

Introduction

Sheffield Hallam University is one of the biggest universities in the UK. With 31,500 students and a turnover of £277million, Sheffield Hallam 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 both the University Caterers Organisation, (TUCO) and the North Eastern

Universities Purchasing Consortium (NEUPC). Both organisations manage joint developmental and improvement projects for collaborative procurement and are members of Procurement England Limited (PEL). They 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>).

The statement has been reviewed with the intent of building on the activities undertaken since 2015, to meet the requirements of Part 6 of the Modern Slavery Act 2015. The key themes of the statement are:

- raising awareness of the risks
- developing 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
- refining collaborative activity to improve the effectiveness of actions taken
- ensuring we have a cohesive policy framework in relation to our modern slavery expectations

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
Admissions and UK Recruitment	Digital Technology Services
Education and Employer Partnerships	Facilities
Finance and Planning	Global Engagement
Human Resources and Organisational Development	Learning, Enhancement and Academic Development
Library and Student Support Services	Marketing, Communications and Development
Registry Services	Research and Innovation Office
Secretariat and Governance Services	Student Engagement, Evaluation and Research
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
More likely to be at risk	Less likely to be at risk
Facilities	Travel
Digital Technology Services (DTS)	Library and Student Support Services
Specialist capital equipment (SCE)	Marketing and Human Resources
Laboratory supplies and equipment	Finance and Professional Services
Catering	
Uniforms	
Office supplies and stationery	

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
Facilities	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](#). We have been a Fairtrade certified organisation since 2007.

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 2018-19 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.
- Once appointed, the delivery partner alliance, responsible for delivering the University's masterplan, the alliance will be responsible to ensure their supply chain is procured in a responsible and ethical way. The delivery partner alliance will be required to identify any modern slavery risks and report annually how they are mitigating these risks.
- Promote Sheffield Hallam University's slavery and human trafficking statement to our supply base, students, staff and members of the public.

Measuring effectiveness and planning

Sheffield Hallam University has benchmarked the activity of fellow Higher Education Institutions. With wider reading, the University's understanding of its risks has improved and we have adjusted the scope of our risk categories accordingly (table T5 above).

Working with our uniforms suppliers, we have a greater understanding of our supply chains in this area, the barriers they face when investigating the human rights status of a remote supply chain and

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

- Work with our overseas representative offices to develop action plans further to have a greater understanding of how we can remedy any direct risks identified.
- Undertake a review of policies, formal documentation and practices to identify and implement improvements to ensure that our commitment to human rights and the eradication of slavery is self-evident as a pre-requisite to working with the University
- 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.

what they are actively doing to promote and sustain good practice.

Having identified the suppliers most likely to be at risk of human rights related infringements, the learning from our uniforms supply chains will be applied to other categories of expenditure identified in table T5.

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

opportunities to access relevant learning resources.

Internally, officers committing high volume/value transactions with Suppliers will have a cycle of training to ensure their

knowledge and focus remains alert to Human rights risk in the supply chain.

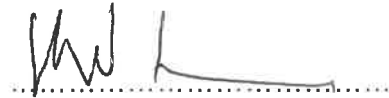
Corporate Services officers with duties to tender opportunities with the supply market are responsible for ensuring that documentation reflects our commitment to

the Modern Slavery Act 2015. Their professional development includes training related to legislative duties and procurement.

Review and Approval

This statement shall be reviewed annually.

This statement was approved by the Board of Governors of Sheffield Hallam University on 27 November 2018.



Lord Kerslake

Chair of the Board of Governors
Sheffield Hallam University

