

# Slavery & human trafficking statement 2023

## 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 Partnership Council 29th September 2023. The statement is updated annually and is our eighth published statement.

Our website statement is located at the footer of our <https://www.shoosmiths.com/> and <https://seriousinjury.shoosmiths.com/> 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/2023>

The focus of our activity since our 2022 statement was published continues to be progressing how we engage with our supply chain on this issue.

## Progress against 2022/2023 priorities

Priority	Progress
Undertake a remote site assessment (interviews and review of process and documentation) of all major cleaning services firms by September 2023.	Remote site assessments were undertaken of three key cleaning suppliers and two sub-contractor cleaning firms. The report and recommendations have been reviewed and are being implemented.
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.	Shoosmiths became an accredited living wage employer in July 2022. The supplier modern slavery survey now also asks suppliers if they are accredited living wage employers via the Living Wage Foundation and if they require their sub-contractors to be an accredited Living Wage employer.
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 2022, we supported Unseen’s anti-slavery day national campaign to raise awareness of the role of business in tackling modern slavery.  In October 2022, the Shoosmiths Foundation awarded £49,690 to JERICHO, a charity supporting employment opportunities for people experiencing inequality in the market. One of the groups the charity supports are survivors of modern slavery.
Continue to raise awareness amongst stakeholders.	Staff engagement undertaken on anti-slavery day. Information provided on the internal intranet.

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

Shoosmiths LLP is a 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 below which includes subsidiaries). Shoosmiths LLP also provides legal services in Scotland. We have been delivering legal services to businesses since 1845 and provide legal services via our advisory services, corporate, and real estate divisions.

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

This statement refers to our financial year 2022/2023 with our year ending 30 April 2023 on which date we had 222 partners and partner equivalents and 1,658 total employees and our revenue for 2022/2023 was £194.1m.

Shoosmiths is a law firm clients choose for excellent service, incisive thinking and above all for our ability to focus on what matters.

Our clients include some of the world's most exciting and ambitious businesses; amazing clients making an impact.

We empower our people to be their authentic selves and to deliver together in supportive teams committed to excellence and innovation.

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.

You can find out more about our services, sectors and specialisms [here](#).

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

As a provider of legal services our supply chain is not overly complex and consists of circa 500 active suppliers 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, IT services and hardware, estate services including cleaning, waste management, refurbishments and maintenance, uniforms and catering, internal and external event services, security, couriers, and recruitment agents. We purchase professional services and work with other law firms and experts in the direct delivery of services to our clients including barristers and court services.

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

Operating with integrity governs our approach and therefore our ESG aspiration to be the leading 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.

In July 2022 Shoosmiths became an accredited Living Wage employer.

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, home working, hybrid working, mental health and wellbeing, pandemics, recruitment best practice, trans inclusion at work guidance, our values, working practices, whistleblowing and your time. Our parental/family policies cover adoption leave, fertility, expectant fathers, and mothers, maternity, parental bereavement leave, pregnancy loss, shared parental leave 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, 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).

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 Legal 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 Executive Board has collective responsibility for directing and reviewing this programme and the annual modern slavery statement. The statement has been 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 which with effect 2023 has changed to an annual online [Communication on Progress platform](#). You can find Shoosmiths' details [here](#) and you can read our previous Communication on Progress reports [here](#). We have been a member of the United Nations Global Compact Network UK Modern Slavery Working Group since May 2016. Members represent a number of industry sectors and share ideas, information and best practice. In July 2023 we will take part for the seventh 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.

### **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.

An online supplier database and onboarding process asks 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. The questionnaire was revised during the year to include two questions asking if the supplier is an accredited Living Wage Employer via the Living Wage Foundation and if using sub-contractors to service Shoosmiths if the supplier requires its sub-contractors to be an accredited Living Wage Employer.

We continue to review our procurement processes, ensuring that we are focusing on continuous improvement in the engagement of our suppliers. As part of this review work, we will be:

- reviewing and updating all our procurement policies and processes – including an enhanced responsible business evaluation to assess potential modern slavery risks, with standardised, and clearer roles and responsibilities involved in supplier selection and ongoing supplier management;
- continuing to embed our supplier code of conduct – ensuring we are engaging with suppliers who are committing to compliance with the Modern Slavery Act 2015;
- focusing on supplier contract management with standardised governance, templates, reporting and outputs;
- undertaking further categorisation of our supply chain – defining key and critical suppliers, ensuring that we are assessing potential risks, including modern slavery risks with the right level of focus;
- investing in centralised contract and procurement process technology solutions to allow us to more effectively identify, assess and manage our suppliers; and

- continuing to invest in our procurement team, with external training, conference and seminar attendance to increase awareness.

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 our service provider supporting our estates management team 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 76 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. No issues were reported by the suppliers. We were informed by six suppliers that they are members of Sedex which works to improve working conditions in global supply chains. One supplier works with the Slave-Free Alliance, two suppliers are involved with the Ethical Trading Initiative, and one supplier reported using the EcoVadis rating tool. One company is a member of

the UN Global Compact Network UK Modern Slavery Working Group, and one company is part of the Modern Slavery Leaders Group at the Supply Chain Sustainability School. One supplier reported it is an accredited Living Wage Employer.

