

Shoosmiths 2021 Slavery & human trafficking statement

www.shoosmiths.co.uk

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 2 August 2021 and the Partnership Council 21 September 2021. The statement is updated annually and is our sixth 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/2021>

The focus of our activity since our 2020 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 and to progress centralisation of our approach to supplier engagement.

Progress against 2020/2021 priorities

Priority	Progress
Standardise procurement policies and practices across the business that are aligned with Shoosmiths' responsible supply chain management requirements.	A suite of tools has been developed that allows us to approach the market in a consistent and transparent way – RFP, RFI, and tender scoring mechanisms.
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.	<p>In September 2020, the Slave Free Alliance conducted a remote Facilities supplier 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.</p> <p>The assessment comprised of document assessments and interviews with the Shoosmiths National Estates Manager who manages these contracts, the Account Director/Manager of FISco UK Ltd who manage our Facility Management Service Contracts and two key cleaning contractors who provide cleaning services to the majority of our sites.</p> <p>Company documents reviewed included:</p> <ul style="list-style-type: none"> • Recruitment and selection. • Grievance and disciplinary. • Employee code of conduct. • Supplier code of conduct. • Whistleblowing. • Responsible sourcing/procurement (including labour providers). • Employee handbook. • Anti-slavery and human trafficking.

	<p>Key findings:</p> <ul style="list-style-type: none"> • Shoosmiths has robust due diligence processes and additional security checks for staff working on the estate; • Lack of supplier awareness training – Shoosmiths subsequently provided access to Shoosmiths’ Academy e-learning module ‘Modern Slavery for Managers’ – for further details about the course see here; • Adjustment to recruitment process, whistleblowing policy and training provision for cleaning company number one – agreed changes confirmed in writing on 19 April 2021; • Formal supplier notification process required to ensure that any potential or confirmed modern slavery cases within the supply chain are reported and fully investigated with appropriate enforcement action plan – work in progress; and • No significant risks or gaps were identified during the supplier assessments.
<p>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.</p>	<p>In October 2020, we supported Unseen’s anti-slavery day national campaign to raise awareness of the role of business in tackling modern slavery.</p> <p>In April 2021, Shoosmiths made a £1,500 donation to the charity Unseen, to support its Unseen helpline.</p> <p>In December 2020, our Birmingham office donated £1,250 to Birmingham Methodist District’s Adavu Project which supports adult survivors of modern slavery in the West Midlands, which has the second highest rate of referrals (after London) for victims of modern slavery. The charity used the donation to buy emergency bus travel and vouchers for clients to buy fresh fruit and vegetables.</p>
<p>Continue to raise awareness amongst stakeholders.</p>	<p>Staff engagement undertaken on anti-slavery day.</p> <p>In May 2021, Estates Management provided access to Shoosmiths’ Academy e-learning module ‘Modern Slavery for Managers’ to key suppliers and eight firms requested access for 23 employees in HR/Recruitment/Account Management type roles to complete this course.</p>

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 (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.

This statement refers to our financial year 2020/2021 with our year ending 30 April 2021 on which date we had 221 partners and partner equivalents and 1,731 total employees and our revenue for 2020/2021 was £167.9m.

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, finance, HR and estates management, information support, learning and development, quality and risk and projects and innovation.

Our supply chain consists of circa 950 suppliers and our procurement expenditure in 2020/2021 was approximately £32.3 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. In August 2020, we achieved Platinum Standard status.

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

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](#). This includes details on how we determine priority suppliers for engagement.

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 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 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 2021 we will take part for the fifth consecutive year in the annual peer review of member slavery and human trafficking statements.

In April 2021, Shoosmiths made a £1,500 donation to the charity Unseen, to support its modern slavery 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 four 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 (13 individuals) has been responsible for leading on such engagement with our suppliers.

With the appointment in March 2020, of a Procurement Manager, a centralised approach to 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 will enable suppliers to provide information and data on a range of responsible questions including signing up to the Shoosmiths supplier code of conduct and answering the modern slavery questions.

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.

Estates management approached tier one, tier two and tier three estates management suppliers. 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., office cleaning, window cleaners, laundry services, caterers 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 six suppliers that they are members of Sedex which works to improve working conditions in global supply chains. It is now common practice for suppliers who do not complete the requested survey, to instead, signpost us to their online slavery statements.

For consumables goods, our suppliers are sourcing from the following countries: Austria, Belgium, China, Estonia, Finland, France, Germany, India, Indonesia, Ireland, Italy, Japan, Lithuania, Malaysia, Mexico, Philippines, Poland, Portugal, Singapore, Sri Lanka, Spain, Sweden, Taiwan, Thailand, UK, United Arab Emirates, USA and Vietnam.

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	2020/2021
Number of instances of modern slavery identified within Shoosmiths business operation or supply chain	0	0	0
Number of required staff who have completed e-learning training	67	18	83
% of required staff who have completed e-learning training	100	78	100

Number of suppliers who have signed up to the Shoosmiths supplier code of conduct*	169	86	49
Number of suppliers requested to complete a survey	140	148	208
Number of suppliers who completed a survey	59	85	127

*Cumulative figure reported in 2018/2019 but from 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, reviewed and updated in November 2020, 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.

For the 2020/2021 period 83 required employees (100%) 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.

In May 2021, learning and development will launch a legal advisor and support functions matrix to signpost employees to all the training resources available at their level/department. Under the quality and risk heading modern slavery is included as an optional course for completion.

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 2020 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, 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 2021/2022

1. Launch online supplier database and onboarding system which will include the modern slavery questions previously asked of priority suppliers by individual directorates and divisions.
2. 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 areas perceived by our priority suppliers within their supply chains.
3. 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: <https://www.hbaa.org.uk/community/our-terms-ethics>
4. 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
5. 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 Corporate Responsibility (CR) 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.

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

Simon Boss
Chief Executive
Shoosmiths LLP

Date: 21 September 2021

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