

**Brighton & Hove Albion FC - Modern Slavery Statement**  
**January 2023**  
**Respecting Human Rights**

## **Introduction**

Modern slavery, forced labour and human trafficking affect all sectors, including football. Modern slavery is a growing global and systemic issue, impacting an estimated 49.6million people.

Brighton & Hove Albion Football Club Limited (the “**Club**”) is committed to acting professionally and conducting its business in an honest and ethical manner, ensuring that the principles of equality and sustainability are integrated within its business operations.

The Club’s ‘[Team Brighton Values](#)’ underpin our approach to human rights and addressing modern slavery, particularly our values of ‘treating people well’ and ‘acting with integrity’.

Section 54 of the Modern Slavery Act 2015 requires companies with a turnover of £36 million or above to publish an annual modern slavery statement. This is the fourth statement published by the Club since its promotion to the Premier League and it sets out the steps taken by the Club to prevent modern slavery in its business and supply chains during the financial year 1 July 2021, ending in June 2022. The statement can be accessed from the home page of the Club’s website: [www.brightonandhovealbion.com](http://www.brightonandhovealbion.com).

*"We are proud to play at the highest level of the professional game; our men’s first team competes in the Premier League and our women’s first team in the Women’s Super League. We understand that this privilege brings with it a global presence and a huge responsibility to ensure that our business is conducted in a way that upholds the highest standards of ethics, compliance, and human rights. Modern football is a global business, and that means a complex and far-reaching supply chain. We recognise that this brings greater potential for exposure to risk and breaches of human rights, but our modern slavery policy provides us with the robust processes and infrastructures to help us anticipate these risks and mitigate against them. Football, as a game watched and played by billions of people around the globe, has an important role to play in upholding human rights and combatting modern slavery."*

*Paul Barber, Brighton & Hove Albion Chief Executive and Deputy Chairman*

## **About Us**

The Club is a professional football club in the English Premier League, which plays its home matches at the American Express Community Stadium in Brighton.

(<https://www.brightonandhovealbion.com/club/club/contact-us>).

We are a multi-national business which has a broad range of domestic and international commercial partners, sponsors, and suppliers. We also benefit from the distribution and broadcasting of live football content, earning revenue from central sale of domestic and international television and radio rights. The Club’s operations are primarily conducted in the UK. The significant majority of our staff are employed and based in the UK. Our operations include participating in professional football competitions, commercial sponsorships, retail, property development, ticketing and community projects. For further information about our structure and operations, see:

<https://www.brightonandhovealbion.com/>.

The Club is a wholly owned subsidiary of Brighton & Hove Albion Holdings Limited (the "**Holding Company**"). Other wholly owned subsidiaries in the group include:

- (a) The Community Stadium Limited ("**TCSL**"), a property development and construction company, which owns the stadium, the training ground and the land adjoining the training ground.
- (b) Brighton & Hove Albion Women's Football Club Limited ("**BHAWFC**"), a professional football club currently competing in the FA Women's Super League.

Together, the Club, the Holding Company, TCSL and BHAWFC shall be referred to in this statement as the 'Group'.

Albion in the Community ("**AITC**") is the official charity of the Club. Through the power of football and the brand of the Club, AITC delivers accessible opportunities that support the health and wellbeing, education and aspirations of the local community.

The ultimate controlling party of the Holding Company is Mr. A. Bloom, owing to his shareholding in that company.

This statement constitutes the statement made on behalf of the entire Group. Save where the context specifies otherwise, references in this statement to the Club shall be taken as referring to the entire Group.

### **Our Commitment to Tackling Modern Slavery**

We are committed to taking steps to ensure that modern slavery does not exist across the Club's operations or supply chains. This statement sets out the Club's top-level commitment to addressing the risk of modern slavery and is recognised as being part of the development of an overall strategy to address modern slavery risk as an integral part of the overall objectives of the Club.

