



BONDED BY BELIEF
SINCE 1878

Anti-Social Behaviour and Incident Investigation Policy



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West Bromwich Albion FC (The Club) works to provide its supporters and all visitors and staff with a friendly, safe and enjoyable experience. The Club is inclusive in its values and is committed to challenging and eliminating all forms of hate, prejudice and discrimination. It supports and promotes values of respect – for opponents and visiting supporters, players, officials, club staff, supporters and for each other – and is committed to working with stakeholders, partners and governing bodies to tackle all forms of anti-social behaviour.

All Club supporters and staff are expected to respect and adhere to these values and behave in a manner that upholds and enhances the reputation of the Club. As a condition of entry, all supporters are expected to abide by the Ground Regulations (as defined by law), a supporter Code of Conduct, and adhere to the Club's Anti-Social Behaviour and Incident Investigation Policy.

The Club operates a zero-tolerance approach in relation to any such breaches of these policies and reserves the right to take immediate action where such breaches have been identified. Such action may include, but is not limited to, immediate ejection from the stadium, investigations and reporting to appropriate authorities, withholding of Club membership, suspension of entry to the stadium, criminal investigations or suspension by the Club, where such events and incidents may result in reputational risk, an investigation by authorities or governing bodies, or criminal investigation. This includes incidents or events reported that may occur away from the immediate footprint of the stadium or at away fixtures where, in the opinion of the Club, reputational risk is at stake.

The Club also operates a zero-tolerance approach towards the use or discharging of pyrotechnic devices. Anyone found with either a used or unused pyrotechnic device, or caught discharging such a device, will be detained by Club officials and reported to West Midlands Police (WMP) which may subsequently result in a criminal investigation.

The Club reserves the right to issue and enforce penalties 'without prejudice' while investigations are ongoing whether these are criminal, internal Club proceedings or by other authorities. The Club reserves the right to issue such penalties where evidence can be substantiated on the 'balance of probabilities'. Anyone ejected from the stadium will not be entitled to a ticket refund.



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This policy follows the EFL's document - *Supporter Sanctioning Guidance on Tackling Supporter Behaviour*.

1. Incident Investigation Process

The following outlines The Club's processes for dealing with alleged incidents of:

- Ground Regulation Breaches
- Ticketing Abuse
- Antisocial Behaviour
- Hate Crime
- Other Crime and Disorder

In respect of reporting, evidence gathering, assessing, investigating, recording, reviewing and the appeal process for all incidents, alleged or otherwise, of prejudice, discrimination or anti-social behaviour.

Reporting

Incidents are reported to the Club via several different sources:

- Matchday Incident Reports
 - Paper reports
 - Electronic Logging System
- Matchday Text Number
- Police Referrals
- Club Email Accounts

The Matchday Safety Team is responsible for collating this information on the first working day after the fixture.

Evidence Gathering

Evidence will be gathered from all appropriate sources, including but not limited to, Police intelligence; Stewards; Supporter Liaison; Medical Staff (if appropriate); Club Officials; CCTV and other video footage or photographs; and Witness Statements.

During this time, the Club may decide to write to (or otherwise inform) someone that their account is suspended to enable the investigation to be progressed.



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Assessment Panel

Information will be reviewed by a panel consisting of a member of the Matchday Safety Team and a full-time member of the Safeguarding team.

The information and evidence will be reviewed without prejudice and decide whether any further action is required.

Communicating the Decision

- No Further Action - If no further action is required, the investigation will be closed.
- Further Action Required - Having reviewed all the evidence presented, in cases where further action is required the Club will communicate its decision in writing to the person under investigation.

Investigation

Where it is deemed that further action is necessary, the Club has a range of options available and may initiate intervening action beginning at any level as detailed below (is broadly in line with the EFL's document - *Supporter Sanctioning Guidance on Tackling Supporter Behaviour*).

Where there are concerns that a crime may have been committed, the Club will make all evidence available to the Police.

Intervention

The Club reserves the right to temporarily suspend any person or persons from attending Club fixtures (home and away) while under investigation by issuing a Temporary Club Suspension. The duration of which will depend upon the nature of the offence.

Issuing a Temporary Club Suspension does not require criminal conviction or acceptance or proof of guilt or responsibility. It may be issued where the Club deems reputational risk is at stake and/or where, in the opinion of the assessment panel, the evidence presented would have the potential to implicate an individual or individuals on the 'balance of probabilities'. It may also be used to enable a speedier investigation.



