

# INTRODUCTION TO THE SANCTIONS POLICY (the "Policy")

Brighton and Hove Albion Football Club (the "Club") is committed to creating a safe, secure and welcoming environment for everyone. Furthermore, the Club operates a zero-tolerance approach towards all cases of discrimination and abuse of its staff. With that, the Club takes a fair but robust approach to all behaviours that breach this Policy.

For the purposes of this Policy, the "Club" shall refer to Brighton & Hove Albion Football Club Limited, Brighton & Hove Albion Women's Football Club Limited (i.e. matches played by the Club's men's, women's and academy teams).

This Policy will apply during all investigations, sanctions and appeals. The Club at all times reserves its rights in respect of any civil claim it may choose to bring in respect of any breach of this Policy.

This Policy should be read alongside the following:

- Ground Regulations available here
- All Terms & Conditions <u>available here</u>
- Equality Policy available here
- Prohibited items available here

All personal data processed pursuant to this Policy, will do done so in accordance with the Club's Privacy Policy which is available here.

The Club will review the Policy at the end of every season, where there is change in legislation or following any learning outcomes from major incidents. With that, changes may occur throughout the season.

#### INVESTIGATION AND BANNING PROCESS

Upon conclusion of an investigation, the investigation team will present their findings to senior members of the Club who will decide on what action, if any, to take in line with this Policy.

Breaches of this Policy are not exclusive to those committed at the American Express Stadium but can include all other Club properties and all other stadia. Where relevant, offences can also be committed via email or online, social media, telephone and letter and will be treated in the same manner as if actioned in person.

#### What happens during live investigations?

Individuals ejected, arrested or subject to a post-match investigation relating to either home or away matches may not be permitted to any future matches or have access to any Club premises until the outcome of the investigation is known; this includes pending a court appearance or Club appeal and the outcome of any related criminal appeal or civil proceedings.

Individuals subject to a live investigation may receive a temporary exclusion letter from the Club.

# What happens when a supporter receives a Football Banning Order?

When a BHAFC supporter receives a Football Banning Order from the court, the Club will write to the individual informing them that they are banned from entering any Club premises. At the conclusion of the Football Banning Order, there is no automatic right for the supporter to return to Club premises. Therefore, upon expiry of a Football Banning Order, the supporter is required to get in touch with the Club who will then review their exclusion in line in accordance with Club policies. There is no automatic right to return to the Club following the expiry of a supporter's FBO.

#### How will we communicate with individuals?

- A recorded letter will be sent to the email and/or home address of the excluded person where the individual is 18 years old and over.
- A recorded letter will be sent to the email and/or home address of the excluded person where the individual is aged 16-17, as well as the parent/guardian or carer.
- In the case of individuals, 15 years and under, a recorded letter will be sent to the email and/or home address parent/guardian or carer.

# **SANCTIONS TARIFF**

	In all offences, supporters are liable to pay any fine imposed on the Club by any third parties as a result of the actions of the supporter										Recommended minimum sanction			
Cat.	Offence Committed									1st Offence		2 <sup>nd</sup> Offence		
1	Smoking/vaping				Persistent standing					!	Warning Letter	3	3 Premier League home games	
2	where there has be				h of the Drinkin iing act th				Persistent foul and abusive language		3 Premier League home games	6	6 Premier League home games	
3	Failure to comply with reasonable requests of a steward	with reasonable that brings the requests of a Club into		Misuse of a ticket where defrauding the Club		Attempting to gain entry without a valid ticket		out	Viewing the match from a seat different to the one you purchased	5	5 Premier League home games	10	10 Premier League home games	
4	Abusive or disorderly behaviour towards other supporters or into the supporters				es onto the pitch Supplying a ticket to away ne crowd fan in home area				10	10 Premier League home games	<b>1y</b>	1 year ban		
5			encroachment al or intended)		Breaching a ba sanction		an or		Physical assault towards other supporters	1 year ban		2 year bar		
	Sending and/or malicious commo targeted at Club s players	Abusive or disorderly behaviour towards staff, players and/or officials			ff,	Tickets being resold or advertised for sale outside our documented authorised processes			(ly)	Tyear ball	∠y)	z year bail		
6	Sexual haras	Discriminatory languaç and/or behaviour			je	Physical assault on a member of staff/player/official		<u>(5ý</u>	5 year ban		Indefinite ban			
7	Any other criminal activity A breach of applicable Terms and Condition: Supporters' Code of Conduct or Ground regulations			Domonoto			Unauthorised sale of unlicensed and/or fake Club branded merchandise (whether online or otherwise)		R	Reviewed on an individual basis	R	Reviewed on an individual basis		

### What happens if a 1901 guest breaches the Policy?

### 1901 guests

Though a 1901 member can assign their ticket(s) to any individual, including supporters of other clubs, there is still a responsibility for the member to ensure that their guest behaves in an appropriate manner including adhering to the Ground Regulations, the Policy and any criminal legislation. Therefore, if a guest does behave in a manner contrary to any aspect of the Policy, they will be subject to any appropriate sanction in line with the sanctions tariff.

