



## **West Ham United Modern Slavery Statement**

### **INTRODUCTION**

We do not tolerate modern slavery or human trafficking in our organisation or in our supply chain. This statement sets out the steps that we have taken to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place along with future proposals to strengthen our compliance.

### **OUR GROUP STRUCTURE AND BUSINESS**

WH Holdings Limited is the parent company of West Ham United Football Club Limited.

West Ham United Football Club Limited is a Premier League football club which has an international presence.

### **OUR SUPPLY CHAINS**

Our supply chains include suppliers of IT and other office equipment, food and beverage suppliers, retail suppliers, cleaning and security services and digital media suppliers.

Our Primary business relationships with third party companies are in the United Kingdom.

We also have a number of business relationships with companies in different territories across the world and therefore the group operates around the world including in North America, Asia and Africa.

### **OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING**

West Ham United FC respects the right to work freely and with equal opportunity. We have robust employment contracts, clear employment-related policies and procedures which set out how we expect our employees to behave and conduct themselves.

All of the club's current written policies and procedures for employees which touch upon modern slavery risks and behaviours are updated annually and presented to staff. All new starters are provided with training in these areas and current staff are provided with continuous training where necessary or where the law changed.

The policies which govern how we treat fellow employees and conduct our operations include:

- Anti-Bribery Policy
- Anti-Harassment and Bullying Policy
- Equal Opportunities
- Grievance Policy
- Whistle Blowing Policy
- Disability Discrimination

These policies ensure the protection of human rights and compliance with employment legislation, with a view to the elimination of discrimination in the work place. These encourage an atmosphere of openness and provide an effective remedy for anyone who may feel they are suffering from behaviour indicative of modern slavery.

As of June 2015 we voluntarily pay every member of full-time and part-time permanent staff the equivalent to the London Living Wage.

As part of our commitment to the Premier League's Equality Standard we plan to incorporate more specific Modern slavery training into these policies and the induction of new employees. As part of our strategy, we intend to review and, where required, strengthen sections of our policies.

### **OUR SAFEGUARDING TEAM**

We have an established safeguarding team that works across the whole of the club and the West Ham United Foundation. The club believes that it is always unacceptable for a child, young person or vulnerable adult to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children, young people and vulnerable adults, by a commitment to practice which protects them. The safeguarding team sits within the HR team and works within Premier League Rules and national legislation. Specific safeguarding policies are in place for both children and vulnerable adults.

Across the clubs there are trained safeguarding officers representing different departments. The safeguarding officer provides a direct link for all staff to raise any concerns or issues they may arise, which are then referred to the safeguarding team. There is a robust referral process in place of any concern.

The safeguarding team work in partnership with statutory agencies safeguarding departments across East London, including Newham Safeguarding Board and Local Area Designed Officers.

The Club has plans to use this joint working, to provide training to staff who work directly with vulnerable groups covering child sexual exploitation, safeguarding, social media and internet safety.

There is commitment to joint safeguard working in partnership with other Premier League clubs' safeguarding teams, The Premier League and the FA. These partnerships provide further training and development opportunities for safeguarding staff.

### **SUPPLIER ADHERANCE TO VALUES AND ETHICS**

We do not and will not tolerate modern slavery and human trafficking and we expect the same high standards from all of our contractors, suppliers and other business partners.

In the future we will include modern slavery provisions within our commercial contracts to ensure suppliers understand our commitment to our policy and that they take reasonable steps to eliminate the possibility of modern slavery and human trafficking taking place in our supply chain.

## DUE DILIGENCE PROCESSES FOR MODERN SLAVERY AND HUMAN TRAFFICKING

To support our initiative to mitigate the risk of modern slavery and human trafficking within our business and supply chains, we will within the next financial year conduct a review of all suppliers across the Club.

This will involve each department reviewing and evaluating the suppliers within its supply chains and we will thereafter review the results.

This will involve a review pm suppliers' reliance on seasonal, low paid or low skilled workers.

If a risk is highlighted within this assessment, we will take the necessary actions.

In light of the above, going forward we will implement the following:

- We will not appoint a supplier or enter into a business relationship without a modern slavery risk assessment taking place;
- We will continually monitor existing suppliers and relationships to ensure that risks are mitigated

## TRAINING

To ensure all staff are aware of the risks of modern slavery and human trafficking to our business and within our supply chains, we shall deliver training in-house to the necessary personnel.

This state is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the financial year ending 31<sup>st</sup> May 2016 as approved by the Board on next Board date.

Signed on behalf of the Board by:

*A J Mott*