

IN THE MATTER OF A REGULATORY COMMISSION OF THE FOOTBALL ASSOCIATION

THURSDAY 22 JUNE 2023

BETWEEN:

THE FOOTBALL ASSOCIATION

And

WOLVERHAMPTON WANDERERS F.C.

WRITTEN REASONS

Background

1. These are the written reasons for the decisions made by a Regulatory Commission which sat on Thursday 22 June 2023 to determine the Charges referred to below for breaches of FA Regulation E21, which Charges had been admitted hereby restricting the Commission's deliberations to those of considering the appropriate sanction.
2. By a Charge Letter ("**the Charge Letter**") dated 5 May 2023, Wolverhampton Wanderers F.C. ("**WWFC**") was charged with two breaches of Rule E21 in respect of matters arising during a match between WWFC and Chelsea FC on 8 April 2023 ("**the Match**"). The Charges were as follows:

“Charge 1

Pursuant to FA Rule E21.4 (and FA Rule 21.1), it is alleged that in or around 61st minute of the fixture, Wolverhampton Wanderers FC failed to ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) conduct themselves in an orderly fashion whilst attending the Match and do not use words or otherwise behave in a way which is improper, offensive, abusive, indecent or insulting with either express or implied reference to sexual orientation.

Charge 2

Pursuant to FA Rule E21.4 (and FA Rule E21.1 it is alleged that in or around 71st minute of the fixture, Wolverhampton Wanderers FC failed to ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) conduct themselves in an orderly fashion whilst attending the Match and do not use words or otherwise behave in a way which is improper, offensive, abusive, indecent, or insulting with either express or implied reference to sexual orientation.”

3. The evidence relied upon by The FA in support of the Charges comprised:
 - (a) A witness statement of Mr Jack Gillett of The FA dated 27 April 2023;
 - (b) A statement released by Chelsea F.C. on 8 April 2023;
 - (c) An FA supporter behaviour letter sent to all Clubs dated 11 January 2023;
 - (d) An FA statement dated 11 January 2023; and
 - (e) Video clips from during the Match.
4. The essence of the Charges is that in both the 61st and the 71st minutes of the Match large elements of the WWFC supporters chanted ‘Chelsea Rent Boy’.
5. WWFC were required to reply by 6pm on 16 May 2023 and did so by providing a Reply Form dated 16 May 2023 which admitted the Charges. It also asked for the matter to be dealt with at a paper hearing and for the correspondence attached to the Reply to be placed before the Regulatory Commission. That correspondence comprised a detailed letter dated 16 May 2023 from Mr Matt Wild, the Club Secretary at WWFC to which were appended 17 exhibits.

6. The Regulatory Commission meet via a Teams call on the morning of Thursday 22 June 2023. The Commission comprised Mr Christopher Stoner KC (Chair), Ms Alison Royston and Mr Peter Fletcher. Mr Michael O'Connor of FA Judicial Services acted as secretary to the Commission, and we record our thanks to him.
7. Prior to the Commission having meet, all the members of the Commission had carefully read all the papers in the bundle, including the Club Secretary's letter and appendices, which were fully discussed during the course of the hearing of the matter. All members of the Commission had also viewed the video clips forming part of documentation supporting The FA's charges.
8. When meeting the Commission also had regard to "*The FA's Policy and Guidance on the Regulation of Discriminatory Conduct (FA Rule 20.1)*". Whilst this Guidance has not been updated to provide for changes, in particular to the Regulation numbers, the Commission was of the view there was no reason why the issue of sanction should be approached differently from cases before the amendments to the Regulations and, most importantly, differently from the terms of the Guidance document.
9. The Guidance had not been included within our hearing bundle, albeit it had been included in a bundle for another matter we were also tasked with considering. In this regard we note that it is unfortunate that when a party admits a Charge and advances mitigation, it is unhelpful to the Commission for The FA to remain absolutely silent and apparently not address its mind to the issue of sanction. We proceeded on the basis The FA had nothing to say on the issue of sanction, but we think The FA should, as a matter of course, identify its position (even if, in essence, a 'nil return'), as well as considering whether there are any documents which have been published by The FA which the Commission ought to be aware of.

The Regulation

10. Regulation E21 provides, as relevant:

"A Club must ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) conduct themselves in an orderly fashion whilst attending any Match and do not:

E.21.1. use words or otherwise behave in a way which is improper, offensive, violent, threatening, abusive, indecent, insulting or provocative;

...

