

Module 2. Understanding, engaging with, and influencing policymakers

Section 1. Introduction

In this second reading, we will examine the idea of engagement in policy affecting women's football business. We can think about two key reasons for developing insight into how to understand, engage with, and influence policymakers in this domain:

1. as an applied endeavour. Policy engagement of any sort is, fundamentally, a practice that each of us can engage in as a citizen, an expert, or in a professional capacity. Here, we will provide you with examples and strategies that you can bring to your own advocacy for policy change, whatever shape that may take, to positively affect women's football.
2. As a means of managing policy: understanding the dynamics of policy change in terms of influence is highly useful in identifying policy-related opportunities and risks as they are evolving. It can also provide insight into likely future changes in policy. For professionals working in the women's football industry in a variety of capacities, managing policy through understanding and engaging with the policy process thus brings significant benefits.

We will return to these two purposes many times as this reading unfolds, and each one is captured in the assignments that accompany this module. In terms of policy engagement and influence as an applied endeavour, the key insight that will be developed across this reading is that an understanding of the nature of policymaking can be used to develop strategies designed to influence the policy environment as you encounter it. That is, there are different strategies for engagement depending on the type of policy in question, the phase in which the policymaking process is, and the nature and interests of the governance actors involved. In terms of managing policy, this will be elaborated in greater detail in reading 4, but the key insight here is that whether a proactive player in the policy game or looking in from the outside, managers can benefit from understanding the policymaking process to identify meaningful and impactful endeavours to shape policy. On this basis, those tasked with managing policy can anticipate likely changes and develop appropriate organisational responses to policy in women's football business.

The reading is structured using the five-stream framework of the policy process (Howlett *et al.*, 2017) introduced in module 1. We will begin by exploring the agenda-setting phase, outlining two key aspects of this phase:



1. driving the prominence of policies pertaining to women's football.
2. Developing and promoting specific policy narratives that define the policy problem.

For both of these aspects, we will explore examples of how policy issues in women's football can be framed in a way that engages the political stream and the policy stream of the policymaking process, to create a policy agenda favourable to the development of women's football.

We will then move onto the formulation and adoption of policies that affect women's football business. Here, we will explore two key elements:

1. policy learning – where a combination of past decisions, experience, and examples from other jurisdictions or agencies condition the types of policy under consideration.
2. Policy entrepreneurs – groups and individuals that develop particular expertise in crafting policy solutions that can be accepted by all (or, at least, a majority of) actors in the policymaking process.

Understanding the dynamics as they play out in policy formulation and adoption can create leverage to shape policy outcomes, which we will explore via a series of examples in policies that affect women's football business. The final phases of our framework, policy implementation, and evaluation, also create significant opportunities for engagement. We will examine the ongoing women's football policy strategies of both FIFA and UEFA, in order to illustrate how the **programme** stream of policymaking creates a set of targets and mechanisms that can be leveraged to shape the reality of policy (which we label 'policy on the ground'), as well as the means by which future policy decisions are made. In the evaluation phase, we advocate engagement with policymakers and the wider public as a means for becoming influential in shaping the continuing evolution of the policy environment.

By the end of this reading, you should be able to look at those areas or aspects of policy that apply to your own engagement with women's football business, in order to structure your own involvement in affecting policy as an advocate, and to strategise how best to manage its ongoing evolution as a professional in women's football business. As the reading unfolds, it may prove useful to refer to the concepts and framework that were introduced in reading 1 – this will both allow you to clarify any ambiguities that you experience in the use of terms in this reading and provide an opportunity to more deeply embed these ideas in your thinking.

Section 2. Getting and keeping women's football on the policy agenda

In this section and the next one, we will look at the issues that arise in the agenda-setting phase of the policy cycle in women's football business. Birkland (2017) lays out the nature of agenda-setting in public policy as follows:

Agenda setting is the process by which problems and alternative solutions gain or lose public and elite attention. Group competition to set the agenda is fierce because no society or political institutions have the capacity to address all possible alternatives to all possible problems that arise at any one time. Groups must therefore fight to earn their issues' places among all the other issues sharing the limited space on the agenda, or to prepare for the time when a crisis makes their issue more likely to occupy a more prominent space on the agenda. (p. 89).

We can therefore view the agenda-setting phase as being characterised by two intersecting, mutually-re-enforcing dynamics. In the next section, we will look at the issue of problem definition. Problem definition centres on how a policy issue is framed, in terms of popular and elite understanding of the types of issues that need to be overcome, and the governance actors who will be involved in doing so.

In the first place, however, there is competition for bandwidth in both public discourse and in the attention of those actors who are empowered to make public policy. It is to this competition for public and elite attention that we will direct our attention in this section. As we will show, this involves either pushing women's football higher on the public agenda or leveraging moments of significant public focus on the women's game (which is at its most pronounced during major women's football events, especially international tournaments). However, public focus on the game is a necessary, but not sufficient condition for driving women's football onto the **policy** agenda. What is needed to do this is the establishment of a clear narrative about the responsibility of policymakers to act, engendering a sense that they will be held to account if they fail to do so.

