

## **Introduction**

Sheffield Hallam University, (the "University"), is one of the largest universities in the UK. With 35,000 students, 4700 employees and a turnover of £300million, Sheffield Hallam as a civic university, has a key role to play in transforming lives, not only for its students and employees but in ensuring that we drive improvements in our wider community regarding inequality, fairness and environmental responsibility.

The University supports the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights. The University follows the principles in the "Preparing a Slavery and Human Trafficking Statement: Guidance

for Higher Education" published in October 2018, (updated November 2019).

The University entered the Times Higher Education (THE) Impact rankings in 2021, in which Universities are ranked on the impact they have on the United Nations' Sustainable Development Goals (SDG). Included is a ranking on SDG 8 – Decent Work and Economic Growth, in which we provide evidence of our commitment to "no forced labour, modern slavery, human trafficking or child labour. The University ranked 73rd in the world (of 685 submissions) for its impact against this SDG.

## **Our commitment**

We recognise that our mission to "transform lives" extends far beyond the work we do to prepare our students for extraordinary futures and to produce innovative applied research. We take our mission to mean that we have a responsibility to our city, region, nation, and world to be a transformative university in all that we do, whether through our employment strategies, our community engagement, or our purchasing and procurement practices. As part of that mission, the University is committed to protecting human rights through our overt

actions and through our indirect effect on the lives of people the university engages. We understand modern slavery to be a crime against humanity that requires the full commitment of all institutions to address. We embrace the opportunity to examine all our operations and practices to identify places where our community can help to ensure that all people are free from lives of slavery and are provided the social and economic rights that are guaranteed to all.

## Promotion of our commitment

The University has five major routes through which it promotes its expectations in relation to human rights and trading decisions:

1. risk identification and relationship management of its supply chains
2. relationship enhancement with its international partner organisations
3. internal policy, process and activity development which reinforces our intolerance of trading activity which might impact on individuals' freedoms
4. our networking capacity to influence national policy- and decision-makers to encourage co-ordinated action, pooling resources to have the greatest, targeted and most meaningful impact we can have as a sector or as a nation upon a local, national and global issue
5. support of student-led activities to minimise risks of trading where unethical practices persist.

## Our structure

The Vice-Chancellor is the University's chief executive and is responsible for the executive management of the University and its day-to-day direction. His executive

The key themes of this statement are:

- the responsible procurement policy
- focusing upon contract management, supporting the supply chain to reduce opportunity for individuals' freedoms to be compromised
- developing links between our academic research and our support of the supply base to improve supply choices
- raising awareness of the risks with our contracted suppliers and our internal purchasing decision-makers
- improving supply chain monitoring and reporting
- taking increased interest in our investments
- lobbying and petitioning policy makers to enable coordinated approaches to making sustainable change.

responsibilities are delegated through the University's Colleges, Research Institutes, Business Delivery Groups, Corporate Services and Overseas Offices:

## Colleges:

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Business Technology and Engineering	Social Sciences and Arts
Health, Wellbeing and Life Sciences	

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## Research institutes:

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Culture and Creativity Research Institute	Industry and Innovation Research Institute
Health Research Institute	Social and Economic Research Institute

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**Business Delivery Groups:**

Academic Delivery and Diversity	Development and Alumni Relations
Business Engagement Skills and Employability	Global Development and Partnerships
Recruitment, Communications and Marketing	Student and Academic Services
Research and Innovation Services	Student Experience, Teaching & Learning

**Corporate Services:**

Digital Technology Services	Human Resources and Organisational Development
Estates and Facilities	Strategy, Planning and Insight
Finance and Procurement	Transformation
Governance, Legal and Sector Regulation	

**Overseas representative offices:**

China	India
Malaysia	Nigeria
Pakistan	

**Our supply chain risks**

The University has identified the following stages along the supply chain which are at risk of human exploitation:

Stage of supply chain activity	Abbreviation
Raw Material Extraction	R
Harvesting	H
Manufacturing	M
Processing	Pr
Assembly	A
Packaging	Pa
Portfolio Selection	PS

This is how the University's supply needs are impacted:

<b>Activity</b>	<b>Supply Need</b>	<b>Impact</b>
Estates and Facilities	Construction Materials	R, M, A, Pa
	Construction Labour	A
	Furniture and Fixtures	R, M, A, Pa
	Cleaning Materials	R, M, Pr, A, Pa
	PPE & Uniforms	R, M, Pr, A, Pa
Technical Services and Research Institutes	Capital Equipment	R, M, A, Pa
	Laboratory supplies	R, M, Pr, A, Pa
	Student Uniforms	R
Digital Technology Services	Digital Infrastructure and Equipment	R, M, Pr, A, Pa
Catering	Fruit, Vegetables Herbs Spices	H, Pr, Pa
	Food processing	Pr, Pa
	Food Packaging	R, M, Pa
Office Areas	Stationery	R, M, Pr, A, Pa
	Specialist DSE equipment	R, M, A, Pa
Finance	Pensions and Funding	PS

## **Action Plan**

### **Our policies and due diligence in relation to slavery and human trafficking**

The University is committed to running our business responsibly and ethically. We are opposed to all forms of slavery and human trafficking and support the Government's efforts to legislate against it. We support the Base Code of the Ethical Trading Initiative, (ETI).

In line with the University's ISO 14001:2015 environmental management system, which focuses not only on the University's activities but also the impacts of our supply chain, we assess our actions

as part of an annual internal review to ensure continued compliance with the Modern Slavery Act.

The Ethical Procurement Policy is developing and has been published in sections onto the University website. The aim is to make the potential supply chain engagement more interactive. The policy reinforces our adherence to Section 54 of the Modern Slavery Act 2015.

### **Our teaching and academic research**

The issue of modern slavery has been integrated into our teaching offer and

academic research in a number of programmes across the University.

The Department of Law and Criminology offers instruction on aspects of modern slavery in the undergraduate human rights track, undergraduate criminology track, the law degree, the MA in Criminology and Criminal Justice Practice, and the MA in Applied Human Rights. Students learn about the Modern Slavery Act and gain a basic knowledge of slavery across the curriculum but receive more advanced training on the subject in modules such as the Level 4 criminology module on “Applying Criminology,” the Level 5 criminology module on “Victims, Offenders, and Vulnerabilities,” the MA module on “Researching Human Rights,” and the MA module on “Global Threats and Penal Policy.” On a more theoretical level, the department encourages students to think of slavery and other human rights violations within the contexts of global capitalism, gender norms, structural violence, and racial and economic inequalities. Students are trained to understand the history of rights and their role in a truly transformational approach to

### **Our Supply Chain**

In 2021, the University implemented the UKUPC Sustain Code of Conduct for contracted suppliers as part of its standard requirements in its invitations to tender. Section 1 of the code prohibits forced, involuntary or underage labour.

The University’s Terms and Conditions for the Supply of Goods and/or Services, which have recently been updated, set out our expectations of our suppliers in relation to human rights and the elimination on modern slavery and human trafficking in their supply chains.

Newly contracted suppliers are also now mandated to report on their social value and ethical trading activities on the

modern slavery that gets at the root causes of injustice. Students have the opportunity to participate in college-student collaborative research that investigates modern slavery as it affects the Sheffield community.

Researchers in the department and in the Helena Kennedy Centre for International Justice work to understand the social, culture, and economic factors that make slavery possible. They conduct research with local police departments to identify trends in their investigations of slavery and to improve their responses. They investigate supply chains to determine how UK products may be connected to slave-made goods. They work on the nexus of migration and human trafficking, as well as on the role of gender norms in modern slavery. The department has recently hired a research professor whose work is focused exclusively on modern slavery, and she is providing research leadership to expand on that research agenda across the department.

Netpositive Futures portal, as part of the contractual obligations of the supplier relationship.

Sheffield Hallam University is a member of the North Eastern Universities Purchasing Consortium (NEUPC), accessing many of its procured solutions. NEUPC has a responsible procurement group of which the University is a member. This group works closely with both The Higher Education Purchasing Association, (HEPA) and the UK Universities Purchasing Consortium (UKUPC) to consider and confront supply chain relationships which could give rise to environments at risk of modern slavery.

NEUPC's Responsible Procurement and Social Value Policy 2020 enforces Modern Slavery Act compliance for suppliers with a £36m turnover and above and encourages the development of an annual statement for smaller enterprises.

