

# Shoosmiths 2022 slavery and human trafficking statement

September 2022

## Introduction

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 by the Shoosmiths Operations Executive 1 August 2022 and the Partnership Council 21 September 2022. The statement is updated annually and is our seventh published statement.

Our website statement is located at the footer of our <https://www.shoosmiths.co.uk> and <https://seriousinjury.shoosmiths.co.uk/> homepages where our previous statements can also be accessed.

Our details are also stored on the UK Government's modern slavery statement registry service website. See: <https://modern-slavery-statement-registry.service.gov.uk/statement-summary/MCdgu5IG/2022>

The focus of our activity since our 2021 statement was published has been to progress the centralisation of our approach to supplier engagement.

## Progress against 2021/2022 priorities

Priority	Progress
Launch online supplier database and onboarding system which will include the modern slavery questions previously asked of priority suppliers by individual directorates and divisions.	Implemented with responsible business questions also included on climate change, corporate responsibility, equality, diversity and inclusion and health and safety.
Continue to offer modern slavery e-learning training to suppliers as a way of increasing supplier understanding and potential for collaboration in order to increase understanding of potential risk.	Shoosmiths' 'Modern Slavery training for Managers' was offered but not requested by any tier two or tier three suppliers during 2021/2022.
Continue to explore opportunities for collaboration within the business sector and with third sector organisations involved in mitigating and preventing slavery and trafficking within the UK.	In October 2021, we supported Unseen's anti-slavery day national campaign to raise awareness of the role of business in tackling modern slavery.  In May 2022, the Shoosmiths Foundation invitation for UK registered charity applications will be social mobility focused, and one of the criteria for selection will be that the project addresses specific underrepresentation. The funding opportunity will also be publicised to charities assisting survivors of slavery or human trafficking.
Continue to raise awareness amongst stakeholders.	Staff engagement undertaken on anti-slavery day. Information provided on the internal intranet.
Through our travel management provider, develop a preferred hotel listing which ensures all properties recommended for Shoosmiths are provided by the Hotel Booking Agents Association members and that the members adhere to HBAA's Terms of Ethics which can be viewed at: <a href="https://beam-org.uk/community/our-terms-of-ethics/">https://beam-org.uk/community/our-terms-of-ethics/</a>	Not achieved. The service provider changed in October 2021. The provider instead aims during its planned audit in December 2022 to seek to incorporate beam's Terms of Ethics into the negotiations when reviewing Shoosmiths' preferred hotel programme.
* <a href="#">beam</a> is the new face of HBAA, representing business events, accommodation and meetings.	

## Shoosmiths structure, business and supply chain

Shoosmiths LLP is a leading 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 (see appendix one which includes subsidiaries). Shoosmiths LLP also provides legal services in Scotland. We have been delivering legal services

to businesses since 1845 and our clients are serviced by four divisions – business advisory, corporate, personal advisory and real estate. Clients include household name blue chip companies, leading financial institutions and foreign owned corporates. Our personal advisory division is dedicated to helping individuals with their personal legal needs.

You can view our firmwide structure [here](#).

This statement refers to our financial year 2021/2022 with our year ending 30 April 2022 on which date we had 227 partners and partner equivalents and 1,662 total employees and our revenue for 2021/2022 was £181.8m.

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

We operate as one team in 14 locations in England, Scotland Northern Ireland, and Belgium namely Belfast, Birmingham, Brussels, Edinburgh, Glasgow, Leeds, London, Manchester, Milton Keynes, Northampton, Nottingham, Sheffield, Solent and Thames Valley.

During 2021/2022 we operated four business units:

- Business advisory which provides commercial, employment, pensions and risk and litigation services;
- Corporate which provides banking, company secretarial, core corporate, restructuring and insolvency and tax advice;
- Personal advisory which provides wealth protection, court of protection, family and conveyancing, and specialist litigation teams advising on clinical negligence, personal injury, special education needs, residential landlord and tenant issues, contentious probate and other professional negligence; and
- Real estate which provides construction, planning, property litigation, and core real estate advice.

