubs to be inclusive but at the same time recognise that there are capacity issues that reflect the availability of volunteers, coaches and facilities. In some cases, this will place limits on the number of teams or players that can be accommodated. However, the emphasis of The FA's Clubs programme is to encourage the development of clubs that best reflect all facets of their community. Those that can do this will be recognised and supported by The FA and CFA. The ethos of a FA Charter Standard Club should be a commitment to work with and improve its member players rather than running open trials with a view to pruning existing players with better ones from elsewhere. The key motivation for most young players is fun, enjoyment and a desire to play with friends. These factors will not be encouraged by an unstable environment in which the player feels that they dispensable.

(v) all FA affiliated clubs and leagues should guarantee fair playing time, at least in the Foundation Phase, and they should have clear standards in place publicly confirming this. This should also include a commitment to The FA's own practice – e.g. in FA regional or national events, including those with Academies;

(vi) every FA affiliated club, league and sanctioned tournament and FA regional or national event must have a very clear code of conduct in place for coaches, players and parents with a defined minimum content. This should be a requirement of affiliation and it should contain a pledge to respect the CRC. It should be a requirement that the code must be visibly displayed and distributed to parents, clubs, etc. More significant required of Charter Standard clubs. Templates could easily be provided.

[Specifically, in relation to tournaments, we suggested:]

In terms of sanctioning, we would suggest that to be sanctioned, a tournament/event application must contain:

(i) a clear code of behavioural expectations for all adults and children attending. This should meet a core set of FA defined minimum standards. Templates could be provided. This should also include a commitment to The FA's own practice – e.g. in FA regional or national events, including those with Academies;

(ii) a description of how this code will be circulated to all attendees;

(iii) confirmation of how the standards will be made visible at the tournament and in any advertising for the tournament e.g. on website links;

(iv) a requirement that the standards must be brought to the attention of all attendees at the start of every age group session of the tournament;

(v) a requirement that all applications must confirm that the event standards have been received and will be complied with and an undertaken they will be forwarded to coaches, parents and children;

(vi) name and contact details of the organisers' welfare officer;

(vii) confirmation of how children have been given a voice in the running of the event;

(vii) confirmation of how the organisers intend to monitor and implement the standards at the event - perhaps with a minimum requirements such as 1 Respect steward per X number of teams, named individual responsible for receiving any concerns, complaints or praise.

This should all be cost neutral once standardised templates, signage etc are drawn up and available – again, it is about a change of approach.

The FA could go further and have Respect events so that a certain set off standards or monitoring allows you to be branded a 'an FA Respect Tournament'.

5. You have suggested that every FA affiliated club, league and sanctioned tournament and FA regional or national event have a very clear code of conduct in place for coaches, players and parents. The FA's Respect programme has promoted the adoption of codes of conduct for the last 10 years and adoption of Respect and Respect measures are a requirement for all Charter Standard Clubs. It is also common practice for clubs and leagues to require participants to sign up to a code of conduct. However, the Respect codes deal with both poor behaviour and misconduct. Whilst The FA and CFAs can influence behaviour and deal with misconduct, clubs, leagues and tournament organisers have the primary role in setting and enforcing standards. The FA considers that the concept of Youth tournaments being obliged to provide the code of conduct that will apply to the competition as a condition of sanction by the FA or CFA to be a good one and we will be promoting the adoption of this measure to CFAs.

Commented [ds2]: NOTE: A code of conduct is not a requirement for all affiliated clubs, only Charter Standard clubs. It is not clear what percentage of clubs are Charter Standard.

County FAs run events without codes of conduct e.g. County Cups and tournaments.

(vii) The FA should make an unambiguous statement that the focus of the Foundation Phase is the individual not the team. This supports the DNA work and, although this information may be available on Hive or through courses, it does not reach many coaches and parents. A clear statement would assist and fits in with (i) in relation to the rights of the child.

The FA should also look to define a very clear 'time off' period as, presently, we are compelling kids to specialise and driving year-round football.

6. You have also suggested that The FA mandates rest periods for youth players to prevent 'year-round' football. Presently The FA and CFAs are unable to monitor a player's activity across all of the environments that they might play in, although this is beginning to change with a progression towards universal player registration. The Standard Code of Rules for Youth Tournaments currently stipulates the permitted number of playing hours per day. However, this issue is currently best addressed by the education of youth coaches to ensure they have an appreciation of the welfare of the child and a recognition that children are at differing stages of physical development. The FA considers that it to be very difficult to determine a single tariff that should be applied to all.

