

# Modern Slavery Statement 2018



This Policy applies to Burgess Salmon LLP (the "Firm"), Burgess Salmon Company Limited, all Burgess Salmon entities and for work undertaken in all jurisdictions.

## Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our firm's slavery and human trafficking statement for the financial year ending 30 April 2018.

## Slavery and human trafficking statement

Burgess Salmon has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings.

This statement sets out the steps that Burgess Salmon has taken - and is continuing to take - to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

## Our commitment

We are committed to ensuring that slavery and human trafficking have no place in our business or in our supply chain. Within this commitment we understand the importance of respecting all human rights. We are dedicated to running our business responsibly and committed to the highest standards of professionalism, ethics and integrity.

## Our business, organisational structure and supply chains

Burgess Salmon is the independent UK law firm which delivers the best mix of advice, service and value to clients. Burgess Salmon has over 750 employees, including over 425 lawyers and 87 partners. We are a partnership and we value collaboration and team playing as the best approach to delivering a great client experience.

Burgess Salmon has offices in Bristol, London and Edinburgh and provides legal advice for the jurisdictions of England and Wales, Scotland and Northern Ireland. We advise in other jurisdictions through a preferred firm network of like-minded independent firms.

We are committed to ensuring that there is no occurrence of slavery or trafficking within our business or in our supply chain. Any supplier in our supply chain who is found to have committed an offence of modern slavery or human trafficking will be reviewed and may be subject to a range of sanctions including termination of contract.

We engage with our suppliers to ensure that they share our high standards. We expect our suppliers to:

- Confirm their commitment to a zero tolerance approach to human trafficking and slavery;
- Commit to applying corresponding values within their own organisation; and
- Demonstrate commitment to achieving sustainable and ethical business practices.

## Policies and conduct

Burgess Salmon is regulated by the SRA and is subject to the SRA Principles and Code of Conduct. We are committed to acting as a responsible business and during 2018, we launched our three year strategy detailing our commitment to being a responsible business, we became a signatory to the UN Global Compact and we provided Firmwide training and awareness sessions on our responsible business strategy.

We also operate a number of internal policies to ensure we are conducting business in an ethical and transparent manner. These include:

- Our Human Rights Policy.
- Our supplier code of conduct, which sets out the standards required of our suppliers.
- Our code of business conduct, which explains the manner in which we behave as an organisation and how we expect our people and suppliers to act.
- Our recruitment policy, which includes conducting eligibility to work in the UK checks for all Burges Salmon people to safeguard against human trafficking or individuals being forced to work against their will.
- Our whistleblowing policy, which ensures that our people know they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

## **Due diligence and risk assessment**

The ILO estimates that, in the past five years, 89 million people will have experienced some form of Modern Slavery for a period of time ranging from a few days to an extended period of time. We commenced a human rights impact assessment to deepen our understanding of human rights and the potential impacts which are most salient to our operations and supply chain. This on-going assessment considers the nature of the Firm and sector we operate in, our geographical context and will determine any areas of higher risk for our business.

We have identified our supply chain as an area for ongoing focus. We already have a number of risk mitigation measures in place with regards to our supply chain and we work with our suppliers to ensure that our approach to slavery and human trafficking is reflected in all our purchases of goods and services so that neither we nor they are involved in any way, either directly or indirectly, in slavery and human trafficking.

We have determined our critical suppliers to be those businesses who supply us with the technology and financial services we need to deliver our legal services to our clients and who help us to run our premises. We tend to foster long-term relationships with these suppliers and we have regular account meetings (monthly or quarterly) with them.

Our Purchase Terms and Conditions (Goods and Services) include anti-slavery provisions, including implementing due diligence procedures with suppliers, sub-contractors and other participants in the supply chain.

Please visit the Suppliers section of our website for further information.

## **Modern slavery training and awareness**

We are committed to improving our practices to combat slavery and human trafficking. We have been working with Unseen, a local charity, to provide training and awareness to staff across the Firm.

## **Effectiveness and performance review**

We monitor and review our suppliers periodically and we consider any issues arising in our supplier performance through our regular account meetings.

We have a whistleblowing policy and a grievance policy to ensure that all staff are able to report any issues which they may encounter during their work.

We also provide a confidential Employee Assistance Programme, administered through an external provider, to ensure that all staff are able to speak to suitably trained staff for any concerns they may have. This is available to all staff 24 hours a day and 365 days a year.

## **Further steps**

### **Completion of the Human Rights Impact Assessment**

To consider and allocate any actions arising from the findings of the Human Rights Impact Assessment.

### **Training and Awareness**

We have commenced a training programme and schedule to achieve the following:

- Firmwide training to all staff (to include drop in sessions and online training) to raise general awareness of modern slavery and human trafficking. Our target is for 80% of staff to have completed at least one form of training by the end of April 2020; and
- Targeted in-depth training to our specialists in Procurement and Management to ensure they are up to date on best practice around managing risks relating to modern slavery and human trafficking in our supply chain. Our target is to ensure that 80% of our relevant specialists receive this training by April 2020.

### **Supplier due diligence**

To ensure that our suppliers share our commitment we have completed due diligence on our suppliers during their onboarding process. To enhance our supply chain due diligence, our goal is to achieve 100% completion of due diligence on all new suppliers, and to include completion of due diligence relating to modern slavery and human trafficking.

In addition to this, for our 31 existing critical or high risk suppliers, we are refreshing our existing due diligence and requesting updated modern slavery and human trafficking statements and internal policies detailing their approach to combatting modern slavery and human trafficking (the "Due Diligence Refresh"). Our targets are as follows:

- For 100% of critical or high risk suppliers to have been subject to a request for a Due Diligence Refresh by August 2019;
- For responses to the Due Diligence Refresh to have been received by at least 60% of critical or high risk suppliers by December 2019; and
- To have scheduled contract meetings with at least 50% of our critical or high risk suppliers to discuss the responses to their Due Diligence refresh. These meetings are to be completed by March 2020.

### **Approval**

This statement was approved by Roger Bull, Managing Partner and the Partnership Committee of Burges Salmon LLP on 27 September 2018. This statement was further reviewed and amended on 20 March 2019 by Roger Bull, Managing Partner and the Partnership Committee of Burges Salmon LLP.



Roger Bull, Managing Partner

20 March 2019