

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Sheffield Hallam University, (the “University”), is one of the largest universities in the UK. With 35,500 students, 5000 employees and a turnover of £330million, 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 December 2021).

The University entered the 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 acknowledges that it has a duty to take a proactive approach towards eradicating slavery and human trafficking throughout our supply chains. Our annual statement aims to describe the actions the University has taken in the last financial year and those we intend to take to address these issues.

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:

- risk identification and relationship management of its supply chains
- relationship enhancement with its international partner organisations
- internal policy, process and research development which reinforces our intolerance of trading activity which might impact on individuals' freedoms

- 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
- support of student-led activities to minimise risks of trading where unethical practices persist

The key themes of this statement are:

- 1) challenging the risks of Modern Slavery with our contracted suppliers as part of the procurement process.
- 2) raising awareness of the risks with our internal purchasing decision-makers through training and information sharing.
- 3) focusing upon, supporting the supply chain to reduce opportunity for individuals' freedoms to be compromised, with performance measures and contract management.
- 4) developing links between our academic research and our support of the supply base to improve supply choices.
- 5) taking increased interest in our investments.
- 6) lobbying and petitioning policy makers to enable coordinated approaches to making sustainable 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 Colleges, Research Institutes, Business Delivery Groups and Corporate Services:

Colleges:	Business Technology and Engineering Health, Wellbeing and Life Sciences Social Sciences and Arts
Research institutes:	Culture and Creativity Research Institute Health Research Institute Industry and Innovation Research Institute Social and Economic Research Institute
Business delivery groups:	Academic Delivery and Diversity Business Engagement Skills and Employability Development and Alumni Relations Global Development and Partnerships Recruitment, Communications and Marketing Research and Innovation Services Student and Academic Services Student Experience, Teaching and Learning
Corporate services:	Finance and Procurement Governance, Legal and Sector Regulation Human Resources and Organisational Development Infrastructure and Change Strategy Planning and Insight

Our supply chain risks

The University has identified the following stages along the supply chain, for particular teams, selecting products and materials, which are at risk of human exploitation:

		Stages of Supply Chain Activity at Risk of Human Exploitation						
Team	Supply Need	Extract Raw Material	Harvest	Manufacture	Process	Assemble	Package	Portfolio Selection
Infra-structure and Change	Construction Materials	x		x		x	x	
	Construction Labour					x		
	Furniture and Fixtures	x		x		x	x	
	Cleaning Materials	x		x	x	x	x	
	PPE & Uniforms	x		x	x	x	x	
	Digital Infrastructure and Equipment	x		x	x	x	x	
Technical Services and Research Institutes	Capital Equipment	x		x		x	x	
	Laboratory supplies	x		x	x	x	x	
	Student Uniforms	x						
Catering	Fruit, Vegetables Herbs Spices		x		x		x	
	Food processing				x		x	
	Food Packaging	x		x			x	
Office Areas	Stationery	x		x	x	x	x	
	Specialist DSE equipment	x		x		x	x	
Finance	Pensions and Funding							x

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 cycle to ensure continued compliance with the Modern Slavery Act.

The responsible 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 will reinforce 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 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.

Modern Slavery focused researchers work to understand the social, cultural, 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.

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, 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 mandated to report on their social value and ethical trading activities on the 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 is a member of the UK Universities Purchasing Consortium’s (UKUPC) responsible procurement group. The group considers and confronts supply chain relationships which could give rise to environments at risk of modern slavery. NEUPC’s Responsible Procurement and Social

Value Policy 2020 (reviewed 2022) enforces Modern Slavery Act compliance for suppliers with a £36m turnover and above and encourages the development of an annual statement for smaller enterprises. From 2022, the University, as a member of NEUPC, now accesses affiliate membership of Electronics Watch which monitors and challenges manufacturing behaviours in relation to Modern Slavery and is widening its scope to include food manufacture.

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.

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 continue to do this whilst works are ongoing, 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. The alliance will focus on carrying out audits to check modern slavery risks on their supply chain are being managed robustly.

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.

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.

Measuring effectiveness and planning

At the end of 2021, the University actively challenged the market when awarding its sports uniforms contract to focus on the lives of the manufacturing workforce. This led to the supplier selecting a brand known for its Modern Slavery diligence. Most products are branded and those products are subject of Verité, the Mekong Club and Impact assessment. The supplier also undertakes independent auditing. For supply chains at greater risk, this approach to contract assignment, management and due diligence is now a template approach.

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. The tool is

now developed to capture five specific metrics to assess and demonstrate progress made by our contracted suppliers, in relation to their Modern Slavery actions.

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

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.

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.

This year we will refer to the British Standards Institution (BSI) to inform and guide training for officers to broaden their understanding and to better inform their purchasing decisions.

Review and Approval

The Modern Slavery and Human Trafficking Statement will be reviewed annually.

This statement was approved by the Board of Governors of Sheffield Hallam University at its meeting on 28 November 2023.

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Meg Munn

Chair of the Board of Governors
Sheffield Hallam University

Hyperlinks relative to the Slavery and Human Trafficking Statement:

 **Links**

[BSI Standards Publication](#)

[Ethical trade base code](#)

[HEPA responsible procurement](#)

[Netpositive Futures portal](#)

[NEUPC](#)

[NEUPC responsible procurement](#)

[NEUPC's Responsible Procurement and Social Value Policy 2020 \(Reviewed 2022\)](#)

[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](#)
