

IN THE MATTER OF A FOOTBALL ASSOCIATION

INDEPENDENT REGULATORY COMMISSION

PROCEEDINGS BETWEEN: -

THE FOOTBALL ASSOCIATION

-and-

(1) BIRMINGHAM CITY FC; AND

(2) HULL CITY FC

**DECISION AND WRITTEN REASONS OF
THE INDEPENDENT REGULATORY COMMISSION**

Regulatory Commission: Bradley Pritchard - Chair
Michael O'Brien
Mike Riley

Secretary to

Regulatory Commission: Nathan Greenslade
(Judicial Services Administrator)

Date: 04 November 2025

Hearing Format: Paper Hearing

Introduction

1. These are the Written Reasons for a decision made by an Independent Regulatory Commission (“**the Commission**”) following consolidated charges brought by The Football Association (“**The FA**”) against Birmingham City FC (“**BCFC**”) and Hull City FC (“**HCFC**”).

2. By respective letters dated 22 October 2025, The FA charged both BCFC and HCFC with Misconduct for a breach of The FA Rule E20.1 (“**the Charge**”) in respect of an EFL Championship fixture between the clubs on 18 October 2025 (“**the Match**”).

3. Both clubs were charged with the following:

*It is alleged that in or around the 42nd minute of the above fixture, Birmingham City FC failed to ensure that its players and/or technical area occupants did not behave in a way which is improper (“**the Incident**”).*

4. With respect to BCFC, The Football Association has designated this as a *Non-Standard* case as the particular facts of the Misconduct were deemed to be of a serious nature. Further, BCFC have received multiple proven charges for Misconduct in respect of breaches of FA Rule E20.1, all occurring within the preceding 12 months.

5. With regard to HCFC, The FA designated their Charge as a *Non-Standard* case due to the facts of matter being of a serious nature.

6. Pursuant to The FA Regulations, The FA consolidated the charges against BCFC and HCFC. As such, the hearings for each club were conducted together and determined at a joint hearing.

Relevant Rules and Regulations

Procedure

7. Regulation 13 states that –

Where the subject matter of or facts relating to a Charge or Charges against one or more Participant(s) is sufficiently linked (including, but not limited to, where offences are alleged to have been committed in the same Match or where there is common evidence of The Association or the defence) and where appropriate for the timely and efficient disposal of the proceedings, The Association and/or the relevant panel shall have the power to consolidate proceedings so that they are conducted together and the Charges may be determined at a joint hearing

Charge

8. FA Rule E20 states that –

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.

Reply to the Charge

9. Both BCFC and HCFC admitted their respective charges and sought a

Commission to deal with matters at a paper hearing ("**the Hearing**").

10. The Commission continued to receive documentation further to the hearing bundle right up until the night before the date of the hearing. In total, the Commission were presented with the following:

- i. Copy of Charge letter for BCFC, dated 04 September 2024,
- ii. Copy of Reply Form for BCFC,
- iii. Email correspondence from BCFC,
- iv. Copy of Charge letter for HCFC,
- v. Copy of Reply Form for HCFC,
- vi. Response from HCFC,
- vii. Email correspondence from HCFC,
- viii. The FA Response to Reply
- ix. Match report of the Incident, from Match Referee, Ruebyn Ricardo, dated 19 October 2025, and
- x. Several videos of the Incident.

11. The following is a summary of the principal submissions provided to the Commission. It does not purport to contain reference to all the points made, however the absence of a point, or submission, in these reasons should not imply that the Commission did not take such point, or submission, into consideration when the members determined the matter. For the avoidance of doubt, the Commission has

carefully considered all written and video evidence in respect of this case.

12. Match Referee, Ruebyn Ricardo states in his report:

"In the 45th minute there was a challenge by BC9 [correction: BC28] in which resulted in MASS CONFRONTATION between both technical areas and Birmingham City stewards, and both sets of players.

Reports of stewards being pushed by Hull City staff and vice versa. Following the incident both BC9 [correction: BC28] & HC21 was cautioned as well as two staff members from either side."

Sanction

13. Having already admitted the Charges, the Commission considered aggravating and mitigating factors for both BCFC and HCFC. The Commission assessed the nature of the incident, the written submissions offered by each club, and the respective relevant disciplinary histories in relation to breaches of FA Rule E20 within first team fixtures.

14. In Non-Standard cases, the Commission have discretion to depart from awarding the standard penalty. The Commission may, if appropriate, impose a sanction ranging from the entry point of £25,000, to a maximum of £50,000 for an EFL Championship club.

15. The Commission considered the FA Guidance provided to all League clubs for this current season in relation to multiple breaches of FA Rule E20.

"For each successive non-standard breach of FA Rule E20, including E20.1 and E20.2, within

a 12-month period the maximum fine shall double and then treble (and so on) the amount set out above."

16. With this in mind, the Commission would then have a sanction range of £75,000 to a maximum of £150,000 fine for BCFC, whilst HCFC would have a sanction range of £25,000 to a maximum of £50,000.

BCFC

17. The Commission initially discussed the merits of applying the new guidelines to breaches occurring in previous seasons. However, this became a moot exercise, as what was clear was BCFC's poor record of Misconduct, not just in the preceding 12 months, but over the relevant period of 5 [five] seasons. It was agreed that any sanction awarded to BCFC should be higher than the £75,000 entry point.

18. BCFC have five proven breaches of FA Rule E20 in the current playing season as well as the preceding 5 [five] season period:

- i. Against Wrexham AFC in an EFL League 1 fixture on 16 September 2024, receiving a fine of £2,500
- ii. Against Shrewsbury Town FC in an EFL League 1 fixture on 8 October 2024, receiving a fine of £7,500
- iii. Against Bolton Wanderers FC in an EFL League 1 fixture on 4 March 2025, receiving a fine of £12,500
- iv. Against Cambridge United FC in an EFL League 1 fixture on 3 May 2025, receiving a

fine of £20,000

v. Against Ipswich Town FC in an EFL Championship fixture on 8 August 2025, receiving a fine of £100,000.

19. As stated in paragraph 16, the Commission discussed BCFC's record in detail. The regularity with which the breaches occurred demonstrated a consistent failing by the club to control its players.

HCFC

20. HCFC have no previous breaches at a First Team level of FA Rule E20 in the current playing season, as well as the preceding 5 [five] season period. However, HCFC have 2 [two] previous proven breaches of FA Rule E20 in the past 12 months at youth level. These breaches were:

- i. Against Coventry City in the Premier League Cup (U23) on 3 February 2025, receiving a fine of £1,250.
- ii. Against Swansea City in the U18 Professional Development League – North (U18) on 15 April 2025, receiving a fine of £1,250.

21. As such, the Commission have imposed the following sanctions:

- i. BCFC is fined £115,000.
- ii. HCFC is fined £25,000.

22. These decisions are subject to the relevant Appeal Regulations.

Bradley Pritchard (Chair)

Michael O'Brien

Mike Riley

05 November 2025