

**IN THE MATTER OF A FOOTBALL ASSOCIATION
INDEPENDENT REGULATORY COMMISSION**

**The FA
V
Sheffield Wednesday Football Club**

**DECISION AND WRITTEN REASONS
OF THE INDEPENDENT REGULATORY COMMISSION**

Regulatory Commission	Dominic Adamson KC (Chairperson) Alison Royston Matt Wild
Secretary to the Commission	Michael O'Connor
Date	28 June 2024
Hearing Type	Paper Hearing

Introduction

1. On 20 February 2024 Sheffield Wednesday Football Club (the Club) was charged with misconduct for a breach of FA Rule E21 in respect of an English Football League Championship match between Sheffield Wednesday v Coventry City FC on 20 January 2024.
2. The particulars of the charge were as follows:

“It is alleged that in/or around the 94th minute of the Match, Sheffield Wednesday FC failed to ensure that its 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 did not

 - *use words or otherwise behave in a way which is improper and/or offensive and/or abusive and/or insulting contrary to paragraph E21.1; and*

- *conduct themselves in a manner prohibited by paragraph E21.1 in circumstances where that conduct is discriminatory in that it included a reference, whether express or implied, to ethnic origin and/or colour and/or race contrary to paragraph E21.4.*
3. On 6 March 2024 the Club admitted the charge. It elected a paper hearing.
 4. We have been supplied with an extensive 432 page bundle. We have considered it in full. We do not reference every document in these written reasons. The fact that these written reasons do not refer to a specific document or issue raised in the bundle should not be taken as an indication that the Commission has not considered it.

The Rules

5. FA Rule E21 states:-

'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:

E21.1 use words or otherwise behave in a way which is improper, offensive, violent, threatening, abusive, indecent, insulting or provocative;

E21.2 throw missiles or other potentially harmful or dangerous objects at or on to the pitch;

E21.3 encroach on to the pitch or commit any form of pitch incursion;

E21.4 conduct themselves in a manner prohibited by paragraph 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.

E21.5 it shall be a defence to a Charge in relation to Rules E21.1 to E21.3 (only) if a Club can show that all events, incidents or occurrences complained of were the result of circumstances over which it had no control, or for reasons of crowd safety, and that its responsible officers or agents had used all due diligence to ensure that its said responsibility was discharged. However, when considering whether this defence is made out a Regulatory Commission will have regard to all relevant factors including:

- *The extent to which the Club has discharged its duty;*
- *The severity of the issues involved;*

- *The extent to which similar issues have occurred previously in which case whether the Club took sufficient action in preventing further such incidences.*

....

6. Thus, pursuant to E21.5 the due diligence defence is not available to a club where its supporters behave in a manner which contravenes E21.1 and which is discriminatory in relation to ethnic origin, colour or race.

The Facts

7. The FA summarises the key facts as follows-

“5 On 21 January 2024, The FA received a Referee Match Report Form from Anthony Blackhouse (“AB”), the Match Referee which detailed an incident in the 94th minute of the game involving discriminatory behaviour by a SWFC spectator towards Kasey Palmer (“KP”), CCFC No. 45. The incident was capture in full in the footage EFL_23_24_CH_SFW_COV_INCIDENT at 7:04. As KP approached the corner flag to retrieve the ball for a throw-in, a spectator in the fourth row of the Kop End can be seen gesticulating towards KP. This including making a monkey gesture. The spectator then leaves the area almost immediately.

6 KP then ran over to AB to report the gesture that had been made. AB advised KP that the allegation would be dealt with following the final whistle and KP confirmed that he was content to allow the match to continue.

7 AB then ran to the touchline informing both managers that a ‘racial allegation’ had been made, Danny Röhl of CCFC and Mark Robins of CCFC. The Fourth Official, Matt Donoghue (“MD”) was within the vicinity of this conversation. MD then states he informed the tunnel steward that there had been a racial allegation and provided the location: “behind the goal, towards the corner”. This exchange is also captured by footage: Tactical 90+5”

8. These facts are supported by the PGMOL Referees Match Report Form¹. The key facts in this incident are not disputed. We address the response to the report by the tunnel steward and the fourth match official below.
9. We have been provided with video footage of the incident in the Kop End of the Hillsborough Stadium. The spectator can very clearly be seen performing the

¹ P.5 of the Bundle

monkey gesture. Very shortly after performing the gesture the spectator moved away. We suspect that he did so because he realised that KP had seen him and there was a risk that he would be identified by either the police or Club staff and face the consequences of his actions.

