

IN THE MATTER OF A REGULATORY COMMISSION OF THE FOOTBALL ASSOCIATION

WEDNESDAY 18 FEBRUARY 2026

BETWEEN:

THE FOOTBALL ASSOCIATION

And

MILLWALL FC

WRITTEN REASONS

WARNING: THESE WRITTEN REASONS INCLUDE REFERENCE TO OFFENSIVE LANGUAGE, INCLUDING DISCRIMINATORY LANGUAGE

1. These are the written reasons for the decisions made by a Regulatory Commission which sat on Wednesday 18 February 2026 to consider the Charges against Millwall F.C. ("**Millwall**") referred to below for breaches of FA Rule E21 in respect of events during a Match between Crystal Palace F.C. and Millwall on 16 September 2025 in the EFL League Cup ("**the Match**"). The Match took place at Crystal Palace's stadium, Selhurst Park.
2. The Regulatory Commission met via a Teams call on Wednesday 18 February 2026, commencing at 9:30am. The Commission comprised Mr Christopher Stoner KC (Chair), Mr Daniel Mole and Mr Matthew Wild. Mr Paddy McCormack, Judicial Services Manager acted as secretary to the Commission, and we record our thanks to him.
3. By an Amended Charge Letter ("**the Charge Letter**") dated 2 December 2025, Millwall were charged with the following breaches of Rule E21:

(1) *“It is alleged that in or around the 11th and/or 80th minute of the Match, Millwall FC failed to ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) attending any Match do not behave [in any] way which is improper, offensive and/or abusive, contrary to FA Rule E21.1.”*

(2) *“It is alleged that in or around the 11th and/or 80th minute of the Match, Millwall FC failed to ensure that spectators and/or its supporters (and anyone purporting to be its supporters or followers) do not conduct themselves in a manner that is prohibited by FA Rule 21.1, in circumstances where that conduct is discriminatory in that it includes a reference, whether express or implied, to disability, contrary to FA Rule E21.4.”*

4. By its Reply Form, which is dated 10 October 2025, but which we have assumed is properly dated 10th or 12th December 2025, Millwall identified that it denied the Charges, but elected to have the Charges dealt with at a paper hearing.

5. By an accompanying written submissions document, entitled ‘Response to Charge’ and dated 10 December 2025, Millwall identified its detailed position at paragraph 1.4. where it stated:

“The Club admits the Charges insofar as they refer to the chanting in the 11th minute of the Fixture. The Club denies the Charges in relation to the alleged chanting at or around the 80th minute of the Fixture ... on the ground that there is insufficient evidence to show the Club breached the FA Rules ...”

6. At paragraph 11 of its written submissions on sanction, The FA refers to this stance, taken by Millwall and says:

“The FA accepts that position and invites the Commission to proceed to sanction on the basis of the chanting having occurred in or around the 11th minute of the Match only.”

7. The Commission construes this as a concession, on the part of The FA, of the allegations relating to chanting in the 80th minute. We note that in the letter dated 18 September 2025 from Paul Sayer, Head of Operations and Safety Officer, it is said:

“Separately, we acknowledge that during the 80th minute of the match, a section of Millwall supporters engaged in chanting directed at Crystal Palace fans, specifically: ‘You’re just the South London spastics’. The Club recognises that this language is ableist and wholly unacceptable.”

8. The language of the chant is that referred to in Match Official’s report, which refers to the 80th minute and differs from the chant in the 11th minute, which was *“you know what you are, you know what you are, South London spastics, you know what you are.”* However, in Millwall’s ‘Response to Charge’ submissions, it is said at paragraph 3.2. that the Club mistakenly acknowledged chanting in the 80th minute and in fact were referring to the 11th minute of the Match.
9. However, in view of the concession referred to above, the Commission has proceeded on the basis the ‘active’ Charges are limited to the chanting in the 11th Minute, which Charges Millwall has admitted.
10. Rule E21 provides (as relevant):

“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.

...

E21.4. 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.*

E21.6. For the avoidance of doubt Rule E21 shall apply to the conduct of both a Club's home and/or away supporters."

11. As is evident from the wording of Rule E21.5, the defence afforded by that Rule is not available to Millwall, given it has admitted a charge pursuant to Rule E21.4. In its written 'Response to Charge' submissions, Millwall have, however, stated at paragraph 3.1: *"The Club admits these Charges, but seeks to rely upon the due diligence defence at Rule E21.5 by way of mitigation as it took all reasonable steps in the circumstances to prevent such incidents occurring ..."*

12. In the case of *The FA v Millwall*¹ another Commission said:

"In [a case where relevant conduct is discriminatory] the extent to which the club used all due diligence to discharge the responsibility set out in FA Rule E21 goes only to mitigation."

Accordingly, we have had regard to Rule E21.5 as part of Millwall's mitigation, but principally in the context of our review of the factors identified below, including those referred to in the Sanction Guidelines recited below, in particular the 4th and 7th factors which relate directly to Millwall's actions in advance of the Match, at the Match and subsequent to the Match, including by reference to the current Action Plan that is in place (as referred to below).

13. Ahead of the Commission meeting we had all carefully considered the 153-page bundle of papers presented to us, as well as reviewing the video clips of the Match relating to both the 11th and the 80th minutes. What is stated in these Written Reasons is necessarily a summary of the evidence. Simply because a particular comment or document is not referred to does not mean that comment or document has not been considered: we have considered the entire bundle and the video evidence.

14. The evidence relied upon by The FA in support of the Charge comprised:

¹ Chair: Graeme McPherson KC, Hearing 20 June 2025, at paragraph 14.

