**Football and Modern Slavery: An Investigation into English and Scottish Top-flight Clubs’ Commitment to Tackling a Global Issue**

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**A report by United Nations House Scotland**

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United Nations House Scotland (UNHS) is a civil society organisation committed to strengthening the implementation of the UN goals and values at grassroots levels. This is done by promoting, supporting, bridging, encouraging innovative engagement, building awareness, monitoring outcomes and being approachable.

UNHS was founded in 2012 by the charity Caledonia International Development Trust (CIDT) with the support of the United Nations Association Scotland and officially opened by the Minister for External Affairs and International Development on 17 September that year.

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**Executive summary**

As part of the work of the United Nations House Scotland to promote the Sustainable Development Goals, this Report focuses on the way in which English and Scottish top-flight football clubs take action to combat human trafficking and modern slavery. The project was initiated in the light of our focus on the private sector’s responsibility to tackle these issues as well as our Conference on Human Trafficking and Modern Slavery at the Scottish Parliament in March 2018.

This Report aims to assess the commitment and transparency demonstrated by English Premier League and Scottish Premiership clubs to combat modern slavery and human trafficking. The first step in assessing was to investigate which clubs have published a Modern Slavery Act Statement. Those clubs from which a statement could be identified were invited by United Nations House Scotland to participate in an interview about their modern slavery policy; the clubs which have not released a statement were also contacted and asked about their reasoning behind not publishing a statement.

Out of all the English and Scottish top-flight clubs required to publish a Modern Slavery Act Statement, only one club agreed to participate in an interview with United Nations House Scotland. A number of other clubs declined and many clubs did not respond at all. Most of the clubs from which a statement could not be identified also failed to respond to the request for their reasoning behind not publishing a statement. These findings set a question mark on the clubs’ intent to combat modern slavery, suggesting a failure of the British football community to take the issue seriously.

**Introduction**

Ever since its inception in 2012, UN House Scotland has been a civil society organisation which links UN values to grassroots activities in the UK. One of its aims is to show the extent to which the Sustainable Development Goals (SDGs) are relevant to our daily lives. This is also part of the rationale behind the organisation’s strong focus on human trafficking and modern slavery over the past year.

These are issues heavily linked to the lack of attainment on SDGs such as Goal 1‘No Poverty’, Goal 16 ‘Peace, Justice and Strong Institutions’, Goal 8 ‘Decent Work and Economic Growth’ and specifically sub-Goal 8.7, which includes eradication of modern slavery. The presence of human trafficking and modern slavery in Scotland and beyond inspired UN House Scotland’s decision to hold a high-profile conference on the issues at the Scottish Parliament in March 2018. At this conference, the responsibilities of the private sector in preventing and combatting exploitation was an important component.

One prominent private sector industry is sport, in which football is arguably the largest component. The English Premier League is regarded as the world’s best league and is growing every year. In the 2013/14 season, the total club revenue in the Premier League was £3.9 billion, reaching almost £4.9 billion in 2015/16 (Deloitte 2017: 10). The supporter base of the clubs participating in the competition are spread all around the world and the clubs consequently have a strong impact on the lives of people globally. The Scottish Premiership might not be as highly regarded in terms of quality and worldwide popularity but does nevertheless have a strong position in British society with its prolonged existence and strong ties to local communities. The powerful influence British top-flight clubs have on their fans makes them, arguably, moral leaders for people pledging their allegiance: with such a significant position in society comes social responsibility.

As all businesses with an annual turnover exceeding £36 million are required to submit a Modern Slavery Act Statement (The British Government 2017: 7), many British top-flight clubs released a statement following the 2015 Modern Slavery Act, which was designed to tackle trafficking and exploitation in the UK. In these statements, the clubs outline how they specifically are contributing to the fight against modern slavery. However, to what extent are these statement real commitments rather than just formalities? Given our interest in football as an institution and social phenomenon - as well as our task of holding organisations and people accountable for implementing actions promoting the SDGs - this is the question United Nations House Scotland wanted to answer. Such an investigation provides a relevant example of how major private sector organisations take action to combat human trafficking and modern slavery. We see this as a valuable contribution to our general focus on the private sector’s responsibility to tackle these issues.