10. Thus it is clear that the Club failed to ensure that the spectator did not contravene rule E21.1. It is also clear that the spectators behaviour was discriminatory contrary to E21.4. Accordingly, no due diligence defence is available to the Club. Accordingly, it has rightly admitted the charge.

The Club's Approach to Preventing Discriminatory Behaviour & Response to the Incident

11. We have been supplied with extensive materials which illustrate the approach to the prevention of discriminatory behaviour.
12. In its original response² to The FA's request for observations regarding the incident the Club acknowledged that the behaviour of the spectator towards KP was '*abhorrent*'. The Club highlighted the efforts made to prevent such behaviour:-
- a. There were three police planning meetings for the fixture. There was no evidence or intelligence to suggest any potential issues of discrimination from both fan bases.
 - b. A pre match meeting was held at 12.30 on the day of the game. A presentation was delivered to all stand managers and supervisors reaffirming a zero tolerance policy to any form of discrimination.
 - c. The incident occurred in the second half. KP reported racial abuse from the Kop Stand to the match referee. The referee spoke to both managers [NB it was not the managers' responsibility to invoke Club protocols on discriminatory behaviour].
 - d. Following extensive examination of CCTV and working closely with South Yorkshire Police specific seat numbers were provided to police which resulted in an arrest.
 - e. The Club stated that it took '*every preventative measure possible ahead of the fixture*' including posters displaying key messages, a real time text service, giant screen messaging, LED board messaging and match day programme messaging.
 - f. After the game, it worked with Coventry City, where both Clubs issued powerful statements condemning the actions of this spectator.

² P.9

13. In the Club's subsequent letter³ responding to the charge it provided further details of their preparations for the match. We do not rehearse the content of those extensive observations. We note:-

- a. There was a match specific risk assessment. It did address conflict between spectators and players but it did not specifically address discriminatory behaviour and how that would be dealt with.
- b. The Club had identified the risk of discriminatory behaviour within the 'Stadium Generic Risk Assessment'. The Stadium Generic Risk Assessment still applies for all matches held at the Stadium even if not every single point is replicated in the Club's Matchday Risk Assessment. It includes the following passage:

"SWFC to promote inclusion and will confront language, chanting and/or physical gestures to eliminate discrimination whether by reason of ethnic origin, colour, race, nationality, faith, gender, gender reassignment, sexual orientation or disability". Additional controls include "SWFC to have additional qualified staff available if event-led intelligence is received. Tannoy/big screen will deliver relevant messages when appropriate".
- c. The Club had 355 stewards on duty. They were briefed prior to the match.
- d. The Steward and Match Day Staff Induction provides extensive training on discrimination including details of the Club's policy on discrimination and the expectations on staff to report all forms of discrimination.
- e. We also have a copy of the Matchday Staff briefing at p.140 of our bundle. In our view, this does not address discriminatory behaviour as a stand-alone topic but it was covered under the banner of safeguarding.
- f. The Club's Ground regulations which prohibit racist, homophobic or discriminatory abuse. Those who attend games are bound by these rules.
- g. It has a Customer Charter which underpins the Club's values and its approach to racism and discrimination under the section entitled "Supporters Code of Conduct".

³ P.25

- h. The Club has a clear sanction tariff in the event of inappropriate behaviour by spectators. Racism or discrimination attracts a ban of between three seasons up to life⁴.
- i. The Club's messaging on the zero-tolerance of discrimination and the various means by which it can be reported⁵. We have been provided with extensive photographic evidence of the signage and messaging the Club issues in relation to discrimination.
- j. The Club has achieved its Bronze Level Certification from the EFL for equality, diversity and inclusion compliance.

14. The Club made the following additional points:-

- a. A strongly worded message was placed on its social media platform condemning the behaviour of the spectator. In addition it issued a powerfully worded video message which was viewed over 237,000 times by the time of the Club's written submission.
- b. It liaised with South Yorkshire Police (SYP) which enabled the SYP to arrest the individual. A very supportive e-mail was received from SYP thanking the Club for its assistance⁶.
- c. The Club liaised with the EFL and Kick it Out regarding the incident and messaging on anti-racism.
- d. The Club had co-operated with the FA's investigation. It acknowledged it has previously been in breach of rule E21.3 (following an incident which arose out of a pitch invasion) but emphasised that it has never been in breach of E21.4.