E21.4. conduct themselves in a manner prohibited by E21.1 in circumstances where that conduct is discriminatory in that it includes a reference, whether express or implied, to one or more of ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation or disability.”

11. As stated, in the present instance the charges relate to a chant by a large number of supporters for a prolonged period of approximately 20 seconds each in the 61st and also in the 71st minutes of “Chelsea rent boy” (“**the Chant**”). As reflected in the admission of the Charges (which the Commission notes was a prompt admission), the Commission, having viewed the video clips, was wholly satisfied that this Chant occurred, breached the terms of Regulation E21.4 (and E21.1) and, accordingly, that the Charges were properly admitted.

Mitigation and discussion

12. Mitigation was advanced by WWFC’s Club Secretary in his detailed letter dated 8 May 2023. We considered the letter and the exhibits very carefully and discussed their contents at length. Simply because a point is not specifically mentioned in these written reasons does not mean that the point was not considered. The Commission considered all points raised and these Written Reasons are necessarily a summary of what was discussed.
13. The letter commences by referring to a letter received from The FA dated 11 January 2023. That letter, written by Tarik Shamel, the Head of Integrity at The FA, stated:

“Dear Club Secretary,

I write further to a recent prosecution by the Crown Prosecution Service for homophobic abuse relating to the ‘Chelsea Rent Boy’ chant.

Following this development, The Football Association wishes to take this opportunity to remind Clubs that it is a breach of FA Rules for a Club's supporters, or anyone purporting to be its supporters, to engage in discriminatory behaviour.

Given the outcome of the recent criminal prosecution, the Association now considers this specific chant to amount to a breach of FA Rules and reserve the right to pursue formal disciplinary action against any Club whose supporters engage in such behaviour going forward. We would also emphasise that these Rules apply to the conduct of supporters at both home and away fixtures.

We would also further remind Clubs that the due diligence defence is not available to a Club charged for its spectators engaging in discriminatory behaviour.

Clubs at all levels of English football have a responsibility to ensure their spectators conduct themselves in an orderly fashion when attending matches and we thank you for your assistance in relation to this matter."

14. The Commission was also shown a statement issued by The FA in which it drew attention to the letter that had been sent, stating the letter reminded clubs "...that [The FA] can pursue formal disciplinary action against any club whose supporters engage in discriminatory behaviour, now including the use of the term 'Rent Boy'."
15. WWFC's Club Secretary refers to the fact that subsequent to The FA's letter, Chelsea FC led on informal discussions, establishing a working group focussing on "Challenging Homophobic Chanting". We were informed that WWFC had been represented at all these discussions and within the working group, which the Regulatory Commission was pleased to learn.
16. The Commission noted that whilst The FA letter and the facts underlying it were clearly taken seriously by and within WWFC, as is identified further below, there is little or no evidence of how WWFC communicated the essential message in the letter to WWFC supporters, whether before the Match, or at all.
17. The suggested mitigation then turns to steps taken before the Match, which we note were plainly steps taken in the context of the Chant being known about; it being identified as a breach of Regulations and it having been successfully prosecuted.

18. We were referred to the matchday planning meeting which was held on 4 April 2023, at which we were told “... *the possibility of the Chant being used by Club supporters at the Match, as well as the prosecutable nature of the Chant (and the FA Statement) was raised and discussed as part of the ‘Safety and Security update’ as well as by Gurpri Bains in the ‘EDI’ segment of the meeting.*” However, as a Commission, we have no evidence of what was actually said, nor in what detail the matter was discussed. Whilst we have the agenda for the meeting, the Chant does not warrant its own agenda item entry.

19. We accept that following that meeting, Gurpri Bains sent an email which, on this point, stated:

“Chelsea Rent Boy chant

Wolves has a zero tolerance approach to all forms of discrimination, harassment and victimisation relating to your sex, gender, sexual orientation as well as religion or race and disability. This can include comments, chants as well as gestures and abusive behaviours.

We encourage all staff and all supporters to report incidents whether you experience or witness this behaviour to a staff member, steward or directly through to our reporting text line – details of this is visible on LED boards, on tickets and across the concourse, the situation will then be monitored by the control room and West Midland Police.

