

RESPONSIBLE BUSINESS

# Modern Slavery Statement 2023

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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 2023.

Modern 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 eighth Burges Salmon Modern Slavery Statement. We publish our statement on our company website: [www.burges-salmon.com](http://www.burges-salmon.com). We file with the Government’s voluntary Modern Slavery Statement Registry: <https://modern-slavery-statement-registry.service.gov.uk/> and with The Transparency in Supply Chains Platform: <https://tiscreport.org/>.

Modern slavery and human trafficking occur for a variety of reasons, including poverty, lack of education, unstable social and political conditions and economic imbalances. The climate crisis and war are also exacerbating factors that can increase a person’s vulnerability to exploitation.

During recent years we have witnessed the continuing effects of the climate crisis, inflation, energy security issues and the pandemic, as well as people fleeing conflict and migrating for economic reasons. Consequently, there are numerous risk factors relating to modern slavery and human trafficking.

In this context, we consider it vitally important to maintain high standards, engage with our suppliers, to be an active community partner, particularly in the areas of employability and inclusion and to progress our Science Based Targets.

Throughout 2023 we continued to progress our community outreach further, focusing predominantly on inclusive employment and supporting refugees. We have a comprehensive community engagement programme encompassing more than 65 key charities, Community Interest Companies and community-based organisations. Our community engagement portfolio provides support to address a range of issues including mental health and isolation, food insecurity, homelessness, access to justice and climate action.

## 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 Organization (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) Global Activity report 2022, new and ongoing conflicts, violence, persecution and human rights abuses have seen the number of people forcibly displaced reach over 120 million.

In September 2022 the ILO reported there are 50 million people in situations of modern slavery on any given day and an estimated 28 million are in forced labour, which includes over 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.

We continue to partner with anti-slavery and human trafficking charity, Unseen, as we recognise the importance of addressing social and environmental issues that can lead to vulnerabilities and put people at risk of modern slavery and human trafficking. During 2023 our people raised over £3,500 running the London Landmarks Half Marathon and Skydiving in aid of Unseen.

In pursuit of inclusive employment, we work with a number of charities aligned to our priorities around social mobility, gender balance, LGBT+, race and disability inclusion. We work with these organisations to support disadvantaged groups and gain feedback to improve our employment practices.

During 2023 we were named a Times Top 50 Employer for Gender Equality and gained Disability Confident Leader accreditation. We have the highest accreditation of 'Platinum' from Investors in People and are a Top 75 Employer in the Social Mobility Employer Index. Our award-winning Working with Schools programme is focused around supporting disadvantaged and under-represented students.

We are active members of Business in the Community (BITC) and our Head of Corporate Responsibility leads the BITC South West Task Force for Skills and Employability, with the aim of galvanising business action to enhance peoples' opportunities for decent work and employment in the region. We collaborate

with the Social Mobility Business Partnership (SMBP) and lead the South West Cluster. SMBP seeks to provide students from low income backgrounds with better access to professional services' careers. These community and inclusion initiatives reflect our commitment to equality, which we believe in pursuing, key in the fight against modern slavery and human trafficking.

During the year, we maintained certification of ISO standards: ISO 9001 (quality management), ISO 14001 (environmental management), ISO 27001 (information security) and ISO 22301 (business continuity).

We participate in the EcoVadis sustainability assessment and our 2022 submission scored 68% overall, with a 70% score in labour and human rights. This places us in the top 5% of companies assessed by Ecovadis, attaining their Gold Standard.

We continue to advocate for the awareness and understanding of modern slavery within our Firm, our supply chain and the business sector.

As a supplier of professional legal services, we regularly disclose to our clients our position and practices addressing modern slavery and human trafficking.

## OUR CREDENTIALS



The Prince's Responsible Business Network



## Our business, organisational structure and supply chains

Burges Salmon is an ambitious, sustainable and inclusive firm that ensures its clients, people and wider communities flourish.

Our clients range from the largest private and public sector organisations and institutions, to entrepreneurial businesses and wealthy individuals and families.

Working from our offices in Bristol, London and Edinburgh, we have built a progressive service culture, based on collaboration and teamwork that is shaped around the needs of our clients. Operating in selected markets where our knowledge, experience and skills deliver highly effective solutions to our clients' complex needs, we aim to be a leader not a follower in these markets.

Burges Salmon works for clients in all three UK jurisdictions and across the globe, through an international network of leading independent law firms – our Preferred Firm Network. Our objective is to provide clients with excellent service and advice, working with these preferred firms around the world to meet clients' international needs, where relevant.

We have more than 980 people, including in excess of 453 fee-earning lawyers and 106 partners (our most senior lawyers who are owners of the Firm) who work in a hybrid way between our offices and their homes. The remainder of our people are business professionals who work in our operations, finance, people, marketing and client support teams. Burges Salmon has offices in Bristol, Edinburgh and London, as well as a presence in Dublin and Cardiff.

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 to set the strategic direction and ensure the effective governance of the Firm. It

has oversight of a number of sub-committees, including the Executive Committee (ExeCom).