As a Scottish-based civil society organisation, we decided to focus on Scottish top-flight clubs. However, due to the magnitude of the English Premier League and its geographical proximity to Scotland, we found it hard to overlook the role played by the top-flight clubs south of the border. Consequently, we chose to focus our research on both leagues and pursue interviews with clubs that have released Modern Slavery Act Statements in order to assess their commitment to combating modern slavery and human trafficking. It should be noted that the rationale behind this project is not to assess the clubs’ strategies *per se* but rather the extent of commitment displayed by the clubs to tackle the issue and their transparency in doing so.

**Methodology**

In order to investigate English and Scottish top-flight clubs’ commitment to combatting modern slavery, the first step was to identify which English Premier League and Scottish Premiership clubs have published a Modern Slavery Act Statement. These clubs were identified by researching the respective websites of all the clubs in the two leagues. Consequently, we were able to categorise clubs into whether they had a statement published on their website or not.

For the clubs we could identify a statement from, we researched the most relevant person or department to contact within the club, mainly the press department or the legal department. If no details were available, we contacted the general enquiries department. Our initial approach was directly by email, requesting an interview about their modern slavery policy. We noted down the responses that indicated a decline of invitation. If the club did not respond, we followed the email by directly calling the clubs and requesting for an appropriate individual at the club who could assist us. After the calls, we contacted the clubs again by email as per requested on the phone calls, stating deadlines. On some occasions, we were advised to contact certain staff members directly. If the club representative did not give us the names of these staff members, we searched on LinkedIn for direct contact names and details.

We also contacted the clubs for which we could not identify a statement online. These clubs were contacted in the same way as the other clubs, this time asking for their reasoning behind this decision and whether we could view a statement. If they sent us a statement, we requested an interview with them.

**Responses - English Premier League**

Among the English Premier League clubs, the only club which accepted our interview was Everton FC. However, a further eight clubs had declined the interview and seven clubs failed to respond to us. Despite the fact that all clubs in the English Premier League have an annual turnover far above the £36 million threshold requiring companies to produce a Modern Slavery Act Statement (Conn 2017), the five remaining clubs had no statement available on their website. We requested to view these but there was no reply from these clubs.

*Responses from English Premier League Clubs:*

**Accepted interview invitation**: 1 (Everton)

**Declined**: 6 (Manchester United, Tottenham, Liverpool, Arsenal, Chelsea, Bournemouth)

**No direct reply:** 8 (Manchester City, West Bromwich Albion, Southampton, Watford, Newcastle, Leicester, Swansea, West Ham)

**No statement accessible on website and did not send one when requested**: 5 (Crystal Palace, Stoke, Burnley, Brighton, Huddersfield)

Upon contacting Liverpool several times via email and phone, they eventually only responded back to our requests by referring us back to the modern slavery statements without any further interest in taking part in our requested interview. Similarly, Chelsea responded by only referring us back to their modern slavery statement. After receiving their message, we expressed disappointment in their reluctance to pursue the interview. However, no reply was given after that.

Our communication with Arsenal had been passed through a few individuals at the club and had finally been directed to the Communications Department. There was some initial interest as to what we were doing but ultimately, they decided to turn our invitation down after indicating they were treating this as a high priority without elaborating further. Manchester United shared a similar sentiment and also declined without specifying their reason for being unavailable for an interview.

Two clubs, Tottenham and Bournemouth, declined by stating that they did not have sufficient resources to attend an interview. According to Tottenham, they are too busy during the season to be able to facilitate such interviews. As for Bournemouth, they claimed that they were unable because many of their players were on international duty. However, there are reasons to believe that these declines were excuses irrelevant to our requests. If we were to follow Tottenham’s guidelines, the only time we could conduct an interview would be during June or July, when the first team does not play. In addition, the international window referred to by Bournemouth only lasted for 10 days. In any case, there is not much reason to believe that first team players’ match commitments would impact the availability of a club’s legal team.