This season, the FA has issued guidance following a recent prosecution by the Crown Prosecution Service for homophobic abuse relating to ‘Chelsea Rent Boy’ chant, and anyone purporting or engaging in this type of discriminatory behaviour is a criminal offence.

From a comms perspective – full details attached, and the club is on the Chelsea FC working group to tackle homophobic chanting at home and away games (club reps include Gurpri Bains (EDI Manager) / PC Stu Ward (WMP Dedicated Hate Crime Officer) / Helen Albanese (Equality Advisory Group member).

I’ll also be monitoring the text line reporting service this Saturday.

Any Q’s please do reach out to myself or Steve/Anju.”

20. We note that it is said on behalf of WWFC that in the matchday planning meeting it was agreed that all internal facing matchday briefings for the Match “... *would explicitly reiterate the Club’s stance on discriminatory language and behaviour, as well as referencing the fact that use of the Chant is a prosecutable offence*”. We also note that (i) the email does not appear to have been sent to the Safety Officer, Wayne Baker,

although it was sent to his deputies (ii) the email does not refer to what was agreed at the matchday planning meeting as recited in the previous sentence.

21. We were also shown a matchday briefing document issued to all stewards. That included the statement:

“Note: Be aware that the use of the ‘Chelsea Rent Boy’ chant is classed as homophobic abuse and is a criminal offence, follow our standard procedures if reported or witnessed.”

22. Given the importance of the issue, we considered this to be a very brief reference, although we do note that we have been told that during the pre-Match matchday briefing delivered to stand managers, they were all verbally briefed on the FA Statement and that Ms Bains witnessed the briefing being re-delivered by stand managers to the wider matchday stewards. The detail of what was said, we have no evidence of. Nor do we have any evidence of any steward following “*standard procedures if reported or witnessed*” (whatever those standard procedures may be – we do not have evidence on this) when the Chants occurred, although the Commission recognises that the sheer scale of the Chant on both occasions it occurred may have overtaken this procedure.

23. We shall return to more general measures adopted by WWFC toward supporters below, but in summary of the pre-Match steps, the Commission felt that whilst WWFC were aware of the Chant and sought to highlight it well *internally* before the Match, there was very little, if any, transference of that knowledge to or engagement with the supporters on the issue, which the Commission considers was essential for proactive attempts at prevention.

24. Whilst considering the matter in terms of ‘pre-Match’, although referred to in the Club Secretary’s letter under the heading of ‘Other actions taken by the Club to tackle discrimination’, we have been supplied with a copy of the Matchday Guide for the Chelsea match, published on WWFC’s website. This includes the following statement:

“Reporting Incidents

Discrimination and antisocial behaviour will not be tolerated at Molineux. Supporters who witness this kind of behaviour should speak to their nearest steward or send details to 077xx xxx xxx starting their message with WOLVES.”

25. The Commission considered this to have been an obvious place to communicate to supporters that the Chant would not be tolerated and to refer to the FA Statement. In addition, the Commission considered that the Matchday Programme offered an opportunity for similar communication with supporters, as well as social media channels, but we had no evidence to suggest these opportunities had been utilised.
26. The mitigation then turns to events during the match. In terms of the points advanced, this refers to a single action, namely the making of an announcement over the public address system. This was made in the 70th minute and appears to have been the catalyst for the second round of use of the Chant (not that this in any way was considered by the Commission to be a factor to the detriment of WWFC). The Commission could clearly hear an announcement on the video clips but could not make out the words. However, we were informed by WWFC’s Club Secretary in his letter that what was said was:

“Wolves would like to remind all supporters that it is a criminal offence to use abusive language, obscene chanting or abuse of any kind, such conduct may result in arrest or ejection.”

27. The Commission have 3 observations on this message:

- (1) The Commission can see no reason whatsoever for the near 10-minute delay between the Chant first being heard and the announcement being made;
- (2) The Commission considers that the language of the announcement was weak. This is in contrast to the post-match statement, where rightly WWFC used words such as ‘discriminatory’ and ‘homophobia’; and
- (3) Given the context and the pre-match internal planning which included knowledge that a discriminatory, homophobic chant may be used, the Commission is surprised that a specific announcement relating to the Chant had not been planned in advance of the Match, such that it could be delivered timeously and with appropriate wording.