- 14.1. A short witness statement from the Football On-Field Regulation Manager.
 - 14.2. An extraordinary incident report from the Match Referee dated 17 September 2025.
 - 14.3. Video clips from the 11th and 80th minutes of the Match.
 - 14.4. A letter from the Football On-Field Regulation Manager to Ms J Newman, the Club Secretary of Millwall dated 17 September 2025.
 - 14.5. A letter from Mr Paul Sayer, Head of Operations and Safety Officer at Millwall dated 18 September 2025; and
 - 14.5. The FA Sanction Guidelines.
15. The FA also provided written submissions on sanction dated 14 January 2026 and copies of Written Reasons from previous Regulatory Commission decisions in *The FA v Millwall* (Chair: Abdul S Iqbal KC), the hearing date being 13 September 2023 (“**the First Millwall Breach**”) ; *The FA v Millwall* (Chair: Graeme McPherson KC), the hearing date being 20 June 2025 (“**the Second Millwall Breach**”) and *The FA v Kings Lynn Town FC* (Chair: Simon Parry), the hearing date being 11 August 2025). The first two of these Written Reasons from previous Regulatory Commissions are both of considerable relevance and will be referred to below: that is because both involve previous, recent, breaches of Rule E21 by Millwall, the first resulting in the imposition of an Action Plan and the second resulting in the imposition of an amended and enhanced Action Plan and a fine, in the sum of £15,000.
16. The evidence relied upon by Millwall before us comprised:
- 16.1. Written Submissions in the form of the document entitled ‘Response to Charge’ dated 10 December 2025.
 - 16.2. A witness statement of Paul Sayer, Head of Operations and Safety Officer, dated 8 December 2025
 - 16.3. A witness statement of Mark Fairbrother, Managing Director, dated 8 December 2025.
 - 16.4. A witness statement of Jason Vincent, Safeguarding and EDI Lead, dated 8 December 2025
 - 16.5. An Email from Millwall to Crystal Palace F.C. dated 11 September 2025.
 - 16.6. A summary of Millwall’s pre-match meeting dated 11 September 2025.
 - 16.7. Millwall’s preview of the Match
 - 16.8. The ‘All Wall’ campaign page from the Club’s newsletter.
 - 16.9. The ‘All Wall’ campaign page on the Club’s website.

- 16.10. The Club's 'X' and 'Facebook' posts from 15-16 September 2025.
- 16.11. The Club's Instagram stories from 15 September 2025.
- 16.12. The Club's app and Instagram push notifications data from 16 September 2025.
- 16.13. An email from Christine Dowdswell/David Nichol to The FA dated 17 October 2025; and
- 16.14. A copy of Mr Graham's review of the Action Plan implementation dated 19 November 2025.

The Charges relating to the 11th minute chanting

- 17. As relevant, in the context of The FA's concession that it was not pursuing allegations relating to the 80th minute of the Match, the facts providing the background to the admitted Charges can be simply stated.
- 18. The Match was one which took place in the EFL League Cup on 16 September 2025. As was said by The FA's On-Field Football Regulation Manager in his analysis of the video of the 11th minute of the Match, which was contained in paragraph 5 of his statement:

"Eight seconds into the clip, the camera cuts to the [Crystal Palace] #6. At this point [Crystal Palace] supporters can be heard chanting "South London is ours, South London is ours, fuck off Millwall, South London is ours." This chant is immediately repeated once more by the [Crystal Palace] fans. Directly following the conclusion of the [Crystal Palace] chant, [Millwall] supporters begin chanting in reply "you know what you are, you know what you are, South London spastics, you know what you are", which is also repeated once more in full."
- 19. The Commission accepts this is an accurate statement as to what was chanted. The Commission also finds that what was chanted by the Millwall supporters can clearly and distinctly be heard on the video clip.
- 20. That this chant happened is, rightly, accepted by Millwall when it says in its Response to Charge document *"The Club admits the Charges insofar as they refer to chanting in the 11th minute of the fixture"*.

21. In the Commission's view, there is no doubt that both Charges were rightly accepted by Millwall. The reference in the chanting to 'South London spastics' by Millwall supporters was, in the Commission's view, clearly improper, offensive and abusive, as well as being discriminatory in including a reference to disability. The Commission considered the chanting to be abhorrent, particularly distasteful and of a nature that can only be condemned and reflect very poorly indeed on those chanting, as well as on Millwall as a Club.
22. The Charges pursuant to Rules E21.1 and E21.4 being admitted in respect of the chanting in the 11th minute, the Commission's principal role is to consider the appropriate sanction.

Sanction Guidelines

23. Before we turn to the information we have been provided which is relevant to the matters to be considered on sanction, in addition to Millwall asking the Commission to have regard to Rule E21.5 as a matter of mitigation, we must also refer to the FA Guidelines on Sanction.
24. The FA's Policy and Guidance on the Regulation of Discriminatory Conduct by Spectators (Rule E20.1) ("**Sanctions Guidelines**") draws a distinction between a first offence and second or further offences. For the reasons identified above, namely the 2023 and 2025 Regulatory Commission decisions involving breaches of Rule E20.1 by Millwall, we are sadly considering a third offence. In the narrative of the document, before Annex 1 which is referred to below, the Guidance says:

"Repeat offences will be treated with the utmost seriousness, and there will be a presumption that a further action plan will not be appropriate. Whilst a Regulatory Commission may impose any penalty as provided by paragraph 40 of Part A to the Disciplinary Regulations, in such circumstances a Regulatory Commission shall consider imposing a financial penalty and/or a stadium closure (whether partial or full)."

The reference to paragraph 40 is properly construed as a reference to paragraph 41 as the Regulations appear in the current FA Handbook.

25. This guidance differs from the guidance for first offences, where the emphasis is on putting in place an Action Plan, the central purpose of which is to focus on improvements that can be made by a particular Club as to the steps it can take in order to minimise the prospects of a similar incident happening again in the future.

26. Annex 1 to the Sanction Guidelines, in the section on Second or Further Offences states:

“Second or further offences will be treated with the utmost seriousness.

There will be a presumption that the imposition of a further Action Plan shall not be appropriate (if the offence has occurred either during the period of the previously imposed Action Plan or within a year of the expiration of the said Plan).

A Regulatory Commission may impose any penalty as provided by paragraph 40 of Part A to the Disciplinary Regulations.

