

AFC Club Licensing Quality Standard

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Part I – General Provisions

This Club Licensing Quality Standard aims to further promote professional management and continual improvement in the running of the club licensing system with a greater focus being placed on the actual core processes.

These Club Licensing Quality Standards define the minimum requirements that Member Associations or affiliated leagues (i.e. the “Licensors”) must comply with in order to operate the Club Licensing System.

In order to ensure the credibility of the Club Licensing System, the Licensor must correctly apply the core processes, the set deadlines, the catalogue of sanctions and the consequences of a license refusal, while guaranteeing the principles of independence, confidentiality and equal treatment of all License Applicants/Licensees. Any impact on the credibility of the Club Licensing System will be taken into consideration by the AFC as part of its overall assessment.

Further guidance in terms of how each requirement can be fulfilled and what is required in order to demonstrate the fulfilment of each requirement is contained within the AFC CLAS (Club Licensing Administration System).

Part II – The Requirements

Requirement 1 – Management Commitment

1. The Licensor must ensure that a member of the top management (e.g. a member of the Exco/Board or the General Secretary) is responsible for the Club Licensing System. The top management of the Licensor must demonstrate its commitment by:
 - a) Establishing an appropriate organization for the Club Licensing System (as defined in requirement 5 below), with all the necessary resources in order to implement and manage the Club Licensing System and process effectively;
 - b) Being responsible for ensuring that the necessary training is made available to all those involved in the Club Licensing System;
 - c) Ensuring an appropriate transfer of know-how should personnel changes occur within the Club Licensing Administration;
 - d) Providing appropriate support to the Club Licensing Administration so that it is able to perform its role and tasks in accordance with the requirements of the AFC Club Licensing Regulations and the National Club Licensing Regulations;
 - e) Playing an active role in the annual review.
2. The top management must understand the Club Licensing System as well as current and future needs, including the expectations of all relevant stakeholders (e.g. the Club Licensing Administration, Decision-Making Bodies, License Applicants, Licensees, AFC and its nominated bodies/agencies).

Requirement 2 – Club Licensing Policy

1. The Licensor must establish a written policy for the management of the Club Licensing System. This policy must be approved by the Licensor's top management and include, as a minimum:
 - a) Well-defined objectives for the Club Licensing System;
 - b) A commitment to continually improve the effectiveness of the Club Licensing System;
 - c) A commitment to provide support to the License Applicants/Licensees with regard to the Club Licensing;
 - d) A commitment to communicate the various rules and regulations to all relevant stakeholders in a timely manner.

2. The policy must be reviewed (and updated if applicable) on annual basis and communicated to all those involved in the Club Licensing, as well as to all License Applicants/Licensees.

Requirement 3 – Internal and External Communication

1. The Licensor must regularly communicate both internally (via intranet, notice boards, meetings with all those involved in the Club Licensing System) and externally (via official website, circular letters, newsletters, the media, etc.) on matters related to the Club Licensing System. Such communication may be in relation to:
 - a) Licensing decisions;
 - b) Developments to the Club Licensing System;
 - c) News about appointments and the responsibilities of those involved in the Club Licensing System;
 - d) Changes to the scope of application of the Club Licensing System and/or the relevant criteria and monitoring requirements.
2. The Licensor must create a dedicated section on its official website in relation to the Club Licensing System.

Requirement 4 – National Club Licensing Regulations

1. The Licensor must establish National Club Licensing Regulations for the participation in AFC Club Competitions which have to be approved by the competent body of the Licensor and which:
 - a) Contain all the applicable requirements in accordance with AFC Club Licensing Regulations;
 - b) Are in compliance with the applicable national law;
 - c) Are in conformity with the statutes of the AFC Member Association;
 - d) Are communicated to the License Applicants before the start of the Club Licensing core process;
 - e) Have been sent to the AFC Club Licensing Administration for review in accordance with the procedure defined;
 - f) Have been uploaded onto the official website of the Licensor;
 - g) Have been uploaded onto the AFC CLAS (Club Licensing Administration System).

2. The Licensor must communicate in writing whether there have been any amendments to the previously submitted set of National Club Licensing Regulations. If a new version of the National Club Licensing Regulations has been approved by the competent body of the Licensor, the new version (in English Language) must be submitted to the AFC Club Licensing Administration for review before the start of the core process.

