



Stop Slavery Blueprint

This document is intended for the internal use of hotels and other stakeholders in the industry. It has been created as a template with recommended action throughout to set up strong processes and protocols to address risk of modern slavery within your business and supply chains. The Blueprint can be adapted by individual managers, department heads and teams as appropriate to better suit the nuances and needs of your organisation. It is important that senior management be ultimately responsible for any processes or policies put in place and that efforts are regularly monitored for effectiveness. We hope to continue adapting the Blueprint in line with best practice and we welcome feedback, constructive criticism and new partnerships to improve this work.

Signed and approved by senior level executive

Signature:

Name:

Date:



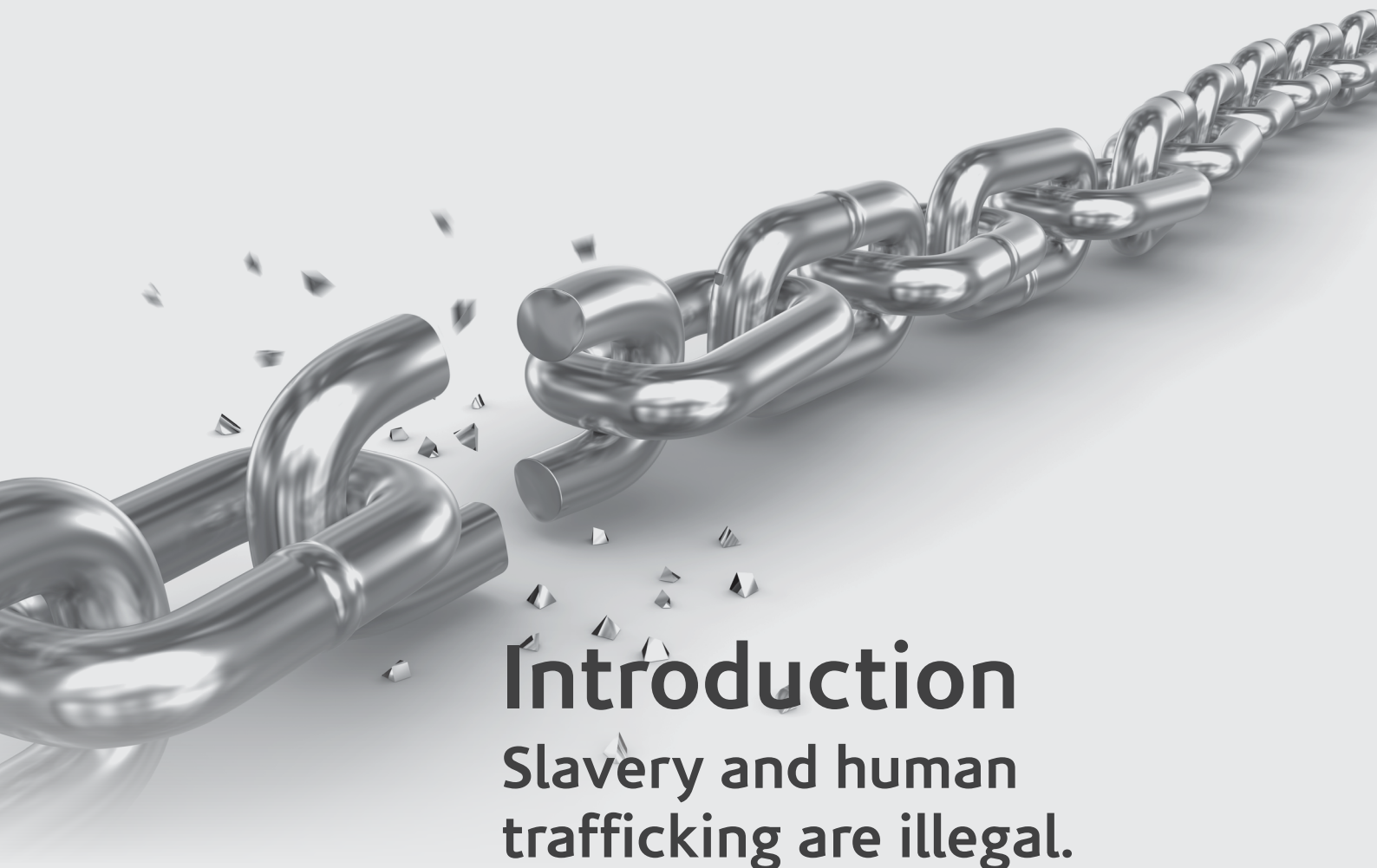
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I am pleased to see Shiva Foundation taking the lead on tackling modern slavery and human trafficking within the hotel sector. This Blueprint is a robust guide for hotels to take action and I hope to see many within that sector taking it up, and other sectors following the leadership this displays to protect vulnerable people from exploitation.

Kevin Hyland,
UK Independent Anti-Slavery Commissioner



Introduction

Slavery and human trafficking are illegal.

Yet, there is an estimated

40.3 million

people trapped in modern slavery in the world today.

