



General Manager Handbook

Contents

This Handbook is to be used by General Managers in conjunction with the Stop Slavery Blueprint. It offers practical tools to help operationalise the guidance from the Blueprint and provides example documents that can be adapted and used accordingly. There are other documents that haven't been included in this Handbook that should be drafted and used, including an incident reporting form for when reports are made, letters for new staff explaining the company's commitment to tackling modern slavery, and letters for suppliers to engage them in this process.

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Stop Slavery Blueprint Summary

Slavery and human trafficking are illegal.
Yet, there are still an estimated 40.3 million people
trapped in modern slavery in the world today.

WHAT IS MODERN SLAVERY?

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as:



**Sexual
exploitation**



**Forced and
compulsory
labour**



**Human
trafficking**



**Debt
bondage**



**Domestic
servitude**

All of these have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Human Trafficking - the movement of people by means such as force, fraud, coercion or deception with the aim of exploiting them.

Slavery, Servitude, and Forced or Compulsory Labour - ownership exercised over a person; or all work or service that is exacted from any person imposed by coercion or under the threat of penalty and for which the employee has not offered himself voluntarily.

WHAT IS OUR HOTEL'S APPROACH?

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business.

- 1** Within the hotel, we are committed to ensuring our properties and services are not used for the purposes of exploitation, whilst ensuring we maintain the respect and confidence of our customers. [See the Hotel Usage Policy for more information.](#)
- 2** When employing people, we are committed to ensuring that the individuals who work for us are afforded basic human rights and employment rights and are treated with dignity and respect at all times. [See Best Practice on Employment and Human Rights for more information.](#)
- 3** Throughout our supply chains, we expect the same high standards from all of our contractors, suppliers and other business partners and we expect that our suppliers will hold their own suppliers to the same high standards. [See the Supplier Code of Conduct for more information.](#)

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery. This commitment applies to all persons working for our hotel or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

WHO IS RESPONSIBLE?

The **Board of Directors** has overall responsibility for ensuring this commitment complies with our legal and ethical obligations, and that all those under our control comply with it.

The **General Manager** has primary and day-to-day responsibility for implementing this commitment in the hotel, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The **Heads of Department** are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

The **Anti-Trafficking Committee**, made up of key representatives from head office and relevant NGOs/ service providers, is responsible for assessing systems and protocols within implementing hotels for their adequacy against industry benchmarks and providing relevant recommendations.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Training on this, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. See the [Anti-Trafficking Reporting Protocols](#) for more information.



WHERE CAN I FIND OUT MORE?

The [Stop Slavery Blueprint](#) sets out the key principles that we commit to embedding into our hotels as part of this fight and the [Stop Slavery General Manager Handbook](#) provides guidance and materials for you in the form of (i) training materials and schedules (ii) communications and reporting protocols and (ii) updated policies and practices.

These shall be adopted across hotels and across departments.

The Stop Slavery Blueprint and General Manager Handbook were created by Shiva Foundation. If you have any questions, please do not hesitate to contact Shiva Foundation at info@shivafoundation.org.uk

GENERAL MANAGER 3-MONTH ACTION PLAN

Hotel Name: _____ Date Action Plan Launched: _____
 GM Name: _____ Date Action Plan Completed: _____

Action Area	Action Required	When (days/ weeks from implementation)	Responsibility (Position)	Completed (Y/N)	Comments or Dates completed
Month 1					
Collateral	<p>General Managers (GMs) issued with suite of training and operational collateral:</p> <ul style="list-style-type: none"> • Stop Slavery Blueprint • Annex 1 – Checklist • Annex 2 – Risk Matrix • Annex 3 – Best Practice Policies and Guidance • Stop Slavery Handbook • Stop Slavery Blueprint Summary • General Manager 3-Month Action Plan • Awareness Training PowerPoint Slides • Indicator List • Incident Reporting Pathway • Combat Case Study 5: Osama • Combat Case Study 1: Karla • Call to Action • Training Course Evaluation • Modern Slavery and Anti-Trafficking Quiz • Public Commitment on Human Trafficking <p>GM to create an Evidence file on property to track implementation.</p>	Day one of implementation	Anti-Trafficking Committee		
Local Partners	<p>GM to contact the local police and any relevant victim’s service providers. Invite partners to the hotel for discussion of the actions that will be imminently rolled out on the property.</p> <p>This is to ensure that the hotel’s reporting protocols are in line with police/NGO advice and to help monitor response from all parties if incidents are suspected.</p> <p style="color: red;">See “Anti-Trafficking Reporting Protocols” in the Blueprint.</p>	Within one month	GM (in coordination with Anti-Trafficking Committee)		