Requirement 5 – Organizational Structure

1. The Licensor must establish an appropriate organization for the Club Licensing System consisting of the following:
 - a) Top management responsible for Club Licensing and club monitoring;
 - b) Licensing Administration (Club Licensing Manager and any additional staff) as defined by Article 6.2 of the AFC Club Licensing Regulations, including at least one person who is capable of communicating in English with AFC and who has access to CLAS;
 - c) Licensing experts, including a financial expert as defined by Article 6.2.2 of the AFC Club Licensing Regulations (either employees of the Licensor or external consultants);
 - d) Someone responsible for communication;
 - e) A First Instance Body (FIB), as defined by Article 6.3 of the AFC Club Licensing Regulations;
 - f) An Appeals Body (AB), as defined by Article 6.3 of the AFC Club Licensing Regulations.
2. The rights and duties of all those mentioned above must be defined in writing.
3. The Licensor must have an organization chart for the Club Licensing System which indicates the name and function of each person involved in the Club Licensing System.
4. In addition, the Licensor must have an organization chart of the Licensor as a whole, clearly illustrating the position of the Club Licensing Administration within the organizational structure of the Licensor.
5. The above organization charts must be approved by the Licensor and submitted to AFC in English language. The AFC Club Licensing Administration must be promptly notified of any change to the organization charts together with an updated version.

Requirement 6 – Confidentiality

1. The Licensor must guarantee confidentiality towards the License Applicants/Licensees by establishing a written procedure to ensure that all those involved in the Club Licensing System respect the confidentiality of information in accordance with Article 6.7 of the AFC Club Licensing Regulations. The written procedure must:
 - a) Impose that all those involved in the Club Licensing System sign agreements, as a minimum, upon their appointment which guarantee the License Applicants/Licensees full confidentiality with regard to all information submitted during the Club Licensing process;
 - b) Describe the method by which confidentiality is guaranteed (e.g. employment contract with a confidentiality clause, separate confidentiality agreement, etc.);
 - c) Describe how confidential information provided by the License Applicants/Licensees is handled;
 - d) Stipulate the consequences in case there are any breaches of confidentiality;
 - e) Stipulate for how long information submitted must remain confidential.
2. If a License Applicant/Licensee is a public-listed entity, the Licensor must pay particular attention to the handling of confidential information and the communication of any significant decision concerning the License Applicants/Licensees.
3. All those involved in the Club Licensing System must be aware of their responsibilities for ensuring confidentiality of information.

Requirement 7 – Independence

The Licensor must establish a written procedure to ensure that all those involved in the club licensing system respect the principles of independence in accordance with Article 6.3.7 of the AFC Club Licensing Regulations. The written procedure must:

- a) Impose that all those involved in the Club Licensing System declare in writing their independence upon their appointment;
 - b) Require that the members of the Decision-Making Bodies also declare orally their independence at the beginning of each meeting;
 - c) Describe the method by which independence is guaranteed;
 - d) Stipulate the consequences should there be any doubt as to the independence of anyone involved in the Club Licensing System.
2. Should conflicts of interest arise, a new written declaration must promptly be signed.

3. All those involved in the Club Licensing System must be aware of their responsibilities in respect of the principles of independence and must abstain if there is any doubt as to their independence from the License Applicants/Licensees or if there is a conflict of interest.

Requirement 8 – Decision-Making Bodies

1. The licensor must establish at least two decision-making bodies in compliance with the composition, qualification and independence rules set out in Article 6.3 of the AFC Club Licensing Regulations, the AFC Member Association Statutes and the National Club Licensing Regulations.
2. In addition to the provisions set out in Article 6.3 of the AFC Club Licensing Regulations, the following principles must be respected:
 - a) The actual number of members of each Decision-Making Body must comply with the number stipulated in the AFC Member Association Statutes and/or as defined in the National Club Licensing Regulations;
 - b) The term of office of the members of the Decision-Making Bodies must be defined;
 - c) Existing members must be reappointed/re-elected or replaced at the end of their term of office;
 - d) Should a member resign, be removed or not be reappointed/re-elected, new members must be appointed or elected.