The need to ensure coaching courses or DNA workshops etc are not using outdated 'psuedo science' or neuromyths."

7. You have not provided any evidence that The FA's Coaching Programme is based on 'pseudo-science' or 'neuromyths', which (for the avoidance of doubt) The FA does not accept. However, we do note that current practice and learning will evolve as new ideas and research is undertake, including in the area of coaching/children's development.

Commented [ds3]: In a meeting we provided examples such as the teaching of the debunked VARK 'learning styles'. This was never followed up.

We hope this response addresses your concerns and that you recognise that, whilst we appreciate your views, The FA is not in a position to provide detailed responses to your queries on a regular basis. Please be assured that The FA takes safeguarding very seriously and is seeking to drive change as much as possible given the breadth of The FA's remit and practical ability to oversee all youth football across the country (much of which is delegated to County FAs).

Dermot Collins

The FA's Grassroots Division

The original letter of 5 April 2019 is below

Dear Mr Clarke,

The 'elite' development of children in football

We write to express our profound concern at the growth of 'elite' football development programmes aimed at very young children (most specifically u5s to u8s). This reflects a rising body of evidence that the 'culture' of youth sports has become disproportionately adult-centred. Dominated by adult views of what progress, competition and success mean, children's sport is now often confused with the expectations of the adult, or even the professional game.

As evidence of this, we would like to draw your specific attention to recent [reports](#) on social media of a Premier League Academy's U5 'elite' team where the children involved (who are only 4 and 5 years of age) have been trialled and selected by the club and then ranked as 'development', 'select' and 'elite' level. It is also suggested that these 'elite' 4 and 5-year olds may be 'training' several times a week.

We do not believe this is an isolated example. We are aware that 'open trials' for very young children have been advertised by other professional clubs. Further, it is of considerable concern that a largely unregulated private coaching industry feeds into this paradigm by offering training for supposedly 'elite' children with 'talent', selling dreams of access to the academy system, sometimes at considerable financial cost. 'Successes' (i.e. academy places gained) are widely advertised with children's photographs. We believe that this is more than just harmless marketing; it is fostering a culture in which children are considered commodities and dreams are being traded. This must be damaging to young children.

Our concerns are essentially two-fold.

First, judged by their own objectives (i.e. early 'talent identification'), such practices are inherently flawed. There is no such thing as an 'elite' 5-year old. Put simply, the assertions of anyone claiming to be able to identify a 5-year-old as a potential footballer rest on wholly unvidenced foundations. They are potentially misleading children and their families. At this age, you can no more predict a potential footballer than you can any other life outcome. It is our believe that, irrespective of the content or quality of the 'training' on offer, programmes of selection, categorisation and 'elite' labelling simply have no coherent theoretical underpinning. Further, as the research literature

suggests that an inclusive multi-sport and non-sport-specialist environment is optimal for player development, we must ask: what is the justification for a specialist, selective approach? Why, and for whose benefit, do such programmes exist? Recruiting very young children in this manner commodifies the youth game and it treats children as little more than assets.

Second, the existence of such programmes reflects a lack of understanding of children's rights – a problem which seems engrained within our youth sport culture. The desire to develop 'the future player' must always be secondary to the rights of the child now. The Convention on the Rights of the Child (CRC) emphasises that the best interests of the child must be the primary consideration in all actions concerning children. Additionally, the CRC provides that every child, of any age, has the right to participate in decision-making and have their voice heard. This is a fundamental value at the heart of the Convention which assures, to every child capable of forming his or her own views, the right to express those views freely in all matters affecting them and to have their views given due weight in accordance with age and maturity. In its General Comment on the right to be heard, the CRC Committee confirms that: "Children require play, recreation, physical and cultural activities for their development and socialization. These should be designed taking into account children's preferences and capacities" and that children who are able to express their views should be consulted. Similarly, in its General Comment on the right to play, the Committee has emphasised the innate value of play, and the importance of unstructured, child-led play as a critical childhood experience and mode of self-expression. It is imperative that these values are understood and respected by all adults working with children. Children's rights and, the safeguarding of them, trump all adult ambitions to produce adult professional footballers. While the CRC has not been directly incorporated into our law, it constitutes an interpretative legal standard to be considered by the courts in legal actions against public bodies and it thus demands consideration within any national sports programme

Unfortunately, current cultural practices undermine these rights and adversely affect the attitudes of adults within the youth game, skewing objectives away from participation, inclusion, retention and enjoyment, to adult-focussed ambitions. This is profoundly damaging to children and the sport. Legal duties to safeguard children must be adhered to and a clear, united and consistent voice is required on this issue. We believe governance bodies and the wider football community must work together, with children and parents, to prioritise children's rights, and to set and enforce standards. Only this will create the cultural change required.