In particular, a Regulatory Commission shall consider imposing any combination of:

- *A financial penalty in accordance with Table 1 above.*
- *The closure of a stand (or part thereof) of a Club’s stadium for a specified number of Matches (“**Partial Stadium Closure**”); or*
- *The closure of a Club’s stadium for a specified number of Matches (i.e. the playing of a Match or Matches without spectators being present (“**Full Stadium Closure**”))*

A Regulatory Commission will have due regard to the circumstances and seriousness of the incident when determining the appropriate sanction (to include the level of any financial penalty that may be imposed). In so doing, the Regulatory Commission will consider a range of factors to include the following:

1. *The number of supporters involved.*
2. *The nature of the behaviour of those involved.*
3. *The duration of the incident(s)*
4. *Whether the Club (and/or its officers):*
 - (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(s) involved.*

(d) Took sufficient action against those supporters responsible where those individuals were identified.

5. *Whether the Club cooperated with The FA*
6. *The previous disciplinary record of the Club or its Participants 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.”*

27. Two points arise from the above citation from the Sanctions Guidelines which require an explanation. The first is that the definition of a ‘Relevant Breach’ which for the purposes of the Sanctions Guidelines is identified at the outset, where it is said:

“These guidelines shall apply where a Club is found in breach of Rule E20.1 in circumstances where the offending conduct, words, or behaviour of persons purporting to be its supporters or followers includes a reference, where express or implied, to any one or more of ethnic origin, colour, race, nationality, religion or belief, gender, gender reassignment, sexual orientation or disability.”

The reference to Rule E20.1. is properly understood, in the current FA Handbook, as a reference to Rule E21.1.

28. The second point is that in stating that the Regulatory Commission shall consider imposing any combination of the matters then stated, which includes “a financial penalty in accordance with Table 1 above’, as a Club playing in the Championship, the range of financial penalty for Millwall provided in Table 1 is £5000 - £75,000.

29. We are mindful that the Sanction Guidelines provide that we may impose any penalty provided by paragraph 41 of Part A to the Disciplinary Regulations, which includes an unlimited fine, but that paragraph 42.1 provides:

“In imposing penalties, a Regulatory Commission must apply any:

Applicable standard sanctions as may be communicated by The Association from time to time. A Regulatory Commission may only depart from such standard sanctions where it deems it appropriate having regard to the facts of an individual case (for example, where a particular act of Misconduct is sufficiently serious that the guideline

sanction would not constitute a sufficient penalty for the Misconduct that has taken place).

30. Whilst we are considering Sanction Guidelines as opposed to standard sanctions, we approach the issue of sanction on the basis the fine range in this case is £5000 - £75,000 unless we deem it appropriate, having regard to our consideration of the facts as stated below, that a fine of up to £75,000 is not a sufficient penalty for the admitted breach of Rules E21.1 and E21.4.

31. We do not forget the fact that a breach of Rule E21.1 is also admitted, being a precursor to a breach arising under E21.4. However, we consider that matters such as the seriousness of the breaches of Rule E21.1, the culpability of Millwall in that breach and the harm caused will all inherently be part of the various matters we are directed to consider within the Sanction Guidelines.

The Evidence

32. This hearing, at Millwall's election, has proceeded as a paper hearing. In signing its Reply Form Millwall expressly acknowledged that it did not request an opportunity to attend a Commission for a personal hearing, whilst also acknowledging that the charges will be dealt with on the contents of the documents served by Millwall and The FA.

33. In this context, from Millwall's perspective, we are dependent upon it to have provided all the evidence it wants us to consider when determining the appropriate sanction. Millwall have had both an opportunity to attend a personal hearing, which they elected not to do, and also the opportunity to present us with all the documentation that Millwall considers we should consider.

34. Any comments in the following paragraphs about a lack of evidence on a point must be considered in this context.

Factors in the Sanction Guidelines

35. Rather than recite in detail the evidence given in the statements of Mr Sayer, Mr Fairweather and Mr Vincent and the submissions contained in the 'Response to Charge' document, all of which we have carefully considered, we shall proceed by considering the various factors identified in the Sanction Guidelines and, in so doing, refer to the evidence and submissions served on behalf of Millwall as appropriate.

The number of supporters involved

36. We do not have any CCTV of the Millwall supporters at the time of the incident. Therefore, in assessing the number of supporters involved, the Commission is primarily dependent upon listening to the audio of the clip of the Match from the 11th Minute.

37. That video clip, in the unanimous view of the Commission, reveals that the chant could clearly be heard such that we are satisfied that the number of spectators involved is best described as 'substantial'.

38. We are mindful that Mr Sayer, in his statement, says:

"I did hear a small amount of discriminatory chanting, specifically the chant "South London Spastics". I could not see where it came from but did not sound like it was a lot of people."

39. Whilst we do not have the benefit of asking Mr Sayer questions about this statement, from what we have heard on the audio of the video clip, we cannot accept Mr Sayer view, if he was intending to say that the chant was not coming from a significant number of supporters.

40. We are also mindful that Mr Fairbrother, in his statement, says:

"For the alleged incident in the 11th minute, I can confirm that I heard the discriminatory chanting coming from a small group of fans. The refrain was repeated twice and lasted for less than 10 seconds before it was drowned out by the vast majority of Millwall fans chanting something else."

41. In terms of the audio, for the reasons we have stated, we reject the suggestion, if that is what is intended, that the chanting was other than from a substantial number of fans (as distinct, for example, from a small percentage of the overall travelling support, the number of whom we are unsure). However, in listening to the video clip, in so far as Mr Fairbrother suggests the chant was 'drowned out' by the majority we consider he is just mistaken: the audio clearly identifies that after the offending chant there was a period of quiet.

The nature of the behaviour of those involved

42. The behaviour was in the form of chanting, which was repeated twice and in its ableist nature was improper, deeply unpleasant, discriminatory, unnecessary abusive and offensive.

