SLAVERY AND HUMAN TRAFFICKING STATEMENT

Section 54, Modern Slavery Act 2015

Kingsley Napley LLP financial year ending on 30 April 2019

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 which Kingsley Napley LLP has taken and is taking to prevent and detect slavery and human trafficking in its own business and in its supply chain, and its assessment of the respective risks.

1  Our business

1.1 Kingsley Napley LLP is a limited liability partnership incorporated in, and governed by the laws of, England and Wales. The LLP is authorised and regulated by the Solicitors Regulation Authority and owned and controlled by its members (partners).

1.2 It operates in the professional services sector out of a single office located in London. It is an independent law firm which provides a broad range of legal services to a diverse client base originating from both within and outside the United Kingdom.

2  Our approach

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

2.2 Our aim is to comply not only with the letter but also with the spirit behind the laws and regulations which govern our business and our activities, no more so than in the area of people focused requirements of the kind with which this statement deals.

2.3 Our high level and over-arching 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 Modern Slavery Act Statement expands upon paragraph 5 of that more broadly based statement.

3  Our initiatives

3.1 An Anti-Slavery Steering Group comprising people from all roles and levels of seniority working in practice areas and support teams where slavery and trafficking issues have potentially greater relevance on a day to day basis has been established to support our anti-slavery activities. Its members act as ‘Anti-Slavery Champions’, in particular by helping to raise awareness in their own teams and in the wider firm of the relevant issues and risks. The Steering Group reports to the Management Team.

3.2 Awareness raising initiatives include mandatory online training for all firm members. Practice areas (such as immigration) and support teams (such as human resources), which potentially have greater exposure to these issues and risks, receive more in-depth guidance and support through their respective Anti-Slavery Champions.
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 our business and supplier reviews and our assessments of the associated risks are summarised below.

**Our people**

Our recruitment procedures and employment practices comply with applicable laws, including immigration laws, and reflect best practice in the legal profession. We respect our people and always try 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. A wide range of benefits, including paid holiday, are available to everyone. We offer numerous training opportunities to help our people develop their skills and careers. We also offer flexible working arrangements to help them find a work-life balance that suits them and us.

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 employer 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.

Our offices and our working practices satisfy relevant health and safety requirements and provide a safe and comfortable environment in which to work. Our health and safety activities are complemented by a wellness programme which offers a broad range of health related benefits and on-going initiatives which are open to everyone.

**Our suppliers**

Our suppliers support us in providing our legal services. We have created an online facility to help us map out, gain visibility on and manage our supply chain. We have used it to identity 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 may source resources or suppliers from geographically.

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 (such as suppliers of catering services and plants). Others are big corporations, many of them household names, which operate globally (such as banks, insurers, technology companies and 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), not commodities.

We only wish 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 all applicable laws and regulations and to the highest ethical standards. We have a Supplier Code of Conduct which tells our supplies what our values are and what we expect of them.

An internal Procurement Protocol describes the firm’s expectations of its suppliers and how support teams should go about selecting a new supplier and managing an existing supplier. It includes a checklist of compliance and risk related considerations. Forced labour and human trafficking issues and risks are mentioned.
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, 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 the United Kingdom. We are governed by UK laws and regulations. We operate in the professional services sector as a regulated law firm. Our labour needs are not seasonal. Our workforce is directly employed by us, highly educated and, in many cases, professionally qualified. We have a range of people focused and ethical focused policies and procedures which we use to manage and operate our business responsibly and compliantly. 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 similarly 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 in our own business. It is towards our supply chain therefore that most of our anti-slavery and anti-people trafficking activities are directed. They include making sure that the support teams which select and manage suppliers are aware of their legal obligations in this area, comply with our internal Procurement Protocol and ensure that the suppliers for which they are responsible comply with our Supplier Code of Conduct, including in the areas of forced labour and human trafficking. A risk-based approach is adopted, with higher risk goods or services and higher risk suppliers receiving the most attention.

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 respect of which we are instructed and who does not feel comfortable reporting their concern in the normal manner or through the usual channels also has the option to raise the matter using our ‘whistle blowing’ policy and arrangements.

The firm’s General Counsel prepared this statement in conjunction with all the members of the firm’s Management Team, Compliance Committee, Responsible Business Committee and Anti-Slavery Steering Group. The Management Team approved the statement on behalf of Kingsley Napley LLP’s members on 14 June 2019. 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.

Stephen Parkinson            Linda Woolley         David Smythe
Senior Partner             Managing Partner        General Counsel
Kingsley Napley LLP            Kingsley Napley LLP        Kingsley Napley LLP