Requirement 9 – Club Licensing Core Process

1. The Licensor must define the Club Licensing core process in order to assess the Club Licensing documentation and manage the Decision-Making process.
2. The Club Licensing core process must be defined in the National Club Licensing Regulations and documented separately as a procedure in accordance with Article 6.5 of the AFC Club Licensing Regulations.
3. The core process must include the following, key steps as a minimum:
 - a) Communication of a Club Licensing core process timetable;
 - b) Submission of the licensing documentation to the License Applicants/Licensees;
 - c) Return of the licensing documentation to the Licensor;

- d) Assessment of the documentation by the Club Licensing Administration;
- e) Submission of the written representation letter to the Licensor;
- f) Assessment and decision by the Decision-Making Bodies;
- g) Communication of decisions to the License Applicants;
- h) Submission of the list of Club Licensing decisions to the AFC Club Licensing Administration in the form required by AFC;
- i) Where applicable, verification that the conditions for granting the license are maintained throughout the Club Licensing Season.

Requirement 10 – Decision-making procedures

1. All those involved in the Decision-Making procedures must understand and comply with the procedural rules defined by the Licensor in the National Club Licensing Regulations and the provisions set out in Article 6.3.10 of the AFC Club Licensing Regulations.
2. The meetings of the Decision-Making Bodies must be documented(minuted) in order to indicate, as a minimum:
 - a) The name of the Chairman and the members who are present/absent at the meeting (if applicable, also the names of others present at the meeting e.g. Club Licensing Manager, club representatives);
 - b) That all the members present declared their independence at the beginning of the meeting;
 - c) Date and place;
 - d) Signature of the Chairman and/or the signature of the Secretary of the meeting.
3. Decisions of the Decision-Making Bodies which are communicated to the License Applicants/Licensees must contain, as a minimum:
 - a) The name of the Chairman and, in principle, also of the members of the Decision-Making Body which took the decision;
 - b) The name of the License Applicant/Licensee to which the decision applies;
 - c) The decision taken;
 - d) A clear statement of the grounds for the License refusal and sanctions (if applicable);

- e) The appeal procedure (if applicable),
- f) The date and place;
- g) The signature of the Chairman.

Requirement 11 – Documentation management

1. The Licensor must establish a procedure for filing and archiving written and electronic documents and records related to the Club Licensing System in order to have an effective document management system.
2. The procedure must define the following, as a minimum:
 - a) The duration for which documents and records must be kept. The duration must be in accordance with national legislation. If national legislation does not stipulate a minimum duration, documents and records relating to a license application must be kept for at least five years and actual Club Licensing decisions for ten years;
 - b) A method for identifying and tracing documents and records, including, if applicable, for the identification, protection and return of original documents.

Requirement 12 – Meetings with the licence applicants

1. The Licensor must organize and properly document at least one meeting with all License Applicants, either collectively or individually, during the licensing and monitoring procedure under review whereby the agenda includes topics such as:
 - a) Results achieved as well as existing challenges and trends;
 - b) Developments in the Club Licensing System;
 - c) Changes to the scope of application and/or the Club Licensing criteria and club monitoring requirements;
 - d) Review and assessment of the licensing and/or monitoring documentation.
2. The Licensor must obtain written feedback from the License Applicants/Licensees to be discussed and acted upon at the annual internal review meeting. Such feedback may include:
 - a) The License Applicants'/Licensees' satisfaction with the Club Licensing System;
 - b) The License Applicants'/Licensees' proposals for possible amendments to the National Club Licensing Regulations and/or relevant processes.

Requirement 13 – Annual internal review meeting

1. The efficiency and effectiveness of the Club Licensing System must be reviewed by the Licensor at an annual internal meeting which must cover, as a minimum:

- a) Possible improvements/amendments to the National Club Licensing Regulations;
 - b) Feedback from the Club Licensing Administration and licensing experts;
 - c) Feedback from the Chairmen of the Decision-Making Bodies;
 - d) Feedback from the License Applicants/Licensees;
 - e) AFC assistance and compliance visits (if applicable);
 - f) The Club Licensing Quality Standard certification audit;
 - g) Corrective actions.
2. As a minimum, the member of the top management responsible for the Club Licensing System and the Club Licensing Manager must attend the annual internal review meeting. In addition, the following persons must attend the meeting unless they provide written feedback:
 - a. Chairmen of the Decision-Making Bodies;
 - b. licensing experts.
 3. The annual internal review meeting must be appropriately documented and should be organized at the end of the Club Licensing core process.
 4. The outcome of the internal review meeting must be presented to the Executive Body of the AFC Member Association.