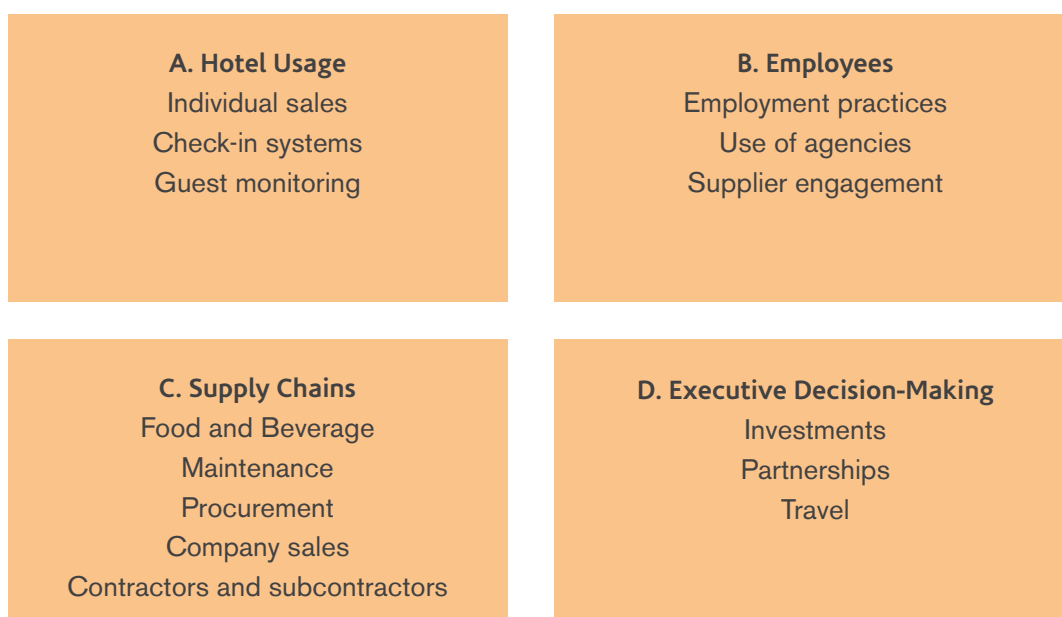
1.1 Background

The global demand for cheap labour fuels the trade in humans and market forces create both the supply and the demand for these people. The hotel and hospitality sector employs 4.49 million people (10% of total workforce) directly and contributes £143 billion to the UK economy. The National Crime Agency states that traffickers and organised criminals look for ways to exploit this. Hospitality businesses need to take the lead in the fight against modern slavery and human trafficking (herein referred to as “**human trafficking**”).

This Stop Slavery Blueprint (the “**Blueprint**”) sets out the key principles that shall be embedded into [X Hotel] as part of its fight against human trafficking. It provides guidance and recommendations in the form of:

- Policies and practices
- Procedures and protocols
- A checklist of suggested actions

These shall be adopted across hotels and across departments. The Blueprint provides further specific guidance for individual managers, department heads and teams where appropriate. Please see Annex 1 at the end of this Blueprint for an easy-to-reference checklist. The guidance focuses on the following key risk areas based on the risk matrix in Annex 2 at the end of this Blueprint:



The Blueprint also sets out guidance on transparency, reporting, performance measurement, business partner engagement, risk assessment, business authentication, and investigation and remediation. Employees can refer to the relevant sections below for further information or contact their manager to discuss these policies in further detail.

The Blueprint also sets out recommendations for how individual hotels may:

1. Raise awareness about the issue of human trafficking, inspiring other businesses and individuals to investigate and improve their work in this area;
2. Provide support to organisations working to prevent and alleviate the consequences of human trafficking.

General Managers shall familiarise themselves with this Blueprint and associated documents to help in the identification and prevention of human trafficking and to conduct business in a manner such that the opportunity for and incidence of human trafficking is prevented. A commitment to implementing the recommendations contained within this Blueprint shall be included in company handbooks and staff reading materials as appropriate.

Note that this Blueprint is not a static document. It is meant to evolve over time as further information, data and knowledge is gathered about human trafficking in the hotel industry. Any feedback, constructive criticism and new partnerships to improve this work are welcome - please discuss with your manager for further details.

1.2 Definitions

For the purposes of this Blueprint, the definition of modern slavery, in keeping with the UK Modern Slavery Act 2015, includes:¹

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

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.

Note, throughout this Blueprint, the term human trafficking refers to trafficking for both sexual exploitation and forced labour.

¹ This definition is extracted from the widely accepted UN Palermo Protocol definition of human trafficking: Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation or the forced prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. Source: United Nations Office on Drugs and Crime.



Commitment to Tackle Human Trafficking

[X Hotel's] public commitment to tackle human trafficking and to eradicate slavery throughout its operations and supply chains is contained in 'Our Commitment to Tackle Human Trafficking'.

Our hotel(s) shall:

- ☐ Share this statement internally with their entire staff and include it as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint.
- ☐ Display this statement publicly in the lobby areas.
- ☐ Display this statement in bedrooms either as part of the printed information packs, on the TV screens or using another appropriate method.
- ☐ Ensure that a copy of this statement is accessible to staff on a daily basis, for example on the staff room notice boards.
- ☐ Incorporate the statement into the hotel's vision, mission, value statement, departmental goals and any other relevant strategic and employment documents, as appropriate.



Policies and Practices

Our commitment to tackle human trafficking shall be integrated throughout our policies, practices and decision-making procedures. By incorporating the position statement on trafficking into each hotel's vision, mission, value statement and goals, the commitment shall be fed down into every policy, hotel and department.

Further detail is provided below on specific policies and practices for each of the four key risk areas. Individual hotels shall incorporate these into their internal policies and practices. Hotels are given the autonomy to do this in a way that best integrates with their existing processes but must adhere to the overall aim of the Blueprint.

3.1 Hotel Usage

Hotels can be subject to a particular risk of human trafficking when it comes to use of facilities. In particular:

- Hotels may be used for sex trafficking where victims are compelled to provide commercial sex to paying customers.
- Victims may be forced to stay at a hotel where customers come to them (in-call), or they are required to go to rooms rented out by the customers (out-call).
- Victims might stay in hotels with their traffickers while moving to locations.