In June 2021, Shoosmiths LLP and national collections, recoveries and enforcement business, Chartsbridge, launched 'Equivo', a new dedicated recoveries joint venture providing end-to-end collections, legal and enforcement services.

Teams providing business support are business development, estates management, finance, general counsel, information systems, people, projects and innovation and quality and risk.

Our supply chain consists of circa 970 suppliers and our procurement expenditure in 2021/2022 was approximately £36 million in relation to the purchasing of goods and services that support the operations of our offices and services to our clients. These include office supplies, marketing materials, digital agents, 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 experts including barristers, court services and enforcement, tracing agents, vehicle recovery agents, litigation support providers, environmental consultants, surveyors, planning consultants, medical professionals, financial advisors and title indemnity insurance policies from insurance companies and brokers.

### **Policies in relation to slavery and human trafficking**

Operating with integrity governs our approach and therefore our ESG aspiration to be the leading UK law firm famous for its positive contribution to society.

As a professional services firm we would like our approach to be viewed as one that addresses the spirit of the regulations, and therefore the moral case for action.

Our responsible business policies and statements in the public domain most relevant to this agenda are:

- [Corporate responsibility policy](#)
- [Supplier code of conduct](#)
- [Environment policy](#)
- [Health and safety policy](#)
- [Modern slavery act duty to notify policy and guidelines](#)
- [Privacy notice](#)
- [Statement about the anti-facilitation of tax evasion](#)
- [Whistleblowing policy](#)

- [Accountability and management of ESG](#)

We are an equal opportunities employer and hold 'Platinum Standard Investors in People' status.

Our employee policies and procedures set out our requirements on such issues as agile working, disciplinary, grievance, equal opportunities, flexible working and holidays, harassment and bullying, hybrid working, mental health and wellbeing, pandemics, recruitment best practice, time off for dependent care, working practices and whistleblowing.

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. If anyone has any concerns about raising a matter internally, they can alternatively use our external, independent whistleblowing service Safecall. Safecall can be contacted to register a concern about any matter by telephone or online. Safecall provides a 24 hour a day, seven days a week service via the Freephone number 0800 915 1571 or via the website [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

During the year no slavery or trafficking concerns were reported by staff or external stakeholders including suppliers.

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 procurement and supplier management policy 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 suppliers are asked 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.

The obligations set out in our supplier code of conduct are underpinned by the contractual terms which we put in place with our suppliers. As a responsible business, newly entered into supplier facing contracts and agreements include obligations on our suppliers to comply with our supplier code of conduct and/or contain appropriate compliance related clauses relevant to the risk to which the firm is exposed, in the context of the services being provided. Furthermore, our standard supplier agreements include specific obligations on our suppliers to comply with all applicable modern slavery laws, breach of which would give rise to a Shoosmiths favourable termination right. We work alongside the Office of the General Counsel to revise and improve our standard supplier agreements to ensure that compliance related contractual gaps are minimised.

We have a policy and guidance on compliance with the [modern slavery act duty to notify regulations](#). This includes details on how we determine priority suppliers for engagement.

Our Head of Corporate Responsibility, who is part of the People Directorate and who reports to the Director of People acts as our lead anti-slavery champion responsible for guiding the business on best practice and raising staff awareness. Our Operations Executive has collective responsibility for directing and reviewing this programme and the annual modern slavery statement. The statement is also approved by the Partnership Council, Shoosmiths' highest decision-making body.

Externally Shoosmiths is a [United Nations Global Compact](#) participant and a member of the Network UK. We report annually on our progress against the 10 principles relating to human rights, labour, environment and anti-corruption. You can read our Communication on Progress reports [here](#). We have been a member of the United Nations Global Compact UK Network Modern Slavery Working Group since May 2016. Members represent a number of industry sectors and share ideas, information and best practice. In June 2022 we will take part for the sixth consecutive year in the annual peer review of member slavery and human trafficking statements.

