

IN THE MATTER OF A FOOTBALL ASSOCIATION
INDEPENDENT REGULATORY COMMISSION

BETWEEN:

THE FOOTBALL ASSOCIATION

and

LINCOLN CITY F.C.

WRITTEN REASONS AND DECISION OF THE INDEPENDENT
REGULATORY COMMISSION FOLLOWING THE HEARING ON 7
OCTOBER 2025

1. These are the written reasons for a decision made by an Independent Regulatory Commission (“the Commission”) which sat by video conference on 7 October 2025.
2. The Commission members were Mr. Simon Parry, (Chairman, and Independent Legal Panel Member), Ms. Alison O'Dowd (Independent Football Panel Member) and Mr. Matt Williams (Independent Football Panel Member).
3. Mr. Michael O'Connor, FA Judicial Services Assistant Manager, acted as Secretary to the Commission.
4. The relevant incident took place in the EFL League One fixture between Lincoln City F.C. (“LCFC/the Club”) and Wrexham A.F.C. on 3 May 2025.
5. By letter dated 15 August 2025 the FA charged LCFC with two breaches of F.A. Rule E21 in that that they 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 do not use words or otherwise behave in a way which is improper and/or offensive and/or indecent and/or insulting with an express or implied reference to religion or belief and/or nationality, contrary to FA Rule E21.1 and E21.4.
6. Charge One relates to chanting in the 64th minute of the fixture and Charge Two to a repetition of this chanting in the 69th minute.
7. By written reply dated 22 August 2025 the Club admitted the Charges and

requested a paper hearing at which to advance mitigation. The Club provided a large number of documents relating to the fixture itself, the Club's Foundation Annual Impact Report and a letter from Mr Matthew Murgett, Head of Football Administration.

8. The Commission had the benefit of written Submissions on Sanction from the FA dated 8 September 2025. There were no additional submissions in response.
9. We have read the written submissions and evidence with care. We are extremely grateful to the parties for the assistance that they have given.
10. 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 in these reasons of any particular point or submission should not imply that the Commission did not take such point or submission into account when the members determined the matter. For the avoidance of doubt, the Commission carefully considered all the evidence and materials provided to it.

FA RULE E21

11. FA Rule E21 states: *A Club must ensure that spectators and/ or its supporters (and anyone purporting to be its supporters or followers) attending any Match do not:*

E21.1 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 the 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 responsible 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.*

FACTS

12. It is accepted that around the 64th and 69th minutes of the fixture LCFC supporters engaged in chanting directed at the Wrexham player, James McClean ("JM"). This particular player is frequently the subject of discriminatory chanting based on his nationality, his religion and the political views that he holds. It is best described as sectarian chanting. The video

evidence available to us confirms that the chant was the same on both occasions - "fuck the Pope and the IRA". It is an overtly discriminatory chant. The chant was short-lived on each occasion but, of course, was repeated only 5 minutes after the first. It is impossible to conclude how many people were involved in the chant on each occasion, but it does not come into the category of mass chanting. The matter was reported to the FA by Kick It Out on 7 May. Thereafter, the FA commenced an investigation and requested detailed observations from the Club setting out:

- a) details of the Club's preparations for the match and measures to prevent misconduct by spectators, specifically in relation to the reported crowd incident;
- b) any measures taken by the Club once they became aware of the incident and the effect of these measures;
- c) any actions taken to identify the perpetrators;
- d) any actions taken against the perpetrators; and
- e) any measures the Club intends to take to reduce the risk of such incidents involving the reported crowd incident from reoccurring.

13. The Club Head of Football Administration, Matthew Murgett, responded on 6 June. In those observations he set out the steps that the Club had taken before the fixture, having identified the risk of potential racist abuse being directed at JM. In the aftermath of the report from Kick It Out, the Club had reviewed CCTV, liaised with Lincolnshire Police and interviewed stewards. In those investigations it was suggested that two Wrexham fans had provoked

the IRA-related chanting, although there was no evidence to corroborate this. The Club's observations set out steps that it would take in the future to mitigate such risks from re-occurring. The Club also indicated that a number of fans had been identified as perpetrators, and, in due course, we were provided with copies of the Club's Sanctions Panel outcomes where seven individuals were banned from the Club for varying periods.