Women's football, like many other women's sports, has a long history of under-representation in media. For instance, Pfister (2015) asserts:

The available quantitative studies which have been conducted in many countries indicate that less than 10% of either newspaper space or broadcasting time [in sports media] is devoted to women's sport. On the basis of the data gathered as

part of the Global Media Monitoring Project since 1995 it can be concluded that women continue to be underrepresented in all sectors of the media. (p. 641).

What is more, coverage of women's sport has tended in the past to have been marked by a combination of trivialisation and sexualisation, focusing less on women's sporting prowess than on their appearance. For instance, Harris and Klayton (2002) note the disparity in media coverage of male to female players, even in tennis, which is one of the longest-established mixed-gender sports. Analysing coverage in UK tabloids of the 2000 Wimbledon tennis tournament, they uncover the following example:

In the [...] edition of the Sun, world No. 1, Pete Sampras, is photographed serving. The photograph is captioned 'Smasher [...] Sampras turns on his Centre Court power'. Another action-shot of a male player, this time British No. 2 Greg Rusedski, states that 'Greg puts all his concentration in this volley', highlighting the control and focus applied by this male athlete. Conversely, just below this article, Anna Kournikova is pictured sat at the side of the court, drinking from a water bottle. The caption reads 'Sitting pretty [...] Kournikova takes a breather'. This picture of Kournikova is representative of the type of picture that often appears. Women athletes are repeatedly suggested to lack the physicality of their male counterparts by picturing them during times of inaction or transience. Five photographs of female tennis players feature, and only one shows the player 'in action', and there were no obvious references to the players' skills or athleticism. (p. 401).

However, comparative analysis over time indicates that inattention toward women's sport and trivialised/gendered framings of women footballers are on the decline in traditional media (McConnell *et al.*, 2022; Petty and Pope, 2019). Furthermore, social media, while being something of a 'high-risk' environment in terms of abusive messaging, has also played its part in driving growing engagement with women's sports across the world (Vann, 2014). As such, while struggling to overcome the longstanding historical disadvantages that it has faced in terms of the amount and tone of media coverage it has received, women's football is, in 2022, at a historical high point in terms of receiving a 'fair hearing' in sports media.

How does this context relate to understanding, engaging with, and influencing policymakers? From an applied point of view, the key strategy is to leverage moments of high public attention on women's football to link the policy actors that you want to influence, to policy issues in the public imagination. An excellent example of this approach can be found in a campaign by members of the England women's football squad undertaken following their victory in the 2022 Women's EURO international tournament. As we outlined in reading 1, this was the highest-profile women's football event in UK history. Speaking as someone living in the UK as the team's progress unfolded (albeit in Wales, which fields its own women's football team), you could not fail to hear about the tournament. The huge viewership numbers attracted by the games were only part of the story – players in the England squad were extensively profiled in UK media, and discussions of the women's game were rife. From a policy point of view, however, this high level of public attention on the women's game needed to be **politicised** to draw the political stream into the policymaking process and drive policy change forward.

The England women's football squad performed this action of politicisation by issuing an open letter (shown in figure 1), calling on Liz Truss and Rishi Sunak (the two candidates vying to become the UK's next Prime Minister) to enhance the accessibility of football for female students in the UK's schools. This letter was widely picked up across the UK media, which is unsurprising given the substantial interest in the 'Lionesses' in the aftermath of the EURO tournament. Of course, the letter has news value – anything attached to the squad does in the context of their recent victory. From a policymaking perspective, this letter represents an attempt to translate this general interest in the team and their performance into a policy priority that connects to identified actors at the state level. There is a clear narrative that cements the call for prioritisation of women's football in England – a narrative of victory 'against the odds' combined with a risk of the victory being squandered, if it does not result in a sustained prioritisation of access to women's football for students in English schools.

Figure 1. Open letter to conservative party leadership candidates by English women's football squad



Dear Rishi Sunak and Liz Truss,

On Sunday evening history was made. The dreams of 23 women came true. England became European champions for the first time in history.

Throughout the Euros, we as a team spoke about our legacy and goal to inspire a nation. Many will think that this has already been achieved, but **we see this as only the beginning**. We are looking to the future. We want to create real change in this country and we are asking you, if you were to become Prime Minister on 5 September, to help us achieve that change.

We want every young girl in the nation to be able to play football at school.

Currently only 63% of girls can play football in PE lessons. The reality is we are inspiring young girls to play football, only for many to end up going to school and not being able to play.

This is something that we all experienced growing up. We were often stopped from playing. So we made our own teams, we travelled across the country and despite the odds, we just kept playing football.

Women's football has come a long way. But it still has a long way to go.

We ask you and your government to ensure that all girls have access to a minimum of 2hrs a week PE. Not only should we be offering football to all girls, we also need to invest in and support female PE teachers too. Their role is crucial and we need to give them the resources to provide girls' football sessions. They are key role models from which so many young girls can flourish.

We have made incredible strides in the women's game, but this generation of school girls deserve more. They deserve to play football at lunchtime, they deserve to play football in PE lessons and they deserve to believe they can one day play for England. We want their dreams to also come true.

