

IN THE MATTER OF A REGULATORY COMMISSION

BETWEEN

THE FOOTBALL ASSOCIATION

and

SOUTHAMPTON FC

and

COVENTRY CITY FC

WRITTEN REASONS OF THE REGULATORY COMMISSION

Regulatory Commission: Sally Davenport (Chair) – Independent Legal Panel Member

Alison O’Dowd – Independent Football Panel Member

Udo Onwere – Independent Football Panel Member

Secretary: Conrad Gibbons – Judicial Services Assistant Manager

Date: 12 January 2026

Venue: Held remotely via Microsoft Teams

Attending: Andrew Phillips, Interim Head of Regulatory Advocates,
The FA – representing The FA

Jim Sturman KC, Barrister, 2 Bedford Row - representing Southampton FC

Katrina Dick, General Counsel, Southampton FC - observer

Katie Smith, Solicitor, Squire Patton Boggs (UK) LLP – observer

Simon Sepesi, Trainee Solicitor, Squire Patton Boggs (UK) LLP - observer

Introduction

1. These are the written reasons of the Regulatory Commission (“the Commission”) that considered two charges (collectively “the Charges” and each a “Charge”) against Southampton FC (“Southampton”) and Coventry City FC (“Coventry”).
2. On 20 December 2025 Southampton played a match (“the Match”) against Coventry in the EFL Championship.

The Charges

3. By letters dated 23 December 2025 (“the Charge Letters”), The FA charged Southampton and Coventry with misconduct amounting to a breach of FA Rule E20.1. It was alleged that following completion of the Match, Southampton and Coventry each failed to ensure that their players and/or technical area staff did not behave in a way which was improper and/or provocative (“the Incident”).
4. The FA designated both cases as Non-Standard because the particular facts of the alleged misconduct was of a serious and/or unusual nature.

5. The FA informed Southampton and Coventry that pursuant to Regulation 13 of the Disciplinary Regulations 2025/26, the Charges had been consolidated and would be determined together at a joint hearing.
6. Together with the Charge Letters, The FA sent Southampton and Coventry the following evidence:
 - Report of the Referee, Adam Herczeg
 - Extract – Essential Information for Clubs 2025/26
 - Video clips of the Incident

Southampton's Response

7. On 2 January 2026 Southampton submitted a Disciplinary Proceedings Reply Form to The FA. It accepted the Charge and asked for the opportunity to attend a personal hearing. It also submitted various witness statements, as detailed below, a document entitled Outline Reply Submissions and the Written Reasons in respect of two previous cases.

Coventry's Response

8. On 2 January 2026 Coventry submitted a Disciplinary Proceedings Reply Form to The FA. It accepted the Charge and asked that the case be dealt with at a non-personal hearing. It did not provide any further evidence or submissions.

Relevant Rules

9. FA Rule E20 states:

“E20 Each Affiliated Association, Competition and Club shall be responsible for ensuring that its Directors, players, officials, employees, servants and representatives, attending any Match do not:

E20.1 behave in a way which is improper, offensive, violent, threatening, abusive, indecent, insulting or provocative;”

The Hearing

10. In advance of the hearing the Commission read the documents referred to in paragraphs 6 and 7 above and viewed the video footage provided to it.
11. Given that the Charges were accepted, the Commission treated them both as proven and reviewed the evidence and submissions purely in order to determine sanction, as set out below.
12. As only Southampton had requested a personal hearing, the Commission dealt with the Charge against Southampton first and then considered the Charge against Coventry on the papers and other evidence.
13. Before hearing oral submissions, the Commission was informed of Southampton’s previous misconduct record for the current and previous five seasons. Similarly, before it discussed the sanction for Coventry, the Commission was informed of Coventry’s previous misconduct record for the same period.
14. The following paragraphs summarise the evidence and the written and oral submissions considered by the Commission. They do not purport to cover all the points made. However, the absence of a point or submission in these reasons should not imply that the Commission did not take that point or submission into account when determining the sanction.

Evidence and written submissions

The Referee's evidence

15. In his Extraordinary Incident Report dated 21 December 2025, the Referee stated that as players and staff were shaking hands on the field of play, there was a confrontation between various players, technical area occupants and substitutes. He stated that due to the number of individuals involved, it had not been possible to determine exactly what had happened and by whom. He stated that the Match Officials had monitored the situation from a distance.

