



# SHOOSMITHS 2019 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 by the Shoosmiths Operations Executive on 9 September 2019 and the Partnership Council 17 September 2019. The statement is updated annually and is our fourth published statement.

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

The focus of our activity since our 2018 statement was published has been to conduct an independent review of our processes and procedures. The brief was to employ a third party as a critical friend to conduct a modern slavery threat assessment in order to assess and evaluate the potential exposure to the risk of modern slavery, actions that Shoosmiths would take to mitigate that risk and practical actions to facilitate continuous improvement. Third party expertise was a prerequisite for this gap analysis and the Slave-Free Alliance, which is part of the anti-trafficking charity Hope for Justice conducted this work between April and July 2019.

Hope for Justice's goal is to prevent exploitation, rescue victims, restore lives and reform society. It is an international charity working across four continents running rescue programmes, aftercare facilities for vulnerable children and providing trauma informed care for victims of modern slavery.

The Slave-Free Alliance's findings and recommendations formed part of a briefing to the Operations Executive and Partnership Council, have helped to shape the content and structure of the 2019 statement and guided the setting of priorities for 2019/2020.

## **Shoosmiths structure, business and supply chain**

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 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.

This statement refers to our financial year 2018/2019 with our year ending 30 April 2019 on which date we had 201 partners and partner equivalents and 1,685 total employees and our revenue for 2018/2019 was £137.6m. We have extended the scope of the 2019 statement to reflect the advisory work completed in July 2019.

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

We operate as one team in 13 locations in England, Scotland and Northern Ireland, namely Belfast, Birmingham, Edinburgh, Glasgow, Leeds, London, Manchester, Milton Keynes, Northampton, Nottingham, Sheffield, Solent and Thames Valley.

**We operate 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.

Directorates providing business support are business development and marketing, finance, HR and estates management, information support, quality and risk and strategic change.

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, 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, 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 corporate responsibility 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 include:**

**Corporate responsibility policy**

**Supplier code of conduct**

**Environment policy**

**Health and safety policy**

**Privacy notice**

**Statement about the anti-facilitation of tax evasion**

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, mental health and wellbeing 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 internally managed whistleblowing policy sets out the process for reporting any concerns about wrongdoing or breaches of policies including forced or compulsory labour or human trafficking. During the year no slavery or trafficking concerns were reported by staff.

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 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 have an internal procedure on compliance with the Modern Slavery Act Duty to Notify Regulations.

Our Corporate Responsibility Consultant, reporting to the board HR Director acts as our lead anti-slavery champion responsible for guiding the business on best practice and raising staff awareness supported by designated divisional and directorate champions who are responsible for implementing our compliance procedure. 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 signatory of the United Nations (UN) **Global Compact** and a member of the UK Network. As a signatory 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 UN 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 2019 we took part for the third consecutive year in the annual peer review of member slavery and human trafficking statements.

Shoosmiths is a partner of the UK Stakeholders for Sustainable Development Network (**UKSSD**). This supports organisations who are working to advance sustainable development and helps to facilitate the delivery of the global Sustainable Development Goals in the UK.

Shoosmiths is also a partner supporter of **tiscreport.org** which it describes as the world's largest open data register committed to ending modern slavery and supply chain abuses. Funds donated are split between administration of the register and the Unseen helpline.

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

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.

All recruitment suppliers are based in the UK and to the best of our knowledge there are no suppliers using a third party within the process. We deal directly with each supplier who is tasked with delivering the relevant service.

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

Shoosmiths does not have a centralised procurement function; instead each directorate and division is responsible for the procurement of its goods and services in line with company procedures. A nominated individual in each division and directorate (10 in total) is responsible for leading on our Modern Slavery Act Duty to Notify procedure.

#### Shoosmiths policy and guidelines to comply with modern slavery act – duty to notify

The internal procedure provides guidance on:

- background to the scale of the problem globally and the UK, 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;
- other sources of information;
- supplier engagement in relation to our supplier code of conduct and supplier surveys;
- engagement with interested stakeholders; and
- procedure in the event of an incident of modern slavery or human trafficking being identified.

We invite priority suppliers to sign up to the Shoosmiths code of conduct and to respond to our supplier survey. As part of the external review the survey was reviewed and found to be fit for purpose.

#### Shoosmiths modern slavery supplier survey

Q1. For the goods and/or services you provide to Shoosmiths which country/countries are they sourced from? (Please provide details).

Q2. Does your organisation operate to any specific due diligence standards? (For instance Better Cotton Standard System, Ethical Trading Initiative Base Code, Fairtrade Standards, Gangmasters and Labour Abuse Authority Standards, Rainforest Alliance Sustainable Agriculture Standard, SEDEX Guidance on Operational Practice and Indicators of Forced Labour or the Travelife Gold Standard etc).

Q3. Have you reviewed your business operations and supply chain during the last twelve months for evidence of any instances of slavery, forced labour or human trafficking? Please describe your approach including going beyond your first tier suppliers.

Q4. Have you identified any goods or services that use modern slavery/human trafficking? If yes please detail.

Q5. Do you have a remediation programme in place in the event that modern slavery or human trafficking is found in your operations and supply chain? Please detail including any support provided to victims.

Q6. Please describe if you are involved in any collaborative initiatives and also if you have any third party accreditations in place to check that modern slavery and human trafficking does not exist in your supply chain?

Q7. Is your company required to publish an annual statement to comply with the Modern Slavery Act 2015 (Duty to Notify) Regulations SI 1743?

If yes - please provide the web link to your statement or provide further details.