### **Due diligence processes in relation to slavery and human trafficking in Shoosmiths' business**

Our people 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 the right to work in the UK where all our offices are based. Candidate sourcing is predominantly managed directly by the inhouse talent acquisition team. Over the last five years we have greatly reduced our use of recruitment agencies, but when they are required all recruitment suppliers are based in the UK and agree to our terms and conditions.

To the best of our knowledge there are no suppliers using a third party within the process and we deal directly with each supplier who is tasked with delivering the relevant service.

From November 2021 Shoosmiths took the opportunity to commit to pay the Real Living Wage to all its employees. This commitment was further extended to all third party contracted staff from February 2022 with the aim to become an accredited Living Wage employer.

### **Due diligence processes in relation to slavery and human trafficking in Shoosmiths' supply chains**

A centralised approach to procurement and supply chain management ensures that the organisation continues to conduct supply chain management in a consistent, fair and transparent way.

During 2021/2022 an online supplier database and onboarding process was launched enabling suppliers (and potential suppliers during tendering) to provide information and data on a range of responsible business questions including signing up to the Shoosmiths supplier code of conduct and answering the modern slavery questions.

First tier suppliers informed Shoosmiths that goods and services are sourced from Australia, Canada, China, France, Germany, Hungary, India, Israel, Malaysia, Romania, South Africa, and USA. In the case of China this related to the sourcing of photovoltaic panels for a Shoosmiths building with due diligence completed to confirm the panels were not sourced using Uyghur forced labour.

A summary of our procedure to identify and manage potential issues associated with the risk of slavery or trafficking in our operations or supply chain can be found [here](#).

Within our estates management function FISco UK Ltd works with Shoosmiths directly managing and taking ownership of all second tier facility management contract services – office and window cleaning, cleaning consumables, couriers, landscaping, waste and recycling and all building services contracts. All new suppliers are vetted, and an annual compliance review is undertaken to include pre-employment screening, training, health, safety, environmental and modern slavery compliance.

During the year estates management approached tier two and tier three estates management suppliers. Existing suppliers who signed the original code of conduct are sent the modern slavery questionnaire on an annual basis. For new suppliers we send out the questionnaire and code of conduct. We pay particular attention to those where unskilled labour is required i.e., office cleaning, window cleaners, laundry services, caterers, external landscaping etc. and we focus on the direct supply of products i.e., stationery and specialist branded products. As part of this review, we engage with suppliers carrying out telephone calls, where needed, to explain the requirements and we hold details on countries that goods are sourced from as well as any published modern slavery statements. We were informed by five suppliers that they are members of Sedex which works to improve working conditions in global supply chains. Two suppliers work with the Slave Free Alliance and one supplier is involved with the Ethical Trading Initiative. One supplier reported using the EcoVadis rating tool. Of the eight second and third tier suppliers who did not respond to the 2022 Shoosmiths request for information three publish modern slavery statements on their websites.

For consumables goods, suppliers have informed us they are sourcing from the following countries: Australia, China, France, Germany, Holland, India, Indonesia, Ireland, Italy, Japan, South Korea, Malaysia, Poland, Singapore, South Africa, UK and USA.

### **Parts of the business and supply chain where there is a risk of slavery and human trafficking taking place and steps taken to assess and manage that risk**

As a professional services firm with office locations in the UK and Brussels it is considered that the level of risk of modern slavery or trafficking within the business is low but there is no room for complacency.

## Effectiveness in ensuring that slavery and human trafficking is not taking place in its business and supply chains and key performance indicator measures

Shoosmiths is unable to determine if its approach is effective but is committed to continued work in this area.

Divisions 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 we will continue to 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.

Our procedures include the steps we would take to investigate any allegations of slavery or trafficking in our business or supply chain.