This is an opportunity to make a huge difference. A change that will impact millions of young girls' lives. We – the 23 members of the England Senior Women's EURO squad – ask you to make it a priority to invest into girls' football in schools, so that every girl has the choice.

Regards,

The 2022 UEFA Women's EURO England Squad

Source: [online image of open letter to conservative party leadership candidates by English women's football squad], (n. d.), <https://bit.ly/3drYLcF>.

Of course, this narrative only fits a very particular circumstance – in this case, a home victory attracting record levels of public and media influence in the women's game. Furthermore, it remains to be seen whether this issue will stay on the political agenda in the United Kingdom long enough for the envisioned policy changes to come to fruition. Nonetheless, the example of the England squad's work to drive women's football higher on the political agenda shows that the prominence of women's football created by large international football tournaments represents a significant opportunity in policy terms. What is key here is the linkage of this policy narrative to action by policymakers (in this



case, the next UK Prime Minister). By framing the agenda-setting in the form of an open letter to the two candidates to become the UK Prime Minister, there is a particularly direct (and clever) form of political linkage at play here. Ultimately, the goal is to identify key actors as responsible in the eyes of the public for implementing policy change. A similar device was used in Brazil in 2014, when representatives of the Brazilian Women's Football League publicly delivered a request for the elaboration of a bill to deal with the professionalisation of women's football to the general secretary of the Secretariat of Policies for Women (Valenti *et al.*, 2021).

The key take-away of this section from an applied perspective is that moments of prominence of women's football in the public imagination, which are becoming more frequent as media coverage of the sport grows, represent an opportunity for policy engagement and influence. In order to harness such moments, the key is to draw the **political** aspect of women's football policy as clearly as possible in the minds of the public – which creates an incentive for policymakers to deliver change. From a policy management perspective, there is real value in understanding the dynamics of prioritisation and politicisation of women's football on the policy agenda. In the first place, there are likely to be significant downstream women's football business opportunities should these policies be implemented, either in the form of publicly funded contracts, or indirectly as a benefit of increased participation. Secondly, and relatedly, understanding the emergence of women's football on policy agendas facilitates a more proactive approach. Women's football businesses approaching state-level, regional, or local government with proposals are more likely to receive a positive response when these actors are aware of the need to grow the game and able to access financial resources in order to do so.

Section 3. Defining the 'policy problem' in women's football

Alongside raising the profile of a policy area, it is important to consider the way a policy area is defined when during the agenda-setting stage of policymaking. Baumgartner *et al.* (2006), in their analysis of comparative studies of agenda-setting, note the following: "Issues rarely rise or fall on the agenda without significant changes in how they are understood or what policies the government considers, so studies of the policy agenda are almost always concerned with issue definition." (p. 961).

In terms of women's football business, this part of agenda-setting involves creating an image or narrative around women's football that connects to the types of policy instruments and policy actors that will become engaged in the policymaking process. In terms of narrative choices, there are three broad approaches that can be discerned in contemporary policy debates. In the first place, there is a narrative that defines women's football policy in terms of overcoming gender discrimination in society. Below, in figure 2, we can see an interesting example of this type of framing from the #GETONSIDE

campaign being driven by the 'Women in Football' professional advocacy network in the United Kingdom. The #GETONSIDE campaign page also features pledges from a wide variety of actors spanning the football governance network, including football associations, clubs, fans' groups, groups representing professional footballers, media partners, and sponsors.

What is interesting here is that this narrative embeds a sense that, while it is important to acknowledge the progress that has been made in advancing women's football policy, there remain significant issues for policy to address. In the case of this example, as we can see in figure 2, the campaign literature for #GETONSIDE opens with an acknowledgement of the role currently being played by women in football, before outlining research on different aspects of gender-based discrimination in the football industry. This echoes the framing of women's football in the example of the open letter by the English women's football squad discussed in the previous section – the narrative is about building on positive progress, rather than solely focusing on problems.

Figure 2. Example of the gender equality framing of women's football policy: the #GETONSIDE campaign by Women in Football

The screenshot shows the top section of the #GETONSIDE campaign website. The header is dark purple with the Women in Football (WIF) logo on the left, which includes the text 'WOMEN IN FOOTBALL' and 'In partnership with BARCLAYS'. On the right of the header are social media icons for email, Twitter, Facebook, LinkedIn, and Instagram. Below the header is a navigation bar with links for ABOUT, NEWS, EVENTS, RESOURCES, JOBS, CAREER DEVELOPMENT, CORPORATE MEMBERS, and #GETONSIDE. There are also buttons for REPORT DISCRIMINATION, JOIN US, LOGIN, and a search icon.

#GetOnside is a rallying cry to be on the side of change when it comes to gender equality in football.
Organisations and individuals across football are **committing to take action** to improve the landscape for women and girls in the game.

Why?

Because women in football are fundamental to the success of football.
We're here, we're working in the game, and we're helping to drive it forward.

