



1.4 SLAVERY AND HUMAN TRAFFICKING STATEMENT 2021/22

INTRODUCTION

This is Minster Law's slavery and human trafficking statement made in accordance with Section 54 of the Modern Slavery Act (2015) (referred to hereafter as 'the Act'). for the financial year ending 30 June 2022.

This statement was approved by the Board of Directors on 19 January 2023 and signed by our Chief Executive, Shirley Woolham. A signed copy of this statement can be made available on request.

As a firm of solicitors, we are committed to acting ethically and have a zero-tolerance stance in relation to all forms of bonded or forced labour including human trafficking and modern slavery.

OUR STRUCTURE, BUSINESS AND SUPPLY CHAINS

Minster Law Ltd (registered number 4659625) is a limited company and subsidiary of BHL (UK) Holdings Limited. We are authorised and regulated by the Solicitors Regulation Authority (registered number 383018).

We provide legal services within the UK specialising in personal injury, employment, residential property disputes and consumer matters.

We are the partner of choice for many well-established insurers, brokers and trusted strategic partners, providing their customers with legal services, particularly in respect of road traffic accident claims.

Due to the nature of the services we provide, some of our supply chain is made up of providers of professional services which support and facilitate the progression of our customers' matters such as medical agencies and barrister's chambers. In addition, there are other types of experts who support our customers' claims as and where required.

Furthermore, we also procure the services of various suppliers whose functions support the day-to-day maintenance of our office space.

WITHIN OUR BUSINESS

Remuneration

Minster Law is a real Living Wage employer, meaning that all colleagues are guaranteed to receive at least the real Living Wage. The real Living Wage is calculated based on the basic cost of living in the UK and is the only wage rate independently calculated based on rising living costs. During the period covered by our statement, we have also conducted our annual salary benchmarking review to ensure that our colleagues are appropriately recognised for the work that they do in relation to prevailing market sector conditions and salary levels.

Pre-employment checks

We have a robust recruitment process which is supported by our Recruitment, Selection and Referencing Policy whose provisions reinforce our commitment to the prevention of slavery and human trafficking.

This year, we have implemented a hybrid approach to onboarding new colleagues with assessments/interviews taking place both onsite and remotely. We remain alive to the risks of recruiting new colleagues remotely.



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All prospective colleagues continue to undergo an array of pre-employment checks including verifying their identity, right to work in the UK and their professional qualifications where applicable. We have controls in place to highlight scenarios that could be considered potential warning signs of modern slavery to enable welfare checks to be conducted e.g. multiple colleagues living at the same address, colleagues with the same bank information

Recruitment

Where recruitment agencies are used to source new colleagues, they are trusted organisations with which we have an established relationship. They must comply with their obligations using all due skill, care and diligence in accordance with good industry practice and they must have a policy recognising, respecting and protecting the human rights of their employees and candidates. Prospective colleagues recruited via recruitment agencies are required to complete a detailed pre-screening questionnaire which is designed to highlight any potential issues that might require further investigation.

Our Recruitment, Selection and Referencing Policy makes it clear that liaising or negotiating with recruitment agencies should only be carried out by our HR Department.

Wellbeing Committee

Our Wellbeing Committee continues to support our colleagues with a view to improving and maintaining their mental and physical health. The Committee continues to provide resources, including hints and tips, webinars and self-help tools to ensure all colleagues are supported whether they are working remotely or in the office.

Additionally, our colleagues also have access to our Employee Assistance Programme and our Mental Health First Aiders should they require any additional support in relation to any aspect of their wellbeing.

Equality Diversity and Inclusion (EDI) Committee

We believe that equality, diversity and inclusion is integral to a successful working environment. Our colleagues bring with them an incredible diversity of viewpoints, beliefs and attitudes which enrich our business.

