

Modern Slavery and Human Trafficking Statement 2024

Introduction

References to we, us and Ward Hadaway in this statement relate to Ward Hadaway LLP.

We recognise that modern slavery is a global issue and we are committed to maintaining effective systems and controls to safeguard our business against any form of modern slavery taking place within it and our supply chain.

Our Modern Slavery and Human Trafficking Statement (our **Statement**) is published in accordance with section 54 of the Modern Slavery Act 2015 (the **Act**) and sets out the work we have undertaken this year to build on and develop our efforts to ensure transparency in our business and throughout our supply chain to eradicate the risk of modern slavery. We acknowledge our responsibility under the Act and continue to work to achieve transparency within our business to meet the objectives of the Act.

Our business

We conduct all our business in an honest and ethical manner.

We continue to provide a full range of legal services in the UK from our offices in Leeds, Manchester, and Newcastle. Whilst our offices are in three major northern cities our client base spans the UK and overseas.

As a full service law firm we offer a variety of services to a wide cross section of client groups including private and public sector organisations and private individuals. Our clients operate across multiple sectors and territories both within the UK and internationally including manufacturing, emerging technology, all aspects of the built environment, healthcare, public and third sectors including local authorities and charities.

People are at the heart of everything we do. We believe in acting fairly, openly, responsibly and honestly at all times to everyone we come across. As a firm, we take our social responsibilities seriously not only for our own people, but for the communities in which we live and work and the organisations we work with. Our Responsible Business Board is chaired by our Senior Partner, with wider membership including our Managing Partner who is also a member of Management Board. Its purpose is to co-ordinate delivery of our Responsible Business Strategy, including publication of our Responsible Business Manifesto and annual report.

Reporting into our Responsible Business Board are the committees which exist to drive forward our Responsible Business Strategy, these being the Wellbeing Committee, the Equality, Diversity and Inclusion Committee, the Environment Committee and the Social Value Committee.

Our policies

We have a number of policies and procedures which support our compliance with the Act, and which are reviewed and updated as appropriate on a rolling basis, including:

- Modern Slavery Policy
- Responsible Business Policy
- External Appointments and Interests, Pro Bono Work, Volunteering and Disclosure Policy and Procedure
- Unacceptable Behaviour Policy
- Anti-Bribery and Corruption Procedure
- Procurement Policy
- Recruitment Policy
- Equality, Diversity and Inclusion Policy
- Whistleblowing Policy
- Vulnerable Persons Policy
- Health and Safety Policy

Our supply chains

We expect our contractors and suppliers to meet the same high ethical standards that we apply to ourselves and the way we do business.

The majority of our suppliers are UK businesses although some are multi-nationals. Our supply chain is not complex; it consists largely of the purchase of services and goods to support the delivery of our services such as IT equipment, software, facilities maintenance and cleaning, general office equipment and consumables. We have continued to increase our focus on understanding our supplier compliance and approach to modern slavery this year and will continue to refine and improve this.

Risk assessment and due diligence

We continue to assess our supply chain prior to contracting with them to better assess the risk they might pose in relation to modern slavery. This includes asking suppliers to provide information on various legislative requirements, including the Act, during our supplier onboarding process. Our assessment of suppliers, if adverse, may lead to either their exclusion from our supply chain or a requirement for improvement.

This year we have completed a further detailed risk assessment of existing tier 1 suppliers in our supply chain. This involved scoring suppliers against various criteria in relation to factors such as known ethical breaches or criminal convictions, sectoral risk, geographical risk based on the 2023 Global Slavery Index, and taking into account matters such as our spend with the supplier and the length of our relationship with them. We used this scoring system to categorise our suppliers as representing either a high, medium or low risk of modern slavery taking place in their business. Of 75 tier 1 suppliers assessed using these criteria, they were all assessed as low risk meaning that the assessment of our supply chain year ending 30 April 2024 has identified no concern of modern slavery.

We will continue to review and refine our approach to how we engage with our existing suppliers and our processes for onboarding new suppliers.

We have continued with our annual completion of a sustainability assessment via EcoVadis to assess and help us continuously improve our position on ESG risk and compliance. This independent annual assessment by EcoVadis includes a review of, amongst other things, our approach to labour and human rights and includes our response to modern slavery. Our silver medal rating puts us in the top 25% of all companies in all industries which take part in the EcoVadis sustainability assessment and we are seeking to improve on this this year.

Effectiveness

We continue to make progress in developing and refining our anti-slavery procedures. At this stage we have not adopted any specific modern slavery key performance indicators over and above our risk assessment process. However, we will continue to actively review what those indicators should be and how we measure them.

Training and awareness

We have reviewed our approach to training on modern slavery and we will shortly be rolling out training to staff who are more likely to be in a situation of coming across concerns around this issue.

Publication

We have taken the decision to voluntarily publish our Statement on the Government's Modern Slavery Statement Registry, as well as on our website. Our Statement is also uploaded to various platforms operated by or on behalf of our clients on request, who in turn are assessing our compliance with the Act. Our staff, our clients and our suppliers are aware of our Statement via the publication on our website.

Approval

This Modern Slavery and Human Trafficking Statement for the financial year ending 30 April 2024 was approved by the Management Board of Ward Hadaway LLP on 5 November 2024, and is signed by Steven Petrie, Managing Partner, in accordance with section 54 of the Act.

Steven Petrie

Steven Petrie
Managing Partner