Requirement 14 – Data Analysis

1. The Licensor must consolidate and analyses data in relation to the Club Licensing System in order to allow benchmarking and trends to be established over different Club Licensing Seasons. Such an analysis may be performed in relation to:
 - a) Licensing results;
 - b) Coaching diplomas;
 - c) Stadiums and infrastructure;
 - d) Attendances;
 - e) Information on transfers;
 - f) Clubs' financial profiles.
2. In order to perform such an analysis, a database (e.g. compiled using Excel) may be created in order to store the data and information received from the License Applicants/Licensees.
3. The analysis must, as a minimum, be communicated internally to all those involved in the Club Licensing System. A report may also be produced and communicated externally.

The below table details the requirements under the Club Licensing Quality Standard with which the licensors must comply with to operate the national club licensing system. It contains the requirements with which all licensors must comply to remain certified as a Licensor starting with the assessment of the clubs applying for a licence for the 2019 season. The Club Licensing Quality Standard takes into account that the licensors have run the club licensing process several times now and thus acquired considerable experience. The AFC or its nominated body reserves the right to audit the Licensors to verify compliance with the below requirements. If in the audit, the licensor does not comply with any requirement listed below, a deadline for remedying the detected non-compliance is set and/or the licensing administration may be suspended by the AFC. The suspension of the licensing administration shall be withdrawn as and when the corrective action has been implemented and assessed by the AFC or its nominated body.

“MANAGEMENT” REQUIREMENTS

Ref No	Requirement	Description	By	Evidence/Document
1	The licensor must demonstrate commitment to the national club licensing system as well as to the requirements	The licensor must make a member of the top management responsible for the national club licensing system. The top management of the licensor must demonstrate its commitment by: <ul style="list-style-type: none"> - establishing an appropriate organisation; - regularly communicating club-licensing-related issues and policies according to which the system is operated; - playing an active role in the annual review. 	Top Management	As a minimum, management commitment is demonstrated by: <ul style="list-style-type: none"> - making a member of the top management responsible for the system; - establishing a policy for the management of club licensing (D1 Club Licensing Policy); - establishing an appropriate organisational structure and processes (D2 Organisational Structure); - reviewing the performance of the licensing system and reporting to the executive body on the outcome (D3 Annual Review); - internal and external communication of club-licensing related issues.
2	The licensor must have national club licensing regulations which are accredited by AFC and approved by the competent body of the licensor for the season under review.	Each version of the national club licensing regulations (applicable for participation in AFC club competitions) must be accredited by AFC. The national regulations must be approved by the competent body of the licensor.	TM	National regulations submitted to AFC for the season under review in CLAS. <ul style="list-style-type: none"> - Documented AFC response on national regulations submitted for accreditation in CLAS. (D4) - Documented approval of the competent body of the licensor. (D5)
3	The licensor must establish and communicate a written policy for the management of the national club licensing system.	The licensor must have a policy document which has been communicated to all those involved in the national club licensing system. As a minimum, it must include the following: <ul style="list-style-type: none"> - commitment to satisfy the clubs’ needs and expectations with regard to club licensing; - commitment to continually improve the performance of the national club licensing system; 	TM	Policy document (D1) which: <ul style="list-style-type: none"> - includes at least the set minimum content; - has been approved by the licensor’s top management; - has been communicated to all those involved in the national club licensing system. Those involved in the national club licensing system understand the content of the set policy.