The Universities Catering Organisation's (TUCO's) "Responsible Processes" include working with an UKAS accredited organisation undertaking food audits against a set of standards.

Where appropriate, we procure through NEUPC and TUCO frameworks, working more closely with both organisations to determine where, by working together, we can better understand our actual risks from the supplies we procure.

### **Our investments**

The University has no direct involvement in the management of the assets of the pension schemes that it participates in but is invited to comment upon each scheme's investment strategy from time to time.

The LGPS, USS and NEST pension schemes have "Responsible Investment" policies, which include social issues that are considered in their investment decisions. The University will continue to gain further understanding and provide input, where possible, on how our contributions are being invested. In particular:

- Our LGPS fund will seek input from employers on the scheme's Investment Strategy Statement, as part of

### **Measuring effectiveness and planning**

The 2019 healthcare uniforms tender was developed as a template for tendered goods where risk categories are being

We continue to identify sources of supply which might contain modern slavery risks and report annually how those risks are mitigated. The Alliance, (the University and its private sector alliance partners), will deliver the University's campus plan. It is responsible for ensuring its supply chain is secured in a responsible and ethical way. The Alliance will do this by verifying against signs of bonded and enforced labour by undertaking toolbox talks about the signs of modern slavery on site, ensuring identity checks are undertaken, signposting help with Alliance-branded posters, ensuring suitable induction processes are in place and by having a trained reporting process.

consultation on the 2022 actuarial valuation process

- The USS will consult with employers on its Statements of Investment Principles following agreement to any benefit changes (likely to be Autumn 2022).

The University holds no direct investments other than those in its subsidiaries, associates and joint ventures, which all operate in areas consistent with the University's objectives. All cash investments are held as bank deposits and are subject to our Ethical Investment Policy.

procured; to promote and sustain good practice.

The NetPositive Futures tool was designed to support all businesses to communicate the positive actions they are undertaking to generate social value in the supply chain. It is currently being developed to enhance reporting and we are actively monitoring how this tool can be developed to encourage and monitor positive actions to reduce risks of exploitation in supply chains. Supplier monitoring and reporting

### **Training**

Integral to Sheffield Hallam University's commitment to Equality, Diversity and Inclusion is a desire to share its learning and on-line training. International partners and vested suppliers will be provided with opportunities to access relevant learning resources.

Internally, officers committing high volume/value transactions with suppliers are now required to access the Government Commercial College, tackling modern slavery in supply chains case study to embed their understanding of the indicators of modern slavery and how to mitigate risks.

### **Review and Approval**

This statement will be reviewed annually. This statement was approved by the Board of Governors of Sheffield Hallam University at its meeting on 7 December 2021.

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**Lord Kerlake**  
Chair of the Board of Governors  
Sheffield Hallam University

is an active area of development for the University and recent contracts are more purposefully setting expectations to review value chain risks as part of the contractual deliverables.

We endeavour to learn from our academic research and seek ways to apply this knowledge for the betterment of our supply choices.

Officers with duties to tender opportunities with the supply market are responsible for ensuring that documentation reflects our commitment to the Modern Slavery Act 2015. All procurement officers are MCIPS qualified or working towards that qualification. Part of the qualification includes the Ethical Procurement and Supply e-learning.

Teams and partners with responsibility for our overseas activities are aware of the duties under the Modern Slavery Act relating to business overseas and receive training from the University to ensure their understanding is refreshed and embedded.

## Hyperlinks relative to the Slavery and Human Trafficking Statement:

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### Links

[Ethical trade base code](#)

[HEPA responsible procurement](#)

[Netpositive Futures portal](#)

[NEUPC](#)

[NEUPC responsible procurement](#)

[NEUPC's Responsible Procurement and Social Value Policy 2020](#)

[Preparing a Slavery and Human Trafficking Statement: Guidance for Higher Education](#)

[TUCO responsible Processes](#)

[Sheffield Hallam University Ethical Investment Policy](#)

[UK National Action Plan on Implementing the UN Guiding Principles on Business and Human Rights](#)

[UKUPC responsible procurement](#)

[UKUPC SUSTAIN Code of Conduct](#)

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