

# Burges Salmon

## Modern Slavery Statement 2019



This statement is made pursuant to obligation under section 54(1) of the Modern Slavery Act 2015 (the Act), for the financial year ending 30 April 2019.

Slavery and Human Trafficking are human rights abuses and have no place in our business or in our supply chain. We are dedicated to running our business responsibly and committed to the highest standards of professionalism and integrity.

### Introduction

This statement sets out the steps, risk management and mitigation measures, which Burges Salmon LLP, its subsidiaries and all affiliated entities (“we”, “us”, “our” or “the Firm”) have undertaken and will continue to take in our business and supply chains, in relation to the issue of slavery and human trafficking.

Our values and reputation are of huge importance to us. They are integral components of delivering exceptional service to our clients as well as being an exceptional place to work for our people.

This is the fourth Burges Salmon Modern Slavery Statement. In the past year, we have enhanced our awareness and understanding of modern slavery and human trafficking, deepened our understanding of human rights in our business context and further engaged our suppliers with a view to better understand and address related risks. We have prioritised collaborations, which have helped us with our approach, understanding and risk mitigation.

### Our business, organisational structure and supply chains

Burges Salmon is an independent UK law firm. We compete at the top of the legal market, working for wealthy private individuals, entrepreneurial businesses, large corporates, institutions and public bodies. We have core and specialist legal expertise delivering across a range of industry sectors including energy,

### MODERN SLAVERY AND HUMAN TRAFFICKING

**We understand modern slavery and human trafficking as defined in the Act, the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisations (ILO), particularly relating to forced or compulsory labour.**

**We recognise that forced labour is a form of slavery and includes debt bondage and the restriction of a person’s freedom of movement whether that be physical or non-physical.**

**According to the International Organization for Migration (IOM) World Migration Report 2020, the number of international migrants is estimated at almost 272 million globally, with nearly two thirds being labour migrants. The number of internally displaced persons due to violence and conflict has reached over 41 million.**

**In 2017, the ILO reported that 40.3 million people were victims of modern slavery and, of these, 24.9 million were in forced labour which includes 16 million in the private sector including construction, manufacturing, mining, utilities, agriculture, forestry, fishing and domestic work.**

**In this context, we recognise that we, and other businesses, are exposed to the risk of modern slavery and human trafficking, in operations and supply chains.**

power and utilities, financial services, infrastructure, transport, real estate, private wealth and public sector.

**We work across the UK.** We have lawyers who are qualified to work in all three legal jurisdictions in the UK – England and Wales, Scotland and Northern Ireland.

**We work internationally.** Across the world, we work with a select number of like-minded independent law firms – our Preferred Law Firm network.

We have over 780 people, including over 450 lawyers and 92 partners (our most senior lawyers who are owners of the Firm). The rest of our people are business professionals who work in our operations, finance, people, marketing and client support teams. Burges Salmon has offices in Bristol, London and Edinburgh. The majority of our people, around 750, primarily work in the Bristol office.

Burges Salmon LLP is a limited liability partnership. The Partnership Committee >

(PCOM) is the main strategic board responsible for overall management of the firm. Chaired by our Senior Partner, its primary responsibility is for setting the strategic direction, and ensuring the effective governance, of the Firm. It has oversight of a number of sub-committees including the Executive Committee (ExeCom).

ExeCom is chaired by the Managing Partner and is responsible for the visible delivery of strategy against agreed priorities. It has responsibility for overseeing the co-ordination and efficient operational delivery of the business services functions of the Firm, the effective delivery of projects and programme coordination, the effective management of operational business risks, and the operational delivery of the business services aspects of the Firm's policies.

In the operation of our business, we purchase a variety of goods and services, rent offices, purchase utilities and recruit people.

Our suppliers provide us with electronic equipment, office supplies, catering, security, information systems and computer applications, travel and accommodation, banking services, telecommunications, professional services, cleaning services, document management, waste disposal, energy, office furniture and rented office accommodation. We have approximately 3500 suppliers on our accounts system.