We emailed Manchester City twice including a follow-up email after a phone call with a member of their press team who had passed it to the relevant person and expressed it was a busy away weekend for the team. However, it resulted in a no response from the club.

We received no direct responses from West Bromwich Albion, Southampton, Watford, Newcastle or Leicester. Exceptions to these were the clubs that informed us that they had directed us to the right department or team. However, they failed to instigate further action even though we followed up by email and phone.

For some clubs, we could not identify a published Modern Slavery Act Statement on their website. Upon questioning the reason for this, West Ham sent us a link to their statement. However, when following up by requesting an interview, the club did not respond to us. Crystal Palace, Stoke, Burnley, Brighton, Huddersfield and Swansea were the other clubs from which we could not identify a statement. None of these responded to our requests.

**Interview with Everton**



*Head of Legal at Everton, Amy Wells (right) and her colleague Emily Walker (left) with United Nations House Scotland Representative Lipa Hussain (middle) in front of Everton’s pitch.*

*As mentioned earlier in this Report, Everton was the only club which accepted our interview request. Our initial email was passed on to Amy Wells, the club’s Head of Legal. She expressed an interest in our project and after liaising about the suitable date to conduct an interview, an appointment was made for 6 December 2017. UN House Scotland’s two representatives travelled down to Liverpool for the day to meet Ms Wells and her colleague Emily Walker at Everton’s stadium, Goodison Park. We were welcomed and given the opportunity to ask our questions about the club’s Modern Slavery Act Statement. The following is a summary of the key information Everton stated in the interview.*

Everton is known as ‘the People’s Club’ – a community-based football club. It is important for the club that this is extended to everything they do, for instance by taking decisions on ethical matters that encompass what is worthy and representative of their community. Moreover, they find it unacceptable that modern slavery is still an issue in modern day Britain, and the club is intent on being part of the solution.

With the position football clubs have in society, Everton believes football clubs have an obligation to take a lead in combating this issue. Furthermore, Everton wants to be a leader on legal compliance and demonstrate how modern slavery policy can be properly implemented. The Merseyside club hopes to reach many people with their example.

As is a standard procedure for all major companies, Everton received external support from a law firm when creating their modern slavery policies. This law firm reviewed the legislation. As well as this, Everton is focused on adapting to all new legal recommendations from the government linked to modern slavery. For instance, the government has advised every company with a Modern Slavery Act Statement to upload all old versions of their statements to their website. This is something Everton complies with.

Whenever a new person joins the club – whether it is a new board member or a new player on the first team – they need to undergo an induction. This induction includes learning about what legal compliance is, which covers modern slavery policy as well. When it comes to Everton’s board, its members are 100% updated on their Modern Slavery Act Statement. The statement has been presented to the board and they have also reviewed its updates. Furthermore, the board had to approve the statement.

The awareness of Everton’s modern slavery policy is not just a high priority within the club. Also, before signing contracts with new partners, Everton makes sure to conduct a thorough investigation of the companies in order to ensure that they comply with their modern slavery policy. From the very start of a new partnership, Everton makes it clear to their suppliers that they need to comply to the club’s modern slavery policy and that they need to sign clauses related to modern slavery in their contracts with Everton. Variation agreements have also been signed with existing partners.

In order to ensure that their partners comply with Everton’s modern slavery policy, the Premier League club give questionnaires to key suppliers. The questionnaires include a range of questions divided into themes such as human trafficking, limiting liberty, exploitation and vulnerable workers. As well as this, Everton has robust clauses in their contracts with suppliers stating that the suppliers need to comply with the club’s modern slavery policy. If this policy is breached by any company Everton works with, they will impose penalties on the company. In the worst instances, this can mean severing ties completely.

When it comes to assessing the internal risk of modern slavery within the club, Everton does not regard the risk as particularly high due to the club’s position as a Living Wage employer. They have also not experienced any elements conflicting with their modern slavery policy in their supply chain. However, enforcing compliance among the whole supply chain is difficult and to some extent, Everton needs to rely on the honesty of their suppliers. If an allegation would arise, the club indicates that they would take the matter very seriously and conduct their own investigation.