But women are still experiencing barriers to their progress.
Research by WIF has discovered that:

- almost four out of five WIF members (78%) want to see more gender diversity in boardrooms
- 71% want more support for the development of women in leadership roles
- horrifyingly, almost one in three (29%) have experienced social media abuse based on their gender

[Watch our first #GetOnside video to learn about the project's launch](#)

We believe in deeds over words – action over conversation – so we are bringing football together to remove those barriers and **level the playing field** for women and girls.

How?

We encourage you to be part of this movement and **pledge your support by taking one action** that will contribute to **an improvement for women and girls in the football industry.**

To be onside means you are actively helping to bring about a **permanent and positive change** for gender equality in football, on and off the pitch.

Source: Women in Football, (n. d.), <https://bit.ly/3qTTMEW>.

Figure 3. Example of the gender equality framing of women’s football policy: the #GETONSIDE campaign by Women in Football

#GETONSIDE PLEDGES

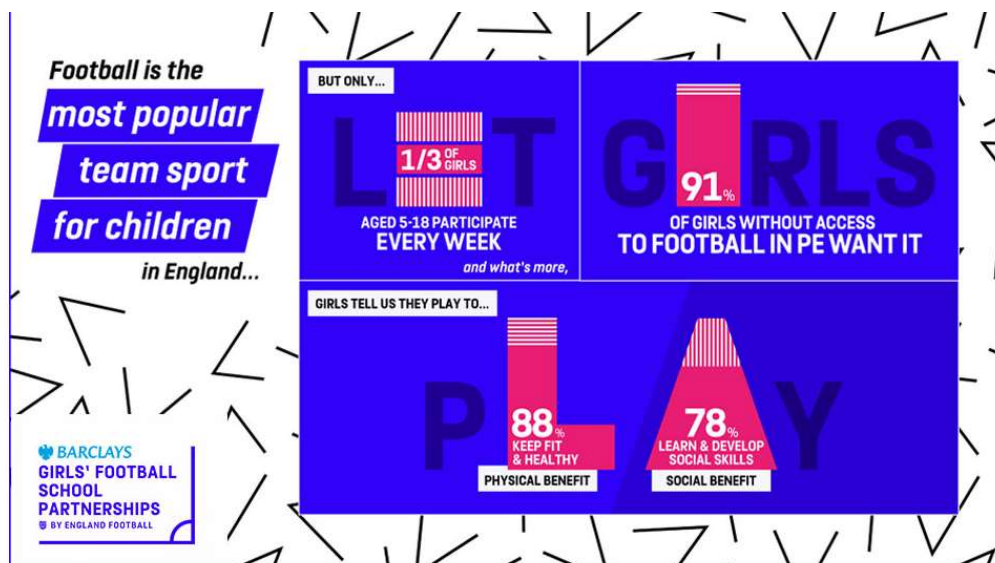
#GetOnside is a rallying cry to be on the side of change when it comes to gender equality in football.
Organisations and individuals across football are committing to take action to improve the landscape for women and girls in the game, take a look at some key campaign pledges below.
#GetOnside is supported by campaign partner Barclays

Name	Pledge
Amateur FA	<p>We pledge to #GetOnside by creating quarterly club forums for female teams to have their say on ways we can develop the game in the future</p> <p>We pledge to #GetOnside by holding female only referee courses to increase the number of referees in the county</p> <p>We pledge to #GetOnside by running monthly training and development events throughout 2022 to support female referees, in partnership with London FA and Middlesex FA</p>
AnalySport	<p>We pledge to #GetOnside by giving free access to our learning pathway to three women pursuing careers in football performance analysis</p>

Source: Women in Football, (n. d.), <https://bit.ly/3qTTMEW>.

A second policy narrative centres on the benefits that stem from football as a mass participation sport. In the example shown in figure 4 below, which is taken from the English Football Association’s ‘Let Girls Play’ campaign, we can see this type of policy narrative in which the health and social skills benefits from participating in women’s football. This appeal to women’s football as a means of achieving wider social benefits is a relatively well-established frame in sport policy, and it has proven to be successful in terms of seeking distributive and re-distributive policy designed to grow grassroots participation (see, for a discussion, Downward *et al.*, 2018).

Figure 4. Example of the social benefits policy narrative in women’s football



Source: England Football, (n. d.), <https://bit.ly/3qOMKRE>.



The third and final type of policy narrative we will outline here is the narrative of women's football as an emerging business with enormous growth potential. For instance, the *Financial Times* (2022) produced a video outlining what they call 'the business case for the women's game', stressing the commercial opportunities that are available for investors. In a recent (2022) report, the 'Fair Game' group, which brings together over 40 football clubs with expert analysts and aligned political actors in England, outlined an excellent example of this type of commercial framing that can be used to make the case for new policies. The report's title captures the core message of this narrative: *The Gender Divide That Fails Football's Bottom Line: The Commercial Case for Gender Equality*. In setting out their approach, they state the following:

Financial sustainability relies on income and good decision-making. Income relies on fans. Good decision-making comes of good corporate governance. And both audience and talent comes in more than one gender. While men make up 49% of the population, that is not representative of what we see when looking at football Boards, fan representatives, and/or senior club staff, where men make up the majority if not all positions. (p. 11).