		<ul style="list-style-type: none"> - commitment to meeting the set ethical values (D10); - commitment to meeting the applicable national laws and regulations of FIFA, AFC and the national association. The policy document, which must serve as the basis for the definition of measurable objectives, must be agreed with the licensor's top management. 		
4	The licensor must define objectives against which the effectiveness of the national club licensing system is measured and communicate them to all those involved in the system.	<p>The set objectives must be reviewed on an annual basis and applied throughout the licensing administration. As a minimum, the objectives must include targets related to:</p> <ul style="list-style-type: none"> - club satisfaction; - effectiveness of the system; - change and improvement. <p>The objectives must be agreed with the licensor's top management.</p>	TM	<p>Document which</p> <ul style="list-style-type: none"> - contains at least the set minimum targets; - has been approved by the licensor's top management; - has been communicated to all those involved in the national club licensing system. <p>Records which demonstrate that measures have been taken to record performance against the objectives (D6). Those involved in the national club licensing system understand the content of the set objectives.</p>
5	The licensor must establish an appropriate management structure for the national club licensing system. The structure must be shown in the form of an organisation chart which also illustrates how it fits into the organisational structure of the licensor. AFC must be notified promptly of any changes to the personnel involved in the club licensing system.	<p>The licensor must show its current organisation for running the national club licensing system in the form of an organisation chart. The organisation chart must identify the management structure of the national club licensing system, the relationship with the licensor's top management as well as the names of the people occupying the different positions. It must have been agreed with the licensor's top management and define, as a minimum, the following:</p> <ul style="list-style-type: none"> - Top Management; - Licensing Manager; - criteria experts; - person responsible for communication; - first instance body; - appeals body. 	TM	<p>Up-to-date organisation chart (D2) which:</p> <ul style="list-style-type: none"> - shows the structure of the licensor; - shows the name and function of the persons involved; - has been approved by the licensor's top management; <p>Documented notification to AFC of up-to-date version of the organisation chart.</p>
6	The licensor must establish at least two decision-making bodies.	The licensor must have at least two decision making bodies (first and second instances) in accordance with the composition, qualification and independence rules set in the AFC Club Licensing regulations.	TM	<p>Documented evidence (D7) that the decision-making bodies have been elected/appointed in accordance with the rules set in the accredited national regulations:</p> <ul style="list-style-type: none"> - composition rules; - independence rules; - qualification rules.

7	The licensor's decision-making bodies must comply with the procedural rules referred to in the accredited national club licensing regulations.	The decision-making bodies must operate in accordance with the relevant procedures referred to in the accredited national regulations.	Chairmen	The chairmen of the decision-making bodies understand the procedural rules set out in the national regulations. Documented evidence (D8 Meeting Minutes) that decisions have been made in accordance with the procedural rules referred to in the accredited national regulations.
8	The licensor must conduct an annual review of the performance of the national club licensing system.	The licensor must hold an annual review meeting to discuss the efficiency and effectiveness of the national club licensing system. The outcome of the activities must be discussed with the licensor's top management and where actions are agreed, responsibilities and timeframes must be defined. The top management is responsible for communicating the outcome of this review to the executive body.	TM	Documented outcome of the review meeting (D3) with the licensor's top management. Where actions are agreed, responsibilities and timeframes are defined. Evidence that the outcome of the annual review has been communicated to the licensor's executive body.
9	The licensor must communicate internally and externally on matters related to the national club licensing system.	The licensor must regularly communicate internally and externally on matters such as: - results achieved and development of the national club licensing system; - news about appointments and responsibilities of persons involved in the national club licensing system; - changes of scope of application and/or criteria.	Licensing Manager	Review of internal and external communication activities (e.g. via newsletters, website, intranet, notice boards, meeting minutes) that have taken place.
10	The licensor must have the resources available to implement and manage the national club licensing system effectively and ensure that club licensing-related information is held in a secure environment.	The licensor must appoint adequate human resources and provide them with the necessary workspace, hardware, software, communication devices and filing and archiving facilities to offer appropriate services to the clubs. The licensing administration must have access to the AFC CLAS.	TM	Appropriate facilities are available to effectively manage the national club licensing system. - Access to physical and electronic documentation related to club licensing is kept in a secure manner. - As a minimum, the LM can demonstrate access to the AFC CLAS. (Club Licensing Administration System) - Evidence of inclusion in the risk assessment. - Documented outcome of discussion at the annual review meeting
11	The licensor must establish a method for analysing data and information received from licence applicants.	The licensor must consolidate and analyse data and information contained in licence applications to increase understanding of the development of the clubs and facilitate benchmarking.	LM	Documented data analysis. (D9)