Since our last statement was published, we have continued our journey to have courageous conversations within our EDI Committee and wider business. During the last 12 months, every colleague has participated in EDI workshops to raise awareness, understanding, and empowerment to embrace our EDI culture. We continue to be passionate about creating an inclusive and supportive workplace and culture where everyone can be true to themselves, feels a sense of belonging and can reach their full potential.

By continuing to invest in our people and culture it is expected that we can continue to foster a safe and open environment for colleagues to feel comfortable sharing any concerns that they might have.

In December 2022, we were successful in renewing our Investors In People accreditation at Platinum level. A Platinum accreditation is only achieved by 5% of organisations worldwide and retaining this is testament to the great people led culture and people management practices within Minster Law.



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OUR POLICIES

Our policies continue to support our zero-tolerance stance on slavery and human trafficking. Key policies that relate to our approach to minimising the risk of modern slavery occurring within our supply chain are our Recruitment and Selection Policy, Contract Approval and Monitoring Policy, Internal and External Equal Opportunities Policies, Anti Bribery and Corruption Policy, CSR Policy and Whistleblowing Policy.

We strive to foster an ethical, safe, supportive environment for our colleagues. Our Whistleblowing policy outlines the mechanisms in place for colleagues to highlight any concerns that they may have in relation to a breach of our regulatory, legislative duties, unethical conduct, or a deliberate attempt to conceal the same. Modern slavery concerns would be included within this and are specifically referenced in the policy.

All of our policies are available to all colleagues on our internal Learning Hub should they need to access them.

Each of our policies is owned by a key stakeholder who takes ownership for completing a regular review of the content to ensure it remains relevant and fit for purpose. As part of the review cycle, each policy is considered and approved by our Executive Risk Committee. Key policies are also Board reserved to ensure visibility and oversight at this level. All Board reserved policies have been rigorously tested within the last 12 months to ensure they are being operated effectively.

SUPPLIER DUE DILIGENCE

Minster Law continues to strive to work with organisations who share our values and culture.

In the previous 12 months we have successfully onboarded a number of new trusted partners. As part of this process, we gain assurance that we continue to work with organisations whose values and approach to doing business are aligned with our own.

We primarily (and purposefully) rely on our strict contractual mandates and clauses with suppliers and partners to ensure these obligations are well known, agreed and fulfilled throughout all the businesses we partner with. The contractual discussions all take place as part of the onboarding of a new supplier or partner which ensures commitment and alignment prior to any work being provided to the supplier.

There are also contractual provisions relating to legislative compliance within our agreements with suppliers. Over time, more of these have evolved to specifically reference the Modern Slavery Act.

In addition to these contractual obligations the periodic audits and site visits that occur as part of our ongoing engagement with our suppliers and partners seeks to assess and ensure adherence to all contractual terms, but especially those that constitute a material contractual breach.

Ensuring our suppliers continue to comply with their Modern Slavery Act obligations remains a key focus for Minster Law, and further enhancements to our supplier due diligence and audit schedule is planned for this year.

RISK ASSESSMENT

We continue to operate a robust risk management framework. Our Corporate Risk Register provides for the monitoring and management of risks relating to new and existing partners and suppliers as well as compliance with our legal and regulatory obligations.

Risk mitigation activities continue to feature in the maintenance of a supplier audit plan.



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All risks are owned, managed and monitored by a member of our Executive Team with relevant reporting to our monthly Executive Risk Meeting.

TRAINING

It is recognised that our colleagues are a key resource in relation to identifying potential areas of concern. For this reason, the topic of modern slavery features in our mandatory Equality and Diversity eLearning module.

This informs colleagues how to identify and report potential instances via our internal reporting process and is completed by all colleagues joining the business as well as featuring in our eLearning calendar to be completed by existing colleagues.

PERFORMANCE INDICATORS

As part of our key control framework, we continue to monitor the effectiveness of the mechanisms we have in place by:

- completion of the annual review of our policies;
- the delivery and completion of mandatory eLearning modules;
- completion of pre-employment checks; and
- completion of the supplier audit schedule.