

## SLAVERY AND HUMAN TRAFFICKING STATEMENT

### Introduction

Sheffield Hallam University is one of the biggest universities in the UK. With 31,500 students and a turnover of £268million, 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 supports 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-](http://static.uk-plc.net/library/london-universities-purchasing-consortium/documents/pel/pel-sustainability-policy.pdf)

[plc.net/library/london-universities-purchasing-consortium/documents/pel/pel-sustainability-policy.pdf](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:

Arts, Computing, Engineering and Sciences	Development and Society
Health and Wellbeing	Sheffield Business School

### Directorates:

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:

China	India
Malaysia	Nigeria
Pakistan	

## Our Supply Chain

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

1. Facilities
2. Digital Technology Services
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, (ETI) (<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

### Due Diligence

Sheffield Hallam University's action plan for the financial year 2017-18 to address the risk of slavery and human trafficking in our supply chain: is as follows:

- Where appropriate, procure through NEUPC frameworks in support of NEUPC's promotion of the NETPositive approach to sustainable supply chain management:  
<http://netpositivefutures.co.uk/>
- 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.
- Newly appointed, above EU threshold, lead ead contractors, directly appointed to work on-site, will be required to sign up to NetPositive as part of their Control of Contractors duties.
- Major Facilities delivery partners will be required to submit an annual assessment and action statement relating to their supply chain risks.

- No harsh or inhumane treatment is allowed

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.

Teams receive refresher awareness on an annual basis.

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

- Promote Sheffield Hallam University's slavery and human trafficking statement to our supply base, students, staff and members of the public.
- Agree a list of existing suppliers with whom we maintain significant expenditure and with whom there is a perceived greater risk of the supply not meeting the ETI Base code; to work with them to evidence their adherence with the code.
- Work with our overseas representative offices to identify any ETI Base Code risks and agree a plan of action to remedy any direct risks identified.
- 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.

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

Our risk remains in the areas initially identified, although the list has extended modestly i.e.:

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, IT 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: Construction and construction materials, perishable foods and overseas services

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

Modern Slavery clauses have been added to our works, services and supplies contracts.

We have committed to the NetPositive approach to sustainable supply chains.

## **Our Plans for the Future**

Sheffield Hallam University is committed to working with our suppliers, 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, and in certain circumstances, mandate our suppliers to commit to the ETI Base Code and NETPositive tool. Where there is a reluctance to do so, we will educate the supplier further and agree a suitable action plan to remedy immediate concerns. Where evidenced as proportionate and necessary, a managed move away from a supplier would be undertaken.

Manufacturers based in high risk regions will be asked to consider joining the Supplier Ethical Data EXchange (SEDEX). SEDEX to audit manufacturers based on their ethical standard, where proportionate and appropriate to the level of expenditure with the University.

Working in partnership with our suppliers and the NEUPC, 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 28 November 2017.

A handwritten signature in black ink, reading "R W Kerslake", is written over a horizontal line.

**Robert Walter Kerslake**

Chair of the Board of Governors  
Sheffield Hallam University