Southampton's evidence

16. Southampton provided statements from four players and a security officer, as detailed below.

Léo Scienza (LS)

17. LS, a Southampton forward, stated that after the Match he had talked to the Coventry Manager, Frank Lampard (FL), and had walked with him towards the halfway line. He said that he had been trying to take FL out from where he was as he could see that he was “*doing some signals and throwing his arms against our fans*”. LS said he did not understand why FL was doing that, so he had just tried to go to him and take him away and say “*why are you doing this, go to your side*” in a good very calm way. They had been calm and respectful with one another. LS did not witness what was happening behind him, although he could see that it got intense.

Taylor Harwood-Bellis (THB)

18. THB, a Southampton centre half, stated that the conversation between him and FL had not been an angry one. He (THB) had said to FL calmly “*you are better than*

that". He had not been angry at all, as shown by his body language in the video. FL had said to him *"you're a young lad – show me some respect"*. FL had repeated the comment but had not said anything else that THB could hear. THB stated that the Referee had called him over. THB had asked what he had done wrong. The Referee had replied *"nothing I'm just getting you away from it"*. THB had then walked away.

Wellington Damascena Santos (WDS)

19. WDS, the Southampton left back, said that he had been badly fouled by a Coventry player during the Match and the player in question had been sent off. In terms of the Incident, he stated that when the *"confusion"* happened at first, he had not said anything to FL at that moment. When he had seen LS approach FL, he had gone to talk to FL to say that he did not need to do what he was doing in front of the Southampton fans. He said that he had been *"surprised"* by one of Coventry's coaches, who had given him a push, and that *"from that moment on the confusion began and I was surrounded by their players and coaches"*. He stated that his intention had just been to join LS and say that FL's attitude was not a good attitude.

Josh Quarshie (JQ)

20. JQ, a Southampton centre half, said that he had seen FL go over to the Southampton fans at the end of the Match and that *"nothing much happened"*. He had then seen WDS going over to FL. Nothing happened until five or six people were running towards WDS trying to push and shove him. JQ had gone to WDS and had tried to protect him as there were six or seven people from Coventry around him. He stated that he had been *"just protecting [WDS] and trying to separate everyone so that he wouldn't get hurt. At the end I was covering him, I don't know what happened but I carried him away from the other players, after that I think everything was good"*. He concluded by saying that he was a big and tall player and always wanted to try and protect people if he could.

Darren Proctor (DP)

21. DP, the Southampton First Team Security Officer, stated that part of his usual matchday responsibilities was to be on the pitch at the full-time whistle to accompany the Manager and assist in escorting the Match Officials off the pitch. He stated that he had witnessed FL *“fist pumping towards the [Southampton] fans”*, after which there had been words between THB and FL. He had heard FL say *“go away you stupid little boy”*, but had not seen any physical contact. He had then seen the second *“coming together”*, although he had not seen what caused it. He had just got in the middle of everyone trying to separate them. He said that at one point a Coventry player had had a go at him, but he had said that he was just trying to stop it. The player had later shaken his hand to thank him. He said that there had been no fighting from what he could see, *“just pushing and angry words from Coventry players and coaches that I was in the middle of trying to stop”*.

Southampton’s written submissions

22. In its written submissions, Southampton helpfully provided a chronology of events, cross-referenced with timings to the various video clips and to its witness statements. The Commission’s assessment of the Incident is set out in paragraphs 35 to 37 below. Southampton apologised to The FA and Commission for the misconduct that led to the Charge.
23. In terms of mitigation, Southampton invited the Commission to consider the following points in respect of the Incident itself:
- Southampton personnel played a very limited role in the Incident. Its contribution and culpability were of a minor nature and far lower than that of Coventry.
 - The Incident was instigated and fuelled by Coventry staff and players, in particular FL, who lost control of his emotions at the final whistle.
 - FL targeted THB, who did not react. THB’s behaviour was exemplary.