Furthermore, the 1901 member will be held responsible for the actions of their guest and can be subject to a Club sanction. In the first instance, the member's account will receive a Club ban of 3 premier league home matches. On a second occasion where a guest of a 1901 member breaches the Policy, the length of the sanction will be 6 premier league home matches.

If there are further incidents involving the guests of a 1901 member, the 1901 member will be required to attend a Club meeting where further action will be considered.

For the avoidance of doubt, the sanction is placed on the 1901 account and not the 1901 member and the Club will block any accounts connected to an incident. For example, if a 1901 member used two of their accounts to purchase tickets and both tickets were used by guests that were found in breach of this Policy, then both accounts will receive a Club ban as outlined above.

## What happens if multiple offences have been committed?

Where an individual's actions fall into several offence categories, it will be at the discretion of the Club to decide whether the relevant sanctions are applied consecutively or concurrently.

#### WHAT TO EXPECT WHEN YOU RECEIVE A CLUB SANCTION

The sanctions tariff provides the length of time that an individual can be excluded for as a result of their actions. Further to this, all persons may be subject to the following as part of their sanction:

- Recovery for costs incurred by the Club
- Recovery for lost revenue
- Loyalty point deduction
- Exclusion from all Club premises (for the avoidance of any doubt, this shall include any venue hired by the Club including, without limitation, Broadfield Stadium)
- Not permitted to purchase, share or assign tickets for the duration of the ban.
- Acceptable Behaviour Agreement
- Fan education course
- Possible revocation of tickets

For the avoidance of doubt, individuals are not permitted to attend any other matches that fall within the sanction period.

For example, if the letter reads "you are excluded from attending the next three Premier League home matches at the American Express Stadium and any other matches played within this period (applicable to all the Club's teams)". This means that you are excluded from attending **any other games** that fall within this period of three Premier League home matches.

### Acceptable Behaviour Agreement

All individuals who have received a Club sanction or behaved in an inappropriate manner contrary to this Policy, will be required to attend the American Express Stadium and meet with a Club representative to discuss future attendance at matches. The meeting will conclude with the joint signing of an Acceptable Behaviour Agreement (the "ABA").

The Club reserves the right to decline to sign the ABA if it is reasonably believed that the individual has failed to provide reassurance that their future behaviour will not impact upon Club staff, visitors or supporters.

If an individual who signs an ABA later goes on to commit another offence, the Club will take this into consideration when deciding on appropriate action to take.

#### Fan education

BHAFC work tirelessly on our commitment to equality, diversity and inclusion. As a Club & Foundation we're proud to be at the very heart of our community, providing a safe, welcoming and positive experience for all supporters, participants and staff.

We have a zero-tolerance approach to discrimination of any kind and work closely with organisations such as Kick It Out to deliver education courses to supporters who receive stadium bans.

#### APPEALING A SANCTION

## Can I appeal a category 1 or 2 offence?

There is no automatic right of appeal for category 1 and 2 offences.

Appeals will only be heard if there is evidence of a) mistaken identity or b) where it can be shown beyond a reasonable doubt, that an offence did not take place.

If the excluded person(s) believe they are eligible to appeal based on the two exceptions above, they should follow the appeals process outlined below.

# Can I appeal a category 3 to 7 offence?

Individuals who commit a category 3 to 7 offence have an automatic right to appeal following the appeal process outlined below.

#### What is the appeal process?

#### 1st appeal

The excluded person(s) must write to the Club within 14 working days of the date of the sanction letter to request an appeal. This request must be in writing and set out the grounds for their appeal.

Appeals will be completed within 25 working days of the Club receiving the appeal request, though this may increase during peak periods if investigation is required.

The composition of the appeal panel for the 1<sup>st</sup> appeal will be at the discretion of the Club but include at least 1 senior manager and may include the attendance of an independent representative from the community.

#### 2nd appeal

The excluded person(s) must write to the Club within 14 working days of having been given the result of the 1<sup>st</sup> appeal. A 2<sup>nd</sup> appeal will not be granted if there is no new evidence available to consider.

Appeals will be completed within 25 working days of the Club receiving the appeal request, though this may increase during peak periods if investigation is required.

The composition of the review panel will be at the discretion of the Club but will include at least 1 member of the BHAFC executive committee and may include the attendance of an independent representative from the community.

#### **EXPIRY OF A SANCTION**

# What happens when my ban has expired?

Upon the expiry of a sanction, the excluded individual should contact <a href="mailto:reports@brightonandhovealbion.com">reports@brightonandhovealbion.com</a> to request the unblocking of their account.

If the individual is required to sign an Acceptable Behaviour Agreement prior to their return, they need to contact the email address above to arrange a meeting with our security team. An individuals account will remain blocked until the successful signing of the Acceptable Behaviour Agreement, where required.