FA SUBMISSIONS ON SANCTION

14. The submissions highlight each of the areas covered within the sanction guidelines section of The FA's Policy and Guidance on the Regulation of Discriminatory Conduct by Spectators. We will address each in turn in our conclusions. The FA reminds us that a dedicated Action Plan is the primary focus of sanction for a Club's first offence. In addition, the Commission has the discretion to impose a fine within the published range for Clubs competing at League One level, which is between £2,500-£37,500.

CLUB REPLY

15. The Club submitted a final reply letter from Mr. Murgett and a bundle of fourteen documents relevant to this fixture and the Club's wider vision in the community. It is clear that the Club does make a concerted effort to play a full part in its local community and embraces the values of inclusivity. It is clear also that the Club were extremely disappointed in the behaviour of those supporters that caused these Charges to be raised.

SANCTION CONSIDERATIONS

16. An Action Plan is a mandatory part of sanction for an offence of this type, and we so order. The terms of the Action Plan are at Appendix One to the Written Reasons and are tailored to the particular facts of this case and to the Club. We acknowledge the steps that the Club has already sought to take in response to this incident and hope that the Action Plan will provide a better framework for the Club to use in combatting the potential for discriminatory abuse in the future.
17. The Commission has to consider whether to exercise our discretion and impose a financial penalty. We are in no doubt that, when considering the factors set out below, there should be a punitive sanction by way of a fine.
18. The first factor which we have regard to is the number of spectators involved. As noted earlier, from the audibility of the chanting we cannot determine with any precision the number of supporters involved. Whilst it is not mass chanting on the scale of thousands, it is more than a mere handful and more likely in the hundreds.
19. The second factor is the nature of the behaviour. The chanting used by the spectators was plainly discriminatory in nature. Given the frequency with which JM faces such abuse, it is likely to be deeply offensive to him. It is sad to say that JM has probably resigned himself to the likelihood of encountering such abuse until such time as attitudes are challenged and changed.

20. The third feature is the duration of the incident. Whilst brief in nature, this chanting happened on two separate occasions, which aggravates the position. Had the chanting been challenged immediately then a repetition may have been prevented.
21. The fourth factor is whether the Club and/or its officers took all reasonable steps in its preparation and planning for the fixture in which the relevant breach occurred; whether the Club and/or its officers took all reasonable steps in dealing effectively with the incident when it arose; and whether the Club and/or its officers took reasonable steps in identifying the supporters involved. In our judgment, the preparation and planning for this fixture went so far but did not go far enough. The Club had correctly identified the potential for discriminatory abuse towards JM. In one sense, that is the easy part. Having identified the risk, and to their credit, the Club liaised directly with Wrexham to discuss specific arrangements concerning JM. It is also clear that the matchday stewards were alerted to issues concerning JM. In our judgment, that is where the efforts end. Thereafter, there is a lack of evidence before us that the Club had taken sufficient steps to combat the risk of this particular type of discriminatory abuse. For instance, there is scant evidence before us of any pre-match messages, whether printed or social media or public address, to spectators discouraging them from this behaviour. The Club provided what is described as a copy of the end of season PA announcement, but we were struck by the fact that it appears firstly, not to be a PA announcement, and secondly to be incomplete, as it

contains the wording "add in here about chanting abusive and offensive messages". Similarly, when the chanting was first heard, there is scant evidence before us that the perpetrators were immediately challenged. Nor is there any evidence before us of any PA announcement after either incident of chanting to warn spectators. However, we are impressed that, unlike in many cases that come before Commissions, the Club was successful in identifying perpetrators and has dealt with them effectively. That factor weighs heavily in the Club's favour.

22. The fifth factor is co-operation with the FA. This factor weighs in the Club's favour - their co-operation with the FA has been full.
23. The sixth factor is the Club's previous record which, again to their credit, is unblemished. This, too, is a substantial mitigating factor. It follows that the Club has never been subject to an Action Plan before.

CONCLUSION

24. We are dealing with a case where there were two separate incidents of discriminatory chanting, and in particular, the fact that neither was dealt with at the time adequately or at all. It follows that there must be some punitive element to our sanction to reflect that, supported by the fact the financial sanction "range" starts at £5,000 and not £0.
25. The Club's best mitigation is its prompt admission of the Charges and its co-operation with the FA investigation. Our starting point reflects those areas where we consider that the Club failed to discharge its duties

adequately, balanced against the fact that the Club did identify the risk and did take positive action against perpetrators afterwards. In our judgment the appropriate starting point is a fine of £10,000. We do consider that the Club's admission of the Charges, notwithstanding that they are strict liability offences, merits some downward adjustment of the starting point. Therefore, we impose a fine of £8,500.

