



Football Association - Tax Strategy

Introduction

The Football Association (“The FA”) is the not-for-profit, governing body of football in England which invested £166m back into the game during the year ended 31 July 2019.

FA group companies are liable to tax in the United Kingdom (“UK”) and the FA group companies pay tax on all of their taxable profits in the UK in line with UK tax legislation.

The FA’s core values are to be Progressive, Respectful, Inclusive, Determined and Excellent (link to website) and the FA operates these values in its approach to taxation.

The FA understands its responsibility to pay the correct amount of tax on time and the importance of tax risk management and governance to ensure this is the case. The FA is committed to being a responsible taxpayer, being straightforward and transparent on all tax matters and acting fairly, responsibly and with integrity in all dealings with Her Majesty’s Revenue and Customs (“HMRC”) and any other tax authorities we interact with.

Our tax strategy seeks to ensure that we are compliant and safeguard our reputation, whilst recognising that we have a responsibility to our stakeholders to manage and control our tax liabilities to protect our investment in the game.

Governance

Tax is managed by the Group’s Tax Manager through a documented tax risk management framework which defines controls for monitoring, reporting and the escalation of tax risks.

Tax is embedded into the commercial operations of the business to ensure it is considered in real-time through the FA’s internal governance framework.

The Group Tax function is also kept up to date with commercial operations through departmental meetings with Commercial Finance Managers covering the entirety of the FA Group’s operations. For significant projects with potential tax issues the Group Tax Manager also sits on Project Steering groups.

Our Chief Financial and Operating Officer has overall responsibility for tax governance and strategy, with formal approval over significant matters of tax judgement provided by the FA Board and the Group Audit Committee. In addition, each year the Chief Financial and Operating Officer will set out the Group’s compliance with its tax strategy to the Group Audit Committee.

The tax legislation requires interpretation of rules and forming judgments. The FA uses reputable professional tax advisors to keep up to date with developments across all taxes and to provide advice or a review of the group’s interpretation of the tax rules.

Tax Risk Management

The FA's stakeholders have high expectations in terms of the FA's risk management and standards of behaviour. The FA's tax risk management framework has been developed with these expectations in mind resulting in rigid levels of acceptable tax risk.

Relationships with Governments

The FA maintains an open and transparent relationship with HMRC and seeks to engage in real time on significant tax issues to achieve early agreement and certainty.

The FA also engages with various government departments and the Treasury to govern and support football in England.

Tax planning

The FA's approach to tax planning reflects its desire to preserve its reputation and good relationships with HMRC.

The FA will only utilise tax incentives or opportunities for obtaining tax efficiencies where these:

- Do not carry significant reputational risk and would be fully justifiable should they become public.
- Are aligned with the policy objectives of HMRC.
- Have been diligently reviewed with professional care and judgement and this has been documented. This includes seeking professional tax advice.
- Have been disclosed appropriately.
- Present a minimum level of uncertainty or risk

The FA has shared its approach to taxation with HMRC.