

MODERN SLAVERY ACT 2015 STATEMENT



Modern Slavery Transparency Statement

1. This statement sets out the steps that the Football Foundation (FF) Group is taking to ensure, as far as is possible, that modern slavery ⁽¹⁾ is not taking place within its business or its supply chains.

The FF Group

2. The FF Group comprises the following three companies:
 - a. The **Football Foundation** is a UK registered charity and company limited by guarantee. As a charity, the Football Foundation is governed by its Memorandum and Articles of Association. Funding is received from the very top of the professional game through the Premier League, The FA and from the Government, via Sport England. The Football Foundation is responsible for dispersing this funding to develop community football facility projects in England.
 - b. The **Football Stadia Improvement Fund** is the 'non-charitable' arm of the Football Foundation and is funded wholly by the Premier League. It funds stadia facility projects for clubs operating in the FA National League System and the English Football League. It also funds professional football club fan engagement projects.
 - c. The third company in the FF Group is the non-charitable wholly owned trading company, **The Football Foundation Trading Limited**.
3. Further information on the FF Group structure and business is set out in the relevant annual report and accounts.

FF Group supply chains – operational partners

4. The FF Group provide capital grants to support the development of new and refurbished sports facilities. Our grantees mainly comprise schools, academies, football clubs, community groups and local authorities. Our grantees are wholly responsible for the delivery of their project and robust due diligence is undertaken before funding is awarded to ensure that any investment provided will achieve the funding criteria and essential outcomes.
5. The FF Group also partners with specialist consultants to manage our framework agreements. These framework agreements are in place to ensure a consistent approach to the quality of 3G pitches, as well as modular build projects, thereby protecting the investment of our funding partners. The FF Group appoints specialist consultants through an open tender process.

¹ 'Modern slavery' is defined by the Modern Slavery Act 2015 ("the Act") as a term to encapsulate the offences of slavery, servitude and forced or compulsory labour, and human trafficking. It is used with this definition throughout the statement to support compliance with section 54 of the Act.



6. The FF Group is committed to implementing effective systems and controls to ensure our supply chains are free from modern slavery and/or human trafficking. Moving forward, we will be asking all existing and prospective suppliers involved in tendering processes to make a positive affirmation that they and their supply chains are similarly free from modern slavery, and their tier 1 suppliers do not endorse, enable or facilitate human trafficking or slavery within their businesses.

Other FF Group supply chains

7. Outside of our capital grant funding supply chain, the FF Group's supply chain consists mainly of IT delivery and support; professional advisers (such as legal and auditing); insurance services; marketing/design services; recruitment service providers; and maintenance service providers – such as cleaning and printing services and property management. We procure a small amount of goods in the form of IT and communications hardware, office supplies and other materials used in our day to day operations.
8. All suppliers of the FF Group have a UK base and we only procure goods and services in Sterling.
9. To further demonstrate our commitment to ensuring our supply chains are free from modern slavery and/or human trafficking, moving forward we will require all newly appointed or newly contracted suppliers to warrant that they will provide the relevant services in accordance with the provisions of the Modern Slavery Act 2015.

Policies, standards and procedures

10. Our recruitment and human resources policies and processes comply with legislation and embrace best practice. Relevant policies and procedures include:
 - a. **Conduct and Fairplay.** This policy drives ethical behaviour, demonstrating our commitment to acting with integrity, managing conflicts of interest and the reporting of issues.
 - b. **Whistle blowing.** This policy is in place to guide and support FF Group employees in raising a whistleblowing concern made in the public interest.
 - c. **Recruitment.** This policy outlines our recruitment and selection process, which helps to ensure that this is transparent and equitable. It also includes checks on the right of employees and agency workers to work within the UK.
 - d. **Anti-bribery and corruption.** This policy compliments our Fairplay policy and outlines the FF Group's commitment to conducting business in an honest and ethical manner. It includes the recording of hospitality and gifts received by FF Group employees.



- e. **Complaints.** This policy provides guidance and support to grant applicants and other external agencies, should they wish to raise any concerns about our staff or operational partners.
 - f. **Salary review.** This policy outlines the process in place to review the salary of all permanent staff to ensure an equitable approach and to ensure that all staff we employ receive fair pay.
11. Policies and processes are reviewed on a periodic basis to ensure they remain fit for purpose. The FF Group is committed to ensuring that our policies and principles are further strengthened by embedding a zero-tolerance approach to modern slavery across the business.
 12. To ensure FF Group staff have a high level of understanding of the risks of modern slavery, to ensure they remain vigilant and are able to report any concerns they may have, a one-page guide will be provided to all staff.

Risk assessment and management

13. The FF group has a robust risk management process in place whereby relevant matters are escalated from staff, through to team leaders, Senior Management Team and the FF Group Boards as appropriate. The Risk Register is reviewed monthly by the CEO and quarterly by the FF Group Boards.
14. In implementing effective systems and controls to mitigate against modern slavery and/or human trafficking, this process will be strengthened to include a regular assessment of any associated risks so that we remain alert to this issue.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the FF Group's slavery and human trafficking statement for the financial year ending May 2019.

Gary Hoffman
Chairman

18 September 2019