15. In our view, none of the matters set out in paragraphs 12 to 14 above are disputed.

The Report by the Fourth Official to the Tunnel Steward

16. In its letter responding to the Charge the Club dedicated a substantial part of the contents to specifically addressing the fact that the fourth official's report to the tunnel steward of a racial allegation did not result in any action by the Club's Safety and Security Team during the game.

⁴ P.39

⁵ P.39

⁶ P.34

17. The Club assert that its Safety and Security team were not made aware of the racial allegation until after the match. As a result the Club explains that its usual protocols and procedures regarding an alleged racist incident were not immediately followed.

18. The fourth official stated in an e-mail that he had reported the allegation of racist behaviour to a tunnel steward. The Fourth Official stated as follows⁷:-

“Shortly after the incident happened, it was clear that an allegation of racist behaviour was being made by Kasey Palmer (Coventry #45). Anthony confirmed that there had been a racial allegation made and then headed over to speak to both the managers. After this conversation had happened, I informed the tunnel steward (90+5:43 on tactical footage on MOAS TV) that there had been a racial allegation and gave him the location of "behind the goal, towards the corner."

19. The Club has explained that it carried out an extensive internal investigation into the Incident. Darren Rooke, the Club's Assistant Safety Officer had spoken to both the tunnel steward supervisor, Stephen Jerrison ("SJ"), and the tunnel steward, Terence Lundy ("TL"), who were on duty for the Match.

20. Neither TL nor SJ recall the fourth official referring to a racial incident when he spoke to them. They thought when the fourth official said there had been an incident in the Kop Stand that he was referring to a safeguarding incident. They were already aware of the safeguarding incident because it had been relayed a few minutes earlier on the radio communications system used by the Club's stewarding team.

21. We should make clear that the Club does not question the fourth official's account of the conversation with the tunnel steward as set out in the Charge Letter.

22. We are satisfied that this discrepancy is explained by confusion and misunderstanding during the communications.

23. In our view, the safeguarding incident and the racial allegation all formed part of the same sequence of events. Shortly before the racist behaviour of the spectator the ball went out of play. It was retrieved by a young female ball retriever who handed it back to KP. She handed the ball back efficiently. At around that time KP used foul language in the general direction of the ball girl.

⁷ P.7

That was the safeguarding incident. However, in our view, the footage shows KP looking past the ball retriever in the direction of the area where the spectator who had engaged in the racist behaviour was or had been. He then turned and moved towards the referee to report the racist incident.

24. We are entirely satisfied on the evidence before us that KP reacted to the racist spectator and that his foul language was not directed at the ball retriever.

25. The ball retriever was (understandably) upset by the incident and that was reported as a safeguarding concern. Thus, when the fourth official reported the allegation of racist behaviour, we are satisfied that the Club staff erroneously failed to grasp what they were being told and thought that the incident being referred to was the safeguarding incident.

26. Accordingly, we accept the Club's explanation for not implementing its usual protocol. It states as follows:-

"...had the Club's safety and security team been made aware of the Incident earlier when the Match was still in progress and there had not been some misunderstanding between the tunnel steward and the 4th official in terms of the information relayed, then the Club confirms that it would have immediately actioned the measures identified by RS in the Club's Additional Observations, which would have included taking the following actions (along with any applicable additional measures set out in the EFL's protocol for dealing with abuse aimed at players as included in the Charge Letter):

- Inform the SYP Match commander;*
- Stewards alerted and response team sent to the area;*
- CCTV focused on the area;*
- PA announcement to the respective area;*
- Identify and arrest any individual(s) in breach of the law and the Stadium's Ground Regulations;*
- Banning order issued in the interim whilst awaiting the outcome of the SYP investigation;*
- Lifetime banning order imposed if any charge is found proven;*
- Inform the Club's DSO of any incident relevant to safeguarding/ EDI issues."*

27. It did not implement the protocol during the match because the relevant personnel were not aware. We note that in the aftermath of the incident, the Club did assist the police and the Club have issued a banning order in relation to the spectator.

