

**IN THE MATTER OF PROCEEDINGS BEFORE THE FOOTBALL ASSOCIATION INDEPENDENT  
REGULATORY COMMISSION**

**AND IN THE MATTER OF AN ALLEGED BREACH OF RULE E8 OF THE FA RULES**

Before:

Ms Sally Clark (Chair)  
Ms Sally Davenport  
Mr Alan Hardy

**B E T W E E N:**

**THE FOOTBALL ASSOCIATION**

- and -

**TOM O'CONNOR**

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**DECISION OF THE REGULATORY COMMISSION**

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**Secretariat to the Regulatory Commission:**

Mr Marc Medas - FA Judicial Services Officer

**A. Introduction**

1. This matter relates to alleged breaches by Mr Tom O'Connor ("Player") of Rule E8 of The Football Association's ("The FA") Rules, as set out in The FA Handbook (2016-17, 2017-18, and 2020-21 versions) ("Rules", with each of them being a "Rule") in respect of 16 bets ("Bets", with each being a "Bet") placed on football matches between 23 April 2017 and 25 May 2021.
2. These proceedings are conducted in accordance with the Rules.

**B. The Parties**

3. The FA is the governing body of English football and is responsible for the governance of all affiliated football in England

4. Mr O'Connor is a professional footballer who, during the relevant time, was a registered Player for Southampton FC and Gillingham FC. As a registered Player, Mr O'Connor was required to comply with the The FA Handbook, including the rules prohibiting betting on football.

#### **C. Procedural background & Facts**

5. On 21 November 2025, Mr O'Connor was charged by The FA with Misconduct under FA Rule E1(b) in respect of 16 bets placed on football matches between 23 April 2017 and 25 May 2021. The Notice of Charge alleged that each of the 16 bets constituted a separate and independent breach by Mr O'Connor of FA Rule E8. The particulars of the 16 bets are set out in Appendix 1.
6. The Notice of Charge, in summary, noted that of the 16 bets placed by Mr O'Connor, 5 bets were placed on competitions involving his own club.
7. Mr O'Connor responded to the Notice of Charge on 24 November 2025 indicating that he admitted the charges laid and waiving his right to have the sanction considered at a personal hearing. Mr O'Connor provided a written statement and a mitigation and defence case statement alongside his reply form for the attention of the Regulatory Commission.
8. Following Mr O'Connor's admission of the charges, on 18 December 2025 the Regulatory Commission ("Commission") was constituted, comprising Ms Sally Clark (Chair), Ms Sally Davenport and Mr Alan Hardy, all of whom are independent panel members of The FA. Mr Marc Medas (FA Judicial Services Officer) acted as the Secretariat to the Commission.
9. On 22 December 2025, a meeting ("Hearing") held by video conference was convened to determine the matter on the papers.
10. Since a paper hearing was conducted, The FA and Mr O'Connor were not required to attend. In advance of the hearing, the Commission was provided with a hearing bundle, which contained the Notice of Charge and Mr O'Connor's response.

#### **D. Rules**

11. FA Rule E1.1 provides:

***E1.1 The Association may act against a Participant in respect of any Misconduct, which is defined as being a breach of the following:***

...

***E1.2 the Rules and regulations of The Association and in particular Rules E3 to E28 below."***

12. FA Rule E8 provides (in relevant part):

***E8.1 A Participant shall not bet, either directly or indirectly, or instruct, permit, cause or enable any person to bet on –***

***E8.1.1 the result, progress, conduct or any other aspect of, or occurrence in or in connection with, a football match or competition.***

...

***E8.4 A Participant shall not bet, either directly or indirectly, or instruct, permit, cause or enable any person to bet on –***

*E8.4.1 the result, progress, conduct or any other aspect of, or occurrence in or in connection with, a football match or competition:*

- (a) In which the Participant is participating, or has participated in that season:*  
*or*
- (b) In which the Participant has any influence, either direct or indirect."*

#### **E. The Parties' Submissions**

##### Mr O'Connor's Submissions

13. In his response to the charge, Mr O'Connor made the following points for the consideration of the Commission with regards to the applicable sanction:

- 13.1 He apologised to The FA for his actions.
- 13.2 He had received education about the prohibition on betting on football while a scholar at Southampton FC and therefore knew that he was not allowed to place bets on football matches, however, he stated he had been "*naïve and stupid*" in doing what he did.
- 13.3 Although he was a registered participant at Southampton FC when he placed the bets that he did, he was never involved in any first-team match day squads, and therefore there was never any prospect of him playing in any game he may have bet on.
- 13.4 None of the bets he had placed had been based on any inside information, and were nothing other than "*honest punts, with small stakes*". He said that he placed bets "*simply to alleviate boredom*".
- 13.5 He acknowledged that he had placed one bet on his own team (to win), however, this was part of a larger 9-part accumulator bet with a stake of £1.11, placed only one month after he turned 18 and was therefore legally allowed to bet, over 8 ½ years ago.
- 13.6 He had not placed any bets on football matches since May 2021 and would not place any bets on football matches going forward.