For consumables goods, 14 suppliers 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.

### **Slave-Free Alliance review of cleaning services firms**

One of our 2022/2023 priorities was to undertake a remote site assessment (interviews and review of process and documentation) of all major cleaning services firms by September 2023.

In April 2023, Slave-Free Alliance (SFA) (part of Hope for Justice, a registered charity) undertook remote assessments of our facilities management (FM) contract partner, three major cleaning suppliers and two sub-contractors and this was extended to include informal discussions with site cleaning operatives.

The approach taken was to conduct remote stakeholder interviews with HR managers, account managers, compliance managers and directors covering their modern slavery policies, awareness, recruitment procedures, business processes to prevent, identify and respond to modern slavery along with training provision. As well as the management discussions, the SFA also spoke to some of our site cleaning operatives (voluntary) to understand their awareness and knowledge.

The SFA issued a report for review and consultation with our key contract partner. The recommendations will be implemented:

- no evidence of modern slavery identified in the cleaning supply chain and the current risk of exposure to the threat of modern slavery with the cleaning suppliers assessed is considered low;
- the FM contract partner and cleaning company have taken positive steps to address the threat of modern slavery since the previous modern slavery assessment undertaken in 2020;
- there are strong procedures and practices in place which mitigate the risk of modern slavery;

- there is a need to raise awareness of modern slavery within the supplier's workforce. The FM contract partner is in the process of developing a training resource which will be rolled out to the supply chain; and
- suppliers to develop and improve their formal business process to deal with identified or potential incidents of modern slavery. At our request SFA has drawn up a reporting flow chart and process for our FM contract partner to distribute to our supply chain – to be reinforced in contract terms, supplier onboarding process and annual supplier due diligence.

This work will form part of the firm's annual estates management supply chain compliance audit scheduled in October 2023.

*'In 2023 Slave-Free Alliance undertook a modern slavery supplier assessment of Shoosmiths' facility management suppliers. The purpose of the assessment was to assess and evaluate any potential exposure to the risk of modern slavery and understand their suppliers' strategic and operational response to mitigate associated risk. Such an analysis enables areas of good practice to be identified and recommendations presented to proportionately mitigate actual and potential risks. The assessment included a review of relevant policies and procedures, as well as interviews with facility management suppliers' management and cleaning employees employed on Shoosmiths contracts.'*

*Shoosmiths has shown complete commitment working towards a slave-free supply chain. It is taking all the right steps to protect its business from the threat of modern slavery, working with a 'beyond compliance' mindset. It has worked collaboratively with its facility management suppliers to understand and mitigate risk.'*

Gary Booth, Technical Services Management, Consultant, Slave-Free Alliance

### **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 can only determine if its approach is effective because zero instances were identified during the year but is committed to continued work in this area.

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.

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.

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	2022/ 2023
Number of instances of modern slavery identified within Shoosmiths business operation or supply chain	0	0	0	0	0
Number of required staff who have completed e-learning training	67	18	83	55	65
% of required staff who have completed e-learning training	100	78	100	98	87
Number of suppliers who have signed up to the Shoosmiths supplier code of conduct*	169	86	49	57	25
Number of suppliers requested to complete a survey	140	148	208	160	146
Number of suppliers who completed a survey	59	85	127	129	105

\*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

All new starters in business services are assigned required modern slavery e-learning training. The training 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 2022 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 blog SHOUTback and inclusion in our annual ESG reporting.

## Our advisory role

Modern Slavery Act advice and training is provided to clients by our regulatory team. This includes 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 and advising clients on investigating allegations of modern slavery in their businesses and/ or supply chain and taking appropriate measures to improve standards and work with regulators, where applicable.

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

In March 2023, we launched [ESG 360](#), a high-level compliance audit tool to help organisations understand their ESG performance, free of charge. The tool includes a section on modern slavery.

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 2023/2024

1. Review procurement processes and procedures to ensure appropriate engagement with our supply chain in identifying and addressing the potential risk of modern slavery and human trafficking in our supply chain.
2. 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.
3. 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 blog SHOUTback and our United Nations Global Compact Communication on Progress disclosure can be found [here](#). You can also contact us at [corporateresponsibility@shoosmiths.com](mailto:corporateresponsibility@shoosmiths.com).

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

David Jackson  
Chief Executive  
Shoosmiths LLP

Date: 29th September 2023

[You can download our 2023 statement here.](#)

Download our previous years slavery and human trafficking statements below.

[2022 statement](#)

[2021 statement](#)

[2020 statement](#)

[2019 statement](#)

[2018 statement](#)

[2017 statement](#)

[2016 statement](#)

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 registration number 12058753

1924 Trustees Limited registration number SC226581

Shoosmiths (Northern Ireland) LLP registration number NC001384

Shoosmiths Europe LLP registration number OC440739