



# SHOOSMITHS 2017 SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Shoosmiths 2017 Slavery and Human Trafficking Statement

The Shoosmiths LLP slavery and human trafficking statement is made pursuant to Section 54 of the Modern Slavery Act 2015 'Transparency in Supply Chains' and was approved and signed by the Shoosmiths Operations Board on behalf of the members on 20 September 2017. The statement will be updated annually.

Modern slavery is a crime where people are exploited and treated as commodities for commercial gain. It includes slavery, servitude, forced labour and human trafficking. It is a global problem of which the full extent is unknown.

The United Nations 2030 Sustainable Development Goals states within Goal 8 - Decent Work and Economic Growth - a target that includes a focus to 'take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking...'

Shoosmiths is committed to playing its part to help effect change.

## Our business

Shoosmiths LLP is a leading national law firm and is a limited liability partnership registered in England and Wales (registered number OC374987). The Shoosmiths group includes a number of subsidiaries and separately constituted legal entities which Shoosmiths LLP ultimately controls, and Shoosmiths (Northern Ireland) LLP (registered number NC001384) which is a separately constituted legal entity regulated by the Law Society of Northern Ireland. Shoosmiths LLP also provides legal services in Scotland. We have been delivering legal services to businesses since 1845 and our clients are serviced by five practice groups – commercial, corporate, private client, real estate and recoveries services. Clients include household name blue chip companies, leading financial institutions and foreign owned corporates. Access Legal Solicitors, our private client practice group provides legal services for individuals and their families.

This statement refers to our financial year 2016/2017 with our year ending 30 April 2017 on which date we had 184 partners and partner equivalents and 1,381 personnel and our revenue for 2016/2017 was £116.7m.

Our goal is to be the leading national law firm famous for its client experience.

We operate as one team in 12 locations in England, Scotland and Northern Ireland, namely Basingstoke, Belfast, Birmingham, Edinburgh, Leeds, London, Manchester, Milton Keynes, Northampton, Nottingham, Southampton and Thames Valley.

Our supply chain entails the purchasing of goods and services that support the operations of our offices and services to our clients. These include office supplies, marketing materials, ICT hardware and software, estate services such as cleaning, waste management, office design, office fixtures and fittings during fit out, refurbishments and maintenance, uniforms and catering, hospitality services such as hotels for conferences and training events, security and couriers as

well as recruitment agents and temporary staff provision. We purchase professional services and work with other law firms and legal experts, court services and enforcement, tracing agents, vehicle recovery agents, medical professionals and financial advisors and title indemnity insurance policies from insurance companies and brokers.

### **Our policies and commitments**

Operating with integrity governs our approach and therefore our aspiration to be recognised by our stakeholders as an organisation which is a responsible corporate citizen in all our relationships. Our responsible business policies include:

#### **Corporate responsibility policy**

#### **Supplier code of conduct**

#### **Environment policy**

#### **Health and safety policy**

We are an equal opportunities employer and were the first top 100 law firm to achieve 'Gold Standard Investors in People' status.

Our employee policies and procedures set out our requirements on such issues as disciplinary, grievance, equal opportunities, flexible working, harassment and bullying, home and mobile working and recruitment best practice. We expect all employees to conduct business with honesty and integrity and we have a zero tolerance approach to bribery and corruption with policies and regular training undertaken on this and other such issues as anti-money laundering, gifts and hospitality and counter terrorist financing.

Our whistleblowing policy sets out the process for reporting any concerns about wrongdoing or breaches of policies including forced or compulsory labour or human trafficking.

We expect our suppliers to share our commitments and approach and by collaborative working we believe we can jointly have a positive impact on society. Our supplier purchasing policy and guidelines underpins our supplier selection process and details a range of environmental, social and ethical issues including slavery and human trafficking for consideration as part of the supplier selection process.

Our priority suppliers are invited to sign up to our **Supplier Code of Conduct** covering laws and regulations, under age and forced labour, freedom of association, discrimination, wages and benefits, working hours, healthy and safe working conditions, environment, business integrity, discipline and grievances.

We updated our procedure on compliance with the Modern Slavery Act Duty to Notify Regulations in July 2017.

Shoosmiths is a signatory of the United Nations (UN) **Global Compact** and a member of the UN Global Compact UK Network Modern Slavery Working Group. As a UN Global Compact signatory we report annually on our progress against the 10 principles relating to human rights, labour, environment and anti-corruption. You can read our 2017 Communication on Progress [here](#).

Shoosmiths is also a partner of the UK Stakeholders for Sustainable Development Network (**UKSSD**); its vision being that one day, everyone in the UK will have the chance of decent work in a prosperous economy within a fair and just society, living within the Earth's limits.