### Key Performance Indicators

Key performance indicator	2018/2019	2019/2020	2020/2021	2021/2022
Number of instances of modern slavery identified within Shoosmiths business operation or supply chain	0	0	0	0
Number of required staff who have completed e-learning training	67	18	83	55
% of required staff who have completed e-learning training	100	78	100	98
Number of suppliers who have signed up to the Shoosmiths supplier code of conduct*	169	86	49	57
Number of suppliers requested to complete a survey	140	148	208	160
Number of suppliers who completed a survey	59	85	127	129

\*Cumulative figure reported in 2018/2019 but from 2019/2020 relates to number of suppliers to have signed up in that year.

We will need to increase direct engagement with high-risk firms that have failed to respond to our survey.

### Staff training and capacity building about slavery and human trafficking

E-learning training is made available to nominated individuals within each division and business directorate. The e-learning training, with content reviewed and updated covers four modules providing an introduction to modern slavery, what are the signs, action to take and an assessment of understanding.

We raise awareness amongst our staff about slavery and human trafficking which this year has included:

- information on our intranet which describes the scale of the problem, what Shoosmiths is doing and ways in which staff can help;
- the Unseen App is included as a feature on all new company iPhones and iPads. The App helps to make it easier to report concerns to the free confidential helpline 08000 121 700, operated by Unseen 24 hours a day 365 days a year. The helpline can be used by victims, members of the public and businesses to get help, report a suspicion or seek advice. The [helpline website](#) also provides resources and directories of services and helpline providers;
- in the run up to Anti-Slavery Day 18 October 2021 the intranet front page detailed Shoosmiths' approach and priorities and ways colleagues can get involved to raise awareness and support the work of organisations tackling the problem; and
- firm wide briefings and articles on our external facing CR blog SHOUTback and inclusion in our annual CR reporting and United Nations Global Compact Communication on Progress.

## Our advisory role

Modern Slavery Act advice and training is provided to clients by our regulatory, employment and commercial teams including board briefings, compliance checklists, conducting investigations, preparing s.54 transparency statements, amending and drafting template contracts to include anti-slavery clauses, assisting with business deals clients are undertaking – including by considering if other parties involved are affected by the legislation and inserting anti-slavery clauses in agreements as necessary.

Our employment and corporate immigration teams also advise on right to work policies and sponsorship policies and training on right to work checks.

To find out more about the advice we provide click [here](#). To find out more about our Academy including e-learning training click [here](#).

## Priorities for 2022/2023

1. Undertake a remote site assessment (interviews and review of process and documentation) of all major cleaning services firms by September 2023.
2. Become an accredited living wage employer by April 2023. Part of our approach will be to also engage with suppliers to determine if they are living wage employers.
3. Continue to explore opportunities for collaboration within the business sector and with third sector organisations involved in mitigating and preventing slavery and trafficking within the UK.
4. Continue to raise awareness amongst stakeholders.

In conclusion, Shoosmiths remains 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. We are particularly keen to hear from like-minded organisations so that we can explore collaborative opportunities.

Further details about our approach to responsible business practices including our policy statements, our annual Impact and ESG reports, our CR blog SHOUTback and our annual United Nations Global Compact Communication on Progress can be found [here](#). You can also contact us at [corporate.responsibility@shoosmiths.co.uk](mailto:corporate.responsibility@shoosmiths.co.uk).

This approved statement is signed on behalf of the members by:

### David Jackson

Chief Executive  
Shoosmiths LLP  
Date: 21 September 2022

## Appendix one Shoosmiths LLP

Shoosmiths LLP registration number: OC374987  
Shoosmiths Nominees Limited registration number: 03468562  
Shoosmiths Secretaries Limited registration number 03206137  
1924 Nominees Limited registration number SC150079  
1924 Directors Ltd registration number SC223723  
Shoosmiths Privacy Services Limited registration number 12970199  
Equivo Limited (formerly Shoosmiths Project F Limited) registration number 13027969  
1924 Trustees Limited registration number SC226581  
Shoosmiths (Northern Ireland) LLP registration number NC001384  
Shoosmiths Europe LLP registration number OC440739