Sanction

Sanction Guidance

28. The FA has issued guidelines which apply where there is a breach of E20.1 where a Club is found of breach where the offending conduct, words of its supporters include a reference, whether express or implied, to ethnic origin or colour which it is referred to as a 'Relevant Breach'.
29. For a first offence, an Action Plan shall be imposed on the Club. The Action shall set out:
 - a. the operational advice and/or practical measures to be carried out by the Club;
 - b. the period the Action shall remain in force;
 - c. the external support to the Club that may be required;
 - d. the process through which the compliance with the Action Plan shall be audited and the frequency with which that audit shall take place.
30. In addition, a Regulatory Commission may also consider imposing a financial penalty in accordance with table 1 in the guideline. For an EFL Championship club that means a fine in the range of £5,000 to £75,000. Part of that penalty may be suspended in accordance with the Disciplinary Regulations if there is a clear and compelling reason to do so.
31. The Guidelines make clear that a second offence will be treated with the utmost seriousness. It is clear to us that in this respect the guidelines are there referring to a second 'Relevant Breach'. It is not concerned with second breaches where the first breach was not a 'Relevant Breach'.
32. The Guidelines then list the factors to be considered in determining the sanction. These include:-
 - (1) The number of supporters involved.
 - (2) The nature of the behaviour involved.
 - (3) The duration of the incident.
 - (4) Whether the Club
 - (a) Took all reasonable steps in its preparation and planning for the fixture in which the Relevant Breach occurred.
 - (b) Took all reasonable steps in dealing effectively with the incident, when it arose.
 - (c) Took all reasonable steps in identifying the supporter involved.

- (d) Took sufficient action against the supporter responsible when identified.
- (5) Whether the Club co-operated with the FA.
- (6) The previous disciplinary record of the Club in relation to Aggravated Breaches or Relevant Breaches.
- (7) In cases where an Action Plan has previously been imposed on a Club, whether the Club has complied in full with that Action Plan.

The FA Submissions on Sanction

33. The FA have helpfully set out their position on sanction in a detailed written document.

34. As regards the incident itself the FA state⁸:-

- a. The conduct of the Club's spectator was highly offensive.
- b. This was a single incident involving a single spectator, who immediately left the area following the behaviour.
- c. The use of the monkey gestures towards KP was plainly grossly offensive racially discriminatory behaviour.
- d. The FA note that this was immediately recognised by the Club in condemning the "*appalling behaviour*" of the spectator through the SWFC account on 'X' and in subsequent press statements.
- e. The incident was of limited in duration. It is further accepted that this behaviour does not appear to have occurred at any other point in the game.

35. On the question of whether the Club (and/or its Officers) took all reasonable steps in its preparation and planning for the fixture in which the breach occurred the FA noted that the match day risk assessment did not refer to the risk of crowd or individual discriminatory behaviour. Although it is acknowledged that this is referred to in the Club's Generic Risk assessment.

36. The FA acknowledges, again correctly in our view, the following⁹:-

"It is plain within the documentation submitted by SWFC that the Club is committed to prevent discriminatory behaviour across all aspects of its footballing operations, including through spectator behaviour. The Club is however measured in its progress and is ambitious to continue improving equality, diversion and inclusion. In particular, The FA acknowledges the following measures taking by the Club generally to combat discriminatory

⁸ P.273

⁹ P.276 para 16

behaviour by its spectators (this is not intended to be an exhaustive list of the measures outlined by SWFC but those most relevant to the misconduct in this matter):

- i. Ground Regulations binding ticket holders not to engage in “Racial, homophobic or discriminatory abuse, chanting or harassment”, available on the back of each ticket and the Club’s website.*
- ii. Customer Charter binding ticket holders with specific reference to addressing and preventing discriminatory behaviour, available on the Club’s website.*
- iii. Match Day Stewards Briefing with express reference to prevention of discriminatory behaviour.*
- iv. Messaging and signage throughout Hillsborough Stadium including: i. Code of Conduct from ‘Enjoy the Match’ English Football League Campaign;*
 - i. Code of Conduct from ‘Enjoy the Match’ English Football League Campaign;*
 - ii. ‘Text Line’ and ‘Real Time’ QR Code signage for spectators to report discrimination, safety concerns and fan behaviour incidents on match days.*
 - iii. Kick It Out Campaign on pitch side advertising hoarding.*
- v. Full time Equality, Diversity and Inclusion Lead, working with EDI board representee, internal and external working groups in leading, promoting and addressing equality, diversity and inclusion within the Club.*
- vi. Equality, Diversity and Inclusion Working Group every 6 months.*
- vii. Equality, Diversity and Inclusion Strategy 2023 to 2025, including ‘Owls Together’ campaign launched in response to discriminatory abuse towards the First Team; liaison with South Derbyshire Police Hate Crime Unit and support for external campaigns including, ‘Show Racism the Red Card’, Kick It Out and Stonewall.*
- viii. Bronze Code of Practice Certificate from EFL for seasons 23/24 and 24/25 (reassessment during 25/26 season).*
- ix. Club banning orders for those found guilty of discriminatory behaviour*