Our policy to tackle such risks is contained in the '**Hotel Use Policy**' which sets out guidance on how employees can ensure that property and services are appropriately used by others.

Adhering to these principles helps us maintain the respect and confidence of our business partners and customers.

Each individual hotel within our portfolio shall:

- ☐ Share this policy internally with their entire staff and include it as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint. Alternatively, incorporate the policy into existing hotel documents.
- ☐ Ensure that a copy of this policy is accessible to staff on a daily basis, for example in the staff room, in particular to the Sales and Front of House teams, and to those who service guest bedrooms.
- ☐ Incorporate the full policy into the hotel's internal policies and documents, as appropriate, including any policies on sales, check-in/check-out and guest assistance.

3.2 Employees

[X Hotel] believes in affording all employees basic human rights and employment rights treating them with dignity and respect, providing a safe and healthy work environment for all employees, not using employees under the legal age for employment, and protecting children from any type of labour that may be hazardous to their health or interferes with their education.

Key human rights issues for the hotel industry include fair wages, migrant worker rights, agency employment, ability to join trade unions and collective bargaining. [X Hotel] shall not in any way participate in or condone practices that breach laws covering these issues and shall work to reduce the prevalence of such problems, and strengthen local communities by running a responsible business. [X Hotel] recognises in the case of migrant workers, that legal status could be used as grounds for discrimination; any worker who is the victim of a crime will have the same right to report their abuse freely. Likewise women can be particularly vulnerable to human trafficking; we are committed to encouraging equality and eliminating unlawful discrimination on the basis of gender.

[X Hotel] shall comply with local laws regarding work hours and payment, and ensure that employees have the ability to communicate their voice as an employee. In addition to formal guidance, we seek to maintain a culture that supports the well-being and inclusion of all employees and is committed to encouraging a positive working environment. We recruit employees without regard to race, sex, pregnancy and maternity, civil partnership status, gender reassignment, disability, religion or beliefs, union organisation, age, sexual orientation or any other characteristic protected by law. Specific guidance is contained in the '**Best Practice Commitment on Employment and Human Rights**' and the '**Guidelines for Establishing Terms and Conditions with Recruitment Agencies**'.

In particular, we support the elimination of forced labour, prison labour, indentured labour or exploited bonded labour and the freedom of association and the right to communicate their voice as an employee. We recognise that subcontracted employees can also be vulnerable to exploitation and therefore we also require any employment agency we contract with to sign our '**Supplier Code of Conduct**'.

Each individual hotel within our portfolio shall:

- ☐ Incorporate the best practice commitments into the hotel's internal policies and documents, as appropriate, including the Staff Handbook, HR Manual, Job descriptions, Application packs, and Welcome pack.
- ☐ Draw employee's attention to any changes made in policies and documents as a result of this incorporation and ensure such commitments are included as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint.
- ☐ Ensure that a copy of the relevant policy containing these commitments is accessible to staff on a daily basis, for example in the staff room, in particular to the human resources and recruitment teams.
- ☐ Ensure that any indirect and direct employment is carried out in line with the relevant policy containing these commitments.

[X Hotel] shall commit to adhering to the principles of implementation contained within these policies.

3.3 Supply Chains

We recognise our responsibility to ensure sound social and ethical practices within our own operations and within our supply chain in every market in which we operates. We acknowledge that every individual supplying goods or services to our hotels deserves the right to live in dignity and in a safe environment. Moreover, we understand that when individuals are treated with respect, both they and their companies benefit from increased commitment and productivity. To address this, our **'Supplier Code of Conduct'** defines our minimum standards and basic principles of cooperation that we expect from all of our suppliers.

Due to the complex nature of our global supply chain, it would be impossible at this stage for us to monitor or control the working conditions of each and every individual who contributes to supplying our hotel. We are determined however to do everything we can to bring responsible sourcing practices to all stages of our supply and value chain.

The principles set out in the code of conduct require all of our suppliers to ensure their facilities meet clear standards and that they apply the same principles within their own supply chain. This code of conduct constitutes minimum and not maximum standards and shall not be used to prevent suppliers from exceeding these standards. Suppliers applying this code of conduct shall be expected to comply with national and other applicable law and, where the provisions of law and this policy address the same subject, to apply that provision which affords the greater protection to the workers.

[X Hotel] is fully committed to implementing this code of conduct throughout the supply and value chain, working towards meeting a target to source all critical products and services sustainably and we shall require the support of all of our suppliers to achieve this goal.

We understand that improving social and ethical standards in the supply chain is a challenging process that requires the cooperation of our employees, suppliers, business partners and other stakeholders. We also recognise that compliance to the code of conduct may not be immediately achievable, but we are committed to working collaboratively towards this goal. The principles of implementation contained in the code of conduct recognise this challenge and set out a process of continuous improvement with the ultimate objective of achieving compliance.

A company may choose to set out the internal criteria to consider when working with a supplier and determining when it is appropriate to terminate the relationship.

Each individual supplier that enters into a contract with [X Hotel] shall be:

- ☐ Provided with a copy of this code of conduct.
- ☐ Required to read and have a copy of this code of conduct signed by a senior officer of the supplier.

Each individual hotel within our portfolio shall:

- ☐ Share this code of conduct internally with staff members who deal with procurement at any level and include it as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint.
- ☐ Ensure that a copy of this code of conduct is accessible to relevant staff on a daily basis.
- ☐ Follow an approved action plan on how to approach suppliers regarding this code of conduct.
- ☐ Provide a copy of this code of conduct to each individual supplier that enters into a contract with the hotel.
- ☐ Require each individual supplier that enters into a contract with the hotel to read and sign a copy of the code of conduct.

