

FOOTBALL ASSOCIATION  
INDEPENDENT REGULATORY COMMISSION

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WRITTEN REASONS AND DECISION OF  
THE INDEPENDENT REGULATORY COMMISSION IN THE MATTER OF A  
WRONGFUL DISMISSAL CLAIM BROUGHT BY BRADFORD CITY FC ON BEHALF  
OF MR ADEN BALDWIN ON 9 MARCH 2026

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## **Background**

1. These are the written reasons for a decision made by an Independent Regulatory Commission which sat by video conference on 9 March 2026.
2. The Regulatory Commission members were Mr Udo Onwere, Independent Football Panel Member and Chairman, Mr Bobby Barnes, Independent Football Panel Member and Mr Stephen Bennett, Independent Football Panel Member.
3. The Regulatory Commission members were advised on the Laws of the Game by Mr Steve Dunn of the Referee Advisory Panel. In particular, the Law relating to ‘Serious Foul Play’ and the factors considered by a Match Official when determining such an incident. Mr Dunn remained available to answer questions with regard to the Laws of the Game, however, took no part in discussions concerning the actual specifics of the case.
4. Ms Veronika Christmas, the FA Judicial Services Administrator, acted as Secretary to the Regulatory Commission.
5. In order for a claim of Wrongful Dismissal to be successful, Aden Baldwin (“the Player”) and his Club (defined below) must establish by the evidence it submits that the Referee made an obvious error in dismissing the Player.
6. The incident in question occurred in the Bradford City FC (“the Club”) v Leyton Orient FC English Football League One fixture which took place on 7 March 2026.
7. The Club submitted video clips of the incident which included different angles of the challenge. This was supported by written submissions from the Club’s Secretary, the Club’s Manager and the Player, the contents of which the Commission read and noted.
8. The following is a summary of the principal submissions provided to the Commission. It does not purport to contain reference to all the points made, however the absence of a point, or submission, in these reasons should not imply that the Commission did not take such point, or submission, into consideration when the members determined the matter. For the avoidance of doubt, the Commission has carefully considered all written and video evidence in respect of this case.
9. The Regulatory Commission considered the relevant Laws of the Game in relation to Serious Foul Play. It is defined as follows:

A tackle or challenge that endangers the safety of an opponent or uses excessive force or brutality must be sanctioned as serious foul play.

Any player who lunges at an opponent in challenging for the ball from the front, from the side or from behind using one or both legs (or with any part of his body), with excessive force or endangers the safety of an opponent is guilty of serious foul play.
10. The following practical information which is given to Match Officials was also considered:
  - Does the player have a chance of playing the ball in a fair manner?

- Can the player legitimately play the ball without putting his opponent at undue risk?
- What degree of speed or intensity is the player using when making the challenge?
- What is the distance the player has travelled to challenge for the ball?
- Is the player making the challenge off the ground/airborne and in control of his actions?
- What was the position of the feet of the player making the challenge?
- Did the player lead with his studs showing when making the tackle?
- Does the player show clear malice or brutality when making the challenge?
- Does the challenge clearly endanger the safety of the opponent?

This list is not exhaustive nor is it a requirement that all elements are made out to satisfy the offence.

11. Having viewed the available footage of the incident on numerous occasions and in detail, the Regulatory Commission agreed unanimously that the Referee had not made an obvious error in his interpretation of the incident.
12. The Commission viewed the challenge in question on several occasions. It was clear that the Player approached the challenge with a high level of speed and intensity. The Player lunged at his opponent and led with his studs showing to win the ball whereby his trailing leg, albeit slightly bent, clearly made contact with his opponent. Furthermore, at one stage, it was noted that both the Player's feet were airborne prior to making the challenge and this added extra momentum to the thrust of the challenge. As such, this met the threshold of endangering the safety of the opponent. Whilst it is accepted that in a contact sport there must be allowances made for firm and fair challenges, the Commission understood why the Referee had decided to dismiss the Player. It was a challenge that was high risk and, therefore, this made the Referee's decision entirely understandable. The Commission concluded that whilst the outcome of the challenge may have been unintentional and/or accidental, intent is not applicable for this offence under the Laws of the Game and the action of the challenge itself as set out in this paragraph meant it was to be viewed as clearly endangering the safety of the opponent.
13. The Commission reviewed and discussed the Laws of the Game and the practical information considered by the Referee in real time. It did not accept the Club's account of the incident. The Commission carefully considered the Referee's judgment and his decision making at the exact time the offence was committed. It was based on this assessment that the Commission concluded that it could not be said in any way that the Referee made an obvious error in dismissing the Player from the field of play. For completeness, it is not the role of the Commission to usurp the Referee or re-referee the incident.
14. Accordingly, it was the unanimous view of the Regulatory Commission that the Referee did not make an obvious error in dismissing the Player pursuant to the Laws of the Game.

### **Standard Punishment Clearly Excessive**

15. The Club further submitted that if the Commission did not accept their submissions that the red card should be rescinded on the grounds that the referee made an ‘obvious error’, they would submit that there were circumstances that a three-game ban is ‘clearly excessive’. The general principles of disciplinary consequences being considered as “clearly excessive” are set out in the FA Handbook 2025/26.
16. The Club submitted that the Player’s action in the challenge was not worthy of a red card and, furthermore, that the red card should be rescinded. Again, this was not accepted by the Commission. The threshold for ‘clearly excessive’ is a high one and based on the prescribed criteria above whereby the Club would have to show it was clear and obvious that a three-match ban would be clearly excessive. There was nothing in relation to the circumstances of this dismissal that it was clear and obvious (or that it had any elements of exceptionality) whereby applying the standard punishment would make such punishment clearly excessive. Therefore, this claim was rejected.

### **Conclusion**

17. As previously stated, the Regulations state that the burden lies with the Club to submit evidence that proves that the Referee made an ‘obvious error’ in sending the Player from the field of play. In this instance the Commission (by a unanimous decision) did not feel that they could say, based on all the evidence before them, that he had made an ‘obvious error’. As such the claim failed.
18. This appeal is therefore dismissed.
19. Pursuant to the relevant Regulations, this decision of the Regulatory Commission is final and binding, and there shall be no right of appeal.

**Mr Udo Onwere, Independent Football Panel Member and Chairman**

**12 March 2026**