- Southampton's Head Coach did not get involved and left the pitch in the usual way. His actions were to be commended.
- The other protagonists were from Coventry, not Southampton, in particular Coventry's Assistant Manager, Joe Edwards (JE), who targeted, sprinted towards and shoulder barged WDS. WDS did not react and backed away from the situation with his hands down.
- A limited number of Southampton players were involved, in contrast to a much larger number of Coventry players and staff who ran in from a distance.
- The only physical contact from Southampton personnel came from JQ, who had been trying to separate the crowd of Coventry personnel who were surrounding and pushing WDS.
- The Incident lasted at most 29 seconds.

24. Southampton also asked the Commission to take account of other mitigating factors:

- It had admitted the Charge at the first opportunity and had cooperated fully with the process. As per the case of *The FA v Ivan Toney (23 May 2023)*, it was appropriate to reduce the sanction by one third.
- The Incident occurred after the final whistle and did not therefore disrupt the Match. It also meant it had less prominence.
- The Incident was very short and the situation was calmly and swiftly de-escalated with the assistance of Southampton.
- The Match Officials who were present did not see or record any offence by Southampton players.
- Southampton was working with its players to ensure that any future issues of this nature were avoided and that every effort was made to walk away and not engage.
- Southampton had apologised and displayed contrition.

25. In terms of the level of sanction, Southampton submitted that the entry point was a suggested starting point only and that the level of sanction could be reduced down if the seriousness of the breach was lower and/or if there were mitigating factors. It

submitted that a breach of FA Rule E20.1 should be viewed as inherently less serious than a breach of FA Rule E20.2 and that the entry point and maximum fine should be considered in that context. It submitted that the behaviour of FL had been “*serious and/or unusual*” so as to merit a Non-Standard Charge, but the conduct of the Southampton players involved was not “*unusual*” on an objective basis. It did not follow that just because the Charges were consolidated, the “*serious or unusual*” designation, and thus the Non-Standard Charge should apply to Southampton as well. The sanction for an admitted Standard Charge, ie £5,000, was the more appropriate barometer.

26. Southampton submitted that the matters it had advanced as to the level of its culpability amounted to clear and compelling reasons to suspend the whole or at least part of any fine imposed.

The FA’s written submissions

27. The FA highlighted the introduction of an entry point for the 2025-2026 season, indicating that it was intended to be an appropriate starting point. It pointed to the fact that prior to its introduction, Regulatory Commissions had tended to look to the Standard Penalty as a starting point, with the consequence that penalties imposed in Non-Standard cases routinely fell significantly short of the maximum penalty available. It referred to the Appeal Board’s decision in *The FA v Plymouth Argyle* [2025] and submitted that the correct approach was to apply the “*stark, simple and intelligible*” guidelines and start from the entry point of £25,000. The FA submitted that when considering the appropriate level of discount for the admission of the Charges, the Commission must consider whether it would be realistic to deny a mass confrontation charge where there was clear footage of the Incident.

The FA's oral submissions

28. In his oral submissions Mr Phillips adopted The FA's written submissions and reiterated its position regarding the entry point. In response to a question from the Commission, he confirmed that it was The FA's position that there was no hard and fast rule that credit of one-third should be given for an admission. It was for the Commission to assess the value of the admission, and in The FA's submission greater value should be ascribed in complicated cases. In mass confrontation cases with video footage where there was no realistic prospect of a denial, the credit should not be so high.

Southampton's oral submissions

29. Mr Sturman likewise adopted Southampton's written submissions and indicated that he did not intend to take the Commission through every point. He began by addressing the question of discount for an admitted charge. He submitted that many clubs pleaded not guilty to mass confrontation charges, despite the fact that the definition of a mass confrontation meant that it was almost a strict liability offence. Instead of doing that, Southampton had taken a "*sensible, proper, pragmatic*" approach and should be given substantial credit, of at least 25%, for its admission.
30. Mr Sturman submitted that on the facts Southampton could rely on very substantial mitigating features, whereas Coventry's conduct demonstrated a number of aggravating features, in particular the behaviour of FL and another coach who lost his temper and barged into a Southampton player. He submitted that Southampton had been incredibly restrained in all the circumstances. Its coaching staff did not get involved and its security staff were on the pitch in any event fulfilling their duties. None of the Southampton players had been aggressive. The players had been on the pitch already, this was not a case of people sprinting towards the Incident to get involved. The only real physical force had been the barge from the Coventry team official.

