

Modern Slavery Act Transparency Statement



This statement is made in accordance with section 54 of the Modern Slavery Act 2015 (the “Act”). The firm’s financial year end is 30 April and this statement covers the period 2021/2022. This statement was approved by the firm’s Senior Management Team on 17th October 2022 and signed by our Managing Partner on behalf of the firm. Our previous Modern Slavery Act Transparency statement can be viewed [here](#).

Our Values

As a law firm, we are rightly held to high standards in all that we do. To operate a sustainable and successful business we must inspire trust and confidence in all of our stakeholders. We are committed to taking a robust approach to opposing slavery and human trafficking. This is consistent with our values – People First, Doing The Right Thing and Forward Thinking.

We similarly expect high standards from those we work with and are committed to ensuring there is no modern slavery or human trafficking in our supply chains.

Business organisational structure and supply chains

Capsticks is a law firm which operates within the UK, we have five offices and a headcount of nearly 600 including lawyers and business services staff. Led by our Senior Management Team, each of the firm’s offices is managed by one of our partners.

We specialise in providing a full range of legal and consultancy services to clients in the health and social care, GP, regulatory, housing, emergency services and insurance sectors. For more information about what we do see – [About us](#).

CAPSTICKS

capsticks.com
Twitter: @capstickslp

BIRMINGHAM

1 Temple Row
Birmingham B2 5LG
T +44(0)121 230 1500
F +44(0)121 230 1515
DX: 13003 - Birmingham

CHORLEY

Ordnance House,
6 East Terrace Business Park
Euxton Lane,
Chorley PR7 6TB
T +44(0)125 726 6008

LEEDS

Toronto Square, Toronto Street
Leeds LS1 2HJ
T +44(0)113 322 5560
F +44(0)113 242 2722
DX 713112 – Leeds Park Square

LONDON

1 St George’s Road
London SW19 4DR
T +44(0)20 8780 2211
F +44(0)20 8780 1141
DX 300118 – Wimbledon
Central

WINCHESTER

Staple House, Staple Gardens
Winchester SO23 8SR
T +44(0)1962 678 300
F +44(0)1962 678 311
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Our supply chains provide us with people, goods and services to support the services we provide to our clients. Our suppliers are generally local although some are part of global businesses.

Policies

Capsticks opposes all forms of slavery and human trafficking, and we are committed to taking steps to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We promote ethical values and behaviour within our business and our Anti-Slavery Policy reflects these principles with a commitment to conduct all our business relationships with ethical principles.

Due diligence and risk assessment processes

We acknowledge that slavery and human trafficking exist. As a professional services firm strictly regulated by our regulatory body, the Solicitors Regulation Authority, our ongoing assessment is that we are at low risk of slavery or human trafficking occurring within our business. However, we do review this assessment periodically. In respect of our supply chains, we recognise there may be greater risk and our assessment and due diligence has primarily focused on our supplier relationships. We recognise that this is an ongoing process and we need to continue to review and refine our risk assessment process in this area.

We work with our suppliers using tools such as supplier assessment questionnaires, provisions in our supplier contracts and our supplier code.

Our overall objective is to establish and maintain supplier relationships which will minimise the risk of slavery and human trafficking within our supply chains.

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Procurement Process

We look to ensure that our supply chains operate in an honest, fair and transparent manner. Supplier feedback serves as an essential means of identifying, assessing and addressing the risk of modern slavery.

Our procurement due diligence process includes a risk assessment process which takes account of the size, geographical location and risk profile of the industry sector which in turn informs any additional checks we undertake.

We ask our suppliers to sign up to our Supplier Code of Conduct which sets out what we require from our suppliers and contractors.

Training and awareness

Capsticks is committed to ensuring that our people understand what modern slavery is, the circumstances in which it may occur and are aware of modern slavery indicators so they are equipped to identify instances of possible slavery and human trafficking.

Our Raising Concerns Policy includes a mechanism for reporting genuine suspicion of criminal conduct, or a breach of a legal, regulatory or professional obligation by anyone in the firm and this would include instances of modern slavery.

Measuring effectiveness

With regard to progress made on previous Key Performance Indicators, we have:

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- continued to broaden and implement our supplier review processes across our supply chain into a single Procurement and Supplier Manager Policy to help ensure the firm follows best practice in the procurement of goods and services and when setting up contracts with suppliers;
- developed a project plan in relation to the Procurement and Supplier Manager Policy to fully implement this across the firm;
- as part of our new Procurement and Supplier Management Policy introduced a specific modern slavery risk rating in relation to suppliers;
- introduced targeted annual checks for any suppliers who the firm considers to be at higher risk of potential modern slavery and human trafficking; and
- updated our training on modern slavery awareness and provided this to all staff within the last 12 months.

Planning and priorities

The firm's Responsible Business Committee is responsible for developing and delivering a Responsible Business Plan which sits alongside and supports our Strategy. Building on the steps we have taken to date, we have identified the following as objectives for the coming year:

- ensure that taking a robust approach to opposing slavery and human trafficking and raising awareness is a key tenet of our Responsible Business Plan;
- continue to further embed contract management and supplier review processes in our procurement processes with further training for those involved in procurement; and
- establish a contract management system which will enable improved oversight of suppliers.

These objectives will be managed by our Chief Operating Officer, who has oversight of our modern slavery compliance.

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This statement is made by Capsticks Solicitors LLP:

Signed: *Martin W. Hamilton*

Date: **17 October 2022**

Martin Hamilton

Managing Partner, Capsticks Solicitors LLP

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