Q8. What do you define as other high risk sustainability issues in your supply chain and what approaches are you undertaking to address them?\* Please detail.

\* (Examples of an environmental, ethical, social nature might include but not be limited to climate change, resource use, labour rights, health and safety, supply continuity/disruption).

Within our estates management function Fisco UK Ltd works with Shoosmiths directly managing and taking ownership of all second tier Facility Management contracts relevant to mechanical and electrical, security, cleaning and vending operations. All new suppliers are vetted and an annual compliance review is undertaken to include pre-employment screening, training, health, safety, environmental and as above modern slavery compliance.

It is standard practice for estates management to approach all the tier one and two estates management suppliers (excludes tier three sub-contractors not contracted by Shoosmiths). Existing suppliers who signed the original code of conduct are sent the 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. cleaning, window cleaners, caterers etc. and we focus on the direct supply of products i.e. stationery and specialist branded products.

As at August 2019 169 suppliers have signed up to our supplier code of conduct and we have received 59 supplier responses to our 2018/2019 slavery and trafficking supplier survey.

As part of our third party assessment work the Slave-Free Alliance reviewed how each part of the business is implementing the modern slavery duty to notify procedure. A number of improvement recommendations were made.

#### **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 solely in the UK 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. Since 2015/2016 when our first slavery statement was published no incident or issue in relation to slavery or trafficking has been reported but the purpose of appointing an independent third party was to help us to determine more robust measures of assessment and therefore greater knowledge of a supply chain that operates in the UK and globally.

Following an independent review of our approach to understanding and tackling the threat of modern slavery in our business and importantly in our supply chain these are the areas we will be exploring in our 2019/2020 work programme:

- developing an escalation and remediation procedure in the event of a report of modern slavery;
- provision of contact details for suppliers to report areas of concern;
- reviewing opportunities for more centralised procurement guidance; and
- looking in more detail at our supply chain, such as goods and services purchased for office use.

#### **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.

Having reviewed our procedures we will provide additional information on the steps we would take to investigate any allegations of slavery or trafficking in our business or supply chain.

We are still determining which key performance indicators we would use year on year.

### Key Performance Indicators 2018/2019

Key performance indicator	2018/2019
Number of instances of modern slavery identified within Shoosmiths business operation or supply chain	0
Number of required staff who have completed e-learning training	67
% of required staff who have completed e-learning training	100%
Number of suppliers who have signed up to the Shoosmiths supplier code of conduct	169
Number of suppliers requested to complete a survey in 2018/2019	140
Number of suppliers who completed a survey in 2018/2019	59

### 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 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 August 2019 67 required employees (100%) have completed the training.

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;
- inclusion in our quarterly induction programme for new joiners;
- the Unseen App is included as a feature on all new company iPhones and iPads ordered from mid-August 2018 onwards. 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 a directories of services and helpline providers;
- in the run up to Anti-Slavery Day 18 October 2019 an intranet feature about the scale and challenges posed by slavery and trafficking will include 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 UN 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, amending and drafting contracts to include anti-slavery clauses, assisting with business deals clients are undertaking – considering if other parties involved are affected by the legislation, inserting anti-slavery clauses in agreements and s.54 transparency statements.

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

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

### Progress against 2018/2019 priorities

Priority	Progress
Undertake a third party modern slavery threat assessment to identify opportunities for improvement.	Slave-Free Alliance appointed with review conducted April to July 2019 and report of recommendations provided for 2019/2020 focus.
Increase understanding of potential risk areas perceived by our priority suppliers within their supply chains.	Based on third party risk assessment recommendations an on-site supplier assessment to be conducted to further increase knowledge and understanding and to identify opportunities for supplier collaboration.
Explore opportunities for collaboration within the business sector and with third sector organisations involved in mitigating and preventing slavery and trafficking within the UK.	<p>Pro bono legal advice provided to Unseen. <i>'As an anti-slavery charity, Unseen ensures that the majority of the donations we receive are used to bring an end to slavery and support survivors. This is only possible because of the generosity of our partners who kindly donate their time and professional knowledge. Shoosmiths recently reviewed a software development agreement for us pro bono. The review raised some very useful operating points for us to consider and helped us to move towards a stronger overall agreement. Now we are in a better position to develop as an organisation and continue in our mission of ending modern slavery.'</i></p> <p>Operations Director, Unseen.</p> <p>Shoosmiths took part in a Business in the Community roundtable exploring how business can empower survivors to enter employment.</p> <p>Staff volunteering support was also provided to Business in the Community's Careers Conversations in the West Midlands which helps to break down barriers to work via conversations for survivors of modern day slavery and refugees. The programme assists individuals by helping to build confidence, develop CVs and assist with job interview preparation, ensuring they are ready to go back to work in a safer environment.</p>

	Similar opportunities are being explored by Shoosmiths in other offices.
Continue to raise awareness amongst stakeholders.	Our main interaction has been with staff and clients during the year explaining our approach and in the case of staff suggesting opportunities for involvement.

**Priorities for 2019/2020**

- Review and develop action programmes based on recommendations made by the Slave-Free Alliance;
- Brief our designated slavery champions to facilitate a consistent approach;
- Continue to increase understanding of potential risk areas perceived by our priority suppliers within their supply chains. To include an on-site assessment of one of our key suppliers;
- 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; and
- Continue to raise awareness amongst stakeholders.

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.

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**. You can also contact us at **corporate.responsibility@shoosmiths.co.uk**.

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

**Simon Boss**

Chief Executive

Shoosmiths LLP

17 September 2019