##### The FA's Submissions

14. The FA did not provide any submissions on sanctions for the Commission to consider, instead leaving it for the Commission to determine the appropriate sanction on the basis of The FA's Sanctioning Guidelines, and Mr O'Connor's own submissions.

#### **F. The FA's Sanctioning Guidelines**

15. The Commission took into account The FA's Sanctioning Guidelines on Betting cases under Rule E8, which state:

SANCTION GUIDELINES – BETTING CASES CHARGED UNDER FA RULE E8 (b)

	Bet placed on any aspect of any football match anywhere in the world, but not involving Participant's Club competitions.	Bet placed on Participant's competition but not involving his Club (including spot bet).	Bet placed on own team to win.	Bet placed on own team to lose.	Bet placed on particular occurrence(s) not involving the player who bet (spot bet).	Bet placed on particular occurrence(s) involving the player who bet (spot bet).
Financial Entry Point – Any fine to include, as a minimum, any financial gain made from the bet(s)	Warning / Fine	Fine	Fine	Fine	Fine	Fine
Sports sanction range	Suspension n/a	Suspension n/a where Participant has no connection with the Club bet on*	0-6 months to be determined by factors below	6 months - life to be determined by factors below	0 – 12 months	6 months - life
Factors to be considered in relation to any increase/decrease from entry point	Factors to be considered when determining appropriate sanctions will include the following: <ul style="list-style-type: none"> <li>Overall perception of impact of bet(s) on fixture/game integrity;</li> <li>Player played or did not play;</li> <li>Number of Bets;</li> <li>Size of Bets;</li> <li>Fact and circumstances surrounding pattern of betting;</li> <li>Actual stake and amount possible to win;</li> <li>Personal Circumstances;</li> <li>Previous record – (any previous breach of betting Rules will be considered as a highly aggravating factor);</li> <li>Experience of the participant;</li> <li>Assistance to the process and acceptance of the charge.</li> </ul>					

#### G. Decision

16. Having carefully considered the parties submissions and the facts of the case, together with the Sanctioning Guidelines, the Commission considered that the following mitigating factors were relevant in Mr O'Connor's case:

16.1 his early admission of guilt and his co-operation with The FA's investigation and disciplinary process;

16.2 the small number of bets placed and the small stakes laid (with a total stake laid of £147.66, with a net loss overall of £73.66), together with the fact that he had not placed any bets on football since May 2021.

17. The Commission also considered that the following aggravating factor needed to be taken into account when determining the appropriate sanction:

17.1 the fact that one of the bets placed was placed on Mr O'Connor's own team (albeit to win).

18. Finally, the Commission noted that this was Mr O'Connor's first offence in relation to the betting rules.

19. Having considered all of the above factors and Mr O'Connor's football related income, the Commission imposed a fine of £4,200, together with a warning as to his future conduct, represents a fair and proportionate sanction for Mr O'Connor's conduct. The Commission considered that Mr O'Connor's conduct does not warrant a sporting sanction.

#### H. Costs

20. The FA did not seek costs against Mr O'Connor.

21. In the circumstances, the Commission was satisfied that each Party shall bear its own costs incurred in bringing or defending the Charges, as the case may be. The costs of convening the Commission shall be borne in their entirety by The FA.

**I. Conclusion**

22. Mr O'Connor has admitted the Charges.
23. Mr O'Connor is ordered to pay a fine of £4,200.
24. Mr O'Connor is issued with a warning as to his future conduct.
25. Each party shall bear its own costs in this matter. The costs of convening the Commission shall be borne in their entirety by The FA.
26. This decision is subject to the relevant FA Appeal Regulations.

**Sally Clark (Chair)**

**Sally Davenport**

**Alan Hardy**

7 January 2026

## **Appendix 1**

### **Particulars of Charge**

#### **2016/17 Season – Bets placed in breach of FA Rule E8 FA Handbook p114-116**

1. Mr O'Connor placed 11 bets on football matches, in breach of FA Rule E8(1)(a)(i), between 23 April 2017 and 24 May 2017 whilst he was a participant at Southampton FC.
  - a. 7 of these bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.
  - b. 4 of the bets were placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which his club and/or he was participating.

#### **2017/18 Season – Bets placed in breach of FA Rule E8 FA Handbook p120-122**

2. Mr O'Connor placed 3 bets on football matches, in breach of FA Rule E8(1)(a)(i), between 30 May 2018 and 26 June 2018 whilst he was a participant at Southampton FC.

#### **2020/21 Season – Bets placed in breach of FA Rule E8 FA Handbook p120-121**

3. Mr O'Connor placed 2 bets on football matches, in breach of FA Rule E8.1, between 27 December 2020 and 25 May 2021 whilst he was a participant at Southampton FC and Gillingham FC.
  - a. 1 of those bets was placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition.
  - b. 1 of the best was placed on the result and/or progress and/or conduct and/or any other aspect of a football match or competition in which his club and/or he was participating.