Consequently, we urge you to:

1. Make an unambiguous statement that the interests of the child are paramount. This statement should include concrete ways of making children's rights real at every level of youth football. For example, engaging with coaches, clubs, children and parents at grassroots level to ensure children's voices are genuinely heard and acted upon.
2. Publish a very clear statement confirming that attempts to create 'elite' programmes at the age of 5 are wholly inappropriate, unsupported by evidence and inconsistent with children's rights. Additionally, reinforce, and enforce, The FA Standard Code of Rules which state clearly that "a child who has not attained the age of 6 shall not play, and shall not be permitted or encouraged to play, in a match of any kind". We fear this is easily ignored in selective or 'elite' sports programmes.
3. Recognise that it is not just very young children who are affected. A culture of premature professionalism pervades our youth game and it has eroded the child's right to play. This must be tackled. Even at grassroots level, we know that children are sometimes subjected to trials and selection processes and then excluded from their own game for adult reasons. There may be little awareness of the evidence on long-term development or the importance

of retaining as many children in the game as possible, for as long as possible. Too many clubs and leagues present themselves as 'elite' accelerating a race to nowhere while there is simply no evidence-based (as opposed to anecdotal) justification for such practices.

4. Reflect on the appropriateness of the current development agenda, including the team and league set-up for young children (including formats and team sizes) and consider whether it adequately respects children's rights and meets their needs. We would ask you to consult with children in doing so.
5. Consider whether further investigation is required in to the practices of academy recruitment, including the links to the wider coaching industry. This should include looking at ethical practice and the efficacy and age of such recruitment in areas where The FA has a governance responsibility.
6. Ensure coach education prioritises the child not the adult coach. It must ensure grassroots coaches are able to access the best coach education opportunities available (certain opportunities exclude Level 1 and 2 coaches). Accessible courses must also be grounded on firm evidential foundations and include at their core: (i) an understanding of learning theory (i.e. how children learn across the age groups); (ii) the promotion of evidence-informed, age-appropriate perspectives to coaches (see the IOC consensus statement on youth athletic development, May 2015 in reference to this) and, most importantly, (iii) unambiguous advice on what children's rights are, and why, and how, they should be respected within the delivery of coaching. There should also be an inclusive, rather than a didactic, approach which engages coaches and clubs and allows them to share best practice.

We understand the political climate – we know The FA has a development vision and that it wants to select players from professional clubs for England teams and that this creates a possible tension - but we believe that, as the governing body of our national game, you have an overriding duty to protect the children who play it. Indeed, we believe our suggestions would also facilitate the development of a wider pool of players by encouraging more players to play and reducing exclusion and early cuts at a very young age.

We write this as an open letter as we believe these issues should receive the widest possible public discussion. To this end, the letter will also be circulated to media outlets.

We await your response on the above points and confirm we are willing to convene a meeting to facilitate constructive discussion of these important issues.

Yours sincerely,

Debbie Sayers, Club Secretary, Salisbury Rovers FC, Wiltshire FA Charter Standard Club of the Year

Pete Donohue, Committee Member, Salisbury Rovers FC

Lee White, Committee Member, Salisbury Rovers FC

Eamonn Doherty, Chair, Salisbury Rovers FC

Dominic Miller, Manager, Hangleton Rangers u9 (Brighton)

P. Lewis, Professional sports coach and coach mentor

Joe. H. Harman. Grassroots Coach for Plymouth Argyle FC Community Trust.

Dan Eggington, Chesworth Rovers FC Under 9's Coach and Mini Soccer Secretary

Lawrence Gower, Chair, Junior Red Star YFC

Richard Williams, coach, Junior Redstar YFC

James Bennett, coach, Junior Redstar YFC

Stuart Ostermeyer, coach, Junior Redstar YFC

Paul White, coach, Junior Redstar YFC
David Dale, coach
Noel Sriitharan, BSc, coach
Alan Gardiner, Head Coach, Rushmoor Community FC
Steve Merrett, Under 9 team manager/coach
Paul Whitty, coach
Russ Tranter, coach
Paul Goodwin, coach
Jordan Piper, coach, Oxford City U12
Lee Bass, coach
Ade Stovell, coach
Mike Thornburg
Saleem Khan, coach
Melanie Lyons, parent
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Les Reed - Technical Director
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Andy Ambler - Director of Professional Game Relations
Sue Ravenslaw - Head of Safeguarding
Bob Cotter - National Game Board member