This code of conduct shall apply to all types of supplier relationships including, as appropriate:

- 1 At the design and building stage with the franchisor, the professional team and the building contractors.
- 2 At the decor stage with the furniture, fixtures and equipment suppliers.
- 3 At the move on-site stage during purchasing of operational items as well as food and beverages.
- 4 At the operational stage with any employee or service agencies.

[X Hotel] commits to adhering to the principles of implementation contained within the code of conduct.

3.4 Executive Decision-Making

Our business objectives shall also comply with our commitment to preventing human trafficking within our work. This means the head office team, when making broader strategic decisions, shall be required to comply with the '**Head Office Guidance on Human Trafficking**'.

Hotel executives shall:

- ☐ Share the Guidance on Human Trafficking and this Blueprint internally with all employees at the executive level;
- ☐ Share the Guidance on Human Trafficking and this Blueprint (or the general objectives contained within this Blueprint) with any existing or potential business partners;
- ☐ Incorporate the objectives of this Blueprint and of the Commitment on Human Trafficking in the broader business objectives for [X Hotel];
- ☐ Ensure that a copy of this guidance is accessible to employees at the head office on a daily basis;
- ☐ Follow the Guidance on Human Trafficking and adhere to principles of implementation contained within any other policy on human trafficking.

At this stage, we are not able to conduct a deep dive beyond our first and second tier to reach all levels of suppliers, and therefore we cannot guarantee that all hotel operations are completely free of modern slavery. However we promote best practice and putting processes in place to adhere to it. Likewise, we cannot guarantee that all of the practices of our subcontractors are modern slavery free, but we can require them to adhere to the principles laid out in this Blueprint.



Procedures and Protocols

In the UK, mechanisms are in place to assist victims of human trafficking once identified. Where employees identify a potential victim, they shall follow a specific internal procedure, as set out below, in order to protect the safety of that individual and in order to comply with UK law.

4.1 Prevention Protocols

Our prevention protocols are set out throughout this Blueprint and related documents. It is vital that all employees familiarise themselves with these protocols.

Anti-Trafficking Champions (General Managers, unless otherwise agreed) should monitor areas of risk as set out in this Blueprint on a regular basis in line with the guidelines provided and report anything unusual to the Anti-Trafficking Committee as appropriate via incident reporting protocols and regular General Manager meetings. Anti-Trafficking Champions are also encouraged to take a proactive approach, in consultation with head office, to corrective actions in order to mitigate any risks or broader impacts.

An **Anti-Trafficking Committee**, consisting of the key representatives from head office, will be formed and meet twice a year in order to report any ongoing challenges, patterns or concerns. Representatives from a relevant NGO or service provider should chair this committee. The committee should review the annual self-assessment reports and industry benchmarks to recommend changes and

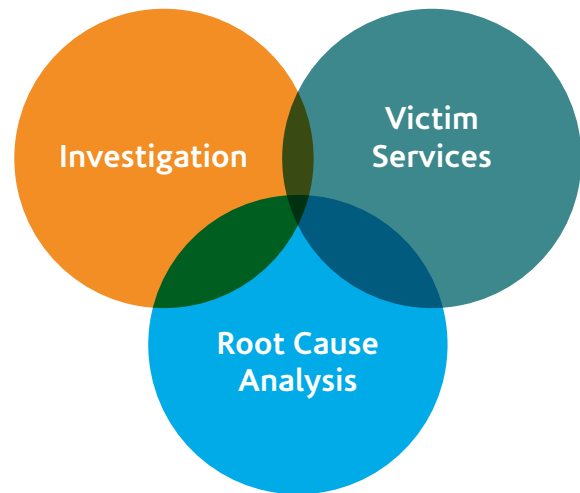
improvements. General Managers and Anti-Trafficking Champions feed into the Anti-Trafficking Committee through regular Health and Safety meetings.

4.2 Reporting Protocols

We promote a culture of openness through clear communication, honesty and integrity, inclusion, mutual trust and respect, teamwork, constructive positive attitude, a supportive and non-blaming culture and one where people want to work for us. As part of this culture, concerns from any employee regarding the guidance set out in this Blueprint, and documents referenced herein, or the law, must be raised with the directors at the earliest opportunity. We have established reporting protocols for employees who suspect a situation of human trafficking which are outlined in the '**Anti-Trafficking Reporting Protocols**' document.

4.3 Remedy Protocols

After an incident has been reported, remedy involves three key steps which are outlined below.



Investigation: Any investigation beyond the initial report should be performed by local police and victim service providers, with the full support of head office and the Anti-Trafficking Champion, in order to protect the victim(s), employee(s), and the business. It is recommended that an investigation of a report made about staff be done in conjunction with the internal disciplinary procedure. For example, confidentiality should be maintained and the staff may be suspended while the report is being investigated.

Victim Services: If an investigation confirms probable incidents of trafficking, Anti-Trafficking Champions should work in cooperation with a local specialist victim service provider to ensure that the victim is protected and aware of all options for access to remedy (judicial and non-judicial). Our hotels will work to ensure that victims of trafficking can continue their employment at the hotel where possible.

If the victim does not want the police to be called, there are confidential 24/7 options. Advisable contacts for victim support in the UK are the Salvation Army (0300 303 8151) and the Modern Slavery Helpline (08000 0121 7000).