ExeCom is chaired by our Managing Partner and is responsible for the visible delivery of the Firm's 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 co-ordination, 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, business travel and accommodation, banking services, telecommunications, professional services, cleaning services, document management, waste disposal, energy, office furniture and leased offices. We have received goods and services from 867 active suppliers during the past year.

As part of the recruitment process, our people are subject to pre-employment screening. This confirms their 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 **Law Society of Scotland**. This requires that all our clients are subject to due diligence, to protect against money laundering, financing terrorism, bribery and corruption as well as conflicts of interest. During the year, we were instructed to 33 clients who are included in our Client Relationship Management programme.

### BURGES SALMON SUPPLY CHAIN AND BUSINESS SCOPE FIGURES

#### Supplies and inputs

**867** active suppliers

- Electronic equipment
- Office supplies
- Catering
- IT / Software
- Travel and accommodation
- Banking services
- Office rental and facilities management



#### Offices and people

**12,164m<sup>2</sup>** Bristol

**870m<sup>2</sup>** Edinburgh

**1,084m<sup>2</sup>** London

**202** new hires

**980** people

**453** fee earners (excluding Partners)

**106** Partners



#### Marketplace and community relationships

**11,700** Client matters

**65+** Key community collaborations

**80+** jurisdictions in Preferred Firm Network

**97%** Modern Slavery e-learning completion rate

**89%** Suppliers paid within 60 days in FY 2022/23



## 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 Ten Principles of the UN Global Compact 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 our people, including contractors and temporary workers. We expect our suppliers to respect and adhere to this policy as part of the **Purchase Terms and Conditions**, our contracting principles and our approach to supplier due diligence.

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

- **Anti-Bribery and Corruption Policy**
- **Responsible Procurement Policy**
- **Health and Safety Policy**
- **Whistleblowing Policy**

Expectations for behaviour are communicated to our people as part of their induction to the Firm as well as through on-going training, via a compliance and e-learning management system.

Our **Risk and Best Practice** team supports the Firm's compliance with the governing regulatory authorities and conducts a range of internal audits, in the pursuit of risk mitigation and continuous improvement.

We have a Whistleblowing Policy and a 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 trained personnel about any concerns they may have. This is available to our people 24 hours a day, 365 days a year.

## Due diligence and risk assessment

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

We recognise there are greater risks of slavery and human trafficking occurring within our supply chains. We understand there are more prominent risks of slavery where workers are

in lower skilled employment, away from home and working in temporary positions. We further recognise there is greater risk in certain geographies and sectors.

We have determined our key suppliers to be those businesses which 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. Our risk assessment includes considering information on the level of spend, whether the supplier has low skilled and / or low paid employees, purchase ratio of high volume to low-cost products, country risk for suppliers' operations and / or supply chain and any known modern slavery allegations or breaches.

In relation to modern slavery and human trafficking risks, we have primarily focused on those suppliers we have identified as **key and potentially higher-risk**, based on the criteria laid out above. 19 suppliers were identified of particular interest from a modern slavery due diligence perspective. Following identification we analysed and scored these suppliers based on responses to our Supplier Assurance questions on Modern Slavery. The result of this process is that all 19 suppliers are deemed to have sufficient approaches in place to mitigate modern slavery and human trafficking risk and so currently we can continue working with them.

We tend to foster long-term relationships with our key suppliers, ensuring they meet our supplier management practices. These include the expectation for our suppliers to implement due diligence procedures with their suppliers, sub-contractors and other participants in the supply chain.

Our **supplier management practices** include a Responsible Procurement Policy; Standardised Purchase Terms and Conditions; Contracting Principles for our Suppliers; financial controls for invoice payment; New Approved Supplier form (requiring supplier alignment on the key issues of anti-bribery & corruption, modern slavery, confidentiality, data protections, information security and tax evasion); risk screening of business services suppliers; Business Services Supplier Log; supplier engagement events; a quarterly supplier performance review of key suppliers; standardised agenda for supplier meetings with supplier relationship managers; a targeted annual supplier assurance questionnaire; as well as regular meetings with key suppliers. Our supplier management practices are monitored and audited as part of our **Quality Management System**.

Our Knowledge and Information Services team use a **tracker service** to monitor news and potential allegations regarding our suppliers.

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**
- **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.

We undertook a **desk-based human rights review** in 2019, 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)

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- **Right to privacy** (management of confidential and personal data)

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- **Right to non-discrimination** (equal opportunities and fair treatment for all)

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- **Right to an adequate standard of living** (living wage, fair financial transactions and economic contributions)

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

These are key considerations in the delivery of our commitments as a responsible business and as signatories to the UN Global Compact.

## WE SUPPORT



## Modern Slavery training and awareness

We recognise the need for everyone at the Firm to have a basic understanding and level of awareness and this is delivered to our people by Vinci Works' **Modern Slavery e-learning** and compliance module 'Preventing Exploitation'. In addition, we utilise our internal communication channels to give relevant updates on modern slavery and human trafficking and to maintain visibility of the issues, collaborating with the not-for-profit anti-slavery and human trafficking charity 'Unseen'.

