



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 2018/2019. This statement was approved by the firm’s Senior Management Team on 16 October 2019 and signed by our Managing Partner on behalf of the firm.

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.

We 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 over 500 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](#).

Our supply chains provide us with personnel, 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, 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.

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 Disclosure 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:

- achieved our aim of raising awareness across all parts of the firm of the risks of modern slavery through providing a comprehensive training programme to all members of the firm ;
- strengthen our procedures by introducing a Supplier Code of Conduct and Procurement Policy;
- begun to introduce our Supplier Code of Conduct in our supply chain; and
- provided initial training to key stakeholders in the new Supplier Code of Conduct and Procurement Policy;
- set up a Governance and Risk Committee to help us improve our monitoring of our compliance.

Planning and priorities

Building on the steps we have taken to date, we have identified the following as objectives for the coming year:

- Further broaden and implement our supplier review processes across our supply chain;
- Refresh our training on modern slavery awareness to include training on the firm's new Supplier Code of Conduct and Procurement Policy; and
- Establish KPI's to monitor our progress and compliance against our objectives, to be reported on and reviewed on a quarterly basis by our Governance and Risk Committee.

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

This statement is made by Capsticks Solicitors LLP:

Signed:

Date: **16 October 2019**

Martin Hamilton

Managing Partner, Capsticks Solicitors LLP