*Everton’s Five-year Modern Slavery Strategy Plan*

A characteristic element of Everton’s Modern Slavery Act Statement is the club’s Five-year Strategy Plan. The plan was initiated in 2016 when a Modern Slavery Strategy and risk assessment tools were developed. 2017 was the first year of implementing the strategy. The focus in this first year was to map out the status quo, identify areas of risk, develop an overarching policy, map out due diligence process entry points and to further develop the strategy. Year 2 – 2018 – will focus on process development. This entails ensuring that everything that is done in the club mitigates the risk of modern slavery taking place as well as updating the modern slavery policy if needed. Year 3 will be characterised by the implementation of the new processes. Once all the processes have been done, Everton wants to ensure that these are working. Thus, 2019 will involve assessing what else can be done and strengthening the programme while constantly checking policies and evaluating themselves. Year 4 and 5 will focus on strengthening implementation and evaluating and planning respectively. Going ahead, Everton is planning on recruiting an internal auditor as well as inviting someone external to come and evaluate the club’s strategy. Nevertheless, Everton is aware that the strategy must be assessed on a year-to-year basis as it is hard to predict what is going to happen.

Everton states that they have not had any big challenges in implementing their modern slavery strategy. However, a lack of staff in the initial stages of formulating the policies caused a delay in their implementation. The biggest challenge the club has experienced has been ensuring that the strategy is complied with. According to the Merseyside club, it is vital to keep the momentum going in the club by sticking to the current modern slavery strategy plan and maintaining focus on this crucial issue.

**Responses – Scottish Premiership**

*Responses from Scottish Premiership Clubs:*

**Declined**: 1 (Celtic)

**Does not have a statement but considering it**: 1 (Ross County)

**No statement accessible on website and did not send one when requested:** 10 (Aberdeen, Hibernian, Rangers, Motherwell, Heart of Midlothian, St Johnstone, Hamilton Academical, Kilmarnock, Partick Thistle, Dundee FC)

In Scotland, Celtic was the only club we could identify that had a Modern Slavery Act Statement on their website. This might be linked to the fact that the club is the only Scottish top-flight club with a turnover higher than the £36 million threshold (Daily Record 2017) which requires companies to produce such a statement. After initially not receiving a response, we eventually received a response to our follow-up emails and calls. However, Celtic just referred us back to their statement.

Emails were sent to all the other remaining Scottish Premiership clubs. Out of these, only Ross County responded, stating that they were currently working internally with governing bodies on the potential of creating policies to respond to the issue. We decided not to proceed with an interview request as a statement was not yet in place. The other nine clubs did not respond to our queries regarding their lack of statements.

**Concluding remarks**

This has been the first ever project of its kind at UN House Scotland. We were interested in the parallels and conflicts of football and modern slavery coming together. The majority of the clubs were bound by law to release statements about the 2015 law but in our research, we only found one club willing to answer important questions regarding their statement. The overall response from the clubs to our interview request was disappointing.

There might be several reasons as to why there was such a resistance in working with us. From a PR perspective, there could potentially be a fear of reputational damage, despite the fact that we explicitly explained we were wanting to highlight the positive work the clubs had been doing. The apparent lack of transparency the world-leading clubs in the English Premier League demonstrate in terms of their modern slavery policy is worrying as it sets a question mark on their intent to actually take the issue seriously. Furthermore, it might suggest that they are still experiencing problems with ensuring that their supply chain is not involved in modern slavery.

The fact that only one Scottish Premiership has released a Modern Slavery Act Statement is particularly thought-provoking. As this club also happens to be the only club required to produce such a statement, and given their reluctance to engage further with us, it is tempting to conclude that their motivation for producing the statement is solely based on the legal requirement rather than actual intent to combat the issue. The same analysis can apply to the English Premier League clubs, which are all required to produce statements due to their high annual turnovers. It is worrying that none of the clubs which are not legally required to produce a Modern Slavery Act Statement have done so, suggesting a failure of the British football community to take the issue of modern slavery seriously.