The duration of the incident

43. The offensive chanting occurred for approximately 11 seconds in the 11th minute of the Match.

Whether the Club (and/or) its officers:

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

44. In considering this factor, and those identified in the sanction guidelines as (b), (c) and (d) of factor 4, we had particular regard to the enhanced and Amended Action Plan that was put in place by the Regulatory Commission which considered the Second Millwall Breach, which Commission made its determination in June 2025.

45. The Commission considered that in determining what was an appropriate and proportionate sanction, it was necessary when considering these points to have regard to the existing Action Plan and how Millwall had responded to the imposition of that Action Plan. In this regard, as a general observation, we had all read carefully the 'Safety and Security Advisor – Inspection Report' prepared by Mr Steve Graham, dated 19 November 2025, in which he assessed Millwall's compliance with the Amended

Action Plan. Mr Graham was largely positive in that report, opening his concluding comments by stating:

“It was clear from my conversations with the [Millwall] staff that they are all committed to make Millwall a more inclusive club and one that is actively anti-discriminatory. At the same time, there is a recognition that some supporters of the club let them down by not living up to the ambition of [Millwall].”

46. Returning to the factors in the Sanction Guidelines, noting that this was an away fixture, we find that Millwall's preparation and planning was generally good.
47. We noted the minutes of the internal meeting held on 11 September 2026, involving at least 7 individuals from Millwall and also Mr Sayer's statement in which he records attending a pre-match planning meeting with the Head of Operations and Safety Officer at Crystal Palace, at which staffing levels, ticketing numbers, egress plans, potential holdbacks, social media messaging, PA system use and CCTV footage sharing were discussed.
48. It is not altogether clear to the Commission when the Match was designated as 'high – risk' by Millwall, but from paragraph 4 of Mr Sayer statement it appears this was at least in the week before the Match, when the police also designated the game as high risk. We also note that the internal meeting on 11 September 2026 refers to the Match as a 'high – risk fixture'.
49. However, having regard to the Action Plan arising from the Commission considering Millwall's Second Breach, and in particular paragraph 14 of that Action Plan there does not appear to have been any request made by Millwall that Mr Sayer, as the Club's Safety Officer (or a suitably qualified person) be permitted to attend the fixture in Crystal Palace's Control Room.
50. This is disappointing, given it is part of the enhanced Action Plan. If such a request was in fact made, for the reasons already identified in respect of the evidence presented to us in this paper hearing, then the burden was on Millwall to prove that to us.
51. Finally, in terms of pre-Match planning, we note:

- (a) That Millwall informed Crystal Palace of its robust communications strategy ahead of the Match.
- (b) That because the Match was designated a high-risk fixture, Mr Sayer travelled to the Match with senior members of the security staff as well as the Supporter Liaison Officer.
- (c) That, in accordance with the enhanced Action Plan, messaging was sent to those attending and published on the website, under the All 'Wall campaign, which complied with paragraphs 12 and 13 (the relevant documents being at pages 43 – 50 of our bundle).

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

52. In respect of this factor, we concluded that Millwall did not take all reasonable steps.
53. Firstly, and following on from the point already made about there being no evidence of compliance with the enhanced Action Plan of a request being made to Crystal Palace that the Safety Officer be allowed to attend the Match in the Control Room, that meant that there was no evidence that paragraph 14(b) of the Action Plan had been complied with.

54. Instead, Mr Sayer, as Millwall's Safety Officer, says in his statement:

"... I positioned myself in the disabled area of the away end, specifically on the segregation line between the home and away supporters. This location provided me with a clear view of the Millwall supporters and allowed me to monitor crowd behaviour effectively."

55. The Commission could not understand why Mr Sayer decided to position himself at this point during the Match. Nor could we understand what communications he had during the Match. His statement accepts "*I did hear a small amount of discriminatory chanting*" but is silent as to what action he took having heard it. Discriminatory chanting, or perhaps in the singular it would be shouting, by just one individual requires to be addressed. Instead, we are simply told that having taken a position which allowed Mr Sayer "*to monitor crowd behaviour effectively*" he "*could not see where [the discriminatory chanting] came from*".

56. We would have expected communications with the Control Room to have been in place to see if they had CCTV of the incident, so that action against any identifiable supporters could be taken. Whilst we now know that no such CCTV exists, we have no reason to believe this would have been known by Mr Sayer during the game. Indeed, we note that he, quite properly, requested CCTV footage from Crystal Palace after receipt of The FA's letter seeking observations "*that might assist in investigating the allegations*", which we take to include reference to the allegations relating to events in the 11th Minute.

57. We should add that had the Safety Officer been in the Control Room, when the chanting occurred in the 11th minute, we would have expected a request to have been made for the CCTV to be turned to the Millwall fans. Whether or not that could realistically be achieved in time or not is a different matter.

58. Equally, that Safety Officer could have requested that an announcement be made, even if only in the away supporters' area, that discriminatory language will not be tolerated and a request could have been made to get stewards to the area to oversee the Millwall supporters in the event of a repeat chant.

59. We also note in the Action Plan there is a requirement for at paragraph 15(d) to:

"Provide each travelling steward with an appropriate body worn camera (which will be activated in circumstances where there is a perceived or reported risk of misconduct) in order that they may deter, detect and evidence any incidents of discriminatory or anti-social behaviour".

60. In the letter dated 18 September 2025, in response to the request for observations from The FA the previous day, Mr Sayer said:

"As the Match occurred at Selhurst Park, we were not in control of the stewards or security apparatus. Our Security Officers heard the chanting and responded by recording on their body worn cameras. We are still analysing the footage to identify any individuals involved in any of the chanting and we have also been liaising with the police to identify perpetrators. At no point during or after the match were we formally notified by Crystal Palace FC or match officials regarding the chanting."

61. It is very disappointing to the Commission that notwithstanding the clear statement that Millwall's travelling stewards heard the discriminatory chanting and that they duly activated their cameras, the documentation prepared for the purposes of this Commission hearing is completely silent: (1) there are no statements from the stewards; and (2) whilst it was wholly understandable that the footage was still being analysed the day after the Match, the footage itself together with an explanation of what it did, or did not, show has not been provided.