28. Aside from the public address announcement and the statement that 3 arrests were made, plus one individual having their details taken for retrospective action, the Commission has no evidence as to what happened during the Match. In particular the Commission has no evidence as to what steps were taken by the stewards or to what extent the Club had relevant CCTV footage, including if there was any indication as to where the Chant may have originated in the stadium. The Commission noted that the Tiktok clip supplied by The FA appears to show the stewards not reacting to the Chant at all.

29. We then segue into WWFC's action after the Match. A strong and commendable statement was put out stating:

"We strongly condemn the discriminatory chants aimed toward Chelsea at today's game.

In response to the chants, supporters were reminded by a public address system announcement that discriminatory behaviour and chants of this nature are not tolerated at Molineux.

Homophobia, like all other forms of discrimination, has no place in football or society, and anyone engaging in discriminatory behaviour is committing a criminal offence."

30. However, we have no evidence of any other steps having been taken. Whilst it may be that WWFC is waiting for police and possible court action to be completed, we would have expected to see a clear statement that anyone found to have committed a crime would be banned from the stadium.

31. Furthermore, we are surprised not to have been told what steps were taken to review the CCTV footage to determine whether other fans who had participated in the Chant could be identified and/or whether fans in sections of the stadiums who could be identified through ticketing had been written to emphasising the stance taken by WWFC in its statement on the website referred to above. The Commission was also surprised that we were not shown any form of post-Match briefing documentation dealing with the Chants.

32. Furthermore, we would have expected to see a statement in the club programme for the next home match condemning the Chants as well as evidence that it was discussed in the next pre-match briefing, including with learning points arising.
33. The next stage of the Mitigation was referred to in WWFC's Club Secretary's letter under the sub-heading of "other actions taken by the Club to tackle discrimination". This referred:
- (a) To the employment, in November 2022, of a dedicated full-time Equality, Diversity and Inclusion Manager, Gurpri Bains;
 - (b) The alignment of WWFC's Acceptable Behaviour Policy with the Premier League's commitment regarding discriminatory and abusive conduct. In considering the Acceptable Behaviour Policy the Commission was impressed that a 1st time offence of use of discriminatory behaviour or language attracted a 3-year ban, whilst a second offence resulted in an indefinite ban.
 - (c) The engagement with West Midlands Police to tackle discrimination, anti-social behaviour and/or hate crime and initiatives such as the 'Not in our Pack' scheme, which the Commission found impressive. However, the apparent excellence of this scheme once again placed focus for the Commission on the seemingly complete lack of engagement by WWFC with its supporters in advance of the Match about discriminatory, homophobic chanting, given the knowledge of the Chant and also the need to communicate that it was a chant which had been successfully prosecuted as a crime. The Commission was also surprised not to have been provided with evidence of how often the 'Not in our Pack' scheme has resulted in matters being reported and to what extent, if any, it was a useful tool during or after the Match in respect of the Chant. As it stands, the Commission has to proceed on the basis it resulted in no information at the Match and did not lead to any action being taken against any supporter at all.
 - (d) Signage in the stadium and wording on ticketing.
 - (e) WWFC's achievement of intermediate level of the Premier League Diversity and Inclusion Standard in April 2023, after an assessment which took place in February 2023. Reference is also made to associated documentation.
 - (f) The launch of a 'Kick It Out' clothing range in the Club shop; and

(g) Gurpri Bains' attendance at an event at Leicester City "Football v Homophobia".

34. Finally, in mitigation, Mr Wilds' letter addressed 'looking forwards'. He said, on behalf of WWFC and to its credit in the eyes of the Commission:

"We recognise that, despite the efforts taken by the Club in recent years to tackle discrimination, there is still room for improvement.

We have reflected internally on the lessons to be learned from the Match, as we seek to prevent a repeat of these (or similar) incidents in the future and to continue to campaign for inclusivity and tackle discriminatory abuse, whether inside stadiums or online – for example:

(1) We acknowledge that the Club could have shared more specific, pre-Match messaging regarding the criminal nature of the Chant to the Club's supporters (whether that be by digital means or through in-stadia communications);

(2) We will look to share 'Not in our Pack' information from the Club's main social media channels, as well as from the Fans Services – specific social media channels. We will also look to engage with other stakeholders (for example West Midlands Police, City of Wolverhampton Council) to share the same messaging from their social media accounts."

