



# SHOOSMITHS 2020 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 7 September 2020 and the Partnership Council 16 September 2020. The statement is updated annually and is our fifth 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 2019 statement was published has been to carry out improvement recommendations identified in 2019 when we employed the Slave-Free Alliance to conduct an independent review of our processes and procedures.

### Progress against 2019/2020 priorities

Priority	Progress
Review and develop action programmes based on recommendations made by the Slave-Free Alliance.	Supplier code of conduct updated to provide details of how suppliers can report any concerns to Safecall and asking suppliers to report to Shoosmiths any incidents of slavery or human trafficking found in its business or supply chain.  Internal modern slavery duty to notify procedure updated to reflect updated statistics and weblinks.  Two appendices have also been added: <ul style="list-style-type: none"><li>• risk assessment to identify priority suppliers for engagement/survey</li><li>• escalation procedure in the event that a potential incident of slavery was to arise or be reported.</li></ul> Cross referencing has been provided in our procurement and suppliers' management policy to the modern slavery duty to notify procedure.

Brief our designated slavery champions to facilitate a consistent approach.	Undertaken February 2020 explaining the external review undertaken and findings, details of updated policies and procedures, a reminder of the supplier engagement and reporting cycle and our plans for working with the Slave Free Alliance once more and to request details of any additional colleagues to complete the e-learning training.
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.	The Slave Free Alliance was appointed to conduct this work but due to the Covid-19 crisis this is now scheduled to take place virtually in September 2020.
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.	Progress not made here so to address again in 2020/2021.
Continue to raise awareness amongst stakeholders.	Progress only made with staff engagement so to address again in 2020/2021.

### Shoosmiths structure, business and supply chain

Shoosmiths LLP is a leading UK 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 2019/2020 with our year ending 30 April 2020 on which date we had 208 partners and partner equivalents and 1,811 total employees and our revenue for 2019/2020 was £154.2m.

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 consists of circa 1,300 suppliers and our procurement expenditure in 2019/2020 was approximately £31 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 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 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**

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, pandemics, recruitment best practice and time off for dependent care.

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, 7 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.

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 a policy and guidance on compliance with the **modern slavery act duty to notify regulations**.

Our Head of Corporate Responsibility, who is part of the HR Directorate and who reports to the 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 July 2020 we took part for the fourth consecutive year in the annual peer review of member slavery and human trafficking statements.

Shoosmiths is 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 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 three 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.

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

Historically Shoosmiths has adopted a devolved approach to procurement with each directorate and division being responsible for the procurement of its goods and services in line with company procedures. In relation to the Modern Slavery Act a nominated individual in each division and directorate (currently 10 individuals total) has been responsible for leading on such engagement with our suppliers.

In March 2020 Shoosmiths appointed a dedicated Procurement Manager as part of a continuous improvement plan. The role is to manage our supply chain and to ensure that the organisation continues to conduct supply chain management in a fair and transparent way.

Through our supplier onboarding process, we undertake defined levels of due diligence depending on the size and risk of the supplier and the goods and services they are providing. Suppliers are also asked to sign the Shoosmiths supplier code of conduct which sets out the behaviours we expect from our supply chain.

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 – 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.

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. During the year we issued the updated supplier code of conduct and survey to all 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 four suppliers that they are members of Sedex which works to improve working conditions in global supply chains. We also took the decision to terminate two contracts and source alternative laundry services suppliers who had failed to respond to our requests for information during the last two years. In some instances, suppliers did not complete the requested survey, instead signposting us to their online slavery statements.

As one outcome of the 2019 review work undertaken by the Slave Free Alliance it was agreed that during early 2020 the Slave Free Alliance would undertake an assessment of the potential risks to Shoosmiths in relation to our outsourced estates management functions through the supplier Fisco UK Ltd. This review was intended to enable Shoosmiths to better understand the risk within the tiers of this function and to improve our understanding of the wider tier two supply chain.

Due to the Covid-19 crisis the face to face audit planned in March 2020 is now scheduled for a virtual assessment in September 2020. The assessment will entail the reviewing of Fisco management policies and main cleaning contractors – scope two suppliers.

**Documents to be reviewed will include:**

Recruitment and selection  
 Grievance and disciplinary  
 Employee code of conduct  
 Supplier code of conduct  
 Whistleblowing  
 Responsible sourcing/procurement (including specifically to labour providers)  
 Employee handbook  
 Anti-slavery and human trafficking

**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.

**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
Number of instances of modern slavery identified within Shoosmiths business operation or supply chain	0	0
Number of required staff who have completed e-learning training	67	18
% of required staff who have completed e-learning training	100	78
Number of suppliers who have signed up to the Shoosmiths supplier code of conduct*	169	86
Number of suppliers requested to complete a survey	140	148
Number of suppliers who completed a survey	59	85

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

### 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. Work commenced in May 2020 to review and update this training, but output has been delayed as a consequence of the Covid-19 crisis and is likely now to be completed around September 2020.

As at August 2020 18 required employees (78%) have completed the training. Our lead anti-slavery champions across the business had identified those colleagues who would benefit from raised awareness on this issue including within business development, estates management, HR and real estate. We did not reach 100% during the year as some staff were subsequently on furlough leave.

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 four quarterly induction sessions 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 directories of services and helpline providers;
- in the run up to Anti-Slavery Day 18 October 2019 the intranet front page featured the scale and challenges posed by slavery and trafficking 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 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 and corporate immigration teams also advise on illegal working policies and procedures, carrying out prevention of illegal working audits and providing 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 Academy including e-learning training click [here](#).

### Priorities for 2020/2021

1. Standardise procurement policies and practices across the business that are aligned with Shoosmiths' responsible supply chain management requirements;
2. 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;
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; and
4. 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. 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 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](mailto:corporate.responsibility@shoosmiths.co.uk).

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

**Simon Boss**

Chief Executive

Shoosmiths LLP

Date: 16 September 2020