

Slavery & human trafficking statement 2024

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 5 September 2024. The statement is updated annually and is our ninth published statement. It covers our 2023/2024 financial year which was an 11-month year 1 May 2023/31 March 2024 as we have changed to a 31 March year end reporting cycle.

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

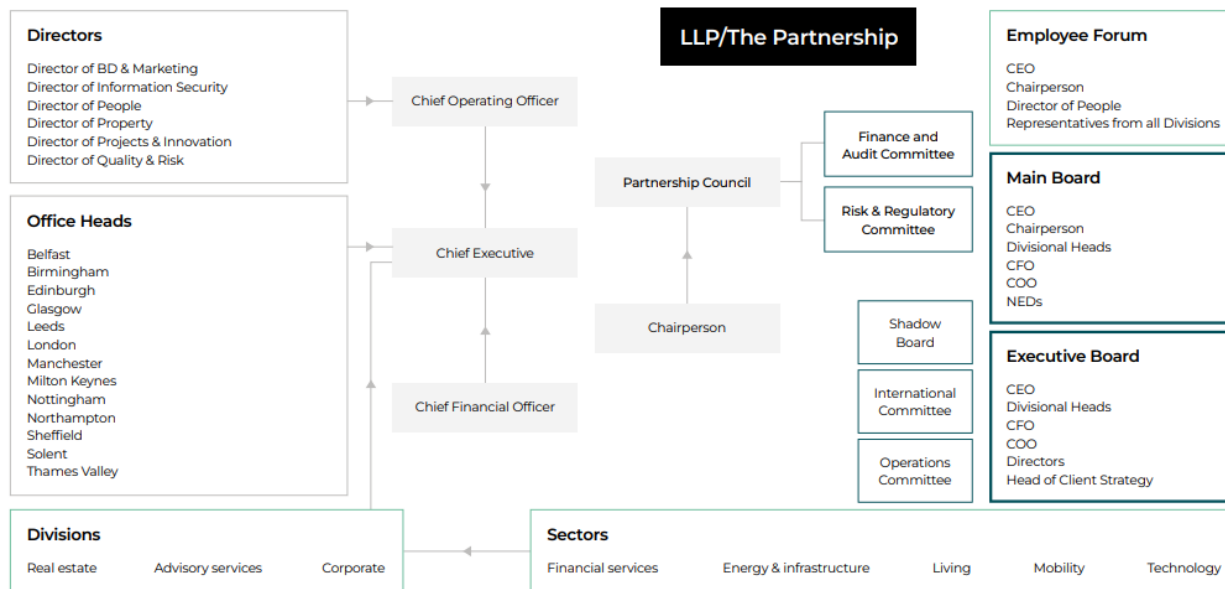
Progress against 2023/2024 priorities

| Priority | Progress |
|--|--|
| 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. | <p>We have created a steering group, including key stakeholders in our risk and ethics, IT, estates and legal teams, to identify our risk posture in each key area of the firm and to put control measures in place.</p> <p>This will help support the firm's ability to mitigate risk in all areas of our supply chain and outline our commitment to clients to exclude any modern slavery and human trafficking within our supply chain.</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>In October 2023, we supported the anti-slavery day campaign to raise awareness of the role of business in tackling modern slavery.</p> <p>In December 2023, JERICHO published its one year on impact report following funding by the Shoosmiths Foundation. One of the groups the charity supports are survivors of modern slavery. See the JERICHO impact report here.</p> |
| 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 and ultimately controls Shoosmiths Europe LLP (registered number OC440739). We have been delivering legal services to businesses since 1845 and provide legal services via our advisory services, corporate, and real estate divisions.

The structure of our partnership can be viewed below.



This statement refers to our financial year 2023/2024 with our year ending 31 March 2024.

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.

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.

Shoosmiths is an accredited Living Wage employer committed to ensuring fair wages and ethical practices. This

accreditation reflects the firm's dedication to social responsibility and the well-being of its employees and its third-party contractors.

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, transitioning at work, our values, working practices, whistleblowing and your time. Our parental/family policies cover adoption leave, co-parent leave, fertility, maternity, parental bereavement leave, pregnancy loss, shared parental leave and time off for dependent care.

We expect all partners, employees and consultants to conduct themselves with honesty and integrity in all business and professional dealings on behalf of the firm. The firm has a zero-tolerance approach to bribery, corruption and financial crime. This is supported by training which takes place during onboarding and annually together with robust with policies and procedures supervised by the centralised risk and ethics directorate.

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.

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.

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.

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.

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 or Belgium where all our offices are based. Candidate sourcing is predominantly managed directly by the inhouse talent acquisition team. Over the last six years we have greatly reduced our use of recruitment agencies, but when they are required all recruitment suppliers are based in the UK or Belgium and agree to our terms and conditions and/or an addendum to those 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.

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 are:

- 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;
- improving our supplier onboarding process to provide a more robust supplier evaluation to mitigate any risks associated with modern slavery;
- 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](#).

Estates management firstly approached tier one high risk suppliers such as catering, laundry, stationery, and uniform suppliers. Secondly, we approached tier two/three facility management suppliers – office and window cleaning, cleaning consumables, couriers, landscaping, waste and recycling and all building services contracts. All new tier two 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 101 tiers one, two and three estates management suppliers. All suppliers were issued with the questionnaire. 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 via email, 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 seven 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 two suppliers 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 is part of a remediation programme – National Referral Mechanism (NRM). Three suppliers reported they are an accredited Living Wage Employer.

For consumables goods, 20 suppliers informed us they are sourcing from the following countries: Australia, China, Czech Republic, France, Germany, Holland, India, Indonesia, Ireland, Italy, Japan, South Korea, Malaysia, Poland, Singapore, South Africa, Turkey, UK and USA.

Follow up to Slave-Free Alliance reviews undertaken in 2020 and 2023

(See our 2023 statement regarding a remote site assessment (interviews and review of process and documentation) undertaken of all major cleaning services firms during 2023.)

After the annual estates management supply chain audit in October 2023 and subsequent meetings in February 2024 with our facilities management (FM) contract supplier, we reviewed the recommendations and the following actions have been undertaken as per the Slave-Free Alliance audits undertaken in September 2020 and April 2023:

- modern slavery training and e-learning modules have been rolled out to managers and employees; and
- the Slave-Free Alliance Modern Slavery reporting process and new modern slavery contract addendum has been adopted by the majority of tier two suppliers, a further progress update will be provided during the next reporting year.

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 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 | 2023/2024 |
|---|-----------|-----------|-----------|-----------|-----------|-----------|
| Number of instances of modern slavery identified within Shoosmiths business operation or supply chain | 0 | 0 | 0 | 0 | 0 | 0 |
| Number of required staff who have completed e-learning training | 67 | 18 | 83 | 55 | 65 | 55 |
| % of required staff who have completed e-learning training | 100 | 78 | 100 | 98 | 87 | 82 |
| Number of suppliers who have signed up to the Shoosmiths supplier code of conduct* | 169 | 86 | 49 | 57 | 25 | 102 |
| Number of suppliers requested to complete a survey | 140 | 148 | 208 | 160 | 146 | 128 |
| Number of suppliers who completed a survey | 59 | 85 | 127 | 129 | 105 | 108 |

*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 2023 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 business immigration team (which forms part of our national employment team) also advises on right to work and sponsorship compliance and provides training on right to work checks and immigration compliance more widely. During the year our national employment team hosted a webinar on 'avoiding illegal working and managing risk' which included [content about modern slavery risks and the consequences of non-compliance](#).

We offer our high-level compliance audit [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 e-learning training click [here](#).

Priorities for 2024/2025

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.

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

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

David Jackson
Chief Executive
Shoosmiths LLP

Date: 5 September 2024

Download our previous years slavery and human trafficking statement below.

[2023 statement](#)

[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
Equivio Limited registration number 12058753
1924 Trustees Limited registration number SC226581
Shoosmiths (Northern Ireland) LLP registration number NC001384
Shoosmiths Europe LLP registration number OC440739