12	The licensor must establish and maintain a code of conduct which outlines the ethical values and standards that those involved in the national club licensing system must respect.	The licensor must define a code of conduct to ensure integrity within the national club licensing system. It must cover at least the following issues: - decision-making; - transparency; - conflict of interests; - gifts and favours. The code of conduct may also be part of the licensor's policy statement. (D3)	TM	Code of conduct (D10) established, maintained and communicated to all those involved in the national club licensing system. Those involved in the national club licensing system understand the content of the code of conduct.
13	The licensor must know the needs of the clubs in respect of the future direction of the national club licensing system	The licensor must take decisions on the development of the national club licensing system based on a thorough understanding of the clubs' needs.	TM	The top management understands the clubs' needs in respect of club licensing and considers their impact.
14	The licensor must establish a procedure for ensuring that all those involved in the national club licensing system respect the confidentiality of information. If a licence applicant is a public-listed entity, the licensor must pay attention to the handling of confidential information and the communication of any licensing decision.	The written procedure must describe the method by which written commitment to confidentiality is established and how to handle confidential information provided by the licence applicants.	TM	Procedure (D11) which defines how the commitment to confidentiality and the handling of confidential information is managed. - Confidentiality agreements (D12) signed by all those involved in the national club licensing system. - Handling of confidential information and communication of licensing decisions, particularly if related to public-listed entities, is in line with the procedure. - Those involved in the national club licensing system understand their responsibilities for ensuring confidentiality of information.
15	The licensor must establish a procedure for ensuring that all those involved in the national club licensing system respect the principles of independence.	The written procedure must describe the method by which the independence of all those involved in the licensing system is declared annually. The procedure must reflect the principles of independence defined in the national club licensing regulations accredited by AFC. The independence of the members of the decision-making bodies must be reviewed at the beginning of each meeting of the decision-making bodies.	TM	Procedure (D7) which defines how the principles of independence are implemented. - Annual independence declarations by all those involved in the national club licensing system. - Minutes of meetings (D8) of decision making bodies which demonstrate that the procedure is followed. - Those involved in the national club licensing system understand their responsibilities in respect of the principles of independence.
16	All those identified in the organisation chart must have a job description and understand their rights and duties.	As a minimum, the written job description must define their responsibilities and identify the deputy to whom tasks may be delegated. Financial expert: the appointed financial expert must comply with the minimum qualification requirements specified in the	TM	- Duties and responsibilities (D14) defined in writing. - Those involved in the national club licensing system understand their role and contribution to the achievement of the overall objectives. - Documented evidence that the financial expert meets the minimum qualification requirements. (D15)

		accredited national club licensing regulations. Members of decision-making bodies: members of the decision-making bodies must be introduced to any newly accredited and approved national club licensing regulations and the requirements of Quality Standards before they undertake their duties.		- Documented evidence that the members of the decision-making bodies have been introduced to any newly accredited and approved national regulations and the requirements of Quality Standards before they undertake their duties. (D17)
17	The licensor must appraise the performance and competence of those involved in the national club licensing system annually.	The licensor must ensure that the performance of at least the members of the licensing administration and the chairmen of the decision-making bodies are appraised annually. The appraisals must be documented and identify training needs, if any.	TM	Documented performance and competence appraisal. (D16)
18	The licensor must evaluate any training or development action undertaken by those involved in the national club licensing system	The assessment of the effectiveness of any training must be documented.	TM	Documented training evaluation. (D17)
19	The licensor must keep a master list of all documents related to the national club licensing system.	To establish an effective document management system, a master list must be kept which identifies all club-licensing-related documents, including forms and procedures, and specifies their current version. The licensor must ensure that the master list is kept up to date with the documents in use.	LM	- Complete and up-to-date list of club-licensing-related documents in use. (D18) - Those involved in the national club licensing system understand the purpose of the master list.
20	The licensor must establish a procedure for filing and archiving written and electronic documents and records.	The written procedure must specify what kind of documents and records need to be kept, where and for how long. The length of time that documents and records must be kept must comply with national legislation, if any. As a minimum, it must be five years for documents and records relating to a licence application and ten years for documents relating to licensing decisions.	LM	Procedure for filing and archiving of written and electronic documents and records. (D19) - Filing and archiving system is in line with the procedure.
21	The licensor must establish a method for identifying and tracing any document and record related to the national club licensing system.	Each document and record related to the national club licensing system must be identifiable, e.g. by a version number or a date of issue. Documents and records related to a licence application must be traceable so that they	LM	Evidence of some form of (D19) identification and ability to retrieve any document and record on request.