62. In view of the above-mentioned points, allied to Mr Sayer statement, which says: "*At no point during this post-match meeting did [Crystal Palace's Safety Officer] raise any concerns about discriminatory chanting or abusive behaviour by Millwall supporters*" we doubt that paragraph 15(c) of the Action Plan has been properly executed. If it had been the stewards who heard the chanting and activated their cameras would have communicated this to Crystal Palace as the host club.

(c) Took all reasonable steps in identifying the supporters involved

63. In some respect we have already covered this when considering the last factor. Ultimately no supporters were identified.

64. Given we are told all the supporters with tickets from Millwall were season ticket holders, we are disappointed not to have seen evidence of post-match communications:

- (a) Condemning the chant that took place; and
- (b) Inviting anyone who had information as to what had occurred to contact the Club, whether anomalously or otherwise. This, we anticipate, could have been achieved under the 'Hear Hate? Don't Hesitate' campaign. If not, no doubt an appropriate request could easily have been made.

65. Whilst we accept Mr Sayer's evidence, recited above, as to his post – match meeting with his counterpart at Crystal Palace, paragraph 16 of the Enhanced Action Plan states:

“Following each away fixture, the Club will request in writing feedback from the host club’s safety and security team regarding any reports or observations of discriminatory chanting or misconduct involving supporters.”

66. Given Mr Sayer accepts in his statement that he heard discriminatory chanting, as was also the case with Millwall’s stewards, allied to the request for observations received from The FA the day after the Match, we are surprised not to have been provided with evidence of this feedback and the feedback itself.

67. This is particularly disappointing given one of the recommendations in Mr Graham’s report, on which Millwall rely heavily in their documentation is:

“As part of the post-away match process, the Safety Officer should actively seek feedback on the behaviour of their supporters, and the email sent to the host Safety Officer seeking this feedback should be held in the matchday folder. It would be unfair to hold [Millwall] accountable for the actions of the host clubs, but they can integrate this action into their processes.”

68. Finally, on identifying the supporters involved, we note the evidence of Mr Sayer that he requested relevant CCTV footage from Crystal Palace, but Crystal Palace had not been able to provide any relevant footage as the cameras, which Crystal Palace did not control, were not facing the Millwall supporters.

(D) Took sufficient action against those supporters responsible where those individuals were identified

69. This factor does not arise, as for the reasons we have stated, no offending supporters have been identified.

5. Whether the Club co-operated with The FA

70. As far as we are concerned the Club has co-operated with The FA. We note that when asked for its observations by letter from The FA dated 17 September 2025, a full response was sent the following day from Mr Sayer.

71. Further, whilst the Reply form denies the Charges, the accompanying Response to Charge document made it plain that the denial related to the alleged incident in the

80th Minute, which, as stated above, is not before us, the point having been conceded. However, the Charges relating to the 11th minute were accepted from the outset.

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

72. This is the third time that Millwall has breached Rule E21. The First Millwall Breach related to a Match in April 2023 and related to discriminatory chanting relating to religion; the Second Millwall Breach related to a Match (also at Crystal Palace) in March 2025 and related to discriminatory chanting relating to sexual orientation.

73. It suffices to say, at this stage, that the previous disciplinary record of Millwall, as relevant, is very poor and a matter for serious concern.

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

74. As we have previously stated, in the present instance an Action Plan was imposed by the Commission which considered the First Millwall Breach. The Commission which considered the Second Millwall Breach considered that in all the circumstances the presumption against a further Action Plan was rebutted and imposed an enhanced Action Plan, which is the one we have been speaking to in these Written Reasons.

75. Inevitably, we have been picking up on points where we do not feel that the Enhanced Action Plan was followed to the letter in respect of the Match. Whilst that is disappointing and warrants sanction, it is also important that we recognise the considerable good work that has been undertaken by Millwall as reflected in the report of Mr Graham dated 19 November 2025.

76. There is little point in such reports being prepared if notice is not taken of them and we do have regard to the fact that whilst progress toward complete compliance remains, Mr Graham said:

“After my earlier visit to [Millwall] reviewing their progress against the previously issued Action Plan, I wrote:

‘In many respects, the club exceeds the requirements of the action plan and are to be encouraged on their ongoing journey.’

My final reflection from this visit is that the club continues to make progress in this journey ...”

77. Mr Graham also states, as we have already quoted, that Millwall “*staff ... are all committed to make Millwall a more inclusive club and one that is actively anti-discriminatory.*” He also referred to “*multiple examples of the club being proactive in tackling discriminatory behaviour*”.

78. Thus, whilst we have made criticisms, to be fair and proportionate we must place those in the context of Millwall’s performance in implementing the entirety of the initial Action Plan and the enhanced Action Plan as reflected in Mr Graham’s report.

Other factors

79. The numbered factors in the Sanction Guidelines are not an exhaustive list. Indeed, they are introduced in terms where the Commission will consider a range of factors, to include those listed in the Sanction Guidelines.

80. Factors which may be relevant when considering a breach of Rule E21.1 alone, such as the seriousness of the breach and the culpability of the Club, we determined to have been subsumed into the above-mentioned factors. In addition, it falls to be said that any breach involving discriminatory chanting is serious. As regards harm, we consider that the nature of the chant was one which would have caused offence and clearly tarnishes the game of football.

Sanction

81. There was a marked difference on the submissions between the parties as to what stance it was submitted we should adopt in sanctioning Millwall. On the part of Millwall, it was said, at paragraph 5.3. of the ‘Response to Charge’:

“The Club is committed to ensuring that its fans act properly at all times and communicates this to supporters consistently and in line with the Action Plan, as mandated by The FA and it respectfully submits that there is little else it can do above

and beyond abiding strictly by its Action Plan, continuing to educate supporters and striving, as the Club always does, to improve standards. The Club seeks that the Commission recognises this, exercises its discretion not to impose a financial penalty upon the Club and takes no further action against the Club except to extend the period for which the Club is under the Action Plan.”

