

THE FA

-v-

LEEDS UNITED FC

DECISION AND REASONS

Warning to the reader of this document. This document contains reference to offensive and/or discriminatory language or behaviour.

Regulatory Commission constitution.

Abdul S. Iqbal KC (Chair – Independent Legal Panel Member)

Peter Fletcher (Independent Football Panel Member)

Matt Williams (Independent Football Panel Member)

Michael O'Connor (Secretary)

Date of hearing : 10/8/23

1. This document sets out the written reasons for the decision in this independent Regulatory Commission (“the Commission”).
2. This document does not set out the entirety of the evidence considered by the Commission. It sets out the relevant evidence on the central relevant issues as considered by the Commission and assessed by the Commission in reaching findings of fact.

3. The Commission met by Microsoft Teams meeting on 10th August 2023 to consider the issues the case raises.
4. The Commission appointed to determine the charge has the requisite experience in crowd management matters and previous crowd management disciplinary hearings.

(1) The charge.

5. By charge letter dated 13th June 2023¹, The Football Association (“The FA”) alleged that Leeds United FC (“Leeds”) during the Premier League match against Brighton & Hove Albion FC (“Brighton”) on 11/3/23 (“the match”) failed to ensure spectators and/or supporters (and anyone purporting to be its supporters or followers) conducted themselves in an orderly fashion whilst attending the match.

6. Accordingly, The FA charged Leeds with :

- i. Failing on 11/3/23 to ensure in or around the 20th minute of the match that its spectators and/or supporters (and anyone purporting to be its supporters or followers) conduct themselves in an orderly fashion whilst attending the match and do not use words or otherwise behave in a way which is improper, offensive, abusive, indecent, or insulting with either reference to sexual orientation contrary to rule E21.1 of the Rules of the Football Association ;
- ii. In addition, The FA alleged that the words and/or behaviour made reference to sexual orientation contrary to FA rule E21.4.

7. Leeds admitted the charge by letter dated 19th June 2023², then formally in correspondence dated 21st June 2023, and requested a paper hearing³.

(2) The facts.

8. The relevant facts⁴ as to these charges are :

- i. An anonymous post-match report was made to the “*Kick It Out*”⁵ organisation of

¹ Page 1 of the case bundle.

² Page 17 of the case bundle.

³ Page 16 of the case bundle.

⁴ This summary is extracted from the various factual witness statements or other documentary material within the case bundle.

⁵ Page 5 of the case bundle.

homophobic chanting by Leeds supporters on at least two occasions at the match against Brighton on 11th March 2023 ;

- ii. The report was to the effect that during the first half of the match the offensive chanting by Leeds supporters included the chants "*does your boyfriend know you're here*" and "*you're going down on your boyfriend*" ;
- iii. It appears that officials and/or staff of Leeds were made aware of the homophobic chanting *as it occurred* during the match. The response filed by Leeds to this misconduct charge states⁶ :
 - a. "*As a club, we were greatly disappointed to hear the chants in question at the Brighton game, especially given the large lengths we have gone to in promoting inclusivity in recent years..*" ;
 - b. "*We were made aware of incidents of inappropriate language in the South Stand during the match by stewards and police*" ;
- iv. Leeds contend that the area from which the offending chanting originated was monitored to ascertain who was involved resulting in the arrest of one Leeds supporter and the ejection of another Leeds supporter ;
- v. Leeds contend that police and stewards were positioned in front of the south stand with body camera equipment to record any inappropriate behaviour taking place⁷. It appears this presence led to an improvement of crowd behaviour.

9. In addition to the above written evidence, the Commission viewed a 44-second and a 38-second piece of video footage with audio of the homophobic chanting by Leeds supporters in the 20th minute of the match.

10. In that video footage, the offensive chanting is clearly audible and involves a very substantial number of Leeds supporters chanting "*You're going down on your boyfriend*".

11. The volume of the chanting leads to the inevitable conclusion that a very considerable number of Leeds supporters engaged in this homophobic chanting and that it was not a brief event.

⁶ See response from Hannah Cox (Club Secretary, Leeds United FC) at page 18 of the case bundle.

⁷ No footage of such recording has been provided to the Commission.

12. In addition, the post-match complaint refers to at least two separate periods of homophobic chanting of different words and so the video footage disclosed to the Commission appears not to be the entirety of the offensive chanting,

(3) The sanction framework.

