

SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Sheffield Hallam University is one of the biggest universities in the UK. With 31,000 students and a turnover of £287million, Sheffield Hallam as a civic university, has a key role to play in transforming lives, communities and the local economy.

Sheffield Hallam University supports the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights. The university is actively following the "Preparing a Slavery and Human Trafficking Statement: Guidance for Higher Education" published in October 2018.

Sheffield Hallam University has four 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. support of student-led activities to minimise risks of trading where unethical practices persist

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 action plan 2019](#) encompassing Modern Slavery.

The University's slavery and human trafficking statement has been reassessed and we now intend to develop specific responsible procurement policy of our own, as part of the revision of the Environmental Plan, to reinforce our adherence to Section 54 of the Modern Slavery Act 2015.

The key themes of the statement are:

- creating an ethical procurement policy
- updating the procurement plan
- raising awareness of the risks
- reassessing our risk priorities and targeting activity
- focusing upon contract management, supporting the supply chain to reduce opportunity for individuals' freedoms to be compromised
- improving cross-university reporting of effective change.

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 responsibilities are delegated through the University's Faculties and Directorates:

Faculties: T1

Science, Technology and Arts	Social Sciences and Humanities
Health and Wellbeing	Sheffield Business School

Directorates: T2

Business Engagement Skills and Employability	Corporate Operations
Development and Alumni Relations	Digital Technology Services
Estates and Facilities	Finance and Procurement
Global Development and Partnerships	Governance and Sector Regulation
Human Resources and Organisational Development	Learning, Enhancement and Academic Development
Recruitment, Communications and Marketing	Research and Innovation Services
Strategy Planning and Insight	Student and Academic Services
Student Engagement, Evaluation and Research	Transformation

Overseas Representative Offices: T3

China	India
Malaysia	Nigeria
Pakistan	

Our Supply Chain

Sheffield Hallam University's supply base mainly falls under the following categories:

Risks within our Supply Chain T4

Directorates more likely to be at risk

Estates and Facilities	Digital Technology Services (DTS)
------------------------	-----------------------------------

Products used within faculties more likely at risk

Catering	Laboratory supplies and equipment
Office supplies and stationery	Specialist capital equipment (SCE)
Uniforms	

From which the University has identified the following areas of heightened risk for human rights, from the products and services it procures:

Category	Product/Service	Nature of Risk
Estates	Capital Building Projects	extraction of raw material within construction products and construction products from 'at risk' regions
DTS	IT equipment, servers, peripheral equipment	extraction of raw material within technology equipment and assembly of technology equipment from 'at risk' regions
SCE		components within the capital items and consumable items required to operate the equipment assembled from 'at risk' regions
Laboratory	Elements, compounds, chemicals and consumable products	extraction of minerals, production of compounds and chemicals, manufacture of consumable products from 'at risk' regions
Catering	Fruit and vegetables, products from grains and beans	preparation of land, cultivation, harvesting and packing. All regions
Uniforms	Imported garments	Raw material cultivation, cotton production, fabric manufacture, dyeing and bleaching and garment and fastenings manufacture. Provenance identified.
Office supplies	All products	extraction of raw materials, , manufacture of consumable products from 'at risk' regions

Our Policies and Due Diligence in Relation to Slavery and Human Trafficking

At Sheffield Hallam University we are 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.

Sheffield Hallam supports the Base Code of the Ethical Trading Initiative, (ETI) (<http://www.ethicaltrade.org/eti-base-code>):

The University advises its potential suppliers of our expectations in relation to human rights on our [website](#).

Where teams within the university have significant responsibility for procurement activity, they have received suitable training to ensure awareness and understanding of the issues involved.

Equally teams with responsibility for our overseas activities are aware of the duties under the Act relating to business overseas.

Individuals involved in procurement, where we have a tangible opportunity to control the risks related to human rights receive refresher awareness on an annual basis.

This knowledge is used to influence our decision-making and ensure the procured supplies and services we receive are purchased in line with the ETI Base Code.

Sheffield Hallam University's action plan for the financial year 2019-20 to address the risk of slavery and human trafficking in our supply chain: is as follows:

- Where appropriate, procure through TUCO and NEUPC frameworks in support of NEUPC's promotion of the NETPositive approach to sustainable supply chain management: <http://netpositivefutures.co.uk/> working more closely with both organisations to determine, where by working together we can better understand our actual risks from the supplies we procure.

- Promote both the NETPositives tool and the ETI Base Code within our own supply base requiring all tendering parties above EU threshold to maintain a NETPositive record as part of the tender submission/contracted supplier status.
- Identify any modern slavery risks and report annually how those risks are mitigated as a result of delivering the University's Masterplan. The Alliance, (the University and its private sector alliance partners), will deliver the University's masterplan. It is responsible for ensuring its supply chain is secured in a responsible and ethical way.
- Promote Sheffield Hallam University's slavery and human trafficking statement to our supply base, students, staff and members of the public.
- Work with and provide policy statements and training for our overseas representative offices to develop action plans further to have a greater understanding of how we can remedy any direct risks identified.
- Develop an ethical procurement policy as part of the review of the University's Environmental Plan
- 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, assess the above actions as part of an annual internal audit cycle to ensure continued compliance with the Modern Slavery Act.

Measuring effectiveness and planning

Sheffield Hallam University has benchmarked the activity of fellow Higher Education Institutions. Our risk categories were duly adjusted in 2018 (table T5 above).

The 2019 healthcare uniforms tender has been developed as a template for tendered goods where risk categories

(table T5) are being procured; to promote and sustain good practice.

We have committed to the NetPositive approach to sustainable supply chains. We will investigate how supplier monitoring and reporting might be progressed.

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 have received a broad training package relating to purchasing decision-making. The training included modern slavery risks. to ensure their knowledge and

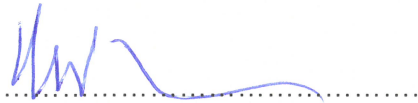
focus remains alert to human rights risk in the supply chain. This training is now being digitised as a University-wide resource.

Corporate Services 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. Their professional development includes training related to legislative duties and procurement.

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 26 November 2019.



Lord Kerslake

Chair of the Board of Governors
Sheffield Hallam University