[Emphasis added]

37. We agree.

38. On the question of whether the Club (and/or its officers) took sufficient action in dealing effectively with the incident when it arose The FA refer to the fact that the Safety and Security were not aware of the discriminatory gestures until after the conclusion of the fixture. The FA suggest that the Safety and Security Team –

who accept that they had received reports of a Safeguarding Incident – could have done more to engage with the fourth official to establish the nature of the incident. We are inclined to the view this as a simple instance of miscommunication/misunderstanding. We do not criticise the Club (or the fourth Match Official) for this misunderstanding. We refer to paragraph 16 to 27 above.

39. The FA correctly accept that the Club promptly notified SYP when it was aware of the incident. The FA also accept that the Club has co-operated fully with their investigation.

40. The FA refer to the previous instance of breach of E21.3 which concerned a pitch invasion. The Club received a penalty of £50,000 in respect of incident. In our view, this was a very different type of incident to the matter which we are concerned with. It was not a ‘Relevant Breach’.

41. The FA concluded with the following submission:-

“As the first offence of the Club for an Aggravated Breach under FA Rule E21, the FA submits that in accordance with the guidelines, an Action Plan ought to be imposed to assist the Club and ensure incidents of this nature are not repeated. The terms of the Action Plan are a matter for the Commission.

In addition, the Commission may impose a financial penalty commensurate with Table 1 of the Sanction Guidelines, namely £5000 to £75,000 as an EFL Championship Club. In light of the recent previous breach of FA Rule E21, the FA would invite the imposition of a financial penalty not less than £50,000.”

42. Given the general thrust of the FA’s submissions which we have summarised above we are somewhat puzzled as to why the FA considered that the Club should receive a financial sanction of not less than £50,000 on the facts of this case. Given the financial sanction guidance and the very substantial mitigation which the FA has accepted is available to the Club this would suggest that before mitigation a fine at the very top of the bracket was merited. That cannot, in our view, be correct. In our view the FA’s submission on the level of the financial penalty is not consistent with the general tenor of its submissions in support of the Club’s responsible attitude.

The Club's Submissions on Sanction

43. The Club have submitted a reply to the FA's submissions¹⁰. This was a helpful document.
44. The Club argue that the financial sanction proposed by the FA (i.e. a fine of at least £50,000) is not proportionate. In particular, they point to the disproportionate weight seemingly attached by the FA to the prior breach of E21.3. They observe that the club's previous breach arose as a result of a pitch invasion which occurred when the Club overturned a four goal deficit from the first leg of a EFL League One play off semi-final. The circumstances were thus very different to the present matter and did not include an allegation of discrimination. We agree.
45. We do not rehearse all of the points made in this document because many of them have already been mentioned above. The Club emphasise that there is a limit to how much it can control spectators particularly in respect of an incident like this. We agree.
46. The individual responsible for the racist behaviour has been charged with a racially aggravated public order offence. He was subsequently found guilty¹¹. The Club has now been banned him from attending any football match involving the Club for life. In 10 years, he will be given the opportunity to attend a Club rehabilitation programme in line with the EDI Code of Practice for all EFL Clubs.
47. The Club then analyses the sanctions imposed in a series of other cases. We note those cases but consider they are of limited assistance to us. Each case has to be decided on its on facts.

Findings and Sanction

48. In our view the relevant facts are as follows:-

(1) The number of supporters involved.

There was 1 spectator in a crowd of over 28,000 involved in this incident.

(2) The nature of the behaviour involved.

The spectator's behaviour was deeply offensive. The Club's description of it as abhorrent was apt.

(3) The duration of the incident.

¹⁰ P282

¹¹ P.432

The monkey gesture lasted for a matter of seconds before the perpetrator moved away from the area sensing he had been or would be identified.

(4) Whether the Club

(a) Took all reasonable steps in its preparation and planning for the fixture in which the Relevant Breach occurred.

We consider that the Club did make a significant effort in its planning and preparation. We echo the words of the FA which when it states that it is clear that the Club is committed to take the steps necessary to prevent discriminatory behaviour. We consider there is some room for improvement. For example, we consider the Match Day Risk Assessment could have specifically addressed discriminatory behaviour and how that will be addressed to ensure it is given maximum prominence. We do not consider that this measure would have been likely to have prevented the incident.

