

Introduction

Sheffield Hallam University is one of the biggest universities in the UK. With 31,500 students and a turnover of £257million, Sheffield Hallam has a key role to play in transforming lives, communities and industries.

Sheffield Hallam University is committed to procuring quality goods and services at the best possible value through an ethical sourcing process and without causing harm to others. As part of this, Sheffield Hallam University is supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

Sheffield Hallam University is a member of the North Eastern Universities Purchasing Consortium (NEUPC), the shared vehicle by which universities in our region manage joint developmental and improvement projects for collaborative procurement. As with other challenges and opportunities, we will work together as a consortium to address this task on an ongoing basis. The NEUPC is, in turn, a member of Procurement England Limited (PEL) and are signed up to PEL's Sustainable Procurement Policy (<http://static.uk-plc.net/library/london-universities-purchasing-consortium/documents/pel/pel-sustainability-policy.pdf>).

This is a statement designed to meet the requirements of Part 6 of the Modern Slavery Act 2015 by informing our students, staff, suppliers and members of the public about Sheffield Hallam University's responsibility and pledge with regards to modern slavery, human trafficking, forced and bonded labour and labour rights violations in our supply chain.

We recognise the importance of this legislation and would state that as a reputable employer our recruitment and employment of staff is fully compliant with all relevant UK legislation. Such employment practices often go beyond the legal baseline so that staff have the support, protection and freedom that would be expected of a reputable employer. Sheffield Hallam University will continue to promote such a working environment recognising the importance of its workforce and the contribution our people make to the success of the University.

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		Directorates		Overseas Offices
Arts, Computing, Engineering and Sciences		Corporate Affairs		China
		Digital Technology Services		Malaysia

Faculties cont.	Directorates cont.
Development and Society	Education and Employer Partnerships
Health and Wellbeing	Facilities and Estates
Sheffield Business School	Finance
	Human Resources
	International Development
	Learning, Enhancement and Academic Development
	Library and Student Support Services
	Research and Innovation Office
	Secretary and Registrar
	Student Engagement, Evaluation and Research

Our Supply Chain

Sheffield Hallam University's supply base mainly fall under seven categories:

1. Estates and Facilities
2. Information Systems and Technology (IS&T)
3. Marketing and Human Resources
4. Finance and Professional Services
5. Office Supplies and stationery
6. Library and Student Support Services
7. Travel

Our Policies 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 (<http://www.ethicaltrade.org/eti-base-code>):

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive

- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

We have been a Fairtrade certified organisation since 2007.

The University will incorporate suitable training for procurement staff to increase awareness and understanding of the issues involved.

Due Diligence

Sheffield Hallam University has developed an initial action plan to address the risk of slavery and human trafficking in our supply chain:

- Where possible, procure through NEUPC frameworks in support of NEUPC's promotion of the NETPositive procurement method (<http://www.net-positive.org>).
- Promote both the NETPositives tool and the ETI Base Code within our own supply base.
- Promote Sheffield Hallam University's slavery and human trafficking statement to our supply base, students, staff and members of the public.
- All organisations with a turnover in excess of £36million to be asked to provide a copy of their Slavery and Human Trafficking Statement.
- Organisations with a turnover of less than £36million will be asked to confirm their awareness of the Modern Slavery Act with information provided to increase understanding.
- All invitation to tender (ITT) documents to contain a request for confirmation of a tenderer's commitment to the Modern Slavery Act, relevant to their financial turnover.

Where the Risk is, and What Steps we Have Taken to Manage that Risk

Following our preliminary investigations, we have judged the current risk within our supply chain in the following categories:

1. Regional risk: products and categories sourced from regions judged to be high risk.

Examples include: Healthcare uniforms, sports clothing, cleaning and maintenance and reception uniforms, graduation (gowning), office supplies and stationery, lab consumables, IS&T equipment and consumables.

2. Labour risk: categories where suppliers and contractors may be employing or sub-contracting to a temporary and / or transient workforce.

Examples include: Estates and Facilities.

We have built a list of suppliers within these areas and are taking the steps outlined in the section 'due diligence' to manage this risk.

Our Plans for the Future

Sheffield Hallam University is committed to working with our suppliers and with the NEUPC to create a robust process, or series of processes, intended to solidify our approach to the

government's requirements, and to ethical trading in a more general sense. As detailed above, we will encourage our suppliers to commit to the ETI Base Code and NETPositive tool. Where there is a reluctance to do so, we will investigate and analyse the reasons why and, if necessary, we would be prepared to make a managed move away from a supplier that has an unjustifiable reluctance to adhere to these requirements.

Beyond that, there is an option of asking some of our manufacturers based in high risk regions to join the Supplier Ethical Data EXchange (SEDEX). SEDEX can partner with auditing organisations such as Bureau Veritas to audit manufacturers based on their ethical standards and often spot issues that suppliers themselves are not aware of. This would provide a useful early warning measure but has a cost element so would be recommended only for Sheffield Hallam's highest turnover suppliers.

Working in partnership with our suppliers we will regularly review, measure and monitor our progress and encourage sharing of best practice to reduce the risks of slavery and human trafficking occurring in any area of our supply chains.

Review and Approval

This statement shall be reviewed annually.

This statement was approved by the Board of Governors of Sheffield Hallam University on 29 November 2016.

A handwritten signature in black ink, reading "R. W. Kerslake", followed by a dotted line.

Lord Kerslake

Chair of the Board of Governors

Sheffield Hallam University