Overall, we can see from these examples that there is a considerable degree of flexibility and contestation in the manner in which the 'policy problem' to be addressed in women's football business is defined. From an advocacy and engagement perspective, it is important to be cognisant of this contestation, as there is a tendency for definitions to consolidate over time in the imagination of both members of the public and policymakers. The current 'live' debates and ongoing campaigns can be seen as excellent resources to join in with, or to learn to contribute to shaping this debate. From a policy management standpoint, the extent of ambiguity in the current debates poses something of a challenge, as it is unclear which of the three narratives outlined here (or which combination of these narratives) will become established as women's football policy continues to develop. However, it is important to be clear that these narratives are important to understand when engaging with policymakers – so track their development closely in order to be able to speak the language of the women's football policy community.

Section 4. Policy learning: the significance of leading examples in policy formulation

In the next three sections of this reading, we will consider understanding, engaging with, and influencing policy during the policy formulation and decision-making stages of the policymaking process. In the policy formulation stage, the policy community moves from

prioritising and defining a policy problem to developing and debating potential policy solutions. In areas such as women's football business, which is a relatively novel policy domain in most states, this poses a significant challenge to actors in the governance network. This is because they cannot draw on an established body of experience in policy within this domain and select a set of ready-made instruments. As Shipman and Volden (2012) note:

In order for governments to fully serve their roles as laboratories of democracy, policymakers must act as scientists, watching these experiments and learning from them. Indeed, the policy diffusion literature has recently provided substantial evidence of governments learning from one another's experiences (...).

Limits on the capacity to learn from others can be overcome, at least partially, by technological advances and by go-between actors. Low-cost communication and travel allow today's policymakers to attend conferences to exchange ideas, to venture forth on fact-finding trips, and to exchange information widely while sitting at their own desks. (p. 790).

Within women's football policy, we can see a clear example of this process in play in Valenti *et al.* (2021) analysis of the emergence of policies, encouraging enhanced integration between women's and men's football clubs in Brazil, China, and Italy in the 2010s. In each of these cases, when policymakers faced a problem definition of mediocre national team performance and low participation, they were able to draw on the internationally-established perception that "integration between men's and women's football sectors was perceived as an instrument that could ease some of the challenges of the women's game has historically faced in the three countries." (Valenti *et al.*, 2021, p. 331). This was because promoting collaboration between men's and women's teams was a well-established practice in countries with a high level of international influence, such as England, France, and Germany going back decades. Similarly, many analyses point to the importance of 'pioneers' in both driving participation and excelling at the elite level in women's football as examples that are subsequently followed by other states' policymakers (Skogvang, 2019).

At a much more localised level of influence, clubs, groups, and even individuals, through innovating and experimenting, policy approaches that subsequently diffuse across the world can be created. For instance, in the domain of women's football business, in 2017,



Lewes FC became the first semi-professional or professional team in the world to adopt a policy of paying their men's and women's football team equally, and providing for an equal resource allocation across both teams. This policy innovation is a fascinating one – on the face of it, it plays into the sense of a fundamentally 'redistributive' policy, wherein there is a clear trade-off between the 'winners' and 'losers' of a new resource allocation policy. However, this innovation has demonstrated that adopting such a policy can be sustainable, as if the club saw both a significant increase in attendance at games of both male and female teams, and was also able to avail of new sponsorship opportunities (Salley, 2021).

From an applied engagement/advocacy perspective, the key takeaway from this section is that policymakers are often motivated to adopt what are seen as successful policy models from elsewhere during the formulation phase. As such, when seeking to engage with or influence policymakers, it is very worthwhile to research other jurisdictions which have adopted policies that are close to the model(s) that you advocate. Examples of policy feasibility and success can be extremely persuasive in a context where policymakers do not have a toolkit of well-understood policy instruments to draw upon. This dynamic is particularly pronounced in the sphere of women's football policy, given that many policymakers lack experience in developing policy in this area. From a policy management standpoint, it can often be beneficial to both research and engage with colleagues working in jurisdictions that are seen as having 'best practice' policy. This can both enable you to understand the direction of policy change in the future, and anticipate the challenges and opportunities that likely new policies can create, if this best practice policy is adopted in your jurisdiction.

Section 5. Policy entrepreneurs: actors who develop integrated policy ideas and drive for their adoption

In this section, we will discuss the role of policy entrepreneurs in the policy formulation and adoption phases. The idea of policy entrepreneurs was first developed by Kingdon (1984). The core concept represents an analogy from the world of business to the world of policy, with a particular focus on the capacity of individuals to exercise agency in the policymaking process. Kingdon (1984) contended that such actors in the policy process can:

Be in or out of government, in elected or appointed positions, in interest groups or research organisations. But their defining characteristic, much as in the case of the business entrepreneur, is their willingness to invest their resources—time, energy, reputation, and sometimes money—in the hope of a future return. (p. 122).



