



# SHOOSMITHS 2018 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 Executive on behalf of the members on 10 September 2018 and the Partnership Council 19 October 2018. The statement will be updated annually and is our third published statement.

Our website statement is located at the footer of our Shoosmiths and Access Legal Solicitors home pages where our previous statements can also be accessed.

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 and can exist in any supply chain and industry.

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 through an improved understanding of its operations, by raising stakeholder awareness and by identifying opportunities for collaboration and shared best practice.

## 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 four divisions– business advisory, corporate, private client and real estate. Clients include household name blue chip companies, leading financial institutions and foreign owned corporates. Access Legal Solicitors, our private client division is dedicated to helping individuals with their personal legal needs.

This statement refers to our financial year 2017/2018 with our year ending 30 April 2018 on which date we had 187 partners and partner equivalents and 1,613 total employees and our revenue for 2017/2018 was £125.8 m. Our goal is to be the leading national law firm famous for its client experience.

We operate as one team in 11 locations in England, Scotland and Northern Ireland, namely Belfast, Birmingham, Edinburgh, Leeds, London, Manchester, Milton Keynes, Northampton, Nottingham, Southampton 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;
- Private client 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.

## **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, retaining Gold Standard status when we were re-accredited in August 2017.

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 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 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 April 2018. 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 latest Communication on Progress [here](#). Since May 2016 we have also been a member of the UN Global Compact UK Network Modern Slavery Working Group. Members represent a number of industry sectors and share ideas, information and best practice. In April 2018 we took part for the second consecutive year in the annual peer review of member slavery and human trafficking statements.

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.

Our Corporate Responsibility Consultant acts as our lead anti-slavery champion responsible for guiding the business on best practice and raising staff awareness.

### 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.

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 and risk assessment – suppliers

A nominated individual in each division and directorate (10 in total) has been briefed on our updated Modern Slavery Act Duty to Notify procedure and this group of colleagues is responsible for leading on its delivery. The procedure 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;
  - slavery/trafficking issues in the UK;
  - 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.

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.

Each priority supplier is also sent a slavery and trafficking survey asking it to provide details on:

- countries that goods/services are sourced from
- any relevant due diligence standards adhered to
- if its operations/supply chain has been reviewed in the last twelve months for evidence of any instances, forced labour, or human trafficking
- if any affected goods or services have been identified
- remediation approach if any instances were to be found
- any collaborative initiatives or third party accreditations in place
- annual statements that have been published

As at September 2018 156 suppliers have signed up to our supplier code of conduct and we have received 72 supplier responses to our 2018 slavery and trafficking supplier survey.

Goods and services sourced outside the UK include US datasite services; paper bags from Bulgaria; and power banks, USBs, folders, travel adaptors, webcam covers, vacuum bottles and stress balls from China.

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 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

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 2018 66 of employees (87%) 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.

Following the launch by BT/Unseen of the Unseen App we have added the App to 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 directories of services and helpline providers.

An update on progress and plans to our national Employee Forum in September 2018.

In the run up to Anti-Slavery Day 18 October 2018 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.

Firm wide briefings and articles on our external facing CR blog SHOUTback and inclusion in our annual CR Report and UN Global Compact Communication on Progress.

## External engagement

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

Modern Slavery Act advice and training 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**.

In June 2018 we organised a workshop with the Law Society and the University of Nottingham. Law firms and the third sector explored challenges that victims and survivors of modern slavery face accessing legal justice and therefore opportunities for possible remedies.

In October 2018 we became a partner of the TISCreport which it describes as the largest Open Data register committed to ending Modern Slavery and supply chain abuses. The £1,500 subscription is split equally between the TISCreport register and the UK Modern Slavery helpline.

Briefing the pro bono clinics we operate in Reading and Northampton and liaising with LawWorks to find ways of raising awareness including the potential for non-specialist legal advisers to help clients complete applications for Exceptional Case Funding.

### Priorities for 2018/2019

- undertake a third party modern slavery threat assessment to identify opportunities for improvement;
- increase understanding of potential risk areas perceived by our priority suppliers within their supply chains;
- 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. 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 Communications 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:

**Peter Duff**  
Chairman  
Shoosmiths LLP

19 October 2018