

IN THE MATTER OF A FOOTBALL ASSOCIATION  
INDEPENDENT REGULATORY COMMISSION

BETWEEN:

THE FOOTBALL ASSOCIATION

and

(1) SHEFFIELD UNITED FC; AND  
(2) BRISTOL CITY FC.

---

WRITTEN REASONS AND DECISION OF  
THE INDEPENDENT REGULATORY COMMISSION FOLLOWING THE  
HEARING  
ON 21 MARCH 2025

---

## **Background**

1. These are the written reasons and decision made by an Independent Regulatory Commission which sat by video conference on 21 March 2025 to consider the consolidated charges against Sheffield United FC and Bristol City FC.
2. The Regulatory Commission members were Mr Gareth Farrelly, Chairman and Independent Football Panel Member, Mr Francis Benali, Independent Football Panel Member and Mr Francis Duku, Independent Football Panel Member.
3. Mr Michael O'Connor, FA Judicial Assistant Manager, acted as Secretary to the Regulatory Commission.

## **Sheffield United FC**

4. By letter dated 12 March 2025, The Football Association charged Sheffield United FC with misconduct for a breach of FA Rule E20.1 in respect of the English Football League Championship fixture between Sheffield United FC and Bristol City FC that took place on 11 March 2025.
5. It was alleged that in or around the 94<sup>th</sup> minute of the fixture Sheffield United FC failed to ensure that its players did not behave in a way which was improper and/or provocative.
6. The FA designated this as a Non-Standard Case due to proven E20 breaches in fixtures against Wrexham AFC on 13 August 2024; Watford FC on 1 September 2024; Portsmouth FC on 28 September 2024; and Coventry City FC on 23 November 2024.

## **Bristol City FC**

7. By letter dated 12 March 2025, The Football Association charged Bristol City FC with misconduct for a breach of FA Rule E20.1 in respect of the English Football League Championship fixture between Sheffield United FC and Bristol City FC that took place on 11 March 2025.
8. It was alleged that in or around the 94<sup>th</sup> minute of the fixture Bristol City FC failed to ensure that its players did not behave in a way which was improper and/or provocative.
9. The FA designated this as a Standard Case.

## **Consolidated Proceedings**

10. The above referenced Charges were consolidated pursuant to Regulation 13 of the Disciplinary Regulations of The FA Handbook Season 2024/25. It was stated on each Charge that the proceedings would be conducted together, and the Charges would be determined at a joint hearing.

## **Rules**

11. 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.*

## **Evidence**

12. The FA included the following evidence with the respective charges:

- Report of the Match Referee, Mr. S. Martin, dated 12 March 2025;
- Two video clips of the incident; and
- Essential Information for Clubs 2024-25.

13. The Match Referee Mr Stephen Martin stated, in his Extraordinary Incident Report Form:-

*“At approximately 90+4 minutes, following a Sheffield United penalty appeal, a mass confrontation ensued between both sets of players.*

*Please could The Football Association review the incident to see if any further misconduct occurred. Thank you”.*

## **Replies to the Charges**

14. Both clubs admitted the charges, Sheffield United FC by reply on 17 March 2025, Bristol City FC on 14 March 2025. Bristol City FC accepted Standard Penalty 1 offered with the charge letter.

15. Sheffield United FC did not request a personal hearing, and their case was dealt with on the papers only. They submitted general mitigation setting out their position, their

submissions on the incident and those involved, as well as their previous charges, and the steps being taken to address these.

16. 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 the written and video evidence in respect of this case.