31. Mr Sturman pointed to the fact that Southampton had taken the case seriously, providing witness statements and detailed submissions. He took the Commission to the video entitled “Frank Lampard Inciting Fans”, pointing to the fact that FL had goaded THB, but THB had not reacted. The situation had then calmed down. He referred to WDS approaching FL while he was talking to LS, at which point JE ran across and shoulder-barged him. WDS backed off and was retreating, not advancing. JQ was trying to separate players and 90% of the Southampton players were retreating.
32. Mr Sturman again made the point that Southampton’s Charge should not be treated as Non-Standard on the facts and the penalty should be closer to £5,000 than to £25,000. If the Commission decided it must treat it as Non-Standard, after taking into account the mitigation it should still be considerably below the entry point. He submitted that on the facts there were clear and compelling reasons to suspend all or part of the sanction. The level of culpability of the two clubs was chalk and cheese.
33. In response to questions from the Commission about WDS’s actions, Mr Sturman reiterated that his approach had not been aggressive and that JE had been the aggressor. He rejected the Commission’s suggestion that to take the same matters into account for both mitigation and suspension of the sanction would amount to double counting. He said that the Southampton players had been reminded of their obligations since the Incident and that the club took such matters very seriously.

The FA’s further oral submissions

34. At the invitation of the Commission, Mr Phillips responded briefly to Mr Sturman’s point about Standard and Non-Standard Charges, reminding the Commission of the definition of a mass confrontation and the fact that “*they started it*” was not a defence to a charge. He submitted that the number of people involved and the nature of the Incident meant that it was appropriate to designate both Charges as Non-Standard.

The Commission's Deliberations

35. The Commission began by discussing the Incident at length. Having viewed the video footage it accepted that the behaviour of FL in goading the crowd was inappropriate and fell short of how any Manager, let alone an experienced one, ought to conduct themselves. Absent any statement from FL or any other evidence or submissions from Coventry, it also accepted the version of events put forward by Southampton in relation to the interactions between THB and FL.
36. The Commission did not agree with Southampton's assessment of the second part of the Incident, namely the coming together of WDS and JE and the mass confrontation that ensued. In the Commission's view, WDS had been approaching FL and LS at speed and with aggression. It was not clear to the Commission why WDS had felt the need to do that. At that point FL was having a calm discussion with LS, as clearly evidenced by both LS's own statement and the video footage. There was no need for anyone else to get involved. The Commission accepted that there had then been a coming together between WDS and JE, albeit that the initial contact from JE was relatively minor. Contrary to Southampton's submission, WDS did react to the contact from JE, pushing back. He had to be restrained by his players. Even though he was outnumbered, he was still seeking to be involved and indeed tried to approach the group of players on a second occasion.
37. The Commission accepted that there were more Coventry personnel than Southampton personnel involved in the mass confrontation. It is always difficult in such situations to determine who is simply acting as a peacemaker and who is displaying more confrontational tendencies. The Commission noted that the confrontation did not go beyond pushing and shoving, and was not therefore at the most serious end of the spectrum. Nonetheless, at least one person ended up on the ground. This was an unseemly end to the Match at a time when many spectators were still in the stadium to witness it. The Commission was satisfied that a number of individuals from both sides had gone beyond simply trying to break up the initial altercation. In the Commission's

view both JQ and the Southampton number 15 were actively involved in the confrontation as well as several players from Coventry.

Southampton Sanction

38. The Commission agreed that its starting point should be the entry point of £25,000. It rejected the suggestion that E20.1 and E20.2 offences should be viewed differently. It was satisfied that The FA was right to designate the Charge as a Non-Standard. The Commission accepted that the behaviour of FL was clearly unacceptable, had heightened emotions and had undoubtedly contributed to what followed. This, coupled with his role as Manager and the involvement of his Assistant Manager as well, meant that Coventry was more culpable, albeit that the Commission did not accept that the difference in conduct was as stark as Southampton sought to portray it. In the Commission's view, the behaviour of WDS in approaching FL in the manner that he did sparked the altercation with JE and led to the mass confrontation that ensued. This was an aggravating factor, as was the number of people from both sides involved in the confrontation and the public nature of the offence. The Commission rejected the suggestion that the fact that the Incident occurred at the end of the Match meant it was therefore less prominent and should afford Southampton mitigation. This was a high-profile Championship game and the crowd was still present. Viewed as a whole (ie both the interaction between FL and THB and the subsequent mass confrontation), the Incident could not be said to be short-lived. The Commission accepted that the Referee had not identified any offence by Southampton and the same was true of Coventry, albeit he had submitted an Extraordinary Incident Report Form in which he brought the Incident to the attention of the FA. The Commission also accepted that the Incident had not gone beyond pushing and shoving and should not therefore be sanctioned at the upper end of the sanction range.
39. The Commission considered that Southampton's misconduct history was a further aggravating factor. It took account purely of Southampton's previous proven E20 breaches for mass confrontations:

- E20 v Stoke City FC. EFL Championship. October 2023. £8,000 fine.
- Category 2 – E20 v Aston Villa FC. U18 Premier League South. August 2024. £5,000 fine
- E20 v SS Lazio. Friendly. August 2024. £20,000 fine.
- Category 2 E20 – v Watford FC. FA Youth Challenge Cup (U18). February 2025. £10,000 fine.

40. The Commission noted that three of the charges related to the 2024-2025 season. While only one of them related to the first team, the Commission was nonetheless concerned about the number of charges within a relatively short time, including one in a pre-season friendly. Although in its submissions Southampton referred to the importance it attached to ensuring that its players and staff complied with the Rules, it had not identified any specific actions taken, either in relation to the breaches or the Rule changes, beyond saying that it had spoken to the players.

41. Taking the aggravating factors into account, the Commission agreed that there should be an uplift from the entry point to £30,000. It then considered mitigation. It agreed that credit should be given for Southampton's admission and its apology to both The FA and the Commission. It did not accept Southampton's submission that the discount should be 33%. In a case where the video footage clearly showed a mass confrontation, it took the view that on this occasion a total of 25% should be permitted for the admission and apology. For the reasons given above, the Commission did not identify any further mitigating factors. It therefore concluded that a fine of £22,500 was appropriate.

42. The Commission did not consider that there were any clear and compelling reasons for suspending the sanction. It had taken the points made by Southampton about seriousness and relative culpability into account when deciding on the appropriate sanction.

Coventry Sanction

43. The Commission was surprised that Coventry had not submitted anything in response to the Charge, other than its acceptance of it. It therefore had nothing to consider that might have affected its view of the seriousness of Coventry's conduct and nothing to consider by way of mitigation beyond the acceptance of the Charge.

44. Again, the Commission took the entry point of £25,000 as its starting point. It considered the behaviour of FL, both in goading the fans and in interacting with THB to have been unacceptable and the catalyst for what followed, albeit that it did not excuse the behaviour of others. The fact that another member of the coaching staff, JE, was involved in the coming together with WDS was a further aggravating factor, as was the number of Coventry players involved. The public nature of the Incident was likewise an aggravating factor.

45. Coventry's misconduct history was also an aggravating factor. The Commission took account purely of its previous proven E20 breaches for mass confrontations:

- E20 v Sheffield United. EFL Championship. November 2024. £10,000 fine.
- Category 2 E20 v Hull City. Premier League Cup (U23). February 2025. £1,750 fine.
- Category 2 E20 v Fleetwood Town. Development League (U23). February 2025. £7,000 fine.

46. The Commission noted that all three breaches related to the 2024-2025 season (including two in the same month for the U23 team). Although only one of them related to the first team, the Commission was concerned at the apparent failure to learn from previous incidents .

47. Taking all the aggravating factors into account, and recognising Coventry's greater culpability, the Commission decided that it was appropriate to apply an uplift of £12,500 to the entry point. The Commission then gave limited credit of 20% for the admission of the Charge. In all the circumstances it decided that a fine of £30,000 was appropriate.

Conclusion

48. The Commission ordered Southampton to pay a fine of £22,500.

49. The Commission ordered Coventry to pay a fine of £30,000.

50. The FA did not seek an order for costs against either party and the Commission made no order as to costs.

51. The decision of the Commission may be appealed in accordance with the appropriate Appeal Regulations.

Sally Davenport

Alison O'Dowd

Udo Onwere

15 January 2026