Modern Slavery and Human Trafficking Statement

**Foreword**

Lyons Davidson Limited is dedicated to promoting equal opportunities for all through our operations and services. We have developed a culture which promotes and stands against any form of discrimination or exploitation, including that of modern slavery and human trafficking. Our [core values](https://www.lyonsdavidson.co.uk/about-us/corporate-responsibility/)outline our commitment to acting responsibly, supporting our local communities, investing in our people and encouraging diversity and accessibility; meeting the varied needs of our clients.

As part of the legal sector, we recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking. We are committed to preventing modern slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from modern slavery and human trafficking and comply with our values.

As part of our on-going strategy to raise awareness of obligations for businesses, we are continuing to work in collaboration with STOP THE TRAFFIK, a leading NGO focused on working with businesses and vulnerable communities to prevent modern slavery. We are looking to strengthen our own reporting processes whilst also sharing modern slavery best practice throughout our networks.

STOP THE TRAFFIK: “We are excited about working together with Lyons Davidson to develop their modern slavery risk mitigation strategy. Lyons Davidson’s position within the sector provides a unique position to promote best practice for modern slavery prevention and we are looking forward to working collaboratively in this vital area.”

Last year, STOP THE TRAFFIK agreed to assist Lyons Davidson in two projects – modern slavery awareness raising training and a risk mapping of Lyons Davidson’s supplier list. These projects have been delayed due to COVID and resourcing issues; however, this will be a focus in the next year. In the Queen’s Speech on 10th May 2022, new amendments to the Modern Slavery Act 2015 were confirmed in the form of a new Modern Slavery Bill. This Bill will increase due diligence requirements for businesses and their supply chains, and will strengthen mandatory requirements, as well as provide further recommendations, around annual modern slavery statements. The Bill outlines that changes to modern slavery statements will include requiring businesses to detail actions taken to address supply chain risk and confirm the training provided on modern slavery.

To that effect, STOP THE TRAFFIK will provide a training deck that will start to raise awareness across Lyons Davidson’s team about modern slavery, and the risks it poses to their business. Other projects, including supply chain risk mapping, will take place throughout the second half of 2022.

Lyons Davidson fully supports the UK’s Modern Slavery Act 2015 (the Act) and the provisions set out. This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out Lyons Davidson Limited’s actions to assess potential modern slavery risks related to its business and to put in place steps aimed at ensuring that there is no modern slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 December 2020- 31 November 2021 and has been approved by the Board of Directors.

**1.**     **Our Organisational Structure and Supply Chains**

This policy covers the activities of Lyons Davidson Limited, Lyons Davidson Scotland LLP and File Dynamics Limited (LDL/FDL).

LDL is a law firm providing legal services to businesses and individuals nationwide. File Dynamics Limited provides support functions to the business.

A map of the united kingdom

Description automatically generated

Across LDL and FDL we operate an agile working policy meaning that most colleagues share their working week between working at home and working in one of the LDL offices based in three locations in England and Wales together with its associated practice in Edinburgh.

LDL and FDL employ around 566 team members.

Our supply chain comprises of suppliers as expected in the running of a legal services office including: experts instructed to provide advice to our clients; counsel; facilities services; recruitment agencies; training providers and equipment providers.

The Company only operates in the UK.

Responsibility for our anti-modern slavery initiatives is as follows:

* Overall: LDL Board
* Policies: HR department
* Risk assessment and due diligence: Compliance Director
* Training: Training department

**2.**     **Policies in Relation to Human Trafficking**

The following policies are relevant to our approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in our operations:

* **Whistleblowing Policy**
* This includes any circumstances that may give rise to an enhanced risk of modern slavery or human trafficking. Our whistleblowing procedure aims to make it easy for staff to make disclosures confidentially, without fear of retaliation. Employees, clients or others who have concerns can raise these with us at any time.
* We encourage all our staff, clients and other business partners to report any concerns related to the direct activities, or to our supply chain.

* **Code of Conduct**
* Our code makes clear to employees the actions and behaviour expected of them when representing our business. We strive to maintain the highest standards of employee conduct and ethical behaviour.

* **Corporate Social Responsibility Programme**
* This documents our approach to our responsibilities in relation to social, ethical and environmental issues. It deals with the way in which we aim to limit any adverse impact caused by our business in these areas, and to promote a responsible approach in the way we conduct business, which includes preventing modern slavery and human trafficking in our operations.