In a review of research on policy entrepreneurs that followed Kingdon's work, Petridou and Mintrom (2021) find the following:

The theoretical narrative regarding policy entrepreneurs focuses on their commitment to a policy solution, the multi-dimensional strategies they use to promote that solution, and a suite of attributes and skills underpinning their actions. Policy entrepreneurs reveal themselves through their attempts to transform policy ideas into policy innovations and, hence, disrupt status quo policy arrangements. This distinguishes them from many interest group leaders, for whom maintenance of current institutional settings and power relations is paramount. In studying the political work of policy entrepreneurs, we can gain insights into what it takes to promote significant policy change. (p. 945).

In the world of women's football policy, there exists a range of policy entrepreneurs, who bring together policy ideas into integrated packages and create advocacy networks to drive these proposals through to adoption. As an example, let us return to the Fair Game group's report proposing the commercial case for gender equality in football. Below, we reproduce their summary recommendations (2022):

Boards: Consider gender diversity when appointing board members – more diversity leads to better decisions.

Broadcasting and visibility: Put forward some of the women in leadership positions when PR opportunities arise or promote women's teams to help higher engagement from women – as both fans and employees.

Fans: Create an environment in football both within and beyond the stadium that is safe, welcoming, and inclusive. Reporting should exist for sexist and misogynistic treatment of fans, as well as consequences for those who engage in this behaviour.

Communication: Ensure that communications teams are inclusive in their outreach and engagement, as this creates the potential for growth in female fans.

Women's football: Invest in women's football teams, integrated within the greater club system, as these can offer potential for economic growth in this fast-growing market.

Participation and Talent Development: Investment strategically towards the challenges and needs of the women's game, focussing on multi-tier, multi-age group, comprehensive, inclusive and year-round engagement to create value for fans, sponsors, investors, broadcasters and other stakeholders.

Marketing and Sponsorship: Equality and inclusivity should form part of both the due diligence and decision-making processes within clubs, as the importance of inclusivity is rising for sponsors and other sources of finance for clubs.

Community and merchandise: Engage with fans, kit manufacturers, and relevant community businesses can increase the proportion of women involved in the wider football ecosystem to ensure that relevant merchandise exists for the fans and grassroots community. (p. 22).

In the first place, we can see that these proposals cover all four of the categories of regulative, distributive, redistributive, and constitutive policy. Regulative policy interventions will be required to shape fan behaviours and communication approaches, and distributive policy is envisioned to develop participation and talent. Redistributive policy will potentially be needed to drive investment in women's football teams and market access, to the extent that such investment and market access represent a threat to the men's game. Finally, we can see the importance of constitutive policy in terms of proposals to ensure better gender representation in the make-up of boards and PR and

marketing teams. This example shows how policy entrepreneurs can create integrated 'packages' of policies that span a range of policy types, and which are driven by a particular problem definition (in this case, a problem definition of the women's game in the UK that highlights issues at the intersection of equality and potential commercial development).

Looking at actors in the governance network, this proposal centres on the role of football organisations, including football clubs and associations. Nonetheless, it is clear to see that state actors, stakeholders, and commercial partners all have important parts to play. States set the wider regulative and resource attribution policy context underlying these proposals, while commercial partners will need to be engaged to drive the proposed policies to fruition. Indeed, the context against which the report was produced was a Fan-Led Review of Football Governance in the UK (2021), which included recommendations about embedding equality, diversity, and inclusivity into football governance going forward. The work of the Fair Game group was therefore designed to seize this opening of the agenda in women's football policy in the UK, and leverage it to propose and drive for a range of policy changes from the above-mentioned actors. This coalition building is another key aspect of the work of policy entrepreneurs – they do not simply 'create' policy packages, they also mobilise support behind them.

From an applied advocacy perspective, the insight that policy formulation and adoption often involve the work of policy entrepreneurs can be carried forward in a variety of ways. In the first place, examples of policy entrepreneurs both within and beyond women's football can serve as a source of inspiration and motivation – they show that individuals and groups can affect significant societal outcomes. In developing strategies for your own advocacy, a scan of the policymaking environment may reveal existing policy entrepreneurs that you can join in order to maximise your capacity to engage and influence. Where such entrepreneurs are not yet part of the policymaking process, there is an opening to develop this kind of advocacy approach. From a policy management perspective, understanding and engaging with policy entrepreneurs can be a highly rewarding investment of time and resources. It can provide early access to the shape of future policy developments, as well as a capacity to make your voice heard with some of the most influential actors in the policy community.

Section 6. Aligning with ongoing policies in their implementation phase

In this section, we will look at how to engage with the policy process during the implementation phase of policymaking. Smith (1973) argues the following:

The real role of interest groups and other interested groups, including political parties, comes when the policies are implemented by the government. It is at the

implementation stage of the policy process when the policy may be abandoned by the government, implemented, or modified to meet the demands of the interested parties. (p. 198).

This insight stems from a straightforward instinct; policies, as agreed 'on paper', often differ from the experience of the targets of those policies 'on the ground'. This gap between abstract and concrete policy can be both a challenge and an opportunity for women's football businesses.