(b) Took all reasonable steps in dealing effectively with the incident, when it arose.

There was no immediate response to the incident by the Club. Unfortunately, it did not implement its usual protocols because of a misunderstanding between Club staff and the fourth match official. However, we do not think this is an aggravating feature of the incident. The incident occurred at the end of the match and there was a limit to what could have been achieved in the circumstances at that time. We are impressed by the efforts the Club has made to publicise and condemn the incident.

(c) Took all reasonable steps in identifying the supporter involved.

The Club did this. It assisted SYP and was thanked by it for their input. As a result the spectator was convicted of a racially aggravated public order offence.

(d) Took sufficient action against the supporter responsible when identified.

In our view, the Club did take sufficient action. In addition to the work it undertook to assist the SYP the Club took its own disciplinary steps. The spectator has been banned for life with an opportunity for rehabilitation in 10 years through an education programme.

(5) Whether the Club co-operated with the FA.

It did. The FA accepts that it did.

(6) The previous disciplinary record of the Club in relation to Aggravated Breaches or Relevant Breaches.

This does not apply to the facts of this case.

(7) In cases where an Action Plan has previously been imposed on a Club, whether the Club has complied in full with that Action Plan.

This does not apply to the facts of this case.

49. We are obliged to impose an Action Plan and we do so. It is annexed to these reasons. We acknowledge that in a number of respects the Action Plan focuses on issues and areas where the Club has already done good work. The Action Plan shall be in place for the 2024/25 season.
50. We therefore turn to the question of a financial penalty. We have sympathy for the Club given its responsible attitude and the fact that preventing incidents of this nature involving a single spectator is obviously challenging.
51. In our view, notwithstanding the very substantial mitigation available to the Club we consider that a financial penalty is necessary to reflect the seriousness of the incident and the behaviour of the supporter. Having considered all the circumstances we impose a financial penalty of £12,500 having regard to the very substantial mitigation available to the Club which has been summarised above. The Club shall be warned as to future conduct.
52. We do not consider that there is any clear or compelling reason why any of the fine should be suspended.
53. There is a right of appeal from this decision as provided for by the Disciplinary Regulations.

Dominic Adamson KC

Alison Royston

Matt Wild

3 July 2024

APPENDIX TO THE DECISION AND WRITTEN REASONS OF THE INDEPENDENT REGULATORY COMMISSION

THE FOOTBALL ASSOCIATION

- v -

SHEFFIELD WEDNESDAY FC

ACTION PLAN

1. The Club shall ensure its Specific Matchday Risk Assessment, Stadium Control Pre-Match Brief and Matchday Staff Briefing documentation include due procedure in specific relation to the prevention and detection of any discriminatory or inappropriate behaviour.
2. The Club shall expand its *“Protocol for dealing with abuse aimed at players, managers and match officials”* document to include all backroom staff, and this should be appropriately referenced in pre-match safety & stewarding briefings to support and continually develop the initial training that is currently given to all stewards.
3. The Club shall properly document and continually review match by match steward deployment plans relating to intelligence-based information surrounding incidents of previous or expected discriminatory or inappropriate behaviour within the stadium.
4. The Club shall review the reference to *Language* under the “Supporters Code of Conduct” section in its Club Supporter Charter and either expand it, or consider a standalone ‘Discrimination’ section, to include relevant and specific information on discriminatory or offensive chanting, words or behaviour, in an effort to

educate supporters on what language and actions are acceptable/unacceptable at their stadium.

5. The Club shall continuously review ticket sales policies to ensure that such policies do not increase the risk of discriminatory or inappropriate fan behaviour, and also to provide usable data to support post-match investigations, and potential associated action in accordance with the Club Sanctions Tariff.
6. The Club shall continue to work towards maintaining / improving its Bronze standard EFL Quality Code of Practice when next reassessed in Season 2025/2026.
7. Upon publication of
 - a. the Regulatory Commission's Written Reasons, and
 - b. this Action Planthe Club shall communicate via the Club website, via social media and in the match day programme for its next home match, an appropriate message and response to their supporters. Such message and response should explain the background to this Charge, reiterate again the Club's condemnation of the action that underpinned the Charge, and emphasising the Club's policies **making it clear in plain effective language that discriminatory abuse is illegal, offensive and will not be tolerated by the Club.**
8. This Action Plan shall be in place for the duration of the 2024/25 season.