Root Cause Analysis: Our hotels endeavor to analyse the root causes for the incident and why the incident involved the business or employees. If applicable, and depending upon the severity of the incident, our hotel may give written warning notice or notice of termination to employee, supplier, contractor, or subcontractor that has violated policy. If applicable, we aim to make improvements that will prevent future incidents. Where an incident is reported by a supplier, hotels are encouraged to have a plan in place to address the root cause within a certain timeframe. The plan may include having a meeting with the relevant supplier making clear what steps should be taken to rectify any outstanding concerns.

Each individual hotel within our portfolio shall:

- ☐ Share the details of the protocols internally with their entire staff and include it as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint;
- ☐ Ensure that a copy of these protocols is accessible to staff on a daily basis, for example on the staff room notice boards;
- ☐ Incorporate the protocols into the hotel's existing procedures and documents (such as crisis management policies, emergency policies, health and safety policies, job descriptions, staff handbook) as appropriate.



Exposure Mapping

As outlined in more detail across different sections in this Blueprint, as part of our initiative to identify and mitigate risk in the short term, hotels shall adopt the following control measures:

- **Relationships:** where possible, build and maintain longstanding relationships with local and trusted suppliers, making clear our expectations of business behaviour.
- **Employment:** Where possible, recruit, vet and employ employees directly, following clear company policies and guidelines.
- **Compliance:** Ensure compliance with current legislation and guidelines by embedding both into the day-to-day of the hotel's work. This includes relevant human resources provisions in law such as Working Time Regulations, and the National Minimum Wage.
- **Knowledge:** Improve knowledge base by collecting relevant data and improving transparency within the business and down the supply chain.
- **Feedback:** Promote a company culture whereby the reporting of concerns and the protection of informants is encouraged.
- **Third Party Engagement:** Build strategic alliances with independence unions, social advisors and NGOs.
- **Measurable Change:** Develop verifiable KPIs to measure progress.

Each hotel shall also carry out more detailed exposure mapping of its supply chain, which will include the three steps outlined below.

A more detailed approach for working with suppliers can be found in the '**Framework for Working with Suppliers: Mitigating Risk of Modern Slavery**' produced by the Stop Slavery Hotel Industry Network.

Step One: Identifying organisations within the supply chain

Each hotel shall identify the organisations within its supply chain, for the supply of people, services and products, across each department. Depending on the size and complexity of the supply chain there may be a number of levels to reach a primary provider. All levels that practicably can be, should be identified in the analysis, including any agents used by a labour provider to source labour in the UK or abroad.

Hotels should work with their direct suppliers in order to ensure they are taking the same steps to track and manage ethical trade risks within their own supply base. A risk based approach should be adopted throughout. A summary spreadsheet should be kept of all organisations identified within this initial analysis of the supply chain and can be used to track risk and record progress. The spreadsheet may contain information such as:

- Company name
- Address/contact details
- Key contacts
- Product/nature of service supplied/sector
- Position in supply chain
- Location
- Dates of current contract
- Previous relationship
- Supplier Code of Conduct signed
- Ethical trade competence
- GLAA licence required
- Preventing illegal working processes in place
- Health and safety processes in place
- Workers contract reviewed
- Audit conducted dates
- Improvement Action Plan in place

This information should be used to assess the potential risk of each supplier in the supply chain based on the nature of their business and the processes they have in place in order to identify and focus on those who represent the greatest risk.

Step Two: Agreeing standard, where none

An open discussion should take place with each supplier in the supply chain to establish basic requirements and assess the competence of that business to manage its workforce legally and ethically. The Supplier Code of Conduct should be used as the basis to agree a standard with suppliers.

Step Three: Work together in partnership to ensure due diligence

Hotels are encouraged to implement appropriate management processes with each of their suppliers to monitor that the standards agreed are being complied with and to establish action plans to improve performance, where necessary. A continuous improvement approach is recommended to promote joint ownership of corrective action plans and the raising of standards. Formal review meetings should be held regularly between hotels and supplier to review progress.



Training

All employees shall participate in training that:

- Provides general awareness on human trafficking and the hotel industry; and
- Details how to prevent risk of human trafficking in your specific role.

They shall also participate in regular update trainings and yearly refresher trainings as agreed with the head office.

Training sessions will be facilitated by experts, in consultation with managers, for individuals and departments throughout the business. This training shall be designed to go beyond awareness raising in order to help each employee understand his or her role in tackling this issue. Training shall be tailored by role and department to have the most impact and relevance.

Trainings should include background information on the issue, guidance to support employees with an understanding of expected behaviour, explanations of relevant policies and protocols, practical examples and more. Employees should be encouraged to raise concerns during or after these sessions. Human trafficking training sessions shall be integrated into each hotel's training course schedule and training strategy.

Where applicable, training of suppliers shall also be provided.

Reporting, Monitoring and Evaluation

Our hotel executives and management teams shall outline specific, measurable and clear KPIs in order to review progress across each area outlined in this Blueprint. These should include monitoring of, among other things:

- Employee training levels;
- Steps taken to upskill high risk suppliers, and assessing their ability to detect and mitigate modern slavery risk in supply chains;
- Actions taken to strengthen supply chain auditing and verification;
- Investigations undertaken into reports of human trafficking and remedial actions taken in response.

Head office shall also work towards publicly reporting on its policies and procedures, goals and targets, investigations, key risk areas and overall performance related to eradicating human trafficking.



Leadership in the Community

In addition to addressing the key risk areas within our business and value chain, we are dedicated to rewarding, supporting and publically encouraging our employees, executives and business partners to commit individually, within their communities and as organisations, to the fight against human trafficking.

