

# MODERN SLAVERY

**Brentford FC Limited**

## **Modern Slavery Act 2015**

### **2022 Statement**

In accordance with the Modern Slavery Act 2015, companies with a turnover above £36 million must include a statement regarding modern slavery within six months after the end of their financial year. Pursuant to that requirement, the Club is publishing this, its first Modern Slavery Act statement in respect of its financial year ending 30 June 2022. We confirm we will update this statement each year to reflect the progress we will make

in further mitigating the risks of involvement with modern slavery and exploitation.

## ABOUT BRENTFORD FC

The Club is a Premier League football club based in the London Borough of Hounslow. The Club was founded in 1889 and has recently been through a period of great change. We moved to a new, 17,250-seater stadium with outstanding facilities for fans, broadcasters, corporate guests, and the community in the summer of 2020, having previously played at their historic Griffin Park home for 116 years.

At the end of the first season in the new stadium, Brentford won promotion to the Premier League. The Club's first season in the top flight of English football since 1947 started in August 2021. Promotion and a move to a new stadium are parts of a longer-term vision that aims to see the Club sustain top level football on the field and ensure that the Club is sustainably run off the field.

Situated next to the M4, the new stadium is at the centre of the Brentford East redevelopment scheme, which includes the construction of more than 900 new homes, a new purpose-built location for Brentford FC Community Sports Trust.

The Brentford FC Community Sports Trust (the "BFC CST") is the Club's official charity. With community work spanning more than three decades, the BFC CST has established itself as a pioneering organisation for the local community using the power of sport to educate, motivate and inspire people from all backgrounds.

The BFC CST and the Club work together to take a very active role in the local community. The Club and the Trust have worked together to win the EFL Community Club of the Year Award four times and the Club has also been awarded a Business in the Community and Community Mark Award. In total, the BFC CST delivers more than £13 million of social benefit to the West London area each year.

The Club operates through Brentford FC Limited and its subsidiary Lionel Road Developments Limited (“LRD”). The Club and LRD together with other (dormant companies) make up the “Group”. References to the Club in this statement cover the Group. This statement is not made on behalf of the BFC CST which is a separate legal entity and the BFC CST is not subject to the reporting requirements of the Modern Slavery Act. However, the BFC CST is a key supplier to the Club and is subject to compliance with key policies and risk assessment along with other suppliers.

The Club operates in the UK and to the extent that it has any overseas business that consists of very short trips abroad for training and friendly games and servicing a small number of fans based globally with retail and memberships. The Club has a global profile through its participation in the Premier League. Apart from its primary business of competing in professional football competitions, and the broadcast opportunities which arise out of those, the Club promotes third parties through sponsorship, advertising and partnerships, it sells Club-branded goods and services through its retail store and online channels, and it operates an event and hospitality business for its fans and corporate customers.

**MODERN SLAVERY AND OUR COMMITMENT TO FIGHTING IT**

The International Labour Organisation estimated that 49.6 million people were in slavery globally including 27.6 million in forced labour. The ILO also estimate that 12% of the victims of forced labour are children[i]. Clearly modern slavery is a serious and global problem. It is of particular concern for our industry as every club has significant relationships with suppliers and partners with global supply chains. The manufacturing sector accounts for one fifth of identified forced labour of adults[iii] including the apparel industry in which there has long been awareness of issues with coercion. However, exploitation has been identified in many areas of commerce and so we are not complacent when we review and risk assess all our activities and those of our partners and suppliers. We employ young people, and many people are employed by the Club directly or indirectly on a match-by-match basis and it is important that they are treated fairly by us or our suppliers and partners.

Protecting people from exploitation is important to us. The Club has made a public commitment to think about inclusion in everything that we do and that commitment, along with the Club's values: togetherness, respectfulness, and progressiveness, underlie how we address the risks of modern slavery. In accordance with these values, we will not tolerate modern slavery or human trafficking in our organisation, among our partners or in our supply chain.

The Club has a zero-tolerance approach to slavery, in all its forms, within its supply chain and in its partners. It is committed to running its business in an ethical and lawful manner and, as such, all persons working for us, and all persons in our supply chain, must comply with the law and help the Club to ensure that modern slavery is not taking place anywhere in our business or in our supply chain or that of our partners.

## OUR ANTI-SLAVERY POLICIES AND PROCEDURES

We have a policy to review of suppliers and partners for a range of reputational and compliance issues, including relating to anti-slavery. Where risk assessments require particular focus on certain suppliers and partners, we review the specifics of their own policies with those suppliers and partners to ensure they meet our standards. If we did not believe that a supplier or partner was working to the required standards we would take appropriate action, including up to seeking termination of our relationship with them.