13. Leeds has admitted a breach of FA rule E21.4 by homophobic chanting by its supporters.

14. The “*due diligence*” defence within FA rule E21.5⁸ is not available to Leeds because of the admitted breach of FA rule E21.4.

15. However, factors relevant to due diligence are relevant to determining sanction because they are relevant to the mitigation available to a charged participant.

(i) The FA “Policy and Guidance on the Regulation of Discriminatory Conduct by Spectators”.

(a) Relevant sanctioning factors.

16. Pursuant to The FA’s “*Policy and Guidance on the Regulation of Discriminatory Conduct by Spectators*”⁹ dated 6th August 2020 (the “*Policy and Guidance*”)¹⁰ under the heading “*Factors to be considered when determining sanction*”¹¹ it is stated :

“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 include¹² the following:

1. The number of supporters involved;
2. The nature of the behaviour of those involved;

⁸ Page 146 of the FA Handbook 2022/23.

⁹ At the time of the publication of this guidance, such discriminatory breaches were regulated by FA Rule E20.1.

¹⁰ See pages 10 to 15 of the case bundle. The Policy and Guidance document can be found in electronic format here : <https://www.thefa.com/news/2020/aug/06/new-charging-policies-and-sanctioning-guidelines-for-discrimination-published-070720>

¹¹ Page 15 of the case bundle.

¹² The Policy and Guidance makes it plain that these factors are not exhaustive. See page 11 of the case bundle under the title “DETERMINATION OF THE CHARGE AND SANCTIONS”.

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 in full 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.“

(b) Action Plan.

17. The Policy and Guidance states in relation to a first offence as follows¹³ :

“Where a finding of a Relevant Breach is made against a Club, a Regulatory Commission shall impose on the Club an action plan in terms that it sees fit with the aim of precluding, a repeat of the conduct, which formed the basis of the relevant breach (“Action Plan”).

Such an Action Plan shall, as a minimum, set out :

- the operational advice and/or practical measures to be carried out by the Club;
- the period during which the Action Plan shall remain in force;
- the external support to the Club that may be required; and
- The process through which the Club’s compliance with the Action Plan shall be audited by The FA and the frequency, with which the audit shall take place.”

¹³ Page 13 of the case bundle.

(c) Financial penalty.

18. The Policy and Guidance states in relation to a first offence as follows :

“A Regulatory Commission may also consider imposing a financial penalty in accordance with Table 1 below where it considers it appropriate, having regard to the particular circumstances of the case and the factors set out below,

A Regulatory Commission may order that part of any financial penalty imposed is suspended in accordance with paragraphs 42 and 43 of Part A to the Disciplinary Regulations.”

19. By Table 1¹⁴, the applicable fine range for such a breach of FA rule E21.4 for a Premier League Club (as Leeds was at the material time) is £20,000 to £300,000.

(4) The submissions on sanction.

20. The Commission read and considered all of the following written documents when considering the appropriate sanction in this case.

21. The contents of each of those documents and appendices are not repeated in this document save for where reference is necessary to explain whether a submission or factor was regarded as relevant or irrelevant to sanction.

(i) The FA.

22. The FA did not make any written or oral submissions to the Commission.

(ii) Leeds.

23. The Commission read and considered :

- i. Signed letter and response from Hannah Cox (Leeds United FC Club Secretary) to Jack Gillett (FA On-Field Football Regulation officer) dated 29th March 2023¹⁵.

¹⁴ Page 14 of the case bundle.

¹⁵ Pages 6 to 8 and repeated at pages 18 to 20 of the case bundle.

(5) The Commission's factual findings and legal conclusions as to sanction.

24. Where it is necessary for the Commission to come to any conclusion(s) as to the relevant facts, the burden of proof is borne by The FA to prove the fact(s) upon the balance of probability.

25. The test to be applied is that the Commission is satisfied an event occurred if the Commission considers that, on the evidence, the occurrence of the event was more likely than not.

26. Firstly, the Commission considered the relevant sanctioning factors within the Policy and Guidance.

1. The number of supporters involved.

27. The evidence suggests there was a very significant number of Leeds supporters involved in the homophobic chanting.

28. This conclusion is supported by the fact that the post-match complaint was based on the chanting being clearly audible on "*national radio*" and the video footage (with audio) that depicts the chanting clearly and loudly by many Leeds supporters.

2. The nature of the behaviour of those involved.

29. The words used by the offending spectators referenced a negative attitude towards the LGBT+ community and a perceived association of that community with Brighton & Hove Albion FC.

30. The use of the phrases is obviously and plainly discriminatory and highly derogatory. The chanting is highly abusive and offensive to those right-thinking people who heard it or came to know of its use in these circumstances.

3. The duration of the incident(s).

31. The homophobic chanting depicted on the video footage was being repeatedly chanted.

32. Accordingly, this was not an isolated single incident of such offensive behaviour by Leeds supporters.

33. The post-match complaint supports the contention that the homophobic chanting extends beyond the footage disclosed to the Commission. Accordingly, the Commission was

satisfied that the homophobic chanting was of significant duration was repeated chanting.

4a. Whether the Club (and/or its officers) took all reasonable steps in its preparation and planning for the fixture in which the relevant breach occurred.

34. The material set out in the letter from Hannah Cox on behalf of Leeds shows that Leeds had in place prior to this match appropriate codes of conduct in relation to equality, diversity and inclusivity that had been placed on the club's website and social media accounts.

35. The "*Marching Out Together*" initiative is an official Leeds United FC group for LGBT+ supporters that has been supported by Leeds United FC including by current players attending and promoting relevant events and promoting the activities of the group generally.

36. The Commission accordingly concluded that *some* proactive steps had been taken by Leeds generically in relation to issues of equality, diversity and inclusivity issues and the risk of discriminatory conduct by its supporters.

37. Leeds had appreciated before the match against Brighton that there was a risk of such homophobic abuse from its supporters directed at Brighton supporters. The letter from Hannah Cox¹⁶ states :

"This match was originally categorised as police free due to the perceived low risk nature of the match and the low incidence of disorder at matches between Leeds United and Brighton & Hove Albion in the past. This was amended to being a policed match recently in order to address the risk of homophobic language and chanting as the club were aware of the potential for fans to engage in this behaviour. The reason for policing was to assist in the arrests of persons involved in this behaviour."

38. The letter from Hannah Cox also states :

"All matchday safety & security staff were briefed on dealing with any offensive language or chanting, particularly reminded of the potential for homophobic remarks against Brighton fans and players. All staff were informed to listen out for any type of offensive language, to ascertain who was partaking in this behaviour, speak to those involved and gather relevant evidence. We also had West Yorkshire police in attendance who were also instructed to monitor crowd behaviour for offensive language."

39. However, in respect of this match against Brighton in particular and the security risks

¹⁶ Page 19 of the case bundle.

attached to it there was a lack of supportive documentation before the Commission to properly evidence proper due diligence carried out by Leeds prior to this match :

- i. Leeds were aware of the risk of such discriminatory conduct by its supporters. It is this awareness that meant Leeds changed the categorisation of this match from “*police-free*” to “*policed*”. There was an obvious risk of such offending behaviour from Leeds supporters ;
- ii. Although Leeds say it was mindful of the risk of homophobic chanting at this match, the Commission was not supplied with any documentation as to any or any proper formal pre-match risk assessment in relation to discriminatory chanting by supporters ;
- iii. There was no evidence before the Commission of any pre-match meetings where such risk issues were discussed. There were no minutes of any such meetings. There was no evidence of any pre-match co-operation between Leeds and others (including Brighton & Hove Albion FC) relating to the identified risks and how they could be properly managed ;
- iv. There was no evidence before the Commission of any pre-match discussions between Leeds and the Police Dedicated Football officers at Leeds or Brighton relating to the identified risks and how they could be properly managed ;
- v. There was no evidence of any or any proper risk assessment by Leeds’ Safety Officer relating to the identified risks and how they could be properly managed. Plainly any such risk assessment must necessarily be match-specific. Any such assessment would identify the risks of such homophobic abuse and how the risk could be properly managed and addressed ;
- vi. There was no evidence of any or any proper pre-match messaging either via Leeds’ social media accounts, match programme messaging or other pre-match announcements relating to the fact that such discriminatory conduct would not be tolerated by Leeds and any person found to have engaged in such conduct would face stern sanction including a permanent ban from attending matches ;
- vii. The Commission was not supplied with any pre-match briefing document in relation to stewards and security staffing at the match ;
- viii. The Commission was supplied no evidence of the quantity of stewarding and security staffing employed by Leeds at this match.