Shoosmiths was part of the Law Society advisory group for the development of the Modern Slavery Act and Section 54 **practice note** published December 2016. This brings together legal requirements contained in the Modern Slavery Act, Bribery Acts and other legislation, and gives solicitors specific advice and examples of best practice for acting as a

trusted adviser assisting their clients in meeting their anti-slavery obligations and managing their supply chains, as well as in their own firms.

### Due diligence and risk assessment – employees

Our employment strategy is based on attracting, developing and retaining the best talent by reinforcing our values and providing a stimulating and rewarding work environment. We recognise everyone is unique and has special contributions to make in delivering the Shoosmiths strategy. Employee engagement is at the heart of our approach and we want to inspire and empower our people to use their talents positively in our communities, whether that be locally, regionally, nationally or ultimately at a global level.

Our recruitment and employment procedures include appropriate pre-employment screening of all staff to determine right to work in the UK where all our offices are based.

### Due diligence and risk assessment – suppliers

Nominated individuals in our practice groups and business directorates have been briefed on our updated Modern Slavery Act Duty to Notify procedure. This details:

- background to the scale of the problem globally, regulations and our legal requirements;
- guidance on how to assess level of risk and therefore selection of priority suppliers for engagement on an annual basis or if a risk arises that requires investigation. Priority considerations can include:
  - sourcing from or operating in countries of high risk;
  - high risk sectors where cases are frequently reported;
  - labour intensive stages of supply chain where the end product is cheap;
  - sub contracted labour forces;
  - low skill employment used;
  - transaction risks;
  - significant values of spend or significant strategic value;
  - contracts coming up for renewal;
  - material change in the supplier's business e.g. merger, acquisition, significant operational changes;
  - if an incident has occurred or a potential incident identified; and
  - previous responses warranting follow up
- invitation for priority suppliers to sign up to the Shoosmiths supplier code of conduct and to provide information on:
  - countries goods/services sourced from;
  - review of operations and supply chain during last twelve months;
  - any instances of slavery/human trafficking identified;
  - any remediation programme in place if instances found;
  - any third party accreditations in place to check slavery/human does not exist in supply chain;
  - details of supplier's slavery and human trafficking statement if an obligated organisation; and
  - approaches to other high risk sustainability issues
- employee and employer procedure in the event of an incident of slavery or human trafficking identified and working with supplier to help victims and mitigate risk in the future.

Practice groups and directorates have not identified any internal business procedures that could make demands of suppliers or contractors that might lead them to violate human rights and will keep this under review.

Shoosmiths has not been informed of any incidents of slavery or trafficking during the year but will investigate any allegations should they arise and take appropriate action accordingly.

### Internal engagement

We raise awareness amongst our staff about slavery and human trafficking which this year has included firm wide briefings and articles on our external facing CR blog SHOUTback.

E learning training is made available to nominated individuals within each practice group and business directorate overseeing compliance with our slavery and human trafficking requirements. The e learning training covers four modules providing an introduction to modern slavery, what are the signs, action to take and an assessment of understanding. As at 11 September 2017 156 suppliers have signed up to our supplier code of conduct.

### External engagement

In addition to our involvement with the United Nations Global Compact and the Law Society activities during the last twelve months have also included:

Modern Slavery Act advice and training have been provided to clients by our regulatory, employment and commercial teams including board briefings, compliance checklists, amending contracts to include anti-slavery clauses, assisting with business deals clients are undertaking – considering if other parties involved are affected by the legislation, conducting supply chain due diligence, inserting anti-slavery clauses in agreements – assisting with drafting, reviewing and amending supply chain documentation, anti-slavery policies, procedures and supplier codes of conduct, audit questionnaires and s.54 transparency statements.

Our employment/immigration team also advises on prevention of illegal working policies and procedures, carrying out prevention of illegal working audits and provides training for staff undertaking checks on illegal working.

We have spoken at a number of events during the year including:

- Client supply chain briefings;
- **House of Commons** 10 November 2016 at the Ethical Labour in Construction Leadership Symposium hosted by the Building Research Establishment;
- **Business in the Community** – East Midlands – convened workshop 8 March 2017 for businesses and community organisations;
- **Law Society** One Year on debate; and
- Westminster Legal Policy Forum Keynote Seminar 20 June 2017 – tackling modern slavery in the public and private sectors – prosecution, protection, prevention.

In conclusion, Shoosmiths is committed to better understanding its supply chains and collaborating with stakeholders who wish to improve transparency and address incidents of slavery or human trafficking. This applies not just to our own practices but also to the identification of opportunities in wider society where we might be able to make a difference.

For further details about our approach to responsible business practices including our policy statements, our annual Corporate Responsibility (CR) reports, our CR blog SHOUTback and our annual UN Global Compact Communication on Progress can be found [here](#).

This policy and statement was approved by the Board of Shoosmiths LLP on behalf of the members on 20 September 2017 and signed by:

**Claire Rowe**

Chief Executive

Shoosmiths LLP

20 September 2017