82. In contrast, The FA, in its written submissions on sanction emphasises to the Commission that this is the 3rd breach by Millwall of Rule E21. The FA states that Millwall are to be commended for their compliance with the extant Action Plan. However, given this is the 3rd Charge the Commission is invited to impose a significant financial penalty. Furthermore, The FA's clear stance is that we should not revise or extend the Action Plan as under the Sanction Guidelines this breach must be treated with the utmost seriousness and to do so would not reflect this. Nor would it reflect the seriousness of the Second Millwall Breach and this breach taking place with extant Action Plans in place, leading, say The FA to the *“conclusion that Actions Plans alone have not been entirely effective in preventing discriminatory behaviour from its spectators/supporters”*. Finally, in line with the Sanction Guidelines, The FA also invites us to consider the imposition of either a partial or a full stadium closure. Anything less, The FA submits *“would fail to adequately address the seriousness of the Club's repeated breaches of FA Rule E 21 or serve as a sufficient deterrent in respect of discriminatory behaviour by supporters/spectators”*.

83. On the point of a partial or whole stadium closure, The FA referred us to the written reasons in the matter of *The FA v Kings Lynn Town* from August 2025. However, we do not derive any assistance from those Written Reasons. At paragraph 17 of the Written Reasons six recommendations are identified from an audit undertaken by The FA, as to which the Commission in that case said:

“These recommendations go to the heart of trying to prevent discriminatory abuse from spectators towards players, officials and opponents. Their importance cannot be understated, and we would expect to have seen the Club enthusiastically embracing those recommendations. As it is, there is no evidence before us that any of those recommendations have been adopted.... Therefore, we are driven to the conclusion that the original Action Plan has not been adopted as fully as it should have been which must be treated as an aggravating factor.”

84. The reference to the *Kings Lynn Town* matter highlights the danger of relying on other Commission decisions, which are decided on different facts and contain no point of principle, and which are not, in any event, binding upon us. We consider that the factual pattern of this matter could not be more different from the *Kings Lynn Town* matter. Here, as evidenced by the report of Mr Graham, Millwall have made real efforts, with real progress to address the matters in the Action Plan, even if, as we have highlighted in these Written Reasons by reference to the Match, we do not consider they have yet reached complete application of all points raised in the enhanced Action Plan imposed by the Commission considering the Second Millwall Breach.

85. We have very carefully considered what the appropriate sanction should be. We understand The FA's call for a partial or whole closure of Millwall's stadium given that this is the 3rd breach, but we think the mitigation that is offered by Millwall's work to date in seeking to meet the original Action Plan and the enhanced Action Plan is sufficient for us to determine, in our discretion, that it would not be appropriate to take such a step in this instance.

86. However, whilst there is mitigation in terms of the work that Millwall have achieved in respect of the Action Plan and the enhanced Action Plan, as identified in Mr Graham's report, we find this does not amount to mitigation (whether called 'due diligence' mitigation or otherwise) to the extent contended for by Millwall in its Response to Charge submissions. This is for the reasons identified in the paragraphs above where in respect of the Match there were, in our view, clearly failings in the implementation of the extant Action Plan. Whilst we commend the positive steps undertaken by Millwall, we reject any suggestion they had fully discharged their responsibilities.

87. We should add that we considered what impact a partial or whole closure would have on Millwall and its supporters and, in particular, the deterrence effect of such a closure. Our decision may well have been a different one if the Match had been a home fixture for Millwall.

88. However, on balance, we consider that having regard to all the circumstances of this matter, the appropriate course is:

(a) To impose a significant financial penalty. We shall detail this below.

(b) That, notwithstanding the submissions on behalf of The FA on sanction, the imposition of a previous Action Plan after the First Millwall Breach, which was

amended and enhanced after the Second Millwall Breach, and the presumption in the Sanction Guidelines that for a second of further breach the imposition of an Action Plan should not be appropriate, in all the circumstances (alongside the significant financial penalty) a further refinement of and extension of the life of the enhanced Action Plan is appropriate.

89. We recognise that like the Commission considering the Second Millwall Breach we are therefore making a determination contrary to the presumption identified in the Sanction Guidelines. However, as with any presumption, it is a rebuttable presumption and we have concluded, after careful consideration, that it is rebutted in the present circumstances.
90. The principal reason we have reached for our conclusion is to reflect the good work Millwall has undertaken to date to meet the extant Action Plan, as reflected in the work of Mr Graham in the guise of his report assessing Millwall's compliance. We consider that the extant Action Plan has worked to a considerable extent and the cause of seeking to remove, in so far as it is possible to do so, discriminatory chanting is best served by it being further refined and extended in duration as opposed to simply closing part or the entirety of the stadium for one or two fixtures, especially as given the financial impact of such a step, it may not be proportionate to then also impose such a significant financial penalty as we have done.
91. We also do not consider it appropriate to simply impose a significant fine on Millwall and do nothing about the fact the current enhanced Action Plan is ending soon, namely at the end of the current season. It seems to us that an extension is a far more appropriate, proportionate and constructive way of dealing with the matter and that such an extended Action Plan is properly to be refined, such that in all the circumstances the presumption of no further Action Plan identified in the Sanction Guidelines is rebutted.
92. We append the amended Action Plan which will remain in place until the end of the season 2026/2027 and commence with immediate effect as soon as this decision and Written Reasons are published. The changes we have made principally aim to incorporate the recommendations made by Mr Graham at the end of his report.

