

Thompsons Solicitors has a network of offices across the UK, including the separate legal jurisdictions of Scotland and Northern Ireland. We are the largest trade union and personal injury law firm in the UK, and provide specialist legal advice on personal injury and employment matters for trade union members, their families and private clients. At any one time we will be handling over 50,000 cases. The firm participates regularly in government consultations on a wide range of issues relevant to our trade union and private clients.

As an employer, we publish a Modern Slavery Act Statement and are fully supportive of the need to do so. We appreciate the important symbolic role a statement can play even if, as a large trade union law firm, the chances of an infringement by us are minimal.

Our full statement on human slavery and trafficking can be found on our website<sup>1</sup>. We report on, and evaluate, our policies, structure and processes in order to identify any and all potential modern slavery or human trafficking risks related to our business. We then put steps in place to mitigate any potential risk within both our own organisation, and supply chain.

We do not want to comment on how other employers go about publishing their statements, or the challenges thereof. However, we do have a view in relation to the criteria that should be considered when deciding who should be brought within the purview of the Act and its requirements.

Our concern with the current requirements are that they are limited in terms of the organisations to which they apply, and that they require limited organisational buy in. There is a risk that the employers who may be the worst offenders are not caught by the Act, and those that are 'go through the motions' rather than engaging meaningfully with the process, or the outcome.

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<sup>1</sup> <https://www.thompsons.law/media/3565/human-slavery-and-trafficking-statement-201718.pdf>

Anecdotally, as with breaches of health and safety or poor employment protections in the general sense, the greatest risk of poor practice is from small to medium size employers (SMEs). These organisations must be brought within the purview of the Act and its requirements. That extension should capture local government and any private contractors with whom they, and national government, have contracts.

We do not believe that the number of employees or turnover should be the criteria for being brought within the Act. As we have made clear above, it is the smaller organisations that are most likely to be the worst offenders. We would favour that that alternative criteria is as wide as possible, and includes as many employers of all sizes as possible. That in itself, though, will be of limited impact if there is an inadequate system of inspection or inadequate funding for said inspections in high-risk areas such as agriculture, food processing, beauty treatment (including hairdressers and nail bars), car washes and delivery companies.

**We would be happy to provide more information to support our response. For further information please contact:**

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