- ix. The Commission was not sent the Safety Officer's decision log or similar material that would allow the Commission to properly evaluate relevant factual issues and the decision making in relation to the information available to Leeds safety and security staff at material times ;
- x. The Commission was not sent any evidence of a pre-match deployment plan and/or briefing for safety and security officials tailored to the circumstances of this match and specific risk factors ;
- xi. The Commission saw no evidence of any formal contingency plans (such as cascade briefing and the like) in the event of such discriminatory chanting at this match ;
- xii. The fact that there was not any evidence of a public announcement message at the match is most probably a reflection of the lack of any or any proper contingency planning ;
- xiii. There were CCTV facilities at the match that captured audio of some of the events that ultimately took place. However, those facilities were either unable to be deployed so as to detect the perpetrators of such chanting or were not properly deployed so to do ;
- xiv. The letter from Hannah Cox states "*We at Leeds United...have recently trained match day personnel on the use of inappropriate language. The training will be refreshed before the start of next season*". The Commission noted that such training and briefing should already have been part of all pre-match briefings to security and safety personnel especially for a club playing in the highest league in England.

4b. Whether the Club (and/or its officers) took all reasonable steps in dealing effectively with the incident, when it arose.

40. The response from Leeds set out in Hannah Cox's letter¹⁷ states that :

"We were made aware of incidents of inappropriate language in the South Stand during the match by stewards and police. The crowd was monitored to ascertain who was involved resulting in the arrest of one home fan and the ejection of another home fan.

Police and stewards were positioned in front of the south stand with body cameras

¹⁷ Page 19 of the case bundle.

to record any inappropriate behaviour taking place. We noticed an improvement of crowd behaviour once the crowd observed police and stewards speaking with fans re. this matter.”

41. Once the offending behaviour came to the attention of Leeds officials, Leeds contends that there was a response by security and stewarding staff as well as the police.

42. It is contended by Leeds that such actions deterred the perpetrators from continuing with such offensive chanting.

43. The Commission noted that one supporter was arrested and another was ejected from the stadium. However, it was not made clear to the Commission why one supporter was arrested and another supporter ejected. It was not clear to the Commission that such action related to homophobic chanting or for unrelated misconduct. No evidence was placed before the Commission from Leeds or the police as to the reason(s) for these actions.

44. The Commission was also surprised that if there was such a swift response to the offensive chanting by Leeds security and stewarding staff, that the perpetrators could not have been more readily identified by the use, for example, of targeted and focussed CCTV cameras.

45. The Commission had been supplied with no evidence that CCTV had been used in this way to monitor the section of the crowd from which the offending chanting emanated. This was both surprising and disappointing to the Commission.

46. Leeds contended that security and stewarding staff deployed body-worn cameras near to the South Stand where the offending chanting emanated. However, there was no evidence before the Commission of what (if any) evidence such body-worn cameras produced. The Commission was surprised that deployment of such equipment failed to produce evidence capable of identifying a significant number of those engaging in such misconduct.

47. Nor was the Commission provided with any evidence as to precisely how the crowd was monitored prior to, during, and after the offending chanting.

48. Although the Commission accepted the submission that Leeds had taken some extra measures relating to the risk of homophobic abuse at this match, those measures were plainly not adequate to prevent such abuse and then to detect a wide range of culprits.

49. There was no evidence before the Commission that a public announcement was made during the match once the homophobic chanting became known to Leeds safety and security officials.

50. Such a public announcement could have reiterated the message that such behaviour was unacceptable, would not be tolerated, reminding supporters of the availability of a direct mobile phone number to identify those involved in the offending behaviour, and that those found to be engaged in such behaviour would be appropriately sanctioned by the club including by immediate ejection from the stadium and future bans.

51. No evidence was placed before the Commission that Leeds have in place a mobile telephone number for supporters to report such offensive misconduct. Accordingly there was no evidence before the Commission as to how the existence of any such facility was clearly and often made known to home and away supporters.