The challenging aspect arises if plans are not delivered at all, or partially delivered, or if resources supposedly dedicated to a policy proposal are not made available. These challenges can arise for a variety of reasons, including unforeseen costs, as well as unexpected events. For instance, Clarkson *et al.* (2022) note that the impact of the COVID-19 pandemic and consequent suspension of women's football matches in England created unforeseen consequences for a variety of elements in the women's game, including organisational and economic repercussions, consequences for player contracts and immigration status, and player wellbeing issues that all required changes in the implementation of the English Football Association's Women's Football strategy. Where, for whatever reason, implementation is inadequate, women's football businesses can bear the brunt.

Opportunities for women's football business in the implementation phase of policymaking arise in the need that policy creates among agencies for delivery – which can drive greater engagement with providers. FIFA's (Women's Football Strategy, 2017) first official global women's football strategy is well into its implementation phase in 2022, with key targets stretching into 2026. It is important to bear in mind that this strategy (and FIFA more widely) has received significant criticism. For instance, Krech (2020) provides the following excoriating commentary:

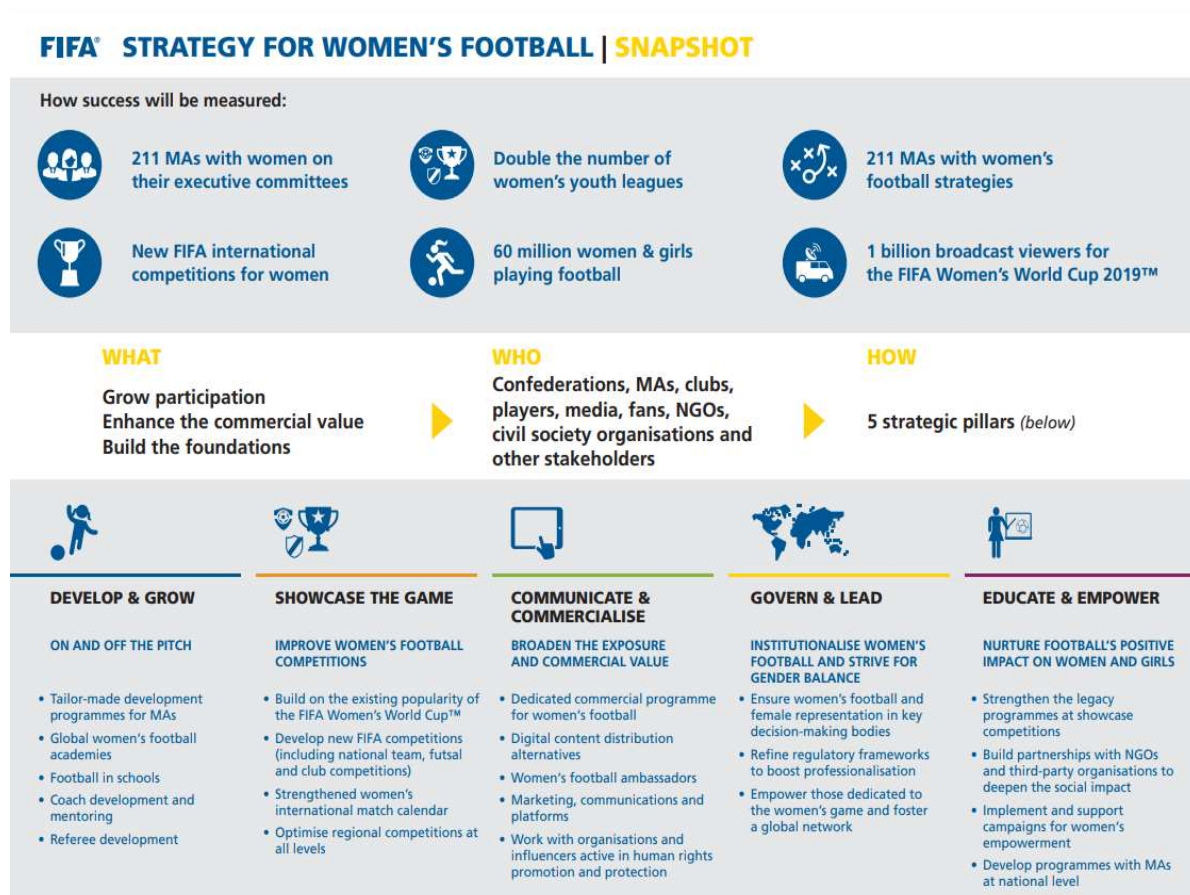
Each key objective of the Women's Football Strategy is framed, and largely subsumed, by a pre-existing mainline institutional objective, namely, enhancing FIFA's global regulatory authority, financial gain, and reputational advantage. This is not to suggest that the two sets of goals cannot be complementary and mutually beneficial, but rather to highlight, as historical institutionalists do, the ways in

which 'new' or partially reformed institutions continue to be 'shaped by past legacies' and by ongoing interactions with the existing norms, structures and practices in which they are 'nested'.

FIFA's Women's Football Strategy is designed not to change, but to support, the institution's overarching goals—to increase its power, profits, and prestige—thereby limiting the Strategy's scope and ambition, and creating tension between 'old' and 'new' institutional priorities. Moreover, the Strategy leaves intact some basic structural features of football governance—a lack of athlete representation, centralized financial management, and political cartelization—that make it more likely that the old/new tensions will be resolved in favour of the former, thus undermining the transformative potential of the latter. (p. 15).

