

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

### **Section 54, Modern Slavery Act 2015**

#### **Kingsley Napley LLP financial year ending on 30 April 2017**

This statement has been prepared and is published in accordance with the requirements of Section 54 of the Modern Slavery Act 2015. It sets out the steps that Kingsley Napley LLP has taken to prevent slavery and human trafficking in its own business and in its supply chain during its financial year ending on 30 April 2017.

### **1 Our business**

- 1.1 Kingsley Napley LLP is a limited liability partnership incorporated in, and under the laws of, England and Wales. It is owned and controlled by its members and authorised and regulated by the Solicitors Regulation Authority.
- 1.2 The firm operates in the professional services sector out of a single office located in the centre of London. It provides a broad range of legal services to a wide range of clients originating from the United Kingdom and abroad.

### **2 Our approach**

- 2.1 Operating our business in a responsible manner for the benefit of our own people and our clients, and in a manner that makes a positive contribution to the wider community and to the environment, is important to us.
- 2.2 Our aim is always to comply not only with the letter but also with the spirit behind the laws and regulations that govern our business and activities, no more so than in the case of people based requirements of the type addressed in this statement.
- 2.3 Our Statement of Core Responsible Business Principles 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 overarching statement, which has a much broader scope than this statement.

### **3 Our initiatives**

- 3.1 An Anti-Slavery Steering Group comprising people of all levels of seniority who work in relevant practice areas and support teams has been established to lead and support our anti-slavery activities. Its members act as 'Anti-Slavery Champions', in particular by helping to raise awareness in the firm of the issues of slavery and human trafficking. The Steering Group reports to the Management Team.
- 3.2 Initiatives to raise awareness of the issues of slavery and human trafficking have taken place throughout the firm. Practice areas (such as immigration) and support teams (such as human resources) which potentially have greater exposure to these issues on a day to day basis have been given more in-depth training.

- 3.3 To help us identify and assess the risk of slavery or human trafficking occurring in our own business and/or in our supply chain, we have undertaken risk-based reviews of our own business and of all our current suppliers. The outcomes of these reviews and our assessments of the associated risks are summarised below.

#### **4 Our people**

- 4.1 Our recruitment procedures and employment practices comply with applicable laws and reflect best practice in the legal profession. We respect our people and try always to treat them properly and 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. We offer a range of training opportunities to help them develop their skills and careers. We also offer flexible working arrangements to help them find a work-life balance that suits them and us. A range of fixed and flexible benefits and an extensive wellness programme are also available to everyone.
- 4.2 We recognise that a diverse workforce gives us access to different cultures, experiences and views which in turn benefit our own business and our clients. As 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 bullying, harassment and discrimination.
- 4.3 We work hard to ensure that our premises and working practices provide our people with a safe environment in which to work. Our health and safety activities are complemented by a wellness programme which offers a range of both health related and life-style related benefits and initiatives that are available to everyone.

#### **5 Our suppliers**

- 5.1 Our suppliers support us in providing the legal services that we provide to our clients. We have created an online facility to help us map out, gain visibility on and manage our supply chain. We have used it to identify and assess: who our suppliers are; what sectors they operate in; what goods or services they supply to us; where they are located geographically; and where they are likely to source resources or suppliers from geographically.
- 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 business operating locally (such as suppliers of sandwiches and plants). Others are big corporations, many of them household names, which operate globally (such as technology companies and international airlines). As is the case with most law firms, our biggest areas of expenditure on external suppliers relate to premises, technology, marketing and the procurement of other professional services, in particular banking, insurance, audit and accounting services.
- 5.3 We wish only to engage and work with suppliers who share our values. We expect our suppliers to operate their own businesses and their supply chains responsibly, in accordance with all applicable laws and regulations and to the highest ethical standards. We have a Supplier Code of Conduct which tells our suppliers what our values are and what we expect of them.
- 5.4 We also have a Procurement Protocol for internal use which describes the firm's expectations of its suppliers and how our support teams should go about selecting and on-boarding a new supplier and managing an existing supplier. It includes a

checklist of compliance and risk related considerations which in turn mentions issues around forced labour and human trafficking.

- 5.5 We are 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 our key suppliers. We have engaged with those of our key suppliers who operate in low paying sectors of the economy (such as cleaning 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 Because we are based in the United Kingdom, we are governed by UK laws and UK regulations, we operate in the professional services sector as a regulated law firm, our workforce is directly employed, highly educated and in many cases professionally qualified, and internally we have adopted a range of people and ethical policies and procedures which we use to manage and operate our business, 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 consider that our supply chain is similarly low risk. We acknowledge however that there is a greater risk of slavery and human trafficking occurring in our supply chain than in our own business. Adopting a risk-based approach therefore, it is towards our supply chain that most of our anti-slavery and anti-trafficking activities are directed. They include making sure, on a risk-based basis, that the support teams that select suppliers and manage supplier relationships are aware of and comply with our internal Procurement Protocol and that the suppliers for which they are responsible comply with the requirements of our Supplier Code of Conduct, including in the areas of forced labour and human trafficking.
- 6.3 A firm member who believes that slavery or human trafficking is or might be occurring inside our own business, in our supply chain or in connection with a client matter in which we are instructed and who does not feel comfortable reporting their concern in the normal manner or through the usual channels may raise the matter using the 'whistle blowing' policy and arrangements we have in place.

The firm's General Counsel prepared this statement in collaboration with all the members of the firm's Management Team, Responsible Business Committee and Anti-Slavery Steering Group. The Management Team approved the statement on behalf of all the members of Kingsley Napley LLP on 25 May 2017. The Senior Partner, Managing Partner and General Counsel have signed the statement as evidence of such approval, and as evidence of the firm's commitment to prevent and detect slavery and human trafficking.

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