On a positive note, our experience with Everton was beneficial as they accepted our interview request and provided us with useful data for this Report. Nevertheless, it should be noted that we did state in our email to the club that one of the UN House Scotland representatives is a fan of the club, which could have impacted the trust and willingness to accept our request. Had we not mentioned the fan element, it is possible we would have ended up with no interviews at all.

As mentioned in the introduction, we emphasise that assessing the different clubs’ strategies on combating modern slavery is outside the scope of this project. We have merely made an initial investigation into the extent of commitment displayed by Scottish and English top-flight football clubs to tackle the issue and their transparency in doing so. More research by relevant experts on modern slavery and legal compliance into this field will be needed in the future. Nevertheless, we hope that this project can contribute to opening further discussions as there needs to be a dialogue about the responsibility football clubs in the UK have towards tackling modern slavery.

**Recommendations for Everton**

* Continue working on modern slavery
* Maintain the transparency around the implementation of the modern slavery policy
* Initiate conversations with other Premier League clubs on the issue and, by sharing experiences, push other clubs to take a similar approach in terms of transparency and thoroughness
* Consider hiring more staff to deal with Modern Slavery Act compliance
* Hire external auditor(s) to keep the work Everton are doing accountable

**Recommendations for all clubs**

* Stay up to date with all relevant legislation regarding human trafficking and modern slavery by attending events and seminars conducted by organisations tackling these issues
* Keep the local football community aware of policy changes via social media channels and use the first team to communicate these messages
* Convey any successes made to media contacts in order to gain exposure for work towards tackling human trafficking and modern slavery
* Provide representatives who can attend human trafficking engagement forums to detail the work the club is doing, in order to be seen as a proactive partner

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**Appendix A - Email templates sent to clubs**

*This is the template email sent to clubs from which we could identify a statement:*

“To whom it may concern,

My name is \_\_\_\_\_, I am a \_\_\_\_ for the United Nations House Scotland, a civil society organisation that contributes to the implementation of UN goals and values such as the SGD’s.

We have been working closely with the Scottish government and other like-minded organisations on the issue of modern slavery that has been making headlines in recent months. We as a civil society have been working hard to discuss the complexities around this issue and how it has specifically affected the UK.

As we have been exploring this topic, we have been looking at the ways sports institutions have reacted to the modern slavery law that was introduced in 2015. Upon research, we observed \_\_\_\_\_\_\_ statement regarding the new law had released a strongly worded response in their commitment to tackling this issue. We were impressed by the detail the statement took whereby \_\_\_\_\_ identified different areas that it will focus on such as \_\_\_\_\_\_

Football is considered more than a sport, it has often in history collided with social and political change and can bring cultural shifts. We understand the magnitude and importance of a club such as \_\_\_\_\_\_ taking a stand against modern slavery and human trafficking and the impact it can have on British culture.

We would like the opportunity to request an interview with \_\_\_\_\_ about their commitment to this law and explore what impacts they have achieved our aims to achieve. We understand that this is a complex issue with many layers, we would like to reassure that this will not be framed in a negative light but rather an interview that informs how different parts of British society aims to tackle this issue. We would like to specifically request a sit-down interview if possible where we could visit the club as these types of interviews generate quality content. We hope to produce a blog series on our website as well as a produce a presentation to our fellow interns at a UN seminar.

We believe this would be a beneficial collaboration between UN House and \_\_\_\_ that not only has achieved significant football success but has also contributed to positive societal changes in\_\_\_\_\_. \_\_\_\_\_\_as a city has had a long history of \_\_\_\_\_\_

We hope you take our request into consideration and if you need any further clarification or have any questions, please do not hesitate to ask me.

I look forward to hearing from you.

Kind regards,”[[1]](#footnote-1)

*This is the email we sent to clubs from which we could not identify a Modern Slavery Act Statement online:*

“To whom it may concern,

My name is \_\_\_\_\_ and I am working at United Nations House Scotland, a civic society organisation that aims to address the goals and aspirations of the United Nations.

We are working closely with the Scottish government and other like-minded organisations on the issue of modern slavery and are organising a high-profile conference on modern slavery and human trafficking in February. In the lead-up to this event, we have been looking at the ways sports institutions have reacted to the Modern Slavery Act that was introduced in 2015. We hope to produce a report on the positive steps British top-flight clubs take to tackle modern slavery.

Upon research, we could not find any statement on the Modern Slavery Act from \_\_\_\_ online. We would, therefore, like to ask if you do have such a statement and if so if you are able to send this to us. If you do not have one, we would appreciate if you could write us a few lines outlining why you have chosen not to produce such a statement. Any information would be very valuable when writing up our report.

If you need any further clarification or have any questions, please do not hesitate to ask me.

I look forward to hearing from you.

Best wishes,”

**Appendix B – Direct responses from**

**English Premier League clubs**

**Arsenal:**

“Hi Lipa

 Many thanks for your email. This is a high priority for us and we are making good progress in assessing areas of risk and focussing on steps to ensure we comply in a meaningful and comprehensive way. I am not going to go into further public detail about what we have done. Our modern slavery act statement is clear and will be updated again in a few weeks.”

**Bournemouth:**

“Hi, Simen,

Thank you for your email and apologies for the delay in getting back to you.

Unfortunately, with a lot of our players still away on international duty, this is something that we are unable to help with. However, we wish you all the best with your study.”

**Chelsea:**

“Good afternoon Lipa, Thank you for your email. Any statement can come via the following [http://www.chelseafc.com/the-club/about-Chelsea-football-club/modern-slavery-act-statement.html](http://www.chelseafc.com/the-club/about-chelsea-football-club/modern-slavery-act-statement.html)

We are also one of only two Premier League clubs to adhere to the Living Wage - <http://www.chelseafc.com/news/latest-news/2016/10/living-wage.html>”

**Liverpool FC:**

“Hi, Lipa,

Hope you’re well? A few of my colleagues have forward emails you have sent them based on the one below.

Unfortunately, we wouldn’t be able to commit to an interview but I can provide you with the statement we made at the time.

<http://www.liverpoolfc.com/corporate/anti-slavery>

May I take this opportunity to wish you the very best of luck with the project and thank you for contacting the Club.

If, in future, you have further requests, please direct them via me only.”

**Manchester United:**

“Dear Mr Jordsmyr Holm

Thank you for your recent correspondence regarding the possibility of an interview with Manchester United about modern slavery.

As you know, this is a subject we take seriously and as an employer, our commitment to addressing the issue is clearly indicated within the statement already published, which is a statutory requirement of UK companies.  While we do not feel that this is an area on which we are able to do an interview, everyone at the club wishes you the best of luck with your forthcoming event.”

**Tottenham Hotspurs:**

“Hi, Simen,

Apologies for the delayed response.

I’m afraid due to extremely busy schedules we would only be able to facilitate an interview such as this outside of the season time.

In addition to the information and statement on [our website](http://www.tottenhamhotspur.com/the-club/tottenham-hotspur-football-club-anti-slavery-and-human-trafficking-statement/), you can find the Premier League’s statement on the topic [here](https://www.premierleague.com/modern-slavery-statement).”

**Appendix C – Direct Responses from Scottish Premiership clubs**

**Celtic:**

“Dear Simen,

 Thank you for your communication.

Apologies for not responding sooner.

On this occasion, I will refer you to the statement which has already been made on our website for any information on the Club’s position on this matter.

<http://cdn.celticfc.net/assets/downloads/Slavery_Human_Trafficking_Statement_signed.pdf>”

**Ross County:**

“Hi Simon,

We do not currently have a statement, though this is currently being discussed internally after consultation with our governing body, whose stance will reflect the national approach.”

1. In the email to Everton, it should be noted that it was added that the sender is a fan of the club. [↑](#footnote-ref-1)