52. Any proper pre-match risk assessment would and should have identified specific risk factors relating to this match against Brighton. Such an assessment would have identified a heightened risk of such homophobic chanting at this particular match and would have demanded extra measures at this match to guard against such an eventuality.

53. The Commission was satisfied that had such a facility been widely promoted to all attendees at every match, that reports of any such discriminatory abuse would have been made to Leeds Safety and security officials immediately and that immediate action to prevent such chanting and to detect more of those involved would have been possible.

54. There was no evidence placed before the Commission as to how, if at all, Leeds responded post-match to this specific homophobic chanting.

55. There was no evidence, for example, of Leeds using its extensive social media facilities to condemn the homophobic abuse at this match, reminding supporters of their responsibilities, and indicating that action would be taken against those found to have been involved in the homophobic or any discriminatory chanting.

55. Nor was there any evidence before the Commission of what extra measures (if any) were put in place after this match by Leeds to reduce the risk of a reoccurrence of such discriminatory chanting in future matches save for the assertion that some additional training was given to security and safety staff as to discriminatory abuse.

4c. Whether the Club (and/or its officers) took all reasonable steps in identifying the supporter(s) involved.

56. It is contended that one Leeds supporter was arrested and another Leeds supporter ejected from the ground.

57. No evidence was placed before the Commission that these two supporters had been identified as involved in the homophobic chanting or whether such actions relating to them were for other misconduct.

58. The Commission was surprised and disappointed that there was no evidence of the use of focussed CCTV towards the area of the homophobic chanting as soon as possible once the offending chanting had been brought to the attention of Leeds safety and security officials.

59. In these circumstances, the chances of identifying the perpetrators of the offensive chanting was much reduced and it was unsurprising that Leeds had not been able to identify more of those involved in the offensive chanting.

4d. Whether the Club (and/or its officers) took sufficient action against those supporters responsible where those individuals were identified.

60. There was no evidence before the Commission of what, if any, action has been taken against any Leeds supporter(s) arising out of these incidents beyond ejection of one supporter from this match and the arrest by the police of another supporter.

61. No evidence was placed before the Commission that these two supporters had been identified as involved in the homophobic chanting or whether such actions relating to them were for other misconduct.

62. The Commission was surprised and disappointed at the lack of any evidence in this regard.

5. Whether the Club co-operated in full with The FA.

63. It was noted by the Commission that Leeds had responded promptly to the charges and admitted the misconduct.

6. The previous disciplinary record of the Club or its participants in relation to aggravated breaches or relevant breaches.

64. Leeds has no relevant misconduct record.

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.

65. Leeds had no Action Plan previously imposed.

(6) Sanction.

(i) A fine.

66. The Commission unanimously concluded that a financial penalty was warranted and appropriate for the admitted misconduct.

67. The Commission noted the various aggravating and mitigating factors set out above.

68. The Commission noted that the misconduct of the Leeds supporters was not limited to an isolated incident but involved sustained incidents of offensive and highly insulting homophobic chanting.

69. For the reasons set out above, there were very substantial deficiencies as to pre-match planning by Leeds.

70. The Commission was satisfied that diligent and responsible pre-match planning would have properly and reliably identified specific risk factors relating to this match.

71. The identification of those risk factors would have much reduced the risk of incidents such as those that ultimately occurred.

72. Proper contingency planning would have very significantly increased the chances of identifying more of those involved in this highly offensive chanting.

73. The damage to the reputation of football and issues of equality, diversity and inclusivity by such discriminatory misconduct is obvious. It is unsurprising that there were complaints from the public after the match relating to this chanting.

74. The fact that (at most) only two (and perhaps no) Leeds supporters have been identified for this offensive behaviour is disappointing but reflective of a lack of any or any proper contingency planning.

75. In a case of seriousness such as this, the Commission was surprised and disappointed at the lack of evidence from Leeds in its response to the charge dealing with the various factors set out by the FA in the Policy and Guidance document.

76. Such circumstances and deficiencies needed to be reflected in the assessed culpability

of Leeds.

77. The Commission categorised the culpability of Leeds in its lack of proper pre-match planning, lack of properly evidenced immediate appropriate reaction to the misconduct, and lack of properly evidenced post-match response as high.

78. The Commission noted this was a Premier League match. The sanctioning guidelines¹⁸ indicate a sanction range of £20,000 to £300,000.

