



Modern Slavery Statement

Purpose and scope

Modern slavery is a serious and often hidden crime in which people are exploited for criminal gain.

The UK's Modern Slavery Act 2015 defines modern slavery as existing when a person is 'held' or 'forced' against their will by another person who knows or ought to know that the other person is being held in slavery or servitude or forced to perform compulsory labour.

Published in accordance with Section 54(1) of the Modern Slavery Act 2015 this statement (which applies to all businesses within our group) sets out the steps taken to prevent modern slavery and human trafficking within our businesses and supply chain to date; and outlines future planned development.

We will not knowingly support or deal with any business involved in slavery or human trafficking.

Our Organisational Structure

Bishop Fleming is the trading name for Bishop Fleming LLP and Bishop Fleming Bath Limited all of whom have a registered address of Stratus House, Emperor Way, Exeter Business Park, Exeter, EX1 3QS. Further information on our registration status and regulated activities can be found on our website www.bishopfleming.co.uk/legal-information.

Bishop Fleming operates from 8 offices in the United Kingdom which for the purposes of the Act, are all part of our supply chain.

Our governance, values and people

As a dynamic UK accountancy firm, we provide a comprehensive range of services across a wide range of sectors. We are governed and registered by the Institute of Chartered Accountants England & Wales (ICAEW). Further information on the ICAEW can be found at www.ICAEW.com.

Employing over 500 members of staff we are committed to [paying people fairly and properly](#) for the work that they perform. We promote [diversity and inclusion](#) and our staff are appraised and rewarded on our [ambitions and values](#) and ways of working.

Responsible for meeting our ambitions and values, the Management Board reviews and is responsible for all strategic and operational plans, including the review of risk from internal and external factors, including modern slavery and human trafficking.

All our staff are required to read our whistle blowing policy as part of their induction and undertake training as allocated throughout their employment.

Our recruitment

We recruit our staff through advertising on our website, direct referrals from existing staff members and by using reputable agents. All employees who join the business are subject to checks including their right to work, verification of identity, evidence of qualifications and references.

Our Suppliers

The supply chain that supports our business comprises a wide range of suppliers, from smaller businesses to global companies, across many jurisdictions.

Our supply chain includes products and services from IT hardware and software, office stationery, fit-out and maintenance, marketing materials, recruitment agents through to outsourced services such as cleaning and catering.

In areas that might be at increased risks of trafficking or slavery such as cleaning, we require the Directors of companies providing the service to confirm that the correct right to work checks have been performed. This is assessed on a case-by-case basis.

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Our Commitment and Plans

We are committed to acting ethically and with integrity in our business relationships and implementing and enforcing effective systems and controls which address the risks of modern slavery and human trafficking anywhere within our business and supply chains is of key importance to us.

We are building upon existing processes across several areas in our business including our supplier engagement and staff training and reporting.

In the past 12 months we have:

- Rolled out whistleblowing training to all our people and incorporated it into the induction for new joiners.
- Run sessions using the ICAEW All Too Familiar film, in which people trafficking is featured.
- Continued our engagement with [Business in the community \(BITC\)](#) and submitted our first [responsible business impact report](#) that demonstrates our commitment to sustainability, social responsibility, and ethical practices.
- Promoted a member of staff to Head of Responsible Business.
- Continued to issue our supplier audit questionnaire to new "key" suppliers. The questionnaire includes questions on whether they have a Modern Slavery Statement and a Whistle-blowing policy.
- Conducted the annual review of our top 50 suppliers to check whether they have (amongst others) Modern Slavery Statements, Inclusivity and Diversity statements, Gender Pay Statements.

Over the next 12 months we plan to build on the robustness of our supply chain which will include:

- Continuing with our risk assessment for reviewing and monitoring modern slavery for our major suppliers and applying the assessment to future engagements
- Publishing a knowledge hub for staff on our intranet with guidance and advice on modern slavery.
- Identifying and rolling out Modern Slavery Training throughout our People
- Submitting our Supplier Code of Ethical conduct to our top 50 suppliers

Our Policies

Our whistle blowing policy encourages the reporting of concerns by staff, clients and other parties in relation to a risk, malpractice or wrongdoing that affects others. Our policy is designed to ensure that individuals feel able to make disclosures without fear of reprisal.

In addition to our whistle blowing policy we operate within and comply with the [ICAEW code of Ethics](#) and have a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent nature including:

- Anti-bribery and corruption (including gifts and hospitality)
- Anti-Money Laundering

On a quarterly basis, we report on the number of queries raised and any instances that have occurred in these areas. Through the cycle of ongoing monitoring we are able to recognise trends emerging and implement any necessary actions as an outcome.

Approval and review

This statement applies to the financial year ending 31 May 2023 and has been approved by the Board who will review and update it annually within the framework of the Modern Slavery Act 2015.



Andrew Sandiford
Managing Partner

30 November 2023