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The below interventions (Sanctions), are taken from the EFL's guidance document. The Club will broadly follow this and document where it has moved away from the below table.

LEVEL	BREACH OF REGULATION	POSSIBLE SANCTIONS
1	<ul style="list-style-type: none">• Smoking/vaping• Alcohol offences (not involving police)• Persistent standing/standing on seats.• Anti-social behaviour (e.g., persistent use of foul and abusive language, excessive gesturing towards opposition supporters, 'horseplay' impacting others.• Conduct that compromises the safety of spectators and/or others.• Non-co-operation with stewards.• Ejection from home or away stadium (not leading to police involvement).• Refused entry to home or away stadium (not leading to police involvement).• Reckless/intentional damage to club property under the value of £100.	<ul style="list-style-type: none">• Safety standards letter• Written warning• Acceptable behaviour contract.• Suspended club ban• Club ban (maximum three home matches)• Five-match ban for breaches away from home• Sanction doubled if there is a repeat of the breach within one year• Educational and restorative justice options will also be available
2	<ul style="list-style-type: none">• Deliberate damage to property• Missile throwing• Pitch encroachment• Reckless/intentional damage to club property over £100.• Aggressive language/ behaviour• Assault on club premises• Use or possession of pyrotechnics• Use or possession of illegal drugs• Use of prohibited items as per ground regulations• Serious public disorder/anti-social behaviour• Hate crime/discrimination (including online)• Breach of existing club ban	<ul style="list-style-type: none">• Written warning• Lengthy ban• Indefinite club ban subject to two-year review• Educational and restorative justice options will also be available

Club Suspension – A Club suspension does not require legal intervention or action and can be implemented by the Assessment Panel. Breach of a Club suspension could result in further sanctions being imposed by the Club and may also result in WMP applying to the courts for a Football Banning Order (FBO).

Where it is determined that a Club Suspension is required, this will be issued in writing and will include information regarding the nature and period of the suspension. Such information will be shared with appropriate authorities under the Sharing of Information Agreement with WMP.

A FBO is applied for by the Police with the support of the Club and imposed by the Courts and is legally binding. Breach of an FBO is a criminal offence.



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Recording

The Club will maintain a record of all persons who are subject to discussions at the Assessment Panel and those who are then given sanctions. This will be regularly updated with any changes to circumstances and will provide an audit trail of those subject to the Anti-Social Behaviour and Incident Investigation Policy

Reviewing

The Club reviews all suspensions periodically (normally every three months, but this may be more frequent where required). This review will include consultation with external authorities and any other evidence gathered. Any change will be communicated in writing. Termination of a suspension may be subject to agreed terms and conditions.

Appeal Process

Any individual issued with a Club Suspension will have the right to appeal which must be submitted within 14 days of the date of the ban being issued. The request for an appeal should be made in writing and should specify the grounds on which the individual is appealing. Appeals must be addressed to: The Safety Officer, West Bromwich Albion Football Club, Halfords Lane, West Bromwich B71 4LF.

The Club will write to the individual acknowledging receipt of the appeal, inviting them to attend an appeal meeting and confirming the following:

- (a) the date on which the appeal meeting is to take place; and
- (b) the venue for the appeal meeting, which will normally be The Hawthorns Stadium.

An appeal meeting will take place on a 'without prejudice' basis and will be held by an appointed Appeal Panel which will act independently from the Assessment Panel.

Following an appeal meeting, the Club will write to the person concerned to inform them of its decision. This decision will be final and there is no further right of appeal.

Expiry of Club Suspension

When any fixed period of suspension expires, the individual must in the first instance write to the Club to request permission to be able to attend Club



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fixtures. This should be addressed to: The Safety Officer, West Bromwich Albion Football Club, Halfords Lane, West Bromwich B71 4LF.

On receipt of this request, the Safety Officer will consult with relevant partners to determine the level of risk exposure to the Club.

Where permission is granted, an individual may be subject to certain conditions of entry which may include, but are not limited to:

- Acknowledgment of, and agreement to, the Club's Acceptable Supporter Behaviour Policy and Code of Conduct.
- Agreement that the Club may insist on the individual being seated in a specific area of the stadium (which may not be their usual seat or area).
- Acknowledgement that breaches of these conditions may result in further sanctions being imposed by the Club; and/or
- Acknowledgement that such information will be shared with West Midlands police (WMP)