GENERAL MANAGER 3-MONTH ACTION PLAN

Action Area	Action Required	When (days/ weeks from implementation)	Responsibility (Position)	Completed (Y/N)	Comments or Dates completed
Month 1					
Public Commitment	<p>Ensure the Public Commitment on Human Trafficking is launched and visible in the lobbies of hotels.</p> <p>Launch an 'in-room' communication through the guest TVs if available.</p> <p>See "Commitment to Tackle Human Trafficking" in the Blueprint. See page 39 of this Handbook for an example Public Commitment.</p>	Within one week	GM		
Stop Slavery Blueprint	<p>Make the General Manager Blueprint available at all times within the GM Office.</p> <p>Upload the hotel's Stop Slavery operational documents to relevant systems.</p>	Within one week	GM HR		
HR Protocols	<p>Ensure the following documents are amended to the new formats which include the statements required in accordance with the Stop Slavery Blueprint:</p> <ul style="list-style-type: none"> • Recruitment adverts: all adverts to now incorporate information about the Public Commitment on Human Trafficking • New application pack replaces all old copies on shared drives or printed • New procedures for recruitment followed including: Application pack sent out to applicants. 	Within one month	GM		
Training Sessions	<p>Send invite to all hotel team for the launch of the Awareness Training and set up 2 hour sessions accordingly. (Training of all hotel team members must be completed within one month of launch).</p> <p>See "Training" in the Blueprint. See pages 11-38 of this Handbook for the training package and associated materials.</p>	On day one of implementation	GM / HR		

GENERAL MANAGER 3-MONTH ACTION PLAN

Training Sessions	<p>Print sufficient copies of the following documents for the training:</p> <ul style="list-style-type: none"> • Awareness Training PowerPoint Slides (for trainer) • Indicator List (one for every participant) • Incident Reporting Pathway (one for every participant) • Combat Case Study 5: Osama (for trainer and participants if required) • Combat Case Study 1 : Karla (for trainer and participants if required) • Call to Action (one for every participant) • Training Course Evaluation (one for every participant) <p>See pages 11-38 of this Handbook for the training package and associated materials.</p>	Before training	Trainer		
Training Sessions	<p>Collate all Training Course Evaluations and consider the feedback for future training modifications.</p> <p>See page 33 of this Handbook for an example Training Course Evaluation.</p>	Immediately after training	Trainer / GM / HR		
Back of house	<p>Once the Blueprint implementation begins, the GM is to ensure that the following documents are printed in large format and placed in prime location back of house: Public Commitment on Human Trafficking</p> <ul style="list-style-type: none"> o Incident Reporting Pathway o Call to Action (Tick off the actions as they are completed) o Public Commitment on Human Trafficking <p>This is part of the visible commitment to the Blueprint.</p> <p>See pages 25, 31 and 39 of this Handbook for relevant examples.</p>	Day one of implementation	GM		
Month 2					
Training Sessions	<p>Ensure any team members not able to complete the training during initial group sessions must complete the training within two weeks of the main workshops.</p>	Two weeks after main training	GM		
Training Sessions	<p>Ensure all new starters receive the training within eight weeks of starting employment. Training should be embedded in the regular training strategy with mandatory attendance.</p> <p>See "Training" in the Blueprint.</p>	Ongoing	GM		

GENERAL MANAGER 3-MONTH ACTION PLAN

Month 3

Training Quiz	<p>Send the Modern Slavery and Anti-Trafficking Quiz to all staff to complete. This is to be used as a measure of recording the level of retained knowledge within the team after training.</p> <p>Results collated can inform whether further action is required.</p> <p>See page 35 of this Handbook for an example quiz.</p>	Three months after initial training	GM		
Supply Chains	<p>Begin engagement with tier one suppliers. Send an initial letter about the organisation's commitment on human trafficking and asking for information on any activities the supplier has in place.</p> <p>Track responses and gather evidence that is submitted.</p> <p>Bring any non-responsive suppliers to the Anti-Trafficking Committee for discussion on next steps.</p> <p>See "Exposure Mapping" and the "Supplier Code of Conduct" in the Blueprint.</p>	Three months	GM / Procurement		

Awareness Training PowerPoint



NOTES FOR TRAINER:

Introduce the awareness training. Explain how this workshop, which all staff are expected to attend, along with other initiatives is now being rolled out across the hotels.

Ask everyone to introduce themselves - name and job role.

Objectives

By the end of this session you will:

- 1 Understand what modern slavery and human trafficking is and its impact on the hospitality industry.
- 2 Understand the global and UK context of human trafficking.
- 3 Understand some of the signs of the different types of human trafficking that could occur.
- 4 Understand your own responsibility in tackling human trafficking and what procedures to follow if you encounter an incident.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Explain the objectives of the training (as on slide).

Provide some context to the training: "Not everyone checking into our hotel is a human trafficker, not every child is being exploited, but, if you see something suspicious, something odd, something out of kilter then report it using the procedures which will be outlined through this workshop."

Provide ground rules:

- Create a safe environment, "feel free to share and be respectful of what others say"
- Participation is encouraged
- If anyone feels upset or distressed by the content of this workshop, they can leave the room.



NOTES FOR TRAINER:

Ask everyone to write on the post-its provided:
 What is your understanding of the term Modern Slavery?
 Ask some to feedback and discuss.

Modern Slavery

Slavery didn't stop in the 19th Century, it is something that is still happening today and not in just certain countries, it exists everywhere, in every country and the UK is no exception.

The definition of modern slavery includes:

Trafficking: the movement of people by means such as force, fraud, coercion or deception with the aim of exploiting them.

Forced labour: all work or service that is extracted from any person under the threat of penalty and for which the employee has not offered himself voluntarily, including:

<ul style="list-style-type: none"> • Debt bondage • Sexual exploitation • Criminal exploitation • Domestic servitude 	<ul style="list-style-type: none"> • Forced begging • Removal and selling of organs • Forced marriage • Illegal adoption
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MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Explain what modern slavery is (as on slide).
 Explain that modern slavery and human trafficking can often be used interchangeably, which can be confusing. Commonly, human trafficking must entail some movement or travel, whereas modern slavery does not require this.
 This training will refer to modern slavery to refer to both terms.