## **Sanction**

17. The Standard Penalty for an EFL Championship club that admits a single breach of FA Rule E20 is £5,000.00. In the event that a breach is denied and found proven, the penalty is £7,500.00. Bristol City FC had accepted Standard Penalty 1 and were fined £5,000.00.
18. With regard to sanction, The FA submitted a comprehensive response to Sheffield United's reply. It was noted that the club had accepted the breach, they had put in place measures to address the issue of on-pitch player conduct, which it accepted had not been successful given this latest charge. They also accepted that the incident was instigated by their own player. They submitted that the mass confrontation was at the lower end of the scale of seriousness.
19. The club accepted it has had a large number of FA Rule E20.1 charges, not just this season, but over recent years, and that this was not good enough. They accepted the steps the club had taken so far to address mass confrontations have not been sufficient. It was submitted that they are in the process of contacting the PGMOL with a view to specific training being delivered to players as to mass confrontations. They are also considering implementing changes to the club's bonus scheme, so that individuals are liable for any involvement they may have in an incident which culminates in an FA Charge. Any such change would come into effect next season.
20. The Commission took account of the submissions and gave consideration to a number of additional factors - the incident itself, the number of players involved from both sides, the duration of the incident, the level of aggression involved and where the incident took place. It was accepted that that this incident was caused by the initial action of the Sheffield United player. The incident escalated with a large number of players from both teams involved, pushing and shoving, and also surrounding the Referee.
21. The Commission considered the incident as well as previous sanctions imposed on Sheffield United FC with regard to breaches of Rule E20 which are detailed as follows:

- (1) The club was fined £7,500.00 for an incident that occurred in an EFL Championship fixture v Norwich City FC on 22 October 2022;
- (2) The club was fined £15,000.00 for an incident that occurred in an EFL Championship fixture v Bristol City FC on 1 November 2022;
- (3) The club was fined £8,500.00 for an incident that occurred in an EFL League Cup fixture v Wrexham AFC on 13 August 2024;
- (4) The club was fined 17,000.00 for an incident that occurred in an EFL Championship fixture v Watford FC on 1 September 2024; and
- (5) The club was fined £40,000.00 for an incident that occurred in an EFL Championship fixture v Portsmouth FC on 28 September 2024; and
- (6) (5) The club was fined £80,000.00 for an incident that occurred in an EFL Championship fixture v Coventry City FC on 23 November 2024.

22. The Regulatory Commission noted that this is the seventh incident of this nature in over two years and four months. This is of course an aggravating factor. The club submissions were not persuasive and given the club's disciplinary record in relation to similar breaches offered little by way of mitigation. This incident was started by a Sheffield United player. He firstly protested to the Referee for his failure to award a penalty kick but then threw an opposing player to the ground. This was the catalyst for what ensued. But for his actions, the incident would not have occurred. It was accepted that the club admitted the charge but again, it would have been difficult, given the weight of evidence to contest it. This is further aggravated by what is, a fifth breach since 13 August 2024. For completeness, the club also have an additional five youth breaches of Rule E20 on the club record between 18 January 2022 and 7 February 2024.

23. In determining the fines issued to clubs at this level, the Commission considered the Standard Penalty Guidelines for EFL Championship Clubs in relation to such incidents. However, this was not a Standard Case for Sheffield United FC, and the Commission has a discretion with regard to sanction. In the *Essential Information for Clubs 2024-2025*, it is stated, *inter alia*, that the maximum fine for Non-Standard E20 breaches in the EFL Championship is £50,000.00. Furthermore, the Guidance states: - "*for each successive breach of Rule E20, including E20.1 and E20.2, within a 12 month period the maximum fine shall double and then treble (and so on) as set out*".

24. The Commission noted that any sanction must be fair and proportionate. However, taking the totality of the offending behaviour into account and the club's previous disciplinary record, notably this now being the twelfth incident within the previous five seasons, the Commission were minded to impose a fine in excess of £160,000.00. However, there was some credit given for the admittance and the fine was reduced accordingly to £120,000.00.

## **Conclusion**

25. The Regulatory Commission, having carefully considered the Regulations, have imposed the following sanction:

### **Bristol City FC**

(i) Bristol City FC is fined the sum of £5,000.00.

### **Sheffield United FC**

(i) Sheffield United FC is fined the sum of £120,000.00.

## **Appeal**

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

Mr Gareth Farrelly, Chairman and Independent Panel Member

Mr Francis Benali, Independent Football Panel Member

Mr Francis Duku, Independent Football Panel Member

26 March 2025