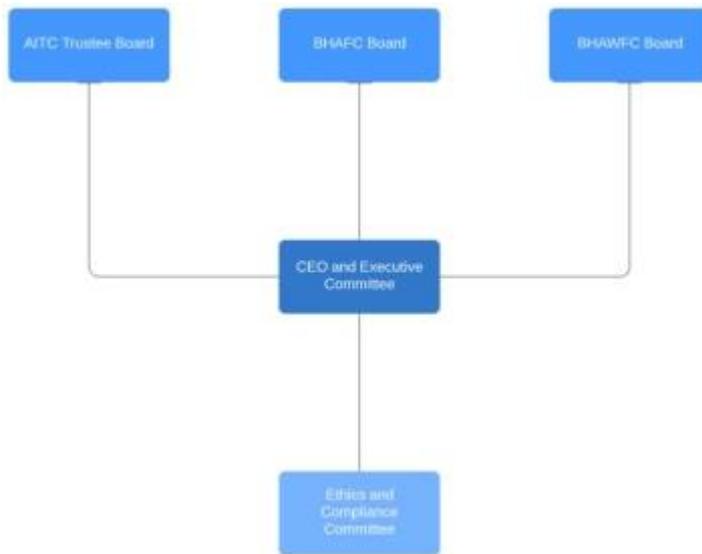
Steps we are taking in the next 12 months:

1. Implement a sustainable procurement framework.
2. Operationalise a Supplier Code of Conduct by circulating amongst supplier base.
3. Incorporating BHAF social expectations into new supplier contracts.
4. Continue risk assessments of high-risk suppliers.
5. Embed the updated Whistleblowing and Anti-Bribery policies.
6. Continue to develop and expand our modern slavery training programme across the Club.
7. Introduce new members of staff into the work of the ethics and compliance committee.
8. Plan the next phase of the Club's modern slavery strategy and integrate into the sustainability strategy.

### **Governance for Anti-Slavery Initiatives**

Our approach and the steps taken to address modern slavery have the full support of our Board and

Executive Team which oversees all strategic decisions in this area. The Club has an Ethics and Compliance Committee (the “Committee”) whose objective is to “*create and maintain an organisational culture committed to high standards of ethics, integrity and compliance*”. The chair of the Committee is Robert Comer, a Board member. This internal governance structure provides oversight, accountability and transparency at all levels of our business. The governance structure of the Committee is set out below:



## Our Policies and Accreditations

We comply with all applicable employment laws relating to working terms and conditions and we are Living Wage accredited. We pride ourselves on our equality work. We have successfully attained the intermediate level of the [Premier League Equality, Diversity and Inclusion Standard – PLEDIS](#) (previously known as the Premier League Equality standard) and we are now working towards the advanced level of the standard. Our key policies are reviewed every three years (or sooner if required by law) from a legislative, equality and human rights perspective, incorporating International Labour Organisation standards.

We have updated our sustainable procurement policy which forms the basis of our revised sustainable procurement framework that addresses the risk of modern slavery. Alongside the policy, we have developed a sustainable procurement procedure which sets out the process by which environmental, social and economic factors (including human rights) will be built into the Club’s purchasing decisions, supplier selection and management.

In 2022, we approved our updated Anti-Bribery and Corruption Policy, our Gifts and Expenses Policy (and associated Gifts and Hospitality tracker) and guidance note to continue to underpin our ethics and compliance programme. This will be circulated with accompanying training in 2023 (see ‘Next steps’).

The Club has reviewed the Whistleblowing Policy and approved a revised version in 2022. This will allow employees to report any concerns relating to the direct activities or the supply chains of the

Club. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

The internal staff Code of Conduct also sets out the Club's expectations of staff in relation to the fair and equal treatment of colleagues and any third parties engaged in the course of working for the Club.

We have created a Supplier Code of Conduct that formally sets out the expectations of the Club in maintaining the highest ethical standards, behaviours and compliance. This includes adherence to legal and best practice standards relating to human rights and modern slavery, as well as broader sustainability issues. We will roll this out to our key suppliers along with updating our terms and conditions, to align our key suppliers' standards with our own.

### **Risk Assessment**

As a Premier League football club, the Club procures a wide range of goods and services to support the success of the Club. These include:

- Audio-visual equipment/services
- Catering supplies and services
- Construction services
- Consultancy/ professional services
- Couriers
- Financial services
- IT equipment/ support
- Kit and equipment
- Maintenance services
- Marketing and design services
- Medical Treatment/Supplies
- Merchandise
- Office supplies
- Property management services
- Recruitment services
- Security services
- Travel & accommodation services
- Utilities
- Waste services

The Club is in the process of developing a risk-based approach to assess the likelihood of the existence of modern slavery within its supply chain and the process is ongoing. This risk assessment process includes our existing suppliers, as well as potential new suppliers.

The Club carried out an inherent risk assessment of the Club's most significant suppliers by spend and sector before COVID-19 impacted operations. As a result, this will need to be refreshed to reflect the current supplier base. Suppliers deemed to be highest risk will be asked to complete our bespoke sustainability assessment in 2023. The data received will be analysed and will guide our risk management actions going forward.

We have identified a number of potential risk factors for modern slavery, including:

- (a) Risk of outsourced labour and recruitment agencies;
- (b) Risk arising from products sourced in identified high risk countries and sectors;
- (c) Less leverage to influence third parties in certain business areas; and
- (d) Risk relating to third party sources of youth-player recruitment.

With respect to the final bullet point above, the Club has been building the awareness of all academy staff of the potential risk that third parties and their associates may pose through their use of the Club's brand and reputation to facilitate modern slavery. This has been done through developing the bribery and corruption guidance, as well as our safeguarding policy and training.

Recruitment of players into the academy often involves relationships with third parties such as agents, private academies (domestic and overseas), football scouting networks and grassroots clubs. The Club has been working to improve education in relation to certain key risk indicators through training and policy development.

We recognise that once we have identified the risk of modern slavery in our supply chains that these risks should be monitored and assessed, and our proposed sustainable procurement strategy is addressing how monitoring will take place.

## **Supply Chain and Due Diligence**

The Club recognises that a robust due diligence framework must underpin its policies and we have started working on how to further develop our current due diligence systems, to ensure that they are reflective of our approach and can appropriately address any potential risk arising from modern slavery. We will communicate any changes to our current policies and procedures to our suppliers as appropriate.

We seek to partner with suppliers that share our values. We expect our supply chain to operate fair and equitable practices, whereby modern slavery is not tolerated. The Club intends, where possible, to leverage its position and status to seek to require that all third parties working with the Club comply with standards set by the Club and take appropriate steps to ensure that there is no slavery in their supply chains. Having developed our Supplier Code of Conduct, we will look to engage with our key suppliers and staff responsible for supply chain standards as part of an overall stakeholder engagement exercise following the risk assessment process. All new suppliers will be required to sign up to the Supplier Code of Conduct as a demonstration of their commitment to operate fair and equitable practices, whereby modern slavery is not tolerated. We will also incorporate the Supplier Code of Conduct into supplier contracts once it is approved.

Before being formally appointed, any new suppliers which we consider represent a higher risk of modern slavery will be required to satisfy us that they operate in a manner which addresses relevant risks as part of the incoming supplier assessment process.

Where non-compliance with our standards is identified, appropriate consequences for breaches will be made clear in supplier contracts, subject to working with our suppliers to assist them with identifying any areas of risk within their supply chains and to mitigate these risks as appropriate.

We have identified the following operations as having a higher risk of exploitation and we are in the process of carrying out a risk assessment in relation to each area in greater depth:

- Agencies
- Subcontracted workers
- Waste operators
- Maintenance
- Security
- IT

## **Training**

Training and capacity building are key to ensuring the prevention of exploitation leading to modern slavery and human rights abuses.

The Club continues to work with an external consultant, [Ardea International](#), to put together a comprehensive training programme for senior leaders and members of staff.

We will be providing a refresher bespoke masterclass for managers and members of the ethics and compliance committee in 2023.

We will continue to participate in [ENDslavery](#), an IEMA-accredited six-week course delivered by Ardea International, to deepen understanding of modern slavery risk by sending two managers on the course. We will also roll out modern slavery eLearning for 128 members of our business operations staff.

As part of its longer-term strategy, the Club is working to identify ways to raise awareness of modern slavery issues, for example via education programmes for staff and fans, as well as collaborative work with our sponsors, partners and other key stakeholders. We became a member of the Ardea Academy, a comprehensive programme of continuous improvement, to support organisations to address modern slavery and human rights issues through bespoke training. Prior to this, the Club had participated in Ardea International's roundtables, bringing in Premier League clubs to explore how football clubs can demonstrate their respect for human rights.

### **Raising Concerns and Dealing with Issues**

An important aspect of a due diligence framework is the ability of workers and others to raise concerns about any abuse of human rights, labour rights, modern slavery, non-compliance with policies and other related issues. The Club prides itself on workplace communication and strong management and grievance procedures to ensure that any complaints are properly identified and addressed.

We have a grievance mechanism and a Whistleblowing Policy in place. The Whistleblowing Policy was reviewed for its effectiveness in dealing with modern slavery in 2022. The procedure has been updated in line with the recommendations to be embedded over the next 12 months.

### **Monitoring Effectiveness**

Mapping our progress in the last 12 months.

The Club continues to build on the activities and progress made over the past year. Specific targets that have been met during the previous 12 months are:

1. We have continued to set up regular meetings with our ethics and compliance committee to continue to ensure compliance, and develop best-practice procedures.
2. We have continued working with an external consultant with relevant expertise to review our human rights strategy.
3. Our sustainability working group has continued its work in this space.
4. We have updated the whistleblowing policy and developed a checklist procedure to guide the business on its implementation.
5. We have continued to increase staff training and awareness raising on modern slavery through e-learning

The Club is committed to monitoring the effectiveness of the steps that it will be taking to address the risk of modern slavery across its operations and supply chains. We have appointed an ethics and compliance officer and a member of the Board has also been appointed as the chair to the ethics and compliance committee to ensure that the proposed steps will be enacted, and to oversee the continued monitoring and effectiveness of any policy or procedures addressing modern slavery.

No instances of modern slavery or forced labour have been identified though any of our safeguarding or reporting procedures during 2018, 2019, 2020,2021 or 2022. We will continue to monitor the various reporting channels and grievance mechanisms to address any concerns that may arise in a timely and appropriate fashion. We will also develop staff awareness to ensure that our reporting channels can be accessed effectively.

Our key performance indicators for the next 12 months are:

<b>Objective</b>	<b>Action Step</b>	<b>Indicator</b>
Ensure staff are trained in identifying and mitigating the risks of modern slavery.	Increase staff training compared to 2019 baseline.	From 2022-2023 we aim to provide 128 staff with introductory modern slavery e-learning.  Expand modern slavery training across the Club.
Circulation of and education in relation to human rights and sustainability related policies.	Distribute the new policies to staff and train key staff on their implementation.	100% of staff in management roles will complete modules on 3 new policies (Whistleblowing, Anti-Bribery and Corruption, Supplier Code of Conduct) on the HR system.

Continue to risk assess the Club's supply chain.	Carry out an enhanced risk assessment of high-risk suppliers.	In 2023 we will request 100% of our high-risk suppliers to complete our sustainability self-assessment questionnaire.
Implement the Supplier Code of Conduct	Circulate the Supplier Code of Conduct to existing Suppliers and incorporate into all new supplier contracts.	100% of key current suppliers identified as high risk to be provided with a copy.  100% of new supplier contracts to incorporate the Supplier Code of Conduct.

## Our Modern Slavery Strategy

### Annual Review

This statement will be reviewed and published annually. We will continue to review our stated commitments during the year as we develop our internal procedures, to ensure that appropriate steps are taken to combat the risk of human rights abuse, human trafficking or slavery in our business and supply chain.

### Approval of the Statement

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's modern slavery and human trafficking statement for the financial year commencing June 2021 and ending 30 June 2022. This statement has been approved by the Holding Company's Board on 10 January 2023 on behalf of all subsidiaries within the Group.

Signed on the Board's behalf for and on behalf of Brighton & Hove Albion Holdings Limited.

Paul Barber



Date: 10 January 2023

Chief Executive and Deputy Chairman and director of The Brighton and Hove Albion Football Club Limited, and a director of Brighton & Hove Albion Holdings Limited