Modern Slavery

- Modern Slavery is a growing issue, which affects men, women and children.
- It is an international crime with an estimated 40.3 million people living in conditions of slavery around the world.
- In the UK for example, the National Crime Agency recorded an actual figure of 3805 potential victims of human trafficking in 2016.
 - A 62% increase on 2014 figures.
 - 1278, 34% of these people are children.

HOWEVER, due to the hidden nature of the crime, the Home Office estimates that there could be up to 10,000 to 13,000 potential victims of modern slavery in the UK.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Go through slide

Around 40% of the people identified as trafficking victims in the UK in 2015 were victims of forced labour.



NOTES FOR TRAINER:

Extra information on modern slavery globally:

- The International Labour Organisation (ILO) estimates that there are around 24.9 million people around the world in forced labour (15.4 million are in forced marriage) - <http://www.alliance87.org/2017ge/modernslavery#!section=10>
- 1 in 4 victims of modern slavery is a child.
- 4.8 million people are forced into sexual exploitation
- 99% of people trafficked in the commercial sex industry are women and girls.
- The map is from the Global Slavery Index 2016

Modern slavery in the hotel industry

- The hospitality sector provides 292 million jobs globally (that's 1 in every 10 jobs)
- The industry contributes 10.2% of gross domestic product globally.
- Traffickers and organised criminals look for opportunities to exploit the industry.
- In Europe, for example, there are potentially:

93,480 victims of sex trafficking in hotels
14,820 victims of forced labour in restaurant and bars
6,840 victims of forced labour in hotels

A total of 115,140 victims of trafficking in the European hospitality industry annually!

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Read out slide to provide a context to the industry (statistics are from World Tourism Council).

Modern slavery in the hotel industry

- Anyone can become a victim of modern slavery.
- Victims in the hospitality sector are likely to be men and women from abroad who are forced to work for little or no money.
- They might even be forced to live in squalid conditions through threat, violence or coercion.
- Victims often have their identity documents taken from them in order to control them.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Read out slide. The main point to stress is that anyone can be a victim of modern slavery.

Who are the traffickers?

- There is no such thing as a “typical” human trafficker.
- They are not necessarily middle-aged men.
- Women can be traffickers as young victims are typically more likely to trust women traffickers.
- Often traffickers know their victims on a personal basis, as a relative, a friend or romantic attachment.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Read out slide. The main point to stress is that there are no typical traffickers.

Who are the victims?

- The victims of modern slavery can be very vulnerable.
- Many don't consider themselves a victim of a crime and are unwilling or afraid to seek help.
- They fear going to the authorities as they may think that they are a criminal and are not aware of their human, legal or immigration rights.
- They can develop an attachment to their traffickers.
- The traffickers can also develop the victims' dependency on drugs or alcohol which they supply.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Read out slide.

Implications for the hotel industry

Modern slavery can impact a hotel in a variety of ways:

- Use of the hotel for the sexual exploitation of children and adults.
- Staff, in particular those recruited or subcontracted via unscrupulous agencies, being victims of bonded or forced labour.
- Products and services supplied to the hotel being produced by forced or bonded labour, labour exploitation and unethical labour practices.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Explain the main ways the hotel industry is vulnerable to risk of modern slavery.

Raising awareness of modern slavery: Guests

We need to be aware of some of the signs that could indicate modern slavery amongst our guests:

- A teenage girl uses cash to rent a room with an older man.
- An older man rents a room, with a young girl, and is always present when she has dealings with staff.
- A string of men enter and leave a particular room throughout the night, each staying for a short time.
- A group of young women enter the hotel saying they are waiting for a man to join them – you suspect they may be prostitutes – they are victims, not criminals.
- A guest requests a room overlooking the car-park or next door to a fire exit.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

These are some of the signs of trafficking with respect to guests. Ask the participants to suggest other signs.

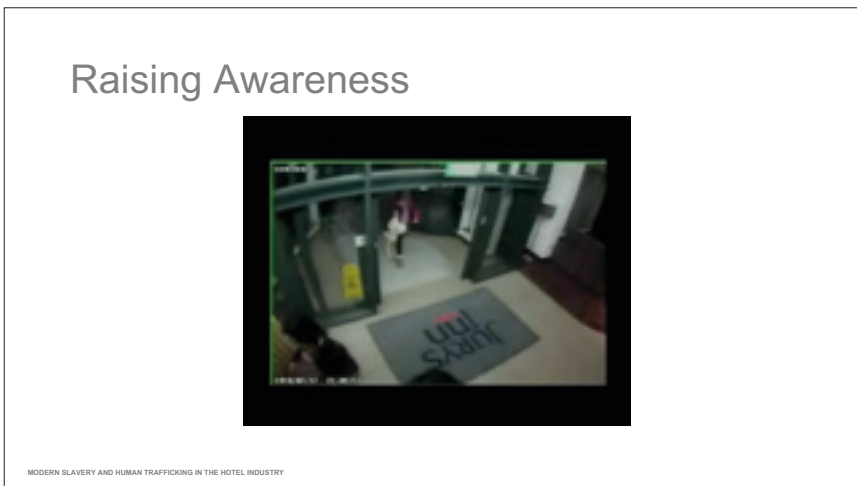


NOTES FOR TRAINER:

Before playing the video explain that it is short film published in August 2015. It is fairly hard hitting and has been primarily made for the hotel industry to raise awareness about child sexual exploitation and trafficking. Remind everyone that if anyone feels distressed at any point, they can step out of the training or do whatever they need and to let one of the trainers know.