35. Reference is also made to attendance at a conference organised by Chelsea FC entitled "*Illegal Chanting: Conference for Change*" as well as the need for more support and clearer, more prescriptive guidance from The FA, before stating:

"We hope that the Commission recognises the efforts taken by the Club in its journey to eradicating discrimination (and discrimination of a homophobic nature in particular) to date, whilst acknowledging that an overnight, complete eradication of the issue is an impossible task. Ultimately, the key to tackling the issue will be education – not just of supporters of the Club or football fans more broadly, but society as a whole – and inevitably there will be delay before the benefits of that education work are fully and widely realised."

36. Having reviewed and discussed the letter and accompanying documents in detail, whilst in summary the Commission felt that WWFC had done work for which they should clearly be commended and which mitigated the sanction, in respect of the Chant and the fact it was known about before the Match, not least as a result of The FA Statement, the Commission felt that WWFC's work was in essence all internal, such that there was a significant lacuna in WWFC's overall approach, notably:

(1) No or next to no communication with Supporters ahead of the Match about the Chant and the fact that not only was it wholly unacceptable, it was discriminatory, homophobic and had been proven to be criminal. We were most surprised, given The FA Statement, WWFC's clear acknowledgement of the issues arising from the Chant internally and the work they had already undertaken against discrimination that there was no evidence of the dissemination of information ahead of the Match of the sort we have described. In the view of the Commission, this was a notable failing.

(2) The Commission also felt that during the Match a slow and weak public address announcement was insufficient. Whilst WWFC had clearly picked up on the Chant and the possibility of it happening at the game, even though we do not know what was said to the stewards in any detail, notwithstanding the reference in the match briefing to following 'standard procedures' (whatever they were), we have no evidence of anything having happened whatsoever other than the public address announcement. In the view of the Commission, this was also clearly insufficient.

(3) In the period after the game, whilst a commendably strong statement was posted on the website, we have been offered no evidence of any other reaction to the Chant, whether by means of seeking to find offenders, writing to supporters, addressing the issue at the next home game (to stewards and supporters) or indeed at all. In the view of the Commission this too was a failing.

37. Ultimately, whilst the Commission was able to give credit for a number of steps of mitigation identified (namely admission of the Charges, co-operation with the FA; tackling the issue internally and the strong condemnation in the post-Match statement) and whilst the Commission is satisfied that the overall measures taken by WWFC show it is committed to tackling discriminatory abuse and homophobia, it felt that there was a clear and significant break down between taking on board what The FA has said in its statement about the Chant and actually doing anything about it, other than internally,

in terms of (1) actions to disseminate relevant information to supporters; (2) procedures to action in the event of the Chant occurring; or (3) reacting proactively, the Chant having occurred. The Commission wishes to stress that it was not expecting or looking for perfection. Nor was it seeking to view matters with the benefit of hindsight. Rather the Commission considered the matter on what was, or ought to have been known to WWFC, how it anticipated matters and how it responded to them.

38. Having regard to the Guidance and the factors to be determined when considering sanction, the Commission considered:

- (1) The number of supporters involved was significant;
- (2) The nature of the behaviour of those involved was to engage in two prolonged (approximately 20 seconds on each occasion) use of a discriminatory and homophobic Chant, which has been successfully prosecuted on another occasion;
- (3) As stated, the duration of the incident was approximately 20 seconds on each occasion;
- (4) The steps taken by WWFC are set out in detail in these Written Reasons, with the principal shortcomings, in the view of the Commission, being those identified in paragraph 36 above (especially the 3 sub-paragraphs within that paragraph);
- (5) There was no relevant previous disciplinary matter to be taken into account;
- (6) No previous Action Plan had been imposed on WWFC.

Furthermore, on the particular facts of this case the Commission saw no reason other than to sanction WWFC for the two Charges together, adopting an holistic approach. There was no basis for differentiating between the two occasions on which the Chant was heard during the Match and certainly no basis for providing independent sanctions for each occasion the Chant was used.

38. In light of the all the foregoing and after its detailed consideration of WWFC's mitigation the Commission was clear that an action plan be imposed on WWFC and also a financial sanction.

39. The action plan we consider is appropriate is appended to these Written Reasons. As the hearing has proceeded as a paper hearing and, as such, we have not heard submissions on the action plan, we will permit WWFC and The FA a period of 14 days from receipt of these Written Reasons in which they can apply to vary the terms of the action plan if either consider it appropriate to do so. This permission extends to points in the action plan, not the underlying rationale for the imposition of the action plan.
40. The action plan should be considered and implemented as soon as possible and will remain in place for the entirety of the forthcoming 2023/2024 season.
41. The Commission considered whether the Action Plan was a sufficient sanction on the facts of this particular case. This was a serious breach, on two occasions, with loud and prolonged use of a chant which had recently been identified as being criminal in nature and for which the Club (along with other clubs) had been placed on notice by The FA. We concluded that it was not appropriate to sanction by only imposing an Action Plan and that a financial penalty should be imposed as well, particularly because of the nature of the Chant and the matters identified in paragraph 36 and its sub-paragraphs above.
42. We reiterate, overall a lot of work to tackle discrimination, including homophobia has been undertaken for which WWFC deserve praise. However, there was a clear disconnect between considering the matter internally and then both disseminating the relevant messages to supporters and also in considering the matter and implementing and actioning a suitable response to the Chant when it occurred.
43. In stating this we should also observe we have given due credit to WWFC for recognising some failings in Mr Wild's letter as recited at paragraph 34 above.
44. Looking at the Guidance the fine range for a Premier League club is between £20,000 and £300,000. We considered the Chant at the Match in all the circumstances mentioned in these Written Reasons to be in the mid-range. We considered that the mitigation we have identified took the Chant to the lower end of the mid-range. Accordingly, we impose a financial sanction, in addition to the Action Plan, in the sum of £100,000.
45. We did consider whether any part of the financial sanction should be suspended. We reminded ourselves of the terms of Regulation 44 which provides:

"When considering imposing a suspended penalty, a Regulatory Commission must:

(a) Determine the appropriate penalty for the breach, irrespective of any consideration of it being suspended; and

(b) Consider whether there is a clear and compelling reason(s) for suspending that penalty ...”

46. Having considered it we could see no clear and compelling reason for suspending the financial penalty (or indeed the Action Plan) and, accordingly, we do not do so.

Order

47. We impose the Action Plan annexed to these Written Reasons, subject to the permission referred to in paragraph 39 to WWFC and The FA to apply to us within 14 days of receipt of these Written Reasons to vary their terms if they consider it appropriate to do so.

48. The Action Plan will take immediate effect and will remain in place for the entirety of the 2023/2024 season.

49. WWFC are warned as to their future conduct.

50. We also order WWFC to pay a fine in the sum of £100,000.

51. Having regard to the matter as a whole and, in particular WWFC’s conduct in response to the Charges, we make no order as to the costs of the Regulatory Commission.

52. This decision, which is the unanimous decision of the Regulatory Commission, is subject to the relevant Appeal Regulations.

Christopher Stoner KC

Alison Royston

Peter Fletcher

26 June 2023

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Signed by the Chair on behalf of the Commission.

Wolverhampton Wanderers Action Plan

- 1) Upon publication of the Regulatory Commission's Written Reasons and this Action Plan, Wolverhampton Wanderers Football Club (***the Club***) shall communicate via the Club website and via social media, and in the next available home league match day programme
 - a) The fact and background to the Charge, including the fact that it involved abusive, offensive, homophobic, discriminatory chanting by Club supporters at a match against Chelsea FC.
 - b) The Club's condemnation of the Chanting that underpinned the Charge and the fact that it has a zero-tolerance policy towards discriminatory abuse of all kinds.
 - c) Further it should state that those responsible were committing a criminal offence and anyone subsequently identified will be banned.
 - d) The fact that this resulted in the Club being charged and found guilty of Misconduct under the FA Rules, being warned as to its future conduct and having an Action Plan imposed upon it together with a fine of £100,000 to prevent any recurrence of the Misconduct.
 - e) The Club's intention to develop existing initiatives to make it more inclusive and more proactive in the prevention and detection of any potential discriminatory or inappropriate words or behaviour in the future, at both home and away fixtures
- 2) The Club shall
 - a. Forthwith conduct a full review of its stewarding management, provision, deployments, and quality of stewarding training. In addition existing processes should be closely examined to ensure quality steward incident reporting (verbal & written) is in place to support proportionate reactions to matchday incidents and potential post-match investigations.
 - b. Continue to ensure all its matchday operational planning, match specific risk assessments and stewarding briefing documents are fully documented to support and evidence due procedure, and to ensure that the prevention and detection of any discriminatory or inappropriate behaviour is sufficiently addressed, and is readily available for inspection by the Football Authorities and the appropriate Safety Advisory Group.

- c. Maintain a detailed operational protocol in support of their safety management and stewarding teams to include stewarding reporting methods, prepared Public Address messages to assist in the prevention of abusive and discriminatory behaviour, and to include any match specific action plans for dealing with such behaviour.
- d. Evaluate their existing CCTV capabilities and operator training in relation to crowd monitoring and evidence gathering including the use of body worn cameras.
- e. If not already in place, establish a pre-match and post-match management group, consisting of relevant heads of department, to share information and plan for & review each fixture accordingly. Such meetings such have any action plans specifically allocated and be properly minuted. It shall be the responsibility of each head of department to properly convey relevant information arising from the pre-match and post-match meetings to their respective team members.
- f. The Club's Safety Officer and Club Secretary should liaise with the opposition club prior to all fixtures both home and away to exchange intelligence.
 - i) on club supporters who are or may be attending the home fixture, and
 - ii) on any factors which may negatively or illegally affect or influence their behaviour; this should include any members of the visiting club whether they be current or former players, backroom staff, directors and club guests who may be potential targets of discriminatory behaviour from the supporters.
 - iii) Such information should then be addressed at the pre-match meeting of both the management group and stewards.
- g. The Club Safety Officer should appraise the match officials before the game to discuss and evaluate any potential issues relating to crowd behaviour, particularly any discriminating behaviour, and have in place methods of communicating with match officials should it be necessary.

3) The Club shall

- a) Continue to develop proactive educational programmes/initiatives for supporters and written policies and procedures
 - i) for the purpose of increasing awareness of unacceptable behaviour, deterring and minimising discriminatory and other inappropriate supporter behaviour, including the inappropriate usage of words, chanting, gestures, behaviour and conduct associated with ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation and disability.

- b) Continue to develop an ongoing positive dialogue with *Kick It Out*, and further enhance the relationship for the purpose of seeking advice on, and ratification of all such, proposed programmes, initiatives, policies and procedures
- 4) The Club shall continue to develop and publicise the Club's policies in relation to Equality, Diversity and Inclusion which must
 - a) include a prominent 'Discrimination' section containing relevant and specific information on all aspects of discriminatory and offensive words and behaviour in an effort to educate supporters on what language and actions are acceptable / unacceptable, whether at home or away fixtures.
 - b) Publicise (or re publish) both the Club's Text reporting system (Not in Our Pack) and Acceptable Behaviour Policy to supporters, in particular supporters committing acts of discriminatory behaviour both at home and at away fixtures to include offences and associated sanctions, in particular relating to discriminatory behaviour.
 - c) Work towards achieving the Advanced Level of the Premier League Equality, Diversity and Inclusion Standards (PLEDIS)
- 5) The Club shall develop and implement an appropriate media campaign across the Club website and the Club's social media accounts emphasising the Club's policies and its zero tolerance toward discriminatory, abusive and insulting language, behaviour and conduct
- 6) The Club shall continuously review ticket sales policies to ensure that such policies do not increase the risk of discriminatory or inappropriate supporter behaviour, and to provide useable data to support post-match investigations and potential associated sanctions.
- 7) The Club shall develop and deploy
 - a) match day PA announcements, and
 - b) printed messages in its match day programme, on any available big screen, on advertising boards and on stadium advisory posters
 - c) content on the Club's website and social media platforms
 to pro-actively target the prevention, usage and detection of any potential discriminatory words or behaviour. Such announcements, messages and content (i) shall make clear in plain effective language that discriminatory and abusive is offensive, may be criminal, and

will not be tolerated by the Club, and (ii) must be supported by clear reporting methods and facilities.

- 8) Prior to each match the Club shall publish warnings to its supporters against the use of discriminatory and other inappropriate supporter behaviour and language. Such warnings
 - a) shall be published on the Club's website and social media outlets, whether as a stand-alone warning, and for away fixtures as part of a 'Travelling Fans Guide', and
 - b) Shall be communicated directly, whether by text or other suitable means, to those supporters that the Club knows have purchased tickets for the relevant away game and/or are travelling to the relevant away game
- 9) The Club shall review all its safety management plans and policies at least once a season.
- 10) This Action Plan shall be in place for the duration of the 2023/24 season and will be monitored by the Football Association .
- 11) The Club shall invite The FA to ensure that an FA Compliance Officer is present at the next home fixture against Chelsea FC.