While one may agree or disagree with these statements, from a pragmatic point of view, the strategy has moved past the formulation and decision stages, meaning that capacities for engagement and influence lie largely in the domain of implementation. Figure 5 below provides an overview of the key components of FIFA's (2017) strategy, outlining its goals and strategic pillars.

Figure 5. Overview of FIFA's (2017) Strategy for Women's Football



Source: [online image of overview of FIFA's Strategy for Women's Football], (n. d.), <https://fifa.fans/3RYqLNP>.

As you can see, these goals are highly ambitious and present a wide array of opportunities for women's football business professionals and organisations to become involved in implementation. These opportunities span player development, marketing, education, and governance. The policy strategy proposes a framework that women's football businesses can use to structure offers to deliver on key goals and strategic pillars; it also creates a financial resource stream (distributive/re-distributive policy) that member associations can draw on for activities aligned with the policy strategy.

As such, the key opportunities in terms of global sports policy are to be found in alignment with this policy by being part of its implementation. From an advocacy perspective, involvement in implementation can be a great way to build your understanding of how policy plays out, and develop greater insight and establish a strong reputation within the policymaking community. These assets can be leveraged as women's football policy continues to evolve. From a policy management perspective, simply being aware of ongoing global (and more local) policies in implementation is necessary, in order to harness the potential business opportunities that they represent. To the extent that you

are in a member association/state/locale where well-resourced policy strategies are not being implemented, you can see an opportunity to align your business plans with these policy plans.

Section 7. Keep your eye on the ball: driving accountability in policy evaluation

The final phase of the policy cycle introduced in the first reading of this module is policy evaluation. On the surface, it may appear that policy evaluation provides relatively few opportunities for engagement and influence – the policy has already been developed and implemented. However, to see the potential that evaluation provides for engagement and influence, we can return to Cairney’s (2022) insight about policy cycles that “The evaluation stage of policy 1 represents the first stage of policy 2, as lessons learned in the past set the agenda for choices to be made in the future.” (<https://bit.ly/3RZD42F>). As such, engagement with policies in the evaluation stage can be a solid strategy for influencing the early phases of the next policy cycle.

The key to understanding the policy evaluation process is to return to the goals that were originally set out in the policy – and explore the data that can be used to evidence them. In the next reading, we will focus on the importance of data and metrics in both implementation and evaluation. However, from the point of view of policy engagement and influence, it is important, towards the end of a policy cycle, to return to the indicators of policy success set out either in the debates in favour of a given policy option or in the official documents that accompanied a policy as it was adopted.

To illustrate this, we can look at the section on ‘goals’ in UEFA’s (2019) women’s football strategy document, which are reproduced in figure 6 below. What is important to bear in mind is that each of the goals are specified as having to occur within a timeframe (i.e., by 2024). At the time of writing this course (Autumn of 2022), we are currently approaching the end of this time frame and have had enough time to form an impression of the extent to which these goals are being realised. While some goals are open to multiple interpretations (e.g., changed public perceptions of women’s football across Europe), others are more straightforward to measure.

Figure 6. 'Goals' section of UEFA's (2017) Women's Football Strategy document



Source: UEFA, 2019, <https://bit.ly/3S8kwNs>.

From an applied advocacy perspective, being at or close to specified goal points provides a substantial opportunity to hold policymakers accountable for the outcomes that they established as benchmarks of policy success. Being aware of these benchmarks allows you to frame arguments for policy change against promises previously made by these governance actors, and publicising failures to achieve agreed goals is an important asset to advocates seeking to initiate a new round of policymaking. From a policy management perspective, it is advisable to be aware of how your activities contribute to policy goals like this – being able to explain your alignment with agreed goals makes it easier to harness the business opportunities created by policy. Having well-organised information to back these points is also important, as there is often a scramble for data from policymakers as the evaluation phase approaches. In short, the evaluation phase offers an opportunity to harness the accountability dynamics of policymaking, established all the way back at the agenda-setting phase.

Section 8. Conclusion

In this reading, we have examined the policy process from the perspective of understanding, engaging with, and influencing policymakers. Throughout, it has been shown that understanding policymaking cycles is very useful in both developing

strategies as a change advocate and in the more prosaic day-to-day management of policy in women's football business. Overall, therefore, it is recommended to consider the state of women's football policy in the jurisdiction(s) that you operate in. Where policymaking is nascent – focus on agenda-setting strategies. Where women's football is on the agenda, look at 'best practice' cases elsewhere as a source of new policy, and engage with (or become) policy entrepreneurs, who both package policy solutions and mobilise advocacy coalitions to drive their adoption. Where policy programmes are established, look for opportunities to engage via delivering aspects of policy implementation and/or contributing to the evaluation of policy efficacy.

In short, the overarching recommendation of this reading is to tailor your approach to policy engagement according to the nature of women's football policy with which you are dealing. The framework and examples provided in this course give you a structured way to think about doing this, and allow you to develop short, medium, and long-term strategies for doing so. In the next reading, we will focus on one of the most important technical aspects of policymaking: metrics.

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