Play movie - <https://www.youtube.com/watch?v=ezcpO-VApgE&t=167s>

Ask the group if they have any questions or if they recognise any of what is happening in the video from their own experience.



NOTES FOR TRAINER:

Before playing the video (embedded), explain that this is actual CCTV footage from an incident in Derby in 2010. Participants are expected to watch the video and explain what indicators came to mind.

Play video and ask the group to feedback on what they noticed.

Example indicators:

- Older man + 2 young girls
- Young girl has a toy and goes away from the area while the other stands by the man
- They have no luggage and it is nighttime

Explain the case: "The man (aged 54) took the girls out for the day, he bought gifts for the girls, the older girl was bought an ipod, the younger girl a cuddly toy. The girls don't look distressed, they don't cry, they've just been bought gifts, they don't know what is going to happen. This CCTV clip was shown at the trial and was instrumental in the conviction of this criminal."

Handout the indicator list and go through it as a group.

Our procedures have been set up so that one indicator doesn't automatically mean a call to the police. Once one indicator has been reported, then senior managers and other team members will be more alert and will check to see if there are any more indicators. If 3 indicators are observed (or whatever threshold is agreed internally) then our reporting procedure will begin.

What to do for a potential incident of Modern Slavery or Human Trafficking



MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Take the group through the incident reporting pathway: "If you suspect something odd is going on, and it could be modern slavery then report it to the senior manager on duty"

Handout and read through the Incident Reporting Pathway.
Ask questions to ensure the information is understood.

Checking awareness of indicators: Guests

1. Odd room request, next to a fire escape.
2. Paid by cash and with limited ID. No use of credit cards.
3. Young person checking in with older persons or with adults that are boyfriends / girlfriends but much older.
4. Behaviour of accompanying person was submissive, didn't speak, sat away from the desk, subdued
5. Arrived with more than one accompanying adult – one adult then broke away so not to be seen.
6. Limited Luggage or lack of luggage

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

This next session is to see what has been learned over the course of the training so far.

Ask the group to think back to the 'Do you see me?' 15 minute short film. During check-in alone, ask the group how many indicators they spotted. Allow a short discussion and then reveal the answers on the slide.

There are actually 6 indicators within 2 short minutes

1. Odd request for a room – next to fire escape
2. Pay by cash with ID
3. Young people with boyfriends / girlfriends who seem much older
4. Behaviour of accompanying person was submissive, didn't speak, sat away from the desk, subdued
5. Limited or lack of luggage
6. Arrived with more than one accompanying adult that then broke away

Raising awareness of modern slavery: Staff

We need to be aware of some of the signs that could indicate modern slavery amongst our fellow staff members:

- Legal documents indicating right to work are not given in the agreed timescale.
- The member of staff doesn't have a personal bank account.
- A group of staff all have the same bank account.
- The behaviour of the staff member is withdrawn or appears frightened; they don't speak for themselves and rarely interact with other colleagues.
- They appear malnourished, unkempt or withdrawn, and are suffering from physical injuries.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

These are some of the signs of trafficking with respect to fellow staff members. Ask the participants to suggest other signs.

Read out the Combat case study: Osama. Ask the group their thoughts and if they knew about this case in Scotland.

Raising awareness of modern slavery: Staff

Karla's story



MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Explain that the group is now going to listen to Karla's story and ask them to make notes on any of the indicators they recognise.

*See Combat case study transcript: Karla
Play recording

Ask the group what the indicators in Karla's story were. Discuss.

Raising awareness of modern slavery: Staff: Karla's Story

Indicators

- Fake CV and references
- Fake address and bank account
- Arrives at work alone
- Dropped off and picked up from the same location
- Isolated and unwilling to socialise with colleagues
- Volunteers to work during social functions
- Works as much overtime as possible
- Cash handling or financial irregularities

Hotel Controls

- HR procedures: written reference check
- HR procedures: the system alerts of this
- Team members can be aware of this
- Team members can be aware of this
- Have a 'buddy' system to encourage interaction
- Have a fair system, to track engagement
- Working time directive limits hours worked
- Daily and monthly departmental financial checks

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

Hotels have different controls in place to ensure any risk factors are mitigated. Go through Karla's story and demonstrate what controls are appropriate for each indicator.

Go through the slide.

Raising awareness of modern slavery: Supply chain

- An audit of our suppliers to ensure that our supply chains are free from modern slavery.
- Implementation of the Supplier Code of Conduct which defines the minimum standard and basic principles of cooperation with our suppliers and business partners.

MODERN SLAVERY AND HUMAN TRAFFICKING IN THE HOTEL INDUSTRY

NOTES FOR TRAINER:

This slide is to inform staff what work is being done to work with suppliers ensuring standards are upheld.



NOTES FOR TRAINER:

Play the video - https://www.youtube.com/watch?v=YRu6CaXTAx&t=28s&index=15&list=PLrOsb2faogNlmWkU09pF19bmSbEy4jSJ_

At the end of the video ask the group:
How many of you recycle today?
How many of you recycled 5 years ago?
How many of you recycled 10 years ago?
Why do you recycle?

Opens up discussion as to we as consumers have a voice in tackling modern slavery through our own purchases, and to question and probe, only when we ask the questions, visit websites, challenge can we really make a difference.



NOTES FOR TRAINER:

Review the post-its from the beginning and re-check understanding of modern slavery.

Ask if there are any questions.

Hand out evaluations and thank everyone for their participation.

Bars and Restaurants

- Behavioural observations: controlling, not allowing second party to speak, ordering for them, buying them 'treats'.
- Behavioural observations of second person: submissive, lack of eye contact, not talking, sitting in secluded area. Subdued if sitting on own – doesn't answer to name as false name is being used.
- Young people with significantly older guests in the restaurant or bar.
- Always follow Challenge 25 protocols. (If using Challenge 25 for anyone in our bar outlets, record the incident following the Challenge 25 and modern slavery indicator reporting protocols).

Post Check-Out

- Room checks as above.
- Noise complaints raised at morning meeting.

Members of staff

- Physical appearance: victims may show signs of abuse, appear malnourished, exhausted or unkempt.
- Isolation: victims may associate rarely with co-workers at work or outside of working hours.
- Few or no personal possessions: victims may have few personal possessions and might always wear the same clothes day in day out.
- Restricted freedom of movement: victims may not be able to move freely outside of work.
- Unusual travel times: victims may be dropped off/ collected for work on a regular basis either very early or late at night.
- Multiple people listing the same address, phone number, bank account and/or next of kin on work records.
- Holiday request is submitted through the HR system by any other employee other than the one requesting the holiday.

If 3 or more of these indicators are checked, then raise your concern with the senior manager on duty.

MODERN SLAVERY AND HUMAN TRAFFICKING AWARENESS

Types of indicators that would raise your suspicion.

If 3 or more of these indicators are checked, then raise your concern with the senior manager on duty.

**SAY SOMETHING IF
YOU SEE SOMETHING.**

Reservations

- Unusual block bookings from 3rd party distributors (eg: long stay in airport hotels).

Arrival/Reception

- Last minute/walk-in bookings.
- Guest lists local address at registration.
- If a group book in: one person signs in for the whole group.
- Booking made in a different name to those who check-in.
- Odd request for room location: eg: at end of corridor, overlooking car park, next to fire exit or lift. Requests interconnecting rooms.
- Controlling ID of accompanying person.
- Behaviour: controlling or dominating towards accompanying person.
- Behaviour of accompanying person: submissive, doesn't speak, no eye contact, appears subdued.
- Limited or excessive baggage and request for assistance declined.
- Refusing to leave credit card imprint and willing to pay in cash for multiple nights in advance.
- Noise complaints by other guests.
- Adult guests who appear secretive about their visit or trying to conceal that they are with a young person or are buying alcohol for someone who you suspect is under 18 years old.
- Numerous adults and young people coming to the hotel who don't appear to have a reason for being there.
- Guests arriving and asking for a specific room number without knowing the name of the person who the room is booked under.
- Young people with boyfriends/girlfriends who seem to be much older.
- Use of porn channels in rooms with children.
- Pre-paid bar tab to a room where children stay.
- Guests extending their room reservation one day at a time and continuing to pay in cash.

Guest movements in hotel

- Suspicious behaviour of controlling person: sat in front of lifts for long periods of time.
- Receiving unusual number of visitors in public areas and/or in their rooms.
- Guests who move in and out of the premises regularly at unusual hours.
- Young people loitering in public areas including the restaurant or bar.
- Guest arrives with or is seen with alcohol that they have purchased off the hotel premises and not from the hotel bar, especially if minors or young adults are known to be present in their hotel room.

Housekeeping and Maintenance

- DND for duration of stay but lots of requests for towels and amenities.
- HSK clean: guest rooms found to contain lots of excessive rubbish, smoking and drug paraphernalia, excessive amount of condom wrappers/waste, and evidence of filming equipment.
- A stream of visitors to a guest room, despite DND.
- Excessive noise or evidence of parties.
- Requests for extra towels and/or bedding.
- Refusing services of daily room attendant.
- Lack of luggage in room.
- Evidence of children and alcohol/drugs/smoking/condom wrappers and waste.
- Unusual activity on the corridors: guests on corridors at times when wouldn't usually see guests.

Room Service

- Request for alcohol where minors are present.
- Request for food from child menu at odd times.
- Frequent room service requests paid for by cash.
- Room service attendant refused entry to the room when delivering order.

What to do for a potential incident of Modern Slavery or Human Trafficking

1. Staff Member witnesses an indicator of possible human trafficking.

- What has happened? Collect information and whatever facts are relevant from the noted indicator.
- Record the information in the indicator log.
- Notify your designated anti-trafficking champion / duty manager

2. Anti-trafficking champion / duty manager continues to observe the situation.

- Refer to the indicator log as appropriate and inquire as to whether multiple indicators have been observed related to the same person.
- When the indicators reach the pre-agreed level of severity, it is deemed an “incident.”

3. Anti-trafficking champion / duty manager / crisis team enacts the incident management process.

- Consider elements like whether the person in question is in immediate risk of harm or whether s/he is still on the premises.
- Contact the police and/or relevant victims service provider as appropriate.
- Follow the process as part of the general crisis management procedure.

4. Anti-trafficking champion / duty manager follows up with the staff member who first reported the indicator.

- Ensure that s/he is commended for and assured that the process followed was correct.
- See whether any follow up with the relevant staff member is needed (if they feel shaken up, for example).

5. Crisis team informs head office and other relevant contacts.

- All contacts, as identified in your crisis management procedure should be contacted as soon as possible. This may include head office, the brand of the hotel and a communications contact to handle any potential PR.
- Keep records of the incident as well as the police case number in case any follow up is made.
- Review how well the process was followed and how effective the process was, and feedback accordingly.

Combating Human Trafficking

Case Study Five

Victim: Osama, 35- year old Bangladeshi male in the UK

Type of Trafficking: bonded labour



Osama's Story:

I thought things were really looking up for me when I heard from a good friend that a businessman he knew in Scotland was looking for men to work for him in his Highlands hotel. The wages I was earning in Bangladesh hardly covered day-to-day living costs so this promise of a new start in life in the beautiful Highlands of Scotland was so attractive to me and my family. The hotel owner requested a deposit of £18,000 in exchange for a job as a chef and a good salary. I managed to take out a loan from a local money lender and to scrimp and save what I could from my wages. My wife even sold her jewellery and her family lent me some of the savings they had accrued. With my deposit in hand and enough money for a flight to Scotland, I left Bangladesh excited for my future and dreaming of one day building up my own business just like the hotel owner I was to work for.

I was forced to work really long hours at the Stewart Hotel – sometimes starting at 5am and not finishing until after midnight- and on tasks not just as a chef. In the first month of being in Scotland, as well as working in the kitchen I had to paint the hotel, clean some of the bedrooms and I even spent two days cutting and moving logs in the hotel grounds when it was below freezing outside. Arefin barely paid me – sometimes not at all, and I had to live in a broken caravan with four or five other men. There was no water or heating and it was damp as the window was broken. I was terrified working for him. He was like a master and we were like the slaves. He had a terrible temper and would throw plates. Once, when someone was a few minutes late, he threw a pot of hot oil on the floor at our feet. He had control over us. He said he would send us back to Bangladesh. He has important relatives and I was very scared what would happen if we were sent back.

My meagre salary left me struggling to clear my debt at home (a burden that continues even today). The people that I had loaned money from in Bangladesh even threatened to remove one of my kidneys to sell it for cash as a repayment. The whole experience has left me so emotionally scarred, I missed my family so badly all the time I was in Scotland and I feel that I have let them down so badly. I was on anti-depressants and now I have counselling. I don't know if I'll ever get back to normal.

Combating Human Trafficking

Case Study One

Victim: Karla, a 22-year old female trafficked in Denmark.

Type of Exploitation: forced criminality



Karla's Story:

I thought I was lucky to have been promised the opportunity to work in a smart city centre hotel in another part of the country. I got the job offer through a distant relative who took me to the city and introduced me to a group of 'her' business associates. They were very kind at first and I was excited. I soon realised that things were not actually what was promised. At the beginning, they helped me with some basic training and to apply for a job at the front desk of a hotel. They also made sure I was presentable so that I could go for an interview. With the CV they provided me, complete with references I got the job. The hotel took my address from the CV. It wasn't my real address, but I guess no one from the hotel ever checked. I also provided the hotel with details of a bank account that my wages were paid into. I wasn't able to access that account to get hold of any money, but I guess nobody checked for that either. Who would give their employer a bank account that they can't access? At least the hotel provided meals during my shifts so I didn't go hungry when I was working. I ate as much as I could on every shift.

At work, I followed my orders from the traffickers. I began to change non-commissionable room reservations into ones booked by the traffickers 'fake' travel agency so that the commission could be paid directly into their bank account. However many reservations I changed, the traffickers always wanted more. I started to volunteer to work extra shifts, so I could change more reservations. I knew it was risky so I tried to keep to myself. I didn't go to any staff social functions but volunteered to cover other employees' shifts instead. When colleagues offered me a lift home after work, it was easy to have them drop me off on the street corner where the traffickers always picked me up.

don't know why I kept doing what I was doing. I felt trapped and had nowhere else to go. I was afraid of what the traffickers might do to me. Their plan was to have me apply for the same job in a bigger and better hotel as soon as one became available so they could make more money on each reservation I changed. It was almost a relief when the hotel discovered what I was doing and called the police. When I was arrested, the police were really only interested in the crime I committed, not my story. They kept me in jail though, as I had no fixed address or any means of support. At least I felt safe from the traffickers there. It was only when the case went to court that my true story came out and with it, the story of several others, like me. It seems that these traffickers had quite a big business going across the city. We were their hidden employees really, working hard for them while employed by the hotels; working hard to cheat the local hotels and feed funds into the traffickers' bank accounts

TACKLING MODERN SLAVERY AND HUMAN TRAFFICKING - CALL TO ACTION

Our hotel, strives towards running our business in a socially responsible way. We work to tackle modern slavery and human trafficking within our organisation and across the industry.

WE ARE COMMITTED TO:

- Raising awareness of this issue by making our commitment to tackling it public and readily available to guests, staff and business partners.
- Ensuring that our property is not used for exploitation in any of its forms.
- Informing and equipping all of our employees to tackle this issue and ensuring they are protected from exploitation themselves.
- Ensuring that there is human trafficking does not exist within our supply chains.
- Ensuring decisions made by our corporate teams are in line with this commitment.

WE DO THIS BY:

RAISE AWARENESS

- Displaying our commitment publically in the lobby area, bedroom area etc.
- Conducting awareness raising workshops with all of our employees.

BE INFORMED

- Helping all staff understand how they can be vigilant in tackling trafficking in their role.
- Putting systems in place to swiftly respond to incidents in a victim-centred way.

DO RESEARCH

- Carrying out exposure mapping of our supply chains.
- Raising the issue with our suppliers and working with them to tackle it.

BE PREPARED

- Amending any relevant HR policies, procedures and handbooks to include best practice of tackling human trafficking.

EVALUATE

- Reporting, monitoring and evaluating our approach on a regular basis.

SUPPORT OTHERS

- Leading in the community by seeking other innovative ways to support those tackling human trafficking in our region.

TACKLING MODERN SLAVERY AND HUMAN TRAFFICKING - CALL TO ACTION

Modern Slavery incorporates:

- Human trafficking
- Forced labour/debt bondage
- Forced labour
- Sexual exploitation
- Criminal exploitation
- Domestic servitude

Implications for the hotel industry of human trafficking:

- Use of hotels for sexual exploitation of children and adults.
- Staff, in particular, those recruited or subcontracted via unscrupulous agencies, being victims of bonded or forced labour.
- Products and services supplied to the hotel being produced by forced or bonded labour, labour exploitation and unethical labour practices.

Raising awareness of human trafficking: guests

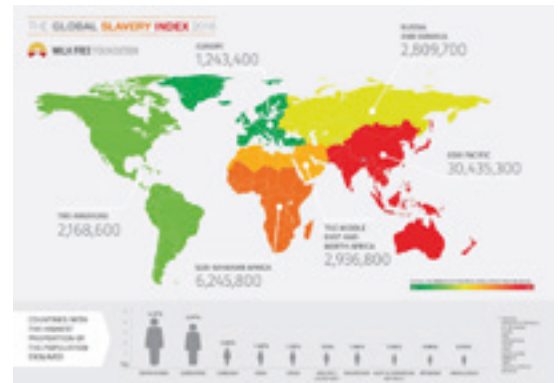
- A teenage girl uses cash to rent a room with an older man.
- An older man rents a room, with a young girl, and is always present when she has dealings with staff.
- A string of men enter and leave a particular room throughout the night, each staying for a short time.
- A group of young women enter the hotel saying they are waiting for a man to join them, you suspect they may be prostitutes - they are victims, not criminals.
- A guest requests a room overlooking the car-park or next door to a fire exit.

Raising awareness of human trafficking: staff

- Checks on right to work documents to ensure that the staff member is who they say they are and that the documents are presented by that person.
- Bank account is in a person's name and there are separate bank accounts for all staff members.
- Being aware of the behaviour and appearance of staff members.

Raising awareness of human trafficking: suppliers

- Audit of suppliers to ensure that our supply chains are free from modern slavery.
- Implementation of the Supplier Code of Conduct.




There are an estimated 40.3 million victims of modern slavery in the world today.

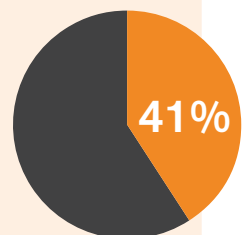
In Europe, there are an estimated 115,140 victims of modern slavery in the hospitality sector annually.

**IF YOU SUSPECT IT,
REPORT IT!**

HUMAN TRAFFICKING IN UK HOSPITALITY INDUSTRY

 **7 victims** of forced labour came from the bar or restaurant sector

41% of victims were trafficked for sexual exploitation. 44 people in hotels.



Training Course Evaluation

Course:	Human Trafficking Modern Slavery Awareness Training	Tutor:	
Name:		Date:	

Thank you for attending the above course and we hope that you found it both beneficial and rewarding. To help assess the performance of the course please complete the information below:

1. Why are you attending?

At your request Personal Development At your managers request Promotion

On a scale of 1 to 5 (with 1 being minimal and 5 being advance) please rate your knowledge of this subject before you attended the course.

5 4 3 2 1

On a scale of 1 to 5 (with 1 being minimal and 5 being advance) please rate your knowledge of this subject after today's training.

5 4 3 2 1

Do you feel confident with the reporting process as outlined during the course? Yes No

If you answered 'no' above, please outline your concerns:

Please circle below any words that best describe how you felt on the course:

Experience:

Intimidating Fun Motivating Scary Boring

Others (please state):

Content:

Too short Informative Too much paper work Useful

Factually Challenging Too hard Too long Too easy Relevant

Others (please state):

Tutor:

Good Approachable Clear Knowledgeable Unorganised

Friendly Confusing Professional Fair At the right level Rushed

Others (please state):

Which part of the course was the most useful or valuable?	
Which part of the course, if any, could be improved?	
What did you learn that was new?	
What else could be included?	

Application of Skills in the Workplace: Please state 1 initiative that you will implement back at your workplace.

Modern Slavery and Anti-Trafficking Quiz

The purpose of this quiz, is to measure the retention of knowledge within the team following their training. It should be issued three months after the initial training, thereby allowing any shortfalls to be addressed.

1. Modern slavery no longer exists.

- True
- False

2. When a person is coerced, forced, or deceived into prostitution, or maintained in prostitution through coercion, that person is a victim of: Tick all that apply.

- Exploitation of minors
- Human trafficking
- The 'Game'
- Sexual violence

3. In what ways are hotels at risk of modern slavery? Tick all that apply.

- Use of hotel rooms for sexual exploitation of adults and children.
- Staff recruited by unscrupulous agencies being debt bonded.
- Products and services supplied to hotels being produced by forced labour.
- Hotels have no risk of modern slavery.

4. Which of the following are behaviours or signs a trafficker might display? Tick all that apply.

- Dresses inappropriately
- Pays only in cash
- Controls all money and ID
- Seems disorientated
- Insists on little or no housekeeping
- Waits whilst other men or adults visit the room
- Requests alcohol to room with minor present
- Calls accompanying person 'daddy or mummy'

5. Trafficking has no effect on the safety or security of guests and employees, nor does it impact the hotel's reputation.

- True
- False

6. Draw a line from the staff position on the left hand column, to the corresponding indicator the staff member might observe.

Receptionist	Request for alcohol where minors are present.
Restaurant Waiter	Numerous adults and young people coming to the hotel who don't appear to have a reason for being there.
Bar Attendant	Guest rooms found to contain lots of excessive rubbish, smoking and drug paraphernalia, excessive amount of condom wrappers/waste.
Concierge	Does not let the victim control the money or speak
Housekeeper	Request for food from child menu at odd times.
Maintenance Engineer	A stream of visitors to a guest room, despite DND

7. Which of the following behaviours or signs might a victim of trafficking display? Tick all that apply.

- Branding Tattoos
- Seems Disorientated
- Possesses numerous phones
- Wears revealing or inappropriate clothing for their age
- Uses violence or intimidation
- Seen with many people older in age than them
- Buys lots of treats for the person they are accompanied with
- Subdued if sitting on own – doesn't answer to their name

8. If you suspect something suspicious, you should do what?

- Think - that's strange, but do nothing as it may be innocent and cause embarrassment
- Think - I suspect it, I must report it
- Think - I should try and approach 'the victim' to ask if he or she needs help

9. If you are an employee that suspects an instance of trafficking, what should you do?

- Confront the trafficker
- Call the local police
- Contact the most senior manager of duty, so that they can follow the company procedures
- Try to get the victim alone

10. Once the guests have left the hotel, if you see something odd in their room, or realise there was more than one indicator, we don't need to report it as it is no longer the hotel's responsibility.

- False – often the final indicator can be evidence within the room, and we may not fully realise until this indicator is observed. I suspect it, I must report it!
- True – once the guests have left it is no longer the responsibility of the hotel, they have left and no crime is reportable.

11. The company has protocols in place to mitigate risk of staff member exploitation, but we must be aware of indicators that a team member could be a victim. Tick all that

- Legal documents indicating right to work are not given in the agreed timescale
- The member of staff doesn't have a personal bank account.
- A group of staff all have the same bank account.
- The behaviour of the staff member is withdrawn or appears frightened, they don't speak for themselves and rarely interact with other colleagues in work or externally.
- Unusual travel times: victims may be dropped off/ collected for work on a regular basis either very early or late at night.

Our Commitment to Tackle Human Trafficking

[X hotel] is a hotel company [add in information about the business]. We strive towards running our business in a socially responsible way. This is core to our mission. We continually engage in dialogue with stakeholders across the industry and in government and civil society in order to reach collaborative solutions to some of the common critical social issues of our time.

Our current commitment is to bring about a model to tackle modern slavery and human trafficking within our organisation and across the industry.

OUR INDUSTRY: The hotel and hospitality sector employs over 4.4 million people and contributes over £143 billion to the UK economy. The UK National Crime Agency states that traffickers and organised criminals look for ways to exploit this. We believe businesses need to take a stand and play a leading role in addressing some of the key risk areas within the industry, including hotel usage, employment and supply chains.

OUR RESPONSIBILITY: We recognise that we have a responsibility to play a critical role in increasing awareness and taking what positive action we can to prevent this horrific crime.

OUR APPROACH: We take a zero tolerance approach to human trafficking within our spheres of influence. However, we recognise that eliminating human trafficking is a long, complex process that can only be fully realised through constructive partnerships with law enforcement at all levels, governments, civil society organisations, communities, including our employees and customers, and business across industries. We also recognise that victims and potential victims must be put at the centre of our work. To demonstrate our absolute commitment we are:



It is imperative that all of our hotels obey the law and ensure that their operations comply with relevant standards of ethics and business conduct. It is our obligation to reinforce throughout our networks and value chain the message that illicit activity like human trafficking not only puts our reputation at risk, but also has the potential to endanger our employees and guests.

If you would like to assist us in this important work, please contact us at [add in contact information].

Contact Details

Please note that this is a Blueprint drawn from best practice, is for example purposes only and is intended to be used by individuals and businesses within the hospitality sector. It is highly recommended that you consult with experts and adapt this to your own circumstances, business, and context. Human trafficking and modern slavery manifests differently in different locations and it is important to be mindful of the nuances. We are not responsible for any loss, damage or expense resulting from reliance on this Blueprint.

This Blueprint was initially trialled in a group of hotels, with its implementation coordinated and supported by Shiva Foundation. If you have any questions or feedback on this Blueprint and related documents or about this work more broadly, you may contact Sian Lea at Shiva Foundation on sian@shivafoundation.org.uk.