In this respect we shall commit to the following key principles:

- We see our own values and this Blueprint as a model for change within the broader industry and corporate communities.
- We assist and support NGO partners to achieve their goals of addressing human trafficking.
- We commit to remaining actively involved in broader effort to both prevent and address the consequences of human trafficking.
- We assist and support others in the industry to achieve their goals of addressing human trafficking.

Where individual hotels would like to lead or get involved in this broader work, they may contact a local anti-slavery organisation directly for assistance in partnership with the Anti-Trafficking Committee.

If you have spotted something you would like to report, you may follow the protocols outlined in this Blueprint or contact the police and/or Modern Slavery Helpline.

Annex 1 - Anti-Trafficking Actions Checklist

✓	Action / Key Performance Indicator	Department Responsibility								
		Head Office	Senior Hotel Mgmt.	Finance	Revenue & Sales	Front Office	House Keeping	Mainten.	F&B	Kitchen
	Commitment on Human Trafficking									
	Incorporate up-to-date versions of the statement into the hotel's website and annual report.	x								
	Share up-to-date versions of the statement with business partners as appropriate.	x								
	Share the statement internally with entire staff and include it as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint.		x							
	Display this statement publically in the lobby areas.		x							
	Display this statement in bedrooms either as part of the printed information packs, on the TV screens or using another appropriate method.		x							
	Ensure that a copy of this statement is accessible to staff on a daily basis, for example on the staff room notice boards, together with a one-pager on the hotel's call to action to tackle trafficking.		x							
	Incorporate the statement into the hotel's vision, mission, value statement, departmental goals and any other relevant strategic documents as appropriate.		x	x	x	x	x	x	x	x
Policies & Practices										
	Hotel Usage									
	- Share this policy internally with the entire staff and include it as required reading, either at the beginning of their employment or on the launch date of this Blueprint or any subsequent updates of this Blueprint. Alternatively, incorporate the policy into existing hotel documents.									
	- Ensure that a copy of this statement is accessible to staff on a daily basis, for example in the staff room, in particular to the Sales and Front of House teams.		x	x	x	x				
	- Incorporate the full statement into the hotel's internal policies and documents, as appropriate, including any policies on sales, check-in/check-out and guest assistance.									

Annex 1 - Anti-Trafficking Actions Checklist

[illegible]

Annex 1 - Anti-Trafficking Actions Checklist

[illegible]

The heads of each business area (Head Office, Senior Hotel Management, Revenue and Finance, Sales, Front Office, Housekeeping, Maintenance, Food and Beverage and Chefs) are responsible for compliance in their respective departments and for their supplier relationships. Given the complexity and changing nature of this issue we have formalised internal governance of Modern Slavery and Human Rights at both operational and senior leadership levels.

Annex 2 - Risk Matrix

The below table identifies potential risk areas and/or areas of focus, organised by function.

Group Affected / Function	Directly Employed Workers	Indirectly Employed Workers	Business Partners	Customers	Local Communities
Executive Team	X		X		X
Management	X		X	X	X
Finance	X				
Sales	X		X	X	X
Front Office	X			X	X
Housekeeping		X			
Maintenance	X				
Food & Beverage Services	X				
Chefs	X				

Annex 3 - Best Practices Policies and Guidance

HOTELS USE POLICY

To incorporate into Staff Handbooks.

In line with our commitment to tackle human trafficking wherever it might occur, [x hotel] and its employees shall strictly comply with all applicable laws and regulations regarding the prevention of human trafficking, including the prevention of the use of its premises for such exploitation.

No employee may:

- use any of the hotel's facilities, resources or equipment (including the hotel premises, computers, networks and restaurants) for the purposes of human trafficking;
- allow the use by any guest of any of the hotel's facilities, resources or equipment (including the hotel premises, computers, networks and restaurants) for the purposes of human trafficking; or
- facilitate any act or related act of human trafficking.

Employees must report all potential cases of human trafficking that come to their awareness in line with the procedures and protocols outlined in the 'Stop Slavery Blueprint'.

Employees must be trained in order to identify any suspicious activity during the sales, check-in/check-out or guest assistance stages.

BEST PRACTICE COMMITMENT ON EMPLOYMENT & HUMAN RIGHTS

To incorporate into HR Manuals.

[x hotel] is committed to upholding basic human rights and supports in full the United Nations Universal Declaration of Human Rights and the International Labour Organisation Core Conventions. We are committed to working towards embedding the following policy, as guided by UK employment law, into our existing policies and documents as appropriate.

1. Employment

- 1.1. We will not use forced, bonded, indentured or involuntary prison labour.
- 1.2. We will ensure that all work performed by our employees and subcontracted employees will be on the basis of a recognised employment relationship established through national law and practice.
- 1.3. We will not avoid our obligations to our employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes.
- 1.4. We specifically commit to prohibiting the following types of behaviour in our direct employment practices and in our indirect employment practices (e.g. when recruiting through an agency):
 - 1.4.1. Deceiving employees or making false promises about terms or types of work.
 - 1.4.2. Failing to provide contracted employees with a contract or a document outlining key terms, as required under Section 1 of the Employment Right Act.
 - 1.4.3. Changing the terms of employment to be less favourable to the employee without notice.
 - 1.4.4. Deducting or withholding paychecks or imposing financial penalties on employees, including employees who quit, unless specified and agreed to in their employment contract or Staff Handbook.
 - 1.4.5. Forcing employees to live in employer housing and/or charging unreasonable prices for rent or food.
 - 1.4.6. Inducing indebtedness by falsifying accounts, charging inflated prices, reducing value.
 - 1.4.7. Requiring workers to lodge financial deposits.
 - 1.4.8. Confiscating employee ID and/or travel documents such as visas or passports.
 - 1.4.9. Abusing (including sexual and psychological harassment) or threatening to abuse an employee.
 - 1.4.10. Depriving employee(s) of food, shelter, or other basic necessities during their working day.
 - 1.4.11. Restricting freedom of employee movement.
 - 1.4.12. Using the personal information of an employee inappropriately.
 - 1.4.13. Requiring child labour that prevents or interferes with school attendance.