93. We must acknowledge, however, that the amendments made by the Commission which considered the Second Millwall Breach included two further terms specifically directed at away fixtures, namely the terms which became paragraphs 13 and 14. This was of particular relevance as the Match was an away match for Millwall. Whilst paragraph 13 was complied with, for the reasons stated above, paragraph 14 was not. After careful consideration, however, we feel that this failure is best reflected as feeding into our consideration of the quantum of fine, allied to the belief that given Millwall's statements as to their commitment contained in the papers, which was reflected in Mr Graham's views, this rather basic error will not happen again.
94. Before turning to the quantum of the fine, we should identify that in considering sanction we have taken into account such mitigation as we consider is available to Millwall. Indeed, we have already referred to the fact the good work that has been implemented under the original Action Plan and the enhanced Action Plan, as reflected in Mr Graham's report and this mitigates against the closure of a part or the whole of Millwall's stadium.
95. The other principal point of mitigation, for which Millwall deserve credit, as recognised by The FA in its Submissions on Sanction at paragraph 81, is the fact that on the Charges we have ultimately been tasked with considering, Millwall accepted the Charges. Indeed, the acceptance was at the first available opportunity.
96. As to the level of the fine, our starting point was to consider that a fine of £60,000 was appropriate to reflect the seriousness of this being the 3rd occasion on which Millwall have breached Rule E21 for discriminatory chants. Having taken account of mitigation, we consider that the appropriate financial penalty is a fine of £45,000.

Costs Application

97. Before concluding, we need to deal with an application made on behalf of Millwall that The FA pay £2,742.50. We reject that application.
98. The basis of the application is that having received an initial Charge Letter Millwall instructed lawyers to prepare the response, which was due on 4 December 2025. However, on 2 December The FA amended what was said to be a 'typographical error' in the Charge Letter to include reference to the incident in the 11th minute of the Match. This, it is said, caused Millwall's lawyers to have to amend the statements and the

Response to the Charge and Millwall seeks recovery of the £2,742.50 it is said this cost it.

99. Whilst there are evidential issues relating to the proof of the £2742.50 claimed, as we have not been provided with any invoice or description of how the sum was calculated, that does not matter for we agree entirely with the submission made by The FA at paragraph 87 of the Submissions on Sanction document. This refers to paragraph 52 of the Disciplinary Regulations and provides:

“Save where otherwise provided, any costs incurred:

52.1. in bringing or defending a Charge will be borne by the party incurring the costs.”

100. We have not been referred by Millwall to any provision it relies upon which provides otherwise. Accordingly, we reject the application as we have no power to award such costs, although we equally have no evidence of the sum claimed.

101. That does, however, leave the costs of the Commission itself, which we do have power to award. Given that this is the 3rd occasion on which Millwall have been before a Commission having breached Rule E21, we consider that it is appropriate that they pay the costs of the Commission. However, given the Charges relate to incidents in the 11th and 80th minutes and the Charges relating to the 80th minute have been conceded, we consider that the appropriate order is that Millwall will pay 50% of the costs of the Regulatory Commission.

Order

102. We order as follows:

- (1) Millwall will be subject to an Action Plan in the terms set out in the Appendix to these Written Reasons, which Action Plan shall (a) take effect immediately upon the publication of this Decision and Written Reasons; and (b) shall continue until 12 midnight on the day of Millwall’s last game of the 2026/2027 season.
- (2) Millwall are fined the sum of £45,000.
- (3) Millwall are warned as to their future conduct.
- (4) Millwall’s application for costs in the sum of £2742.50 is rejected.
- (5) Millwall will pay 50% of the costs of this Regulatory Commission.

103. This decision is subject to the Appeal Regulations.

Christopher Stoner KC (Chair)

Matt Wild

Daniel Mole

Dated 19 February 2026.

Appendix

Action Plan for Millwall to be in place until midnight after the last game of the 2026/2027 season.

1) Upon publication of the Regulatory Commission's Decision and Written Reasons and this Action Plan, Millwall Football Club ('the Club') shall communicate via the Club website and via its social Media accounts:

a) The fact and background to the Charges, including the fact that it involved improper, abusive, offensive, discriminatory chanting by Club supporters at a match against Crystal Palace FC

b) The Club's condemnation of the chanting that underpinned the Charges and the fact that it has a zero-tolerance policy towards discriminatory abuse of all kinds.

c) That those responsible for the chanting may have been committing a criminal offence and anyone subsequently identified will be banned

d) The fact that this resulted in the Club being charged and accepting that it was guilty of misconduct under the FA Rules, being fined, being warned as to its future conduct, and having an amended Action Plan imposed upon it for a longer period

e) The Club's intention to continue to develop existing initiatives to make it more inclusive and more proactive in the prevention and detection of any potentially discriminatory or inappropriate words or behaviour in the future, at both home and away fixtures.

2) The Club shall:

a) Forthwith conduct a further full review of its stewarding management, provision, deployments, and quality of stewarding training. In addition existing processes should be closely examined to ensure good 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) Continue to maintain a detailed operational matchday protocol in support of its 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, including consideration of training the Control Room CCTV operators to the SIA standard as well as consideration of 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 and review each fixture accordingly. Such meetings should 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 continue to liaise with the opposition club prior to all fixtures both home and away to exchange relevant intelligence whether directly or via the EFL WhatsApp group:
- i) on any factors which may negatively affect or influence the behaviour of identified club supporters who are or may be attending the fixture (this should include any members of the opposing club whether they be current or former players, backroom staff, directors or club guests who may be potential targets of discriminatory behaviour from the supporters);
- ii) Similarly, the same information should be obtained associated with the opposing club so any appropriate risk assessment can be made and acted upon prior to the fixture
- iii) Such information should then be addressed at the pre-match meeting of both the management group and stewards
- g) The Club's Safety Officer should appraise the match officials before every home game to discuss and evaluate any potential issues relating to crowd behaviour, particularly any discriminatory behaviour, and have in place methods of communicating with match officials should it be necessary as per the matchday protocol referred to earlier in this Action Plan.
- 3) The Club shall review all its safety management plans and policies at least once during the 2025/2026 season (if not already done) and once during the 2026/2027 season.
- 4) The Club shall:

a) Continue to develop proactive supporter initiatives for usage and communication ahead of both home and away fixtures, in addressing the potential for discriminatory or other inappropriate supporter behaviour

b) Continue to develop an ongoing positive dialogue with Kick It Out, the EFL and other local organisations to further enhance their relationship by seeking advice on the development of and ratification of new policies and procedures relating to discriminatory behaviour

c) Develop additional supporter and steward educational programmes in conjunction with “Kick It Out”, the EFL and other local organisations 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.