Our people, as part of the recruitment process, are subject to pre-employment screening. This confirms right to work, involves criminal background checks and verifies identity, experience and qualifications.

As a law firm, we conduct business under the strict governance of the **Solicitors Regulatory Authority (SRA)** and the **Scottish Law Society**. This requires that all our clients are subject to due diligence to protect against money laundering, financing terrorism, bribery and corruption and conflicts of interest. We are instructed by over 5000 clients in a single year.

### Policies and conduct

At Burges Salmon our **six core values** are: ambition, collaboration, commitment, fairness, quality and respect. They underpin everything we do.



As the Firm is regulated, our people are required to conduct themselves to specific standards including the **SRA Principles and Code of Conduct** and under the regulatory regime of the Scottish Law Society.

We pride ourselves on being a responsible business and are signatories to the UN Global Compact's 10 Principles for responsible business. This requires us to report on our commitment and progress in the areas of human rights, labour practices, anti-bribery and corruption and the environment.

Our **Human Rights Policy** aims to avoid causing or contributing to human rights impacts through our own activities, uphold the respect of human rights in direct relation to our operations and business relationships, and support the promotion of human rights within our operations and sphere of influence.

Our Human Rights Policy applies to all of our people including contractors and temporary workers. We expect our suppliers to respect and adhere to this policy as part of our Purchase Terms and Conditions and our approach to supplier due diligence.

We operate our firm to a high standard and have attained accreditations in ISO 9001 for quality management, ISO 14001 for environmental management, ISO 27001 for information security and ISO 22301 for business continuity.

We have a number of other policies, which are relevant to the operation of our Firm and address modern slavery and human trafficking risks. These include:

- Anti-Bribery and Corruption Policy;
- Procurement Policy;

- Health and Safety Policy; and
- Whistleblowing Policy.

Expectations for behaviour are communicated, to our people as part of the induction to the Firm and as part of on-going training which is supported by a compliance and e-learning management system.

Our **Risk and Best Practice** Team exist to support the Firm's compliance with the governing regulatory authorities and conduct a range of internal audits in the pursuit of risk mitigation and continuous improvement.

We have in place a Whistleblowing Policy and Grievance Procedure to enable our people to report any issues, which they may encounter at work.

We provide a confidential Employee Assistance Programme, administered through an external provider, enabling our people to speak to suitably trained personnel about any concerns they may have. This is available to our people 24 hours a day and 365 day a year.

## Due diligence and risk assessment

As a professional services firm, which operates under strict governance criteria and regulation, general assessment is that we are at low risk of slavery and human trafficking occurring within our own operations.

We recognise that there is greater risk of slavery and human trafficking occurring within our supply chains. We understand that there is a more prominent risk of slavery where workers are in lower skilled employment, away from home and working in temporary positions. We further recognise that there is greater risk in certain geographies and sectors.

In relation to modern slavery and human trafficking risk, we have primarily focused on what we have termed 'critical and high-risk suppliers' of which there are 34. We have determined our critical suppliers to be those businesses, who supply us with goods and services that are significantly important to the delivery of our legal services. We have included additional suppliers that we have identified as higher risk based on our risk criteria.

We tend to foster long-term relationships with these suppliers and have regular account meetings (monthly or quarterly)

with them. They are subject to our Purchase Terms and Conditions (Goods and Services) which include anti-slavery provisions. We expect our suppliers to implement due diligence procedures with their suppliers, sub-contractors and other participants in the supply chain.

We have requested that our critical and high-risk suppliers complete a modern slavery questionnaire detailing specific information. Our Knowledge and Information Services team have set up a tracker service to help monitor any news regarding our suppliers and potential allegations.

We engage with our suppliers to assert our expectations. We expect our suppliers to:

- Confirm their commitment to no slavery or human trafficking;
- Apply corresponding values within their own organisation; and
- Demonstrate commitment to achieving responsible business practices.

We monitor and review our suppliers periodically and we consider any issues arising in our supplier performance through our regular account meetings. Any supplier in our supply chain who is found to be non-compliant in terms of our standards will be reviewed and may be subject to a range of sanctions including termination of contract.

During 2019, we undertook a desk-based human rights review following the UN Guiding Principles on Business and Human Rights, to help us assess our respect of human rights in the context of the Firm's operations and in terms of the four stakeholder groups of our clients, people, suppliers and communities. We deemed this important given the wider context of preventing modern slavery through the general respect of human rights.

In addition to the 'Right to be free from slavery and forced labour' we identified these other human rights as most pertinent to the Firm:

- Right to life (safeguarding health, wellbeing and the environment);
- Right to privacy (management of confidential and personal data);
- Right to non-discrimination (equal opportunities and fair treatment for all);
- Right to an adequate standard of living

(living wage, Fair financial transactions and economic contributions); and

- Right to education (no child labour, social mobility, training and development).

Our human rights review has primarily identified enhancements for our procurement policy, supplier engagement and communication of performance.

## Modern Slavery Training and Awareness

In alignment with our 2019 commitments, we have deployed firm-wide e-learning, run a communication campaign and held specific workshops.

We recognised the need for everyone in the Firm to have a basic understanding and level of awareness, which was delivered by Vinci Works and their Modern Slavery e-learning and compliance module: Preventing Exploitation.

Given our understanding of risk, we conducted more in-depth training with personnel in specific roles covering the people team, risk and best practice, supplier relationship managers and procurement. These people were targeted with a more in-depth Vinci Works Modern Slavery e-learning and compliance module: Practical Steps for Procurement.

We supplemented the targeted e-learning with a face-to-face workshop to enable discussion, consideration of risk in the operational context of the firm and to deepen understanding of how modern slavery manifests in the UK and global supply chains.

Working with the not-for-profit anti-modern slavery and human trafficking charity 'Unseen' we raised awareness with an internal communication campaign, which featured regular articles in our internal magazine and enabled our people to express their support for the work against modern slavery, at an internal solidarity event, which coincided with anti-slavery week in October 2019.

In June 2019, one of the Unseen Directors joined a session with PCom to strengthen awareness of requirements of the Act from a leadership perspective and to give feedback on our Modern Slavery Statement 2018 and facilitate a conversation around areas of modern slavery risk and approaches to mitigation. >

## Collaborations

Given the challenges around the effective address of modern slavery and human trafficking, we recognise the importance of collaborating with other organisations and the sharing of and advocating of good-practice.

Collaboration	Activities
	<p><b>Unseen</b> is a not-for-profit organisation working towards a world without slavery. They provide victim support and rehabilitation, helpline, partnership resources, advocacy and awareness raising.</p> <p>We have contributed to Unseen with financial donations, in-kind support and enabled the advocacy of their work with representatives from other businesses, civil society and the community. They have delivered training to our people, supported us with communication and awareness campaigns and given feedback to our Partners Committee (PCOM) on our previous Modern Slavery Statement for 2018.</p>
	<p>The <b>Living Wage Foundation</b> is a campaigning organisation in the UK, which aims to persuade employers to pay a Living Wage.</p> <p>We are an accredited Living Wage Foundation employer. This means we are committed to paying all of our people at least the living wage. This includes personnel on temporary contracts and workers at our premises, who are contracted through our suppliers. This is particularly relevant in terms of security, catering and cleaning personnel.</p>
	<p><b>Fairtrade</b> is a global movement with a strong and active presence in the UK, represented by the Fairtrade Foundation. They work to connect disadvantaged farmers and workers with consumers, promote fairer trading conditions and empower farmers and workers to combat poverty support sustainability.</p> <p>We have had a link with the Fairtrade Network South West since 2011 to increase awareness of Fairtrade produces and merchandise. We annually mark the anniversary of Fairtrade fortnight and sponsor at least one of the Fairtrade South West Awards in advocacy for good practice.</p>
 <p>The Prince's Responsible Business Network</p>	<p><b>Business in the Community</b> is a membership organisation for business that have a commitment to responsible business and wish to be part of a network of like-minded organisations.</p> <p>As members of business in the community (BiTC) we participate in their Responsible Business Tracker benchmark, which helps us to take a continuous improvement approach to all aspects of responsible business including human rights and supply chain management.</p> <p>We draw on BiTC resources, and insights from other business, as part of this responsible business network.</p>

In July 2019, we collaborated with a local human rights consultant and the Anthesis Group, to deliver a business only event, to share insights and enable other local businesses to engage on the topic of business and human rights and the Modern Slavery Act.



## Effectiveness and Performance

We review our policies and procedures to ensure that they remain effective and to identify opportunities to enhance and strengthen our approach. This includes discussion within our Risk Committee, ExeCom and PCom.

2019 Commitment	Progress
Deliver training to all our people to raise general awareness of modern slavery and human trafficking. Achieve a target of at least 80% of our people to have completed at least one form of training by April 2020.	We have launched and enabled this training to all of our people. This target is on track with a current completion rate of 77%.
Deliver in-depth training to our target specialist group in Procurement and Management to ensure they are up to date on best practice around managing risks relation to modern slavery and human trafficking in our supply chain. Achieve a target of at least 80% of our relevant specialists to have received this training by April 2020.	We delivered in-depth training through e-learning and face-to-face workshops. This target is on track with a current completion rate of 68%.
Completion of the Human Rights Impact Assessment and consider and allocate any actions arising from the findings.	We undertook and completed a desk-based human rights review to consider our potential impact on the main rights-holders including our people, clients, suppliers and the community. This has identified improvements for our Procurement Policy, supplier engagement and communication of performance. This is being taken forward as part of our 2020 commitments and next steps.
Enhance our supply chain due diligence with a new specific questionnaire to elicit information in relation to modern slavery and human trafficking risk.	We have created a new questionnaire. It has been sent to all existing critical and high-risk suppliers and incorporated into the on-boarding of new critical and high-risk suppliers.
For our 31 critical and high-risk suppliers (2018), refresh existing due diligence, with a specific modern slavery and human trafficking questionnaire, so that 100% of have been subject to this new request by April 2020.	We have fully delivered on this commitment.
For responses pertaining to the due diligence refresh, we wish for at least 60% of critical and high-risk supplier responses to have been received by December 2019.	We have achieved the target responses, currently reported at 62% We will continue to follow-up with all our critical and high-risk suppliers to obtain the required due diligence information.
To have scheduled contract meetings with at least 50% of our critical and high-risk suppliers to discuss responses to the due diligence refresh and to complete by March 2020.	We reviewed the scheduling of contract meetings. We decided to first focus attention to a supplier re-categorisation exercise. We maintain this commitment and have carried forward into the next steps (in 2020), with a revised timeline.

As part of our support of Unseen we made a donation to support the continuation of the UK's Modern Slavery Helpline. This public helpline enables victims of Modern Slavery to get help and for any person to report a suspicion and seek advice.



## Next steps

In 2020, we plan to take the following steps as part of our commitment to continuous improvement:

- We originally used our Critical Supplier List and added any suppliers identified as potentially high-risk in terms of Modern Slavery. We will implement a new categorisation based on the top 100 business service suppliers by annual spend and focus on those suppliers which are flagged on any of the following criteria:
  - Employ low skilled / low paid

workers in the delivery of their service to Burges Salmon

- Manufactures in a high risk country;
  - Supplies a significant volume of low cost products to Burges Salmon that originate from a high risk country;
  - Is subject to a modern slavery allegation either directly or within its supply chain;
  - Other reason which raises a modern slavery concern.
- Prioritise contract review meetings where modern slavery and human trafficking risks is flagged in addition to

fully integrating into standard contract review meetings and meeting schedule.

- Implement enhancements to better address Modern Slavery and the respect of human rights in the firm's New Supplier Form and the Procurement Policy.
- Include a specific session on Modern Slavery and Human Trafficking as part of the 2020 Supplier Engagement Day preferably with the support of Unseen.
- Continue delivery of the general and targeted training and awareness across the firm attaining the target completion and coverage rate of at least 80%.

## Approval

This statement has been approved by the Partnership Committee of Burges Salmon LLP on 18th March 2020.



**Roger Bull**  
Managing Partner

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