2. Freedom of association

We recognise that our employees, without distinction, have the right to join or form trade unions or other comparable, employee organisations of their own choosing. We recognise their right to express their views and will provide reasonable opportunities for them to do so.

3. Working conditions

We will, to the best of our ability and in line with our Health and Safety Policy, endeavour to:

- 3.1. provide a safe and hygienic working environment at all times.
- 3.2. maintain a record of health and safety incidents with an action plan to improve performance by minimising the causes of hazards in the working environment.
- 3.3. provide regular and recorded health and safety training to our teams.
- 3.4. ensure all our employees have access to clean toilet facilities and potable water while at work.
- 3.5. assign responsibility for health and safety to a senior management representative.

4. Child labour

- 4.1. We will comply with all relevant child labour laws and not employ individuals who are under age in the UK, or outside of the UK, as designated by ILO conventions.
- 4.2. We will maintain appropriate documentation and systems to prevent taking children into our employment directly or indirectly.

5. Fair wages

- 5.1. In the UK, we will comply with the minimum wage and outside the UK will ensure that wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards or industry benchmark standards.
- 5.2. We will pay overtime at an overtime rate or in equivalent days in lieu.
- 5.3. We will provide all our employees with written information in respect to wages before they enter employment.
- 5.4. We will not make deductions from wages, except as permitted by law or in accordance with the worker's contract

6. Working hours and annual leave

We will comply with the Working Time Regulations in the UK and outside the UK shall ensure that working hours comply with national laws and industry standards appropriate to the role and level of seniority.

7. Discrimination

We will comply with the Equality Act and will comply with all applicable laws regarding equality of employment opportunities.

8. Humane treatment

- 8.1. We prohibit all forms of physical and verbal abuse; the threat of physical abuse, sexual harassment or other forms of intimidation is also prohibited. This includes face-to-face interactions as well as communications by phone, email, social media or Internet.
- 8.2. We will take fair disciplinary action, proportionate and fully compliant with applicable laws.

GUIDELINES FOR ESTABLISHING TERMS AND CONDITIONS WITH RECRUITMENT AGENCIES To incorporate into HR Manuals.

Agreeing Terms of Business between an agency and [x hotel] for the Supply of Staff Services

- The terms should be agreed between [x hotel] and the agency.
- The terms must be recorded in a single document, or contract, and a copy must be sent to [x hotel] as soon as possible.
- These terms must:
 - State that the agency is acting as an employment business.
 - State that temporary workers contracted must be residing in the UK (according to the Immigration Act 2016).
 - Provide details of any fees, including the amount or method of calculation.
 - Provide details of any refund or rebate that they offer including the circumstances in which these may be payable. If they do not provide any refund or rebate, a statement to this effect must be included.
 - Provide details of the procedure to be followed if a temporary worker proves unsatisfactory.
 - Specify in what circumstances transfer fees apply.
 - Agencies must not indicate that they would charge a transfer fee if the worker's employment with the client, or supply through another employment business, starts either more than 8 weeks from the end of initial supply, or 14 weeks from the start.
 - Specify that the agency will provide you with an option to extend the period of temporary supply as an alternative to paying a transfer fee.
- These terms must not state:
 - That the agency will change any of the terms without prior notice or agreement.
 - Where changes to the terms are agreed between [x hotel] and the agency, these must be confirmed in writing as soon as possible, stating the date on which such changes will come into effect.

Checking the Contract between the Agency and the Temporary Worker (Terms of Engagement/Contract for Services)

- Terms should be agreed between the agency and the temporary worker prior to the agency providing any work-seeking services.
- These terms should be recorded in a single document, wherever possible, and a copy must be given to the temporary worker as soon as possible.
- These terms must:
 - Specify the type of contract e.g., contract for services or contract of service (employment) that the temporary worker will be engaged under.
 - Include a statement confirming that the worker will be paid for hours worked regardless of whether or not the agency is paid by [x hotel].
 - Specify the length of notice that the temporary worker is required to give and is entitled to receive in order to terminate particular assignments.
 - Specify either the actual rate of pay or the minimum rate of pay the agency reasonably expects to achieve for the temporary worker.
 - Specify the intervals in which payment will be made.
 - Include details of annual leave entitlement and holiday pay.
 - State that the agency will act as an employment business.
 - State the type of work that the temporary worker will be supplied to do.
- These Terms must not state:

- That payment to the temporary worker will be withheld on any of the following grounds:
 - That [x hotel] has not yet paid or is withholding payment.
 - That a timesheet has not been submitted, unless the agency has made enquiries with [x hotel] and we have not verified that the work in question was carried out.
 - As a penalty for any reason i.e., for lateness, absence, failing to complete an assignment etc. (workers must be paid for all hours actually worked).
 - That the agency will be charging temporary workers a fee for providing work-seeking services.
- That the provision of work-seeking services is conditional upon the temporary worker either:
 - Using other services for which the Agency charges a fee; or
 - Hiring or purchasing goods, whether provided by the Agency or any person.
- That a temporary worker may be threatened or subjected to any detriment on the following grounds:
 - That they have terminated or given notice on their contract with the agency; or
 - That they have taken up or propose to take up employment elsewhere.
- That the temporary worker is required to inform the agency of the identity of any future employer.
- That the agency will change any of the terms without prior notice or agreement with the temporary worker. Where changes to the terms are agreed between the agency and temporary worker, these must be confirmed in writing, within 5 working days, stating the date on which such changes will come into effect.