79. Balancing all of the aggravating and mitigating factors set out above, the Commission concluded that the appropriate financial sanction is £150,000.

80. Accordingly, Leeds United FC is fined £150,000.

(ii) An Action Plan.

81. The Commission concluded unanimously that an action plan in accordance with Annex 1 to the Policy and Guidance was necessary in this case.

82. In order to reduce the risk of further such breaches of FA rule E21, there shall be an action plan in the case of Leeds United FC in the following terms :

“1. Upon publication of the Regulatory Commission’s Written Reasons and this Action Plan, Leeds United Football Club (***‘the Club’***) shall communicate via the Club website and via social media, and in the next available home league match day programme :

- a. The fact and background to the charge, including the fact that it involved abusive, offensive, homophobic, discriminatory chanting by Club supporters at a match against Brighton and Hove Albion FC.
- b. The Club’s condemnation of the chanting that underpinned the charge and the fact that it has a zero-tolerance policy towards discriminatory abuse of all kinds.
- c. Further it should state that those responsible were potentially committing a criminal offence and anyone subsequently identified will be banned.
- d. The fact that this resulted in the Club being charged and found guilty of misconduct under the FA Rules, being warned as to its future conduct and having an Action Plan imposed upon it together with a fine of £150,000 to prevent any recurrence of the misconduct.

¹⁸ Table 1 in the Policy and Guidance document at page 14 of the case bundle.

- e. The Club's intention to develop existing initiatives to make it more inclusive and more proactive in the prevention and detection of any potential discriminatory or inappropriate words or behaviour in the future, at both home and away fixtures
2. The Club shall :
- a. Forthwith conduct a full review of its stewarding management, stewarding provision, stewarding deployment, and the quality of stewarding training. In addition existing processes should be closely examined to ensure 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. Maintain a detailed operational protocol in support of their 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 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 shall 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 liaise with the opposition club prior to all fixtures both home and away to exchange intelligence :
 - i. on club supporters who are or may be attending the home fixture, and
 - ii. on any factors which may negatively affect or influence their behaviour; this should include any members of the visiting club whether they be current or former players, backroom staff, directors and club guests who may be potential

targets of discriminatory behaviour from supporters.

- iii. Such information should then be addressed at the pre-match meeting of both the management group and stewards.
 - g. Ensure the Club Safety Officer appraises the match officials before the game of any identified potential issues relating to crowd behaviour, particularly any discriminatory behaviour, and have in place methods of communicating with match officials should it be necessary.
3. The Club shall :
- a. Continue to develop proactive educational programmes and initiatives for supporters and written policies and procedures 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.
 - b. Continue to develop and promote an ongoing positive dialogue with *Kick It Out*, and further enhance the relationship for the purpose of seeking advice on and ratification of all such proposed programmes, initiatives, policies and procedures.
4. 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 / unacceptable, whether at home or away fixtures.
 - b. Publish The *Leeds United Foundation Equality Policy* on the Club's web site together with the procedure and facilities available to attendees at matches for reporting abuse particularly that of a discriminatory nature
 - c. Continue to work towards upholding the values and expectations of the Premier League Equality, Diversity and Inclusion Standards (PLEDIS). (It is recognised that the Club are no longer a member of the Premier League however the Regulatory Commission recognise that work had commenced on achieving the Preliminary Standard last season and believe that that work should continue).

5. The Club shall 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.

6. 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.

7. The Club shall develop and deploy :

- a. match day PA announcements, and
- 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 pro-actively target the prevention, usage and detection of any potential discriminatory words or behaviour. Such announcements, messages and content (i) shall make clear in plain effective language that discriminatory language or behaviour is abusive and offensive, may be criminal, and will not be tolerated by the Club, and (ii) must be supported by reference to clear reporting methods and facilities.

8. Prior to each match 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, 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

9. The Club shall review all its safety management plans and policies at least once per season.

10. The FA shall monitor the Club's compliance with this Action Plan by periodic checks as deemed appropriate, so as to ensure that the various constituents of the Action Plan have been initiated and are being complied with."

83. Leeds United FC is formally warned as to future conduct.

84. The above sanctions are formally imposed.

85. There is the right to appeal these decisions in accordance with FA Regulations.

ABDUL S. IQBAL KC

PETER FLETCHER

MATT WILLIAMS

10th August 2023