		can be retrieved at any time in the process.		
22	The licensor must record any complaints related to the national club licensing system.	The licensor must establish a method of recording and resolving complaints related to the running of the national club licensing system. Complaints may include comments on documentation, respect of deadlines, behaviour or the licensing process, and may come from any stakeholder.	LM	- Procedure for management of complaints. (D20) - Complaints are handled in line with the procedure.
23	The licensor must obtain feedback from the clubs on their satisfaction with the national club licensing system.	Once a year at least, the licensor must seek feedback from the clubs on the national club licensing system and their level of satisfaction with the effectiveness of implementation by the licensor. A summary of the feedback received must be returned at least to the participating clubs.	LM	- Documented feedback from the clubs. (D21) - Summary of feedback returned to the clubs.
24	The licensor must obtain feedback from the chairmen of the decision-making bodies on their satisfaction with the national club licensing system.	Once a year at least, the licensor must seek feedback from the chairmen of the decision-making bodies on their satisfaction with the national club licensing system and in particular with the decision-making process.	LM	Documented feedback from the chairmen of the decision-making bodies. (D22)
25	The licensor must perform an internal control to assess the implementation of the national club licensing system in accordance with the requirements set out in this document.	Once a year at least, the licensor must assess compliance with the set requirements and draw conclusions (including recommendations if any) in writing.	LM	Documented outcome of internal control. (D23)
26	The licensor must conduct a risk assessment of the national club licensing system. When major changes to resources or processes are planned, the licensor must ensure that the impact on the national club licensing system is assessed and appropriate action taken to control any associated risks.	Once a year at least, the licensor must conduct a written risk assessment of the national club licensing system and its core process to identify potential risks. Based on this analysis, preventive action must be taken to ensure that the risks identified are under control and/or remain at an acceptable level.	LM	Documented outcome of risk assessment and evidence that agreed preventive action has been taken. (D23)
27	The licensor must review the applicability of the accredited national club licensing regulations, including	Once a year at least, the licensor must conduct a review of the accredited national regulations and exceptions granted by AFC to	LM	- Documented outcome of the review of the applicability of the accredited national club licensing regulations, including any exceptions granted. (D24)

	any exceptions granted, and communicate with AFC if required.	ensure that they are applicable for the next licensing season. Any requests for exceptions or changes to the accredited national regulations must be submitted to AFC for approval/accreditation prior to the deadline communicated by AFC.		- Documented AFC response on submitted exception request(s). - Documented AFC response on national regulations submitted for accreditation.
28	The licensor must apply an appropriate method for implementing agreed corrective actions.	Corrective action may relate to issues identified during the club licensing process and in the annual review. (D3)	LM	Documented evidence of corrective action agreed on and undertaken. (D25)
29	The licensor must analyse and interpret the outcome of the activities required by 22 to 28 and produce a summary report. The report must also include an examination of the set objectives, i.e. the extent to which they have been achieved. The summary report must be discussed with the licensor's top management (D3)	Once a year at least, the licensor must review the national club licensing system and produce a summary report. As a minimum, the summary report must consider the following: - analysis of complaints received; - feedback from the clubs; - feedback from the chairmen of the decision-making bodies; - outcome of internal audit; - outcome of risk assessment; - assessment of applicability of the national club licensing regulations; - feedback on staff understanding of the code of conduct; - status of agreed corrective action; - status of the national club licensing system compared to the set objectives	LM	Summary report (D26) on the status of the national club licensing system considering the outcome of the activities required by 22 to 28 and a review of the set objectives.
30	The licensor must document how the core process of the national club licensing system is organised.	The following key process steps must be defined as a minimum: - production and submission of licensing documentation to the clubs; - checking that licensing documentation received from licence applicants is complete; - assessment of licensing documentation by the licensing administration; - receipt of licence applicant's representation letter by the licensor; - decision-making process (D8); - communication of licensing decisions to licence applicants;	LM	- Documented process including the defined key steps and persons responsible. (D27) - Licence applications have followed the defined key process steps. - Licence applications have adhered to the set timetable

		<ul style="list-style-type: none"> - notification of licensing decisions to AFC; - monitoring of licensees during season for which licences have been granted. <p>The documentation may take the form of a flowchart or a narrative description and must include the persons responsible.</p>		
31	The licensor must produce a timetable for the licensing process management which must be officially communicated to the clubs.	The licensing process timetable must specify the key deadlines for the submission of documents and communication of decisions.	LM	<ul style="list-style-type: none"> - Timetable provided to the clubs. (D27) - Licence applications have adhered to the defined timetable.
32	The licensor must provide AFC with a list of licensed clubs by the deadline communicated by AFC.	The licensor must notify AFC of its licensing decisions by the deadline set by AFC	LM	<ul style="list-style-type: none"> - Duly completed and signed 'list of licensed clubs'. (D28) - Documented evidence of notification to AFC by the set deadline.