MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern Slavery Act 2015, Section 54
Statement of Kingsley Napley LLP for the financial year ending on 30 April 2023

This statement has been prepared and is published in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It summarises some of the steps which Kingsley Napley LLP has taken, and continues to take, to prevent and detect slavery and human trafficking in its own business and in its supply chain, and its assessment of those risks.

1 Our business

1.1 Kingsley Napley LLP is incorporated in England as a limited liability partnership. It operates in the professional services sector as an independent law firm and is authorised and regulated by the Solicitors Regulation Authority.

1.2 From a single office in London, we provide a broad range of legal services to individual, business and government clients from the UK and overseas. Further information about the firm and its legal services is published on our website.

2 Our approach

2.1 Operating our business in a responsible manner, for the benefit of our own people and our clients, and making a positive contribution to the community and to the environment, are important to us and what we always try to do.

2.2 Our aim is to comply with all laws and regulations which govern our business and our activities. We also try to have regard to the spirit behind them, no more so than in people focused areas, such as the subject matter of this statement.

2.3 An over-arching Statement of Core Responsible Business Principles is published on our website. It identifies some of the practical ways in which our wish to be a responsible business manifests itself in the day to day life of the firm. This statement expands upon paragraph 5 of that general statement of core principles.

3 Our initiatives

3.1 A Steering Group of Anti-Slavery Champions has been established to support our anti-slavery activities, in particular by helping to raise awareness of the issues, risks and warning signs. It comprises people of varied roles and levels of seniority who work across the firm in legal practice areas and in business support teams where such issues have potentially greater relevance. The Group reports to the General Counsel and through him to the Compliance Committee and Management Team.

3.2 Awareness raising initiatives include mandatory online training during their induction programme for all new joiners. Practice areas (such as Immigration) and support teams (such as Human Resources and Facilities) which have the potential to have greater exposure to these issues than other areas of the firm’s operations receive ongoing guidance and support through their respective Anti-Slavery Champions.
3.3 All firm members are encouraged to raise issues or concerns of any description with their line manager or another appropriate person promptly. A firm member who believes that slavery or trafficking is or might be occurring inside our own business, in our supply chain or in connection with a client matter we are handling also has the option to use the firm’s ‘whistle-blowing’ arrangements to report it if they do not feel comfortable reporting it through the usual channels.

3.4 To help us assess and manage the risk of slavery or trafficking occurring in our own business or in our supply chain we have undertaken risk-based reviews of our business and of our current suppliers. The main outcomes of those business and supplier reviews, and our assessments of the respective risks, are recorded below.

4 Our people

4.1 Our recruitment procedures and people practices comply with applicable immigration and employment laws. They are also consistent with best practice in the UK legal profession. We respect the people who work for us and always try to treat them fairly. We wish them to be content in their work and to feel appropriately remunerated for their efforts. Everyone is paid above the mandatory national minimum wage and at or above the voluntary London Living Wage, which is higher. A wide range of benefits, including paid holiday, are available to everyone. Training opportunities to help them develop their skills and careers are also provided. Flexible working arrangements to help them find a work-life balance that suits them are also offered.

4.2 We recognise that a diverse workforce gives us access to different cultures, experiences and views which in turn benefit our business, people and clients. As a responsible business and an equal opportunities employer we work hard to cultivate an inclusive culture and a working environment where everyone can succeed based solely on merit and which is free from discrimination, bullying and harassment.

4.3 Our building and working practices comply with health and safety requirements and provide a safe and comfortable environment for all our people to work in. Our health and safety activities are complemented by a comprehensive wellness programme which offers a broad range of health-related benefits and initiatives to everyone.

5 Our suppliers

5.1 Our suppliers help us to service our clients’ legal needs. The Head of Operations leads our Supplier Management Programme which is risk-based and includes inception processes and ongoing monitoring. An online resource to help us map out, gain visibility on and manage our supply chain has also been created. We use it to identify and assess: who our suppliers are; what sectors they operate in; what products or services they supply to us; where they are located geographically; and, if possible, from where in the world they might source commodities or suppliers.

5.2 The nature and composition of our supply chain reflects our activities as a provider of legally focused professional services. Some of our suppliers are small, owner-managed businesses operating locally or nationally (such as catering, plant and art providers). Others are very big companies, many of them household names, which operate globally (such as banks, insurers and technology companies). As with all law firms, our biggest areas of expenditure on suppliers relate to premises, technology, marketing and the procurement of other professional services (such as banking, insurance, audit and accounting services), not commodities.

5.3 We wish only to engage, and work with, suppliers who share our own values. We expect our suppliers to operate their own businesses and their own supply chains responsibly, in accordance with applicable laws and regulations and to the highest
ethical standards. The above-mentioned Statement of Core Responsible Business Principles, and a Supplier Code of Conduct which we have also prepared, tell our suppliers what our values are and what we expect of them. These external documents are supported by an internal Procurement Protocol which provides business support team members with guidance on selecting and managing suppliers. The Protocol includes a checklist of compliance and risk related issues and considerations, including reminders about forced labour and human trafficking risks.

5.4 The firm is a signatory to the Charter of the London Living Wage Foundation whose requirement that everyone working in London should be paid not just the national minimum wage but a living wage for London extends not only to our own people but also to certain of our key suppliers. We have engaged with those of our key suppliers who operate in low paying sectors of the economy (such as cleaning, catering and security) to ensure, and we have received written commitments from each of them confirming, that those of their people who they deploy to work for us are also paid at least the London Living Wage, as are our own people.

6 Our risks

6.1 We are based in, and operate from, the United Kingdom. We do not have an office overseas. UK laws and regulations govern our business and our activities. These provide strong protections for people, workers and labour rights. We work in the professional services sector as a regulated law firm. We do not operate in a high-risk industry. Our labour needs are not seasonal or manual, and our workforce is directly engaged, highly educated and, in many cases, professionally qualified. Our wish to operate our business responsibly and compliantly is underpinned by arrangements we have put in place to address all aspects of business conduct, professional ethics and people management. For these and other reasons we consider that there is a low risk of slavery or human trafficking occurring within our own business.

6.2 For the same reasons, we also consider that our supply chain is low risk. We acknowledge however that there is a greater risk of slavery or human trafficking occurring in certain areas of our supply chain than there is in our own business. It is towards our supply chain therefore that most of our anti-slavery and anti-trafficking activities and monitoring is directed. Suppliers, services or products which we consider have the potential to be higher risk receive the most attention.

This statement was prepared by the firm’s General Counsel in conjunction with the Management Team, Compliance Committee and the firm’s Anti-Slavery Champions (whose members include the Head of Operations). It was approved on 31 May 2023 by the Senior Partner, Managing Partner and General Counsel who have put their names to it as evidence of the firm’s continuing commitment to prevent and detect slavery and human trafficking.

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