Given our understanding of risk we provide more in-depth training for people in specific roles, including the people team, risk and best practice team, supplier relationship managers and procurement team. This training involves a combination of an **additional e-learning and compliance module** 'Practical Steps for Procurement' and a **facilitated workshop**. The workshop is designed 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. Unseen provides this training in-house and 23 of our people attended training sessions in March 2023.


Members of our Corporate Responsibility team maintain their knowledge of the issues and track latest developments through participation in relevant training, events and conferences.



Burges Salmon trainee solicitors fundraising skydrive for Unseen

## 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>Since this collaboration was established in 2018, we have contributed to Unseen with financial donations and in-kind support and enabled the advocacy of their work with representatives from other businesses, civil society and the community. They deliver training to our people, support us with communication and awareness campaigns and gave feedback to PCom on our Modern Slavery statement 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 people.</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 been a supporter of the Fairtrade Network South West since 2011 to increase awareness of Fairtrade produce and merchandise. We mark the anniversary of Fairtrade Fortnight with awareness raising and internal events and sponsor at least one of the Fairtrade South West Awards</p>
	<p><b>Business in the Community</b> is a membership organisation for businesses that have a commitment to responsible business and wish to be part of a network of like-minded organisations.</p> <p>As a member of BITC, we participate in their Responsible Business Tracker benchmarking tool, 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 insight from other businesses, as part of this responsible business network. We are members of the BITC South West Leadership Board and head up the South West Employability and Skills Taskgroup.</p>

## 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.

2023 Commitment	Progress
<p><b>Prepare a relevant set of Key Performance Indicators for disclosure in our next Modern Slavery statement (2023).</b></p>	<p>Completed.</p>
<p><b>Actively support and engage with our charitable partners, in pursuit of inclusive employment.</b></p>	<p>We are partnering with Business in the Community (BITC) South West Skills &amp; Employability Taskforce in progressing a new Wellspring Settlement Inclusive Employment programme. We also continue to work with the Women’s Work Lab offering work experience placements and insights.</p>
<p><b>Review the impact of our responsible procurement approach as it embeds further.</b></p>	<p>A new code of conduct is being developed requiring suppliers to commit to its requirements. On site supplier audits are being trialled, with a focus on responsible procurement. A Procurement Manager (new role) is being recruited in November 2023.</p>
<p><b>Continue to support and advocate for the work of Unseen.</b></p>	<p>We continue to partner with Unseen to mark Modern Slavery day annually during October.</p> <p>Unseen provide our in-house training and 23 of our people attended sessions, March 2023.</p> <p>Our people raised over £3,500 by running the London Landmarks Half Marathon and Skydiving in aid of Unseen.</p>
<p><b>Participate in relevant benchmarks and assessments and action improvements highlighted, particularly in relation to supply chain management and labour practices.</b></p>	<p>We participate in BITC Responsible Business Tracker, to gain insight into our value chain practices and our latest result shows continuous improvement.</p> <p>We are a member of the Legal Sustainability Alliance Supplier/Scope 3 Working Group.</p>
<p><b>Hold another Supplier Engagement event.</b></p>	<p>Our Supplier Engagement Day will be held by the end of our financial year, in collaboration with BITC.</p>
<p><b>Review and update our standard Purchase Terms and Conditions in alignment with the new Responsible Procurement Policy.</b></p>	<p>The current T&amp;Cs include a section on compliance with Modern Slavery, tax evasion and corruption/anti-bribery, which align with the Responsible Business report.</p> <p>The updates in progress relate to ESG.</p>
<p><b>Review our Whistleblowing Policy and its level of disclosure.</b></p>	<p>Our Whistleblowing policy was reviewed May 2023 by our Head of People Advisory.</p>
<p><b>Drive engagement with Modern Slavery e-learning within the Firm, with internal communications and targeted reminders, to achieve the above 95% completion rate.</b></p>	<p>We run weekly reports to check progress and remind those people who have not completed their e-learning to do so. For FY2022/23 our completion rate was 97%.</p>



Key performance indicator	FY2022/23	Comments
Modern Slavery e-learning completion rate	97%	Mandatory training for all of our people
EcoVadis Score for Labour Practices and Human Rights	Awaiting score at time of publication	2022 submission scored 70% for labour and human rights
Suppliers paid within 60 days in financial year ending 30 April	89%	

## Commitments

During FY 2023/24, we plan to deliver upon the following commitments to continuous action and improvement:

- Review and enhance concern reporting processes and associated policies for example our Whistleblowing process;
- Participate in relevant benchmarks and assessments and action improvements highlighted, particularly in relation to supply chain management and labour practices;
- Drive engagement with Modern Slavery e-learning within the Firm, with internal communications and targeted reminders, to achieve above 95% completion rate;
- Continue to support and advocate for the work of Unseen;
- Work with newly appointed Procurement Manager on ESG requirements and objectives related to modern slavery.

## Approval

**This statement has been approved by the Partnership Committee of Burges Salmon LLP on 1 November 2023.**



**Roger Bull**  
Managing Partner



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.

**The UK Modern Slavery Helpline 08000 121 700**  
[www.unseenuk.org](http://www.unseenuk.org)



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