## WHISTLEBLOWING

We have a whistleblowing policy in place set out in the company's employee policies portal which allows employees to help us tackle corruption and crime, including modern slavery. Employees, and anybody connected with us, are encouraged to speak up if they have concerns about slavery in our business or within our supply chain and concerns can also be raised to the Club directly at [enquiries@brentfordfc.com](mailto:enquiries@brentfordfc.com). Alternatively, a complaint can be addressed to the Club's adjudicator which is the Chair of the Board of Brentford Football Community Society Limited "Bees United" and also a director of the Club. If any complainant wishes to whistleblow to an organisation that is completely independent of the Club they may do so by contacting Protect, an independent charity which supports whistleblowers and lobbies for protection for whistleblowers. The Club is a member of Protect, and they may be contacted on +44 20 3117 2520 or [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk).

## TRAINING

We are currently updating the compulsory training that employees receive on equality, diversity, inclusion and safeguarding to ensure it includes anti-slavery training which is appropriate to each role, and in this respect those areas of compliance overlap. We are working on ensuring that care is taken to ensure that key individuals involved in procurement, compliance and legal, commercial sales and operations are aware of how to reduce risk in their areas both for our own operations and that of key suppliers and partners. The Club operates a strict policy for the recruitment of staff, which includes mandatory, pre-recruitment right to work checks.

## RISK ASSESSMENT

The Club has in place a risk assessment process for all aspects of its business by implementation of a risks and opportunities register which identifies the areas of the business which are most at risk and includes an assessment of the risks resulting from slavery and human trafficking. The Club reviews its risk register periodically in order to identify any new or changing risks and ensure that safeguards are being put in place in our own operations, in suppliers, and lower down the supply chain to minimise the risk of exploitation and trafficking.

## THE CLUB'S OWN OPERATIONS

In common with many other sports clubs, we have a relatively small full-time staff and then engage a large number of staff as employees, through agencies, or sub-contractors, to work on match days, in catering, stewarding and other match day roles. All of these roles are important to providing the best experience for our fans but the nature of those roles mean they are often staffed by young people, with comparatively fewer qualifications than full time staff and a significant proportion of them earn relatively low wages. We voluntarily agree to pay every member of staff over the age of 18 at least the London Living Wage – which is set in line with the cost of living and is significantly above the current national minimum wage. The Club also imposes this obligation on key third party organisations who supply us with staff to work at our sites.

The Club has very recently restarted its academy operation which means we must consider the welfare of young people in our care. We have some experience in this area already because we already operated a B team and we take particular care to ensure that the welfare of our youngest and most vulnerable players is a high priority for our staff. We employ a full-time specialist head of safeguarding whose responsibilities include overseeing the care of vulnerable people across the Club. Consideration is given to the ongoing education and welfare of players in the academy and the B team to ensure the risk of them being exploited is minimised as far as possible.

## OUR SUPPLIERS

Our supply chains include suppliers of goods and services which support our participation in football competitions, including the accompanying broadcast

commitments, our commercial operations, including advertising partners and sponsors, our retail operations – in particular sports apparel, entertainment and events. Key suppliers identified as part of our risk assessment in 2022 were the Club's primary apparel, hospitality, food and beverage partners. All the foregoing have Modern Slavery statements on their websites and we make compliance a condition of our contracts with them. As part of our relationships with those companies we have the ability to interrogate them about their procedures to ensure that we and they remain in compliance with our policies.

The Club selects new suppliers against pre-agreed criteria to mitigate risks to the Club. The Club also has an onboarding process for new suppliers that ensures they meet the Club's minimum standards and includes due diligence checks to identify risks, including slavery and trafficking. We carry out periodic risk assessments to consider the areas of the business where modern slavery and exploitation may be a risk and give the most attention to these areas.

The Club is committed to creating and ensuring a non-discriminatory working environment for its staff and non-discrimination policies apply to all employees.

Our contracts include terms requiring our counterparties to comply with all applicable laws including relating to anti-slavery and human trafficking.

## **ASSESSMENT OF EFFECTIVENESS**

In order to assess the effectiveness of the measures taken by the Club we will continue



to regularly review and refine our policies and procedures in relation to modern slavery and human trafficking and will include updates on any actions we take in future statements.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by the Club to prevent modern slavery and human trafficking in our business and supply chain.

## APPROVAL

This statement was approved by, and signed on behalf of the Board of Brentford FC Limited on 14 December 2022, and will be available from the Club's home page at <https://www.brentfordfc.com/en/modern-slavery> from Friday 23 December, 2023 and on the Government's Modern Slavery Statement Registry here: <https://modern-slavery-statement-registry.service.gov.uk/> on or before 14 January 2023.

A handwritten signature in black ink, reading 'Nity Raj'.

**Nity Raj**

**Director and General Counsel**

**Brentford FC Limited**

[1] <https://www.ilo.org/global/topics/forced-labour/lang--en/index.htm>

[1] [https://www.ilo.org/global/topics/forced-labour/publications/WCMS\\_854733/lang--en/index.htm](https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm)