



DEPARTMENT	Operations / Finance / Club Services
POLICY/PROCEDURE	ETHICAL PROCUREMENT POLICY
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Document Control

Item	Detail
Document title	Lincoln City Football Club Ethical Procurement Policy
Version	Version 3 - 2026/27 website refresh
Department	Operations / Finance / Club Services
Policy owner	Club management, supported by budget holders, Operations, Finance and department leads
Applies to	All procurement, supplier selection, contractor appointment, service contracts, consultancy, event suppliers, retail, catering, maintenance and capital project purchasing
Review	Annually, and sooner where law, EFL/FA guidance, procurement risk, supplier performance or Club operations materially change

This 2026/27 version expands the previous ethical procurement policy into a clearer public-facing framework. It keeps the original commitments to sustainability, fairness and social responsibility, while adding more explicit supplier expectations around anti-bribery, modern slavery, worker welfare, equality, data protection, health and safety, environmental compliance and football environment standards.

Policy Statement

Lincoln City Football Club is committed to buying goods and services in a way that is fair, transparent, legally compliant, environmentally responsible and aligned with the values expected of a professional football club.

The purpose of this policy is to set out how Lincoln City Football Club expects procurement decisions to be made and how suppliers, contractors and service providers should behave when working with or on behalf of the Club.

- Act with integrity, fairness, transparency and value for money.
- Choose suppliers who meet appropriate legal, ethical, safety, environmental and quality standards.
- Support local suppliers, small businesses and social value where feasible and commercially sensible.
- Prevent bribery, corruption, modern slavery, exploitation, unsafe working and discriminatory practice in the supply chain.
- Review supplier performance and take proportionate action where standards are not met.

What This Policy Covers

This policy applies to all procurement activity, whether carried out through formal tender, quotation, purchase order, contract renewal, department-level purchasing, one-off project appointment or emergency operational requirement.

Covered activity	Examples
Goods	Equipment, cleaning products, PPE, maintenance materials, office supplies, retail products, furniture, signage and printed materials.
Services	Security, stewarding, cleaning, catering, consultancy, waste management, transport, IT, ticketing, contractors and event support.

Covered activity	Examples
Works and projects	Construction, refurbishment, facilities improvements, mechanical and electrical works and temporary installations.
Commercial partnerships	Suppliers or partners whose activity is connected to Club operations, events or public-facing delivery.

How We Buy

Principle	Policy position
Integrity	Procurement decisions must be made honestly, without improper influence, conflicts of interest or hidden personal benefit.
Value and quality	Price matters, but decisions should also consider reliability, safety, quality, service, whole-life cost, sustainability and operational risk.
Fair opportunity	Where practical, suppliers should be treated consistently and given clear information about what the Club requires.
Local and community value	Local suppliers, SMEs and community-focused suppliers should be considered where they can meet the Club's requirements.
Sustainability	Environmental impact, packaging, waste, transport, energy use and materials should be considered proportionately.

What We Expect from Suppliers

Suppliers must act lawfully and responsibly. The Club may request evidence of compliance before appointment and during the supplier relationship, particularly where the service is higher-risk, public-facing, safety-critical, high-value or delivered on Club premises.

Standard	Expected supplier behaviour
Legal compliance	Comply with applicable laws, regulations, licences, permits, taxes, employment obligations and industry standards.
Anti-bribery and corruption	Do not offer, request, receive or facilitate bribes, improper gifts, facilitation payments or dishonest business advantage.
Modern slavery and labour rights	Prohibit forced labour, bonded labour, human trafficking, exploitative labour and unlawful child labour; provide fair conditions and lawful wages.
Health and safety	Provide safe systems of work, competent staff, suitable risk assessments, insurance, training and safe equipment.
Equality and inclusion	Avoid discrimination, harassment and victimisation; support fair access and respectful behaviour.
Environmental responsibility	Minimise waste, emissions, resource use and unnecessary packaging; comply with waste, recycling and pollution requirements.
Data and confidentiality	Protect personal data and confidential Club information, and only process data under agreed instructions and lawful arrangements.
Football environment	Respect safeguarding, supporter welfare, anti-discrimination, safety, security and conduct expectations when operating in a football environment.

Assessment and Due Diligence

Procurement checks should be proportionate to the value, risk and nature of the supplier relationship. A one-off low-value purchase will not require the same process as a safety-critical matchday supplier or a construction contractor.

Risk area	Examples of checks that may be requested
Financial and commercial	Quotation, scope of work, payment terms, value-for-money review, insurance, financial standing for larger contracts.
Safety and competence	Risk assessments, method statements, training records, licences, accreditations, public liability and employer's liability insurance.
Ethical standards	Anti-bribery declaration, modern slavery statement where applicable, labour standards, conflict-of-interest declarations.
Environmental performance	Waste carrier registration, environmental permits, recycling routes, packaging information, sustainability credentials or product specifications.
Food and catering	Food hygiene rating, HACCP or food safety management evidence, allergen controls, traceability and product assurance.
Data and systems	Data processing arrangements, cyber/security controls, confidentiality terms and access controls where systems or personal data are involved.