SANCTION

26. Lincoln City FC shall be subject of an Action Plan, in the terms set out at Appendix One of the Written Reasons.
27. Lincoln City FC shall be fined the sum of £8,500.
28. The decision is subject to any appeal as provided by the Regulations.

Mr. Simon Parry (Chairman)

Ms. Alison O'Dowd

Mr. Matt Williams

8 October 2025

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

THE FOOTBALL ASSOCIATION

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LINCOLN CITY FC

ACTION PLAN

1. The Club shall ensure its Specific Matchday Risk Assessment, Stadium Control Pre-Match Brief and Matchday Staff Briefing documentation all include due procedure in specific relation to the prevention and detection of any discriminatory or inappropriate behaviour.
2. 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.
3. The Club shall maintain a detailed operational protocol in support of their safety management and stewarding teams to include stewarding reporting methods, prepared Public Address messages to specifically assist in the prevention of abusive and discriminatory behaviour, and to include any match specific action plans for dealing with such behaviour, in order to support proportionate reactions to match day incidents and potential post-match investigations.
4. As it was not referenced in the Club's submissions in respect of the charge giving rise to this Action Plan, the Club shall ensure that, as a minimum method of reporting, it has an appropriately advertised mobile number text line for anyone wishing to report (anonymously if they wish) misconduct of others in real time during a match in order that the Club may take immediate action as appropriate.
5. The Club shall develop and deploy
 - a. matchday PA announcements for use before and during a match in accordance with EFL guidance & recommendations
 - b. messages in its printed / digital match day programme, on advertising boards and on stadium advisory posters, and
 - c. specific content on the Club website and social media platformall of which shall proactively target the prevention, usage and detection of any potential discriminatory words and/or behaviour. Such announcements, messages and content (i) shall make clear in plain effective language that discriminatory abuse is offensive, may be criminal and will not be tolerated by the Club, and (ii) must also be supported by clear reporting methods and facilities.

6. The Club shall review the information contained in the Lincoln City Football Club Customer Charter “Supporters Code of Conduct” and “Anti-Discrimination” sections on its website and either introduce a separate dedicated Club Supporter Charter or, as a minimum, have a more prominent ‘Anti-Discrimination’ section within the existing Customer Charter;
 - (i) such document should contain 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, and
 - (ii) list relevant match day offences and associated sanctions, in particular relating to discriminatory behaviour in the form of a Club Sanctions Tariff.
7. The Club shall develop educational programmes and initiatives for supporters in conjunction with Kick It Out and engage with supporter groups for the purpose of increasing awareness of unacceptable behaviour, and deterring and minimising discriminatory and other inappropriate supporter behaviour, including the inappropriate use of words, chanting, gestures, behaviour and conduct associated with ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation and disability.
8. The Club shall continuously review both home and away ticket sales policies to ensure that such policies do not increase the risk of discriminatory or inappropriate supporter behaviour, and also to provide usable data to support post-match investigations, and potential associated action in accordance with the Club Sanctions Tariff.
9. The Club shall continually evaluate its existing CCTV capabilities and operator training in relation to crowd monitoring and evidence gathering, including the use of body worn cameras.
10. The Club shall implement a “*Protocol for dealing with abuse aimed at players, managers and match officials*” document (to also include all backroom staff) and this should be appropriately referenced in pre-match safety & stewarding briefings to support and continually develop the training that is given to all stewards in respect of EDI and discriminatory behaviour.
11. Upon publication of
 - a. the Regulatory Commission’s Written Reasons, and
 - b. this Action Plan
 the Club shall communicate via the Club website, via social media and in the digital match day programme for its next home match, an appropriate message and response to its supporters. Such message and response should explain the background to this Charge, state 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.**

12. This Action Plan shall be in place for the duration of the 2025/26 season.
13. The FA shall monitor the Club's compliance with this Action Plan by way of an appropriate match day audit, whereupon the club shall exhibit all requisite material to The FA representative in attendance. Such audit to be carried out at least once in the Season that the Action Plan remains in place.