* **Equal Opportunities**
* We are committed to promoting equal opportunities in employment, with this policy setting out our approach to equal opportunities and the avoidance of discrimination at work. Employees and any job applicants receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (‘Protected Characteristics’). This policy also outlines what an individual can do if they feel they have suffered discrimination or been treated unfairly, including through the Company’s confidential Grievance Procedure or through its Anti-bullying and harassment policy.

**3.**     **Risk Assessment**

Annually we undertake a risk assessment which includes determining the level of modern slavery and human trafficking risk to our business, for our employees, clients and within our supply chain.

Although we acknowledge that our risk of modern slavery is relatively low considering we operate in the professional services sector, we acknowledge that no business is without risk. Additionally, we recognise the associated risk that operating as a national law firm brings with it.

Thus, although we recognise that there is a low risk for our employees, operating in professional service roles which have a low risk for modern slavery, our recruitment policies and processes include appropriate checks on all new employees and regular meetings to ensure that all our staff are safe and supported.

Our supply chain is likely to be where the highest risk of modern slavery lies for our company. We have assessed that our high-risk suppliers are likely to provide facilities services, manufactured products, and construction and refurbishment.

In order to assess the risk inherent in our supply chain and produce an appropriate action plan to manage that risk, we will be conducting a supply chain risk mapping with STOP THE TRAFFIK over the second half of 2022. This risk mapping of our Tier 1 suppliers will develop a strategic overview of the inherent modern slavery risk in our supply chain by ranking suppliers by their modern slavery risk in both their sector and country of operation. This will create a list of suppliers who will be prioritised in modern slavery due diligence processes over the course of the following years.

Any risks identified from the above processes will be prioritised and dealt with in accordance with comments set out below.

**4.**     **Due Diligence**

As outlined above, we recognise that our highest risk is within our supply chains. Our supply chain risk mapping will identify suppliers which need to be prioritised in our modern slavery due diligence practices. It is anticipated that the highest risk suppliers, warranting enhanced due diligence, are likely to provide facilities services, manufactured products, and construction and refurbishment.

In general, we undertake due diligence when considering taking on all new suppliers, and when reviewing existing suppliers. These mitigating steps include:

* Evaluating the modern slavery and human trafficking risks of each new supplier by assessing the sector and geographical associated risks;
* Considering whether they are required to produce a Modern Slavery and Human Trafficking Statement, and reviewing any such statement and associated policies as part of contract negotiations/tender processes with any new supplier;
* Addressing any high-risk areas identified with the suppliers;
* Entering into a remediation process with suppliers who fail to address non-compliances;
* Taking steps to improve any suppliers’ practices which cause concern, including requiring them to implement action plans;

Where a potential frequent supplier is unwilling to co-operate with our enquiries, considering if that is a business relationship we wish to start.

**5.**     **Training**

In the past year, due to the ongoing impact that the COVID-19 pandemic has had on our business and operations, our training on modern slavery and human trafficking has been delayed. However, our aim for the coming year is to work in conjunction with STOP THE TRAFFIK in order to help our staff better understand and respond to identified modern slavery and human trafficking risks. This will include:

* An overview of the various forms of modern slavery and trafficking and the current picture of modern slavery both in the UK and globally;
* How our supply chain is at risk of modern slavery, primarily in facilities services, manufactured products, and construction and refurbishment; and
* How to report concerns and respond to incidents effectively

**6.**     **Key Performance Indicators**

We understand the importance of measuring our performance against our commitment to preventing modern slavery and human trafficking. In order to assess the effectiveness of our approach to modern slavery, we will be reviewing on an annual basis the following key performance indicators:

* + % of staff who have received modern slavery training
  + % of supply chain inherent risk mapped
  + % of awareness resources developed and shared with our networks

**7.**     **Our Next Steps**

Throughout the coming year, in order to meet our commitment to prevent modern slavery and maintain human rights in our operations and supply chain, we are committing to following these next steps:

* Supply Chain Risk Mapping
* Awareness training for staff
* Improving our supplier and customer due diligence processes

**8.**     **Statement Approval**

This statement covers the financial period December 2020 to November 2021 and has been approved by the Board of Directors on 7 June 2022, who will review and update it annually.

|  |  |
| --- | --- |
| **Signed by** | **Date** |
| Alex Hewitt  Compliance Director | 07/06/2022 |