5) 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 or unacceptable, whether at home or away fixtures

b) Continue to publicise the Club’s “Hear Hate? Don’t Hesitate” text reporting system and The Millwall Foundation Equality Policy on the Club’s website in particular in relation to the procedures and facilities available to attendees at matches for reporting abuse, particularly that of a discriminatory nature.

6) To ensure diverse representation and meaningful engagement the Club will amend the constitution of its Equality, Diversity and Inclusion (EDI) Steering Group/Equality Steering Committee to formally reserve seats for:

a) At least one representative from the Club’s executive leadership

b) A representative from each of the following communities:

i) Ethnically diverse groups

ii) The LGBTQIA+ community

iii) Disabled supporters.

7) The Club shall continue to 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. This shall include a review of the manner in which the All ‘Wall strategy is shared on the club website to ensure that the Club’s anti-discriminatory position is obvious from the link on the website.

8) The Club will deliver at least one monthly feature under the “All ‘Wall” Campaign which promotes inclusivity and/or showcases the Club and Millwall Community Trust’s initiatives. These will be shared across all digital platforms.

9) 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.

10) The Club shall

- a) Introduce an incentive scheme for stewards for a broad range of measures to reward stewards who demonstrate vigilance and professionalism in identifying and reporting discriminatory incidents, pro-activity, good standing with the fans
- b) Embed that scheme within the Club's stewarding training and performance review framework.

11) The Club shall continue to develop and deploy:

- a) Match day public announcements
- 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 proactively target the prevention 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 behaviour is offensive, may be criminal, and will not be tolerated by the Club, and
 - ii) must be supported by clear reporting methods and facilities.

12) Prior to each match (home and away) 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 message 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.

13) In addition to (12) above, in advance of any away fixture (1) that the Club and/or the opposing club considers to be 'high-risk', or (2) for which the Club perceives there to be an increased risk of discriminatory chanting or other behaviour, the Club shall communicate directly to those individuals who the Clubs knows have purchased tickets for the fixture through the Club (whether by text message or other suitable means) a message in plain effective language to the effect:

- a) That the individual is attending the away fixture as an ambassador of the Club and is expected to behave as such, and;
- b) That discriminatory and abusive chanting and behaviour is offensive, may be criminal, will not be tolerated and will, if it occurs, result in any individual participating in such chanting or behaviour being banned from the Club and all future fixtures. Those communications should be sent (1) 4 hours, and again (1) 30 minutes, before the relevant away fixture kicks off.

14) In advance of any away fixture (1) that the Club and/or the opposing club considers to be 'high-risk' or (2) for which the Club perceives there to be an increased risk of discriminatory chanting or other behaviour:

a) The Club shall make a request to the opposing club that the Club Safety Officer (or another suitably qualified and experienced employee of the Club) shall be permitted to attend the fixture in the opposing club's Control Room, and;

b) If such request is accepted, the Club shall ensure that its Safety Officer (or another suitably qualified and experienced employee of the Club) attends the fixture in the opposing club's Control Room and gives such assistance as is required in the event of misconduct or potential misconduct by the Club's supporters. If such request is rejected, the Club shall request a direct line of communication into the opposing club's Control Room so they can liaise with the opposing club and make them aware of any incidents that may be occurring.

The request and response shall be kept on the Matchday folder, as shall a report by the Safety Officer (or another suitably qualified and experienced employee at the Club) of any incidents of misconduct or potential misconduct that the Safety Officer (or other suitable qualified and experienced employee of the Club) shall have provided assistance in respect of, including the nature of the incident, details of the assistance offered and details of action taken.

15) The Club shall (at the Club's own cost and not that of the host Club) make all reasonable efforts

a) To send (together with the Club's Supporter Liaison Officer (SLO)) a minimum of two travelling away stewards to any Club away fixture deemed to be 'high risk';

b) Provide the host Club with full contact details of the Club's SLO and travelling stewards

c) Ensure that the Club's SLO and travelling stewards liaise throughout the fixture with the host club, its Safety Officer and its stewarding operation to provide close liaison and communication with the travelling fans at the stadium and act as a communicational conduit between the host club and the Club's travelling fans and in doing so seek to formulate evidential reports concerning any poor behaviour associated with the travelling fans in order to develop and collate appropriate intelligence on the Club's travelling fan base

d) Provide each travelling steward with an appropriate body worn camera (which will be activated in circumstances where there is a perceived or reported risk of misconduct) in order that they may deter, detect and evidence any incidents of discriminatory or anti-social behaviour.

e) keep a written record, to be kept on the matchday folder, of the methods of communication adopted by the SLO and away stewards and any other relevant personnel from Millwall used at the fixture

16) Following each away fixture:

a) the Club must request in writing feedback from the host club's safety and security team regarding any reports or observations of discriminatory chanting or misconduct involving Club supporters. This request and the response shall be kept on the matchday folder.

- b) In the event of any incident involving discriminatory chanting or misconduct not being resolved during a fixture and/or those responsible not being identified, to consider after the fixture using appropriate media channels, such as the 'Hear Hate, Don't Hesitate' campaign, to encourage supporters to report to the Club any information they may have relating to the incident.

17) In the event that hate-driven or discriminatory comments are posted in response to anti-discrimination content, the Club will work with the UK Football Policing Unit (UKFPU) and Metropolitan Police to identify and take action against offenders.

18) The Club shall invite The FA to ensure that an FA / EFL Compliance Officer is present at any home or away fixture where, as a result of the match-specific risk assessment, the Club assesses there is a high risk of discriminatory language or behaviour from supporters.

19) For each of the seasons covered by this Action Plan the Club shall prepare and publish via the Club website and via its social media accounts a summary report, detailing:

- a) The number of disciplinary incidents;
- b) The nature of the misconduct; and
- c) Any sanctions imposed.

The sanctions imposed, both by the Club and any Court, shall be sufficiently detailed as to enable supporters to read about the implications that fans have had to face as a result of their actions.

The summary report for each season shall be prepared and published by no later than 30 June following that season's end.