Gifts, Hospitality and Personal Interests

Employees involved in procurement must avoid situations where personal interests could influence, or appear to influence, a Club purchasing decision. Any actual, potential or perceived conflict should be declared to the relevant manager before a decision is made.

- Do not accept gifts, hospitality, incentives or personal benefits that could influence a procurement decision.
- Do not split purchases to avoid approval thresholds or normal controls.
- Do not use Club purchasing arrangements for personal gain.
- Record and manage any conflict involving family, friends, personal business interests or financial connections to a supplier.

Monitoring and Non-Compliance

Supplier performance should be monitored throughout the contract or service period. Concerns should be addressed early and documented where the issue could affect safety, legality, service delivery, reputation, cost or supporter experience.

Issue	Possible Club response
Minor service issue	Supplier discussion, corrective action and review at the next contract meeting.
Repeated poor performance	Performance improvement plan, revised scope, withheld renewal or competitive re-tender.
Safety, food safety or safeguarding concern	Immediate escalation, suspension of activity where required and investigation before work continues.
Bribery, fraud, modern slavery or serious misconduct	Immediate senior review, possible contract termination and reporting to relevant authorities where appropriate.

Issue	Possible Club response
Environmental non-compliance	Corrective action, review of waste/recycling records, supplier replacement or contract termination for serious breach.

Responsible Local Impact

The Club will, where feasible, encourage procurement from local suppliers, SMEs, social enterprises and diverse businesses. This must be balanced with quality, safety, value, compliance, availability and operational needs.

Procurement balance: Ethical procurement is not just about choosing the lowest price. It is about choosing suppliers who can deliver safely, fairly, legally and responsibly for the Club and the community it represents.

2026/27 Compliance Framework

The Club will apply this policy in line with relevant legal duties and recognised football-sector expectations. The table below is a practical summary, not a substitute for legal advice.

Area	Relevant requirement / expectation	Policy response
Anti-bribery	Bribery Act 2010 and government guidance on adequate procedures.	Risk-based due diligence, conflict management, no improper payments and monitoring of supplier conduct.
Modern slavery	Modern Slavery Act 2015, including supply-chain transparency duties where applicable.	Supplier expectations prohibit forced labour, trafficking and exploitative labour; higher-risk suppliers may be asked for evidence.
Tax evasion	Criminal Finances Act 2017 failure-to-prevent principles.	The Club expects lawful tax conduct and will not support evasion or dishonest facilitation.
Equality	Equality Act 2010 and football-sector anti-discrimination expectations.	Suppliers must support fair treatment, reasonable adjustments where relevant and non-discriminatory service delivery.
Health and safety	Health and Safety at Work etc. Act 1974 and related regulations.	Contractors must provide safe systems of work, competence, insurance and risk controls.
Data protection	UK GDPR and Data Protection Act 2018.	Suppliers handling personal data must use suitable data-processing, confidentiality and security arrangements.
Environment and waste	Environmental Protection Act, waste duty of care, Simpler Recycling and EPR packaging requirements where relevant.	Supplier selection and contract management should consider waste, packaging, resource use and lawful disposal.
Food procurement	Food safety, hygiene, allergen and traceability requirements where suppliers provide food or catering services.	Food suppliers must provide evidence of safe, legal and traceable food supply.

Area	Relevant requirement / expectation	Policy response
Public venues and events	Terrorism (Protection of Premises) Act 2025 / Martyn's Law readiness and protective-security guidance where relevant to venue services.	Security, event, facilities and public-facing suppliers may need to support Club protective-security arrangements.

Continuous Improvement

The Club will continue to improve its procurement controls by reviewing supplier performance, procurement risks, operational learning, staff feedback and changes in legal or football-sector requirements.

- Maintain clear approval routes for significant or higher-risk purchases.
- Use contract reviews to address safety, service, cost, ethical and environmental performance.
- Support departments to ask the right questions before appointing suppliers.
- Treat serious supplier misconduct as a Club governance and reputational risk, not just a purchasing issue.
- Refresh supplier standards when legislation, EFL/FA requirements or Club operations change.

Review date: This policy will be reviewed by July 2027, or sooner where there is a relevant legal, EFL, FA, procurement, supplier, safety, data, food or operational change.

Key Guidance Considered

Source / framework	How it has informed this policy
GOV.UK - Bribery Act 2010 guidance	Anti-bribery principles, due diligence, monitoring and top-level commitment.
GOV.UK - Modern Slavery Act 2015 overview	Supply-chain transparency and prevention of forced labour and trafficking.
HSE - Health and Safety at Work etc. Act 1974	Supplier and contractor safety expectations.
GOV.UK / FSA / DEFRA guidance	Food safety, allergen, waste, recycling, packaging and environmental procurement considerations.
EFL / FA football environment expectations	Integrity, safeguarding, inclusion, supporter welfare and responsible conduct where suppliers operate in football settings.