Checking the Complaints Procedure

A reputable agency should have a complaints procedure that enables clients and work-seekers to make a complaint to the agency. Ideally, this should include:

- Information on whom to contact with a complaint. This should be the managing director of the agency or another named individual with clear responsibility for handling complaints.
- What the process involves along with timescales within which a complainant can expect a response.
- The process for appealing a decision whether this is by appealing to a more senior manager and/or referring a complainant to an external arbitrator / body.
- An alternative process for dealing with the complaint in writing in cases where a complainant does not wish to have a meeting with the agency.

Equal Opportunities and Diversity Policy

A reputable agency should have an Equal Opportunities/Diversity Policy in place that meets all legal obligations under anti-discrimination legislation and promotes diversity in both employment practices and in the operation of its recruitment business. This should cover: sex, sexual orientation, gender reassignment, marital or civil partnership status, age, disability, colour, race, nationality, ethnic or national origin, religion or belief, political beliefs or membership or nonmembership of a trade union, or spent convictions.

SUPPLIER CODE OF CONDUCT ON HUMAN TRAFFICKING

To make available to Suppliers.

Message from the Director

[x hotel] recognises its responsibility to ensure sound social and ethical practices within its own operations and within its supply chain in every market in which it operates. We acknowledge that every individual supplying goods or services to [x hotel] deserves the right to live in dignity and work in a safe environment. Moreover, we understand that when individuals are treated with respect, both they and their companies benefit from increased commitment and productivity. We have therefore developed a Supplier Code of Conduct which defines both our minimum standards and the basic principles of cooperation that we expect from all of our suppliers, whether they supply goods, services or people.

Due to the complex nature of our global supply chain, it would be impossible at this stage for us to monitor or control the working conditions of each and every individual who contributes to supplying our hotel. We are determined, however to do everything we can to bring responsible sourcing practices to all stages of our supply and value chain, which is why we have developed this code of conduct and principles of implementation.

We recognise that local socio-economic, cultural and traditional constraints might apply to the implementation of this policy and we are prepared to work collaboratively with all suppliers to achieve compliance over a reasonable time frame.

The principles set out in this policy require all of our suppliers to ensure their facilities meet the standards as defined in this policy and that they apply the same principles within their own supply chain.

This policy constitutes minimum and not maximum standards and should not be used to prevent suppliers from exceeding these standards. Suppliers applying this policy are expected to comply with national and other applicable law and, where the provisions of law and this policy address the same subject, to apply that provision which affords the greater protection to the workers.

We are fully committed to implementing this code of conduct throughout the supply and value chain, working towards meeting a target to source all critical products and services sustainably and we require the support of all of our suppliers to achieve this goal.

Director

Supplier Code of Conduct

This policy defines both [x hotel's]' minimum standards and the basic principles of cooperation that we require of all suppliers, whether they supply goods, services or people. It also identifies the commitments we will make to ensure the Supplier Code of Conduct is effectively implemented throughout the supply and value chains. The policy requirements are based on core international labour organisation conventions, the ETI base code and the UN Guiding Principles on Business and Human Rights.

1. Employment

- 1.1.** There are no trafficked individuals working in any part of the supply chain, who have been recruited, transported, transferred, harboured or received for the purposes of exploitation.
- 1.2.** There is no forced, bonded, indentured or involuntary prison labour.
- 1.3.** Workers are not required to pay fees, either directly or indirectly to obtain work, or lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.
- 1.4.** No offence under the Modern Slavery Act 2015, the Immigration Act 2016, and any Gangmasters Licensing Authority regulation will be committed.

2. Freedom of Association and Employee Voice

- 2.1.** Workers, without distinction, have the right to join or form trade unions or other comparable, legal organisations of their own choosing. We recognise their ability to communicate their employee voice and will provide reasonable opportunities for them to do so.

3. Working conditions

- 3.1.** A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry, any specific hazards and legal requirements in line with internationally recognised certification and standards .
- 3.2.** A record of health and safety incidents (accidents and injuries) shall be maintained, with an action plan to improve performance by minimising the causes of hazards in the working environment.
- 3.3.** Workers receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- 3.4.** Access is provided to clean toilet facilities, potable water, and sanitary food storage.
- 3.5.** Responsibility for health and safety is assigned to a senior management representative.
- 3.6.** Facilities will undergo an environmental and safety risk assessment and have all required documentation and permits regarding structural, electrical and fire safety.

4. Child labour

- 4.1.** Suppliers may not employ workers under the age of 15 or as indicated by local law, whichever is the higher.
- 4.2.** Suppliers must maintain formal documentation that verifies the age of each worker.
- 4.3.** Suppliers must comply with all relevant child labour laws.
- 4.4.** Suppliers shall contribute to programmes which provide for the transition of child labour to education, or support our efforts to do so.
- 4.5.** Young persons under 18 shall not be employed at night, in hazardous conditions and suppliers must comply with all international and national laws regulating young workers including educational opportunities.

5. Fair Wages

- 5.1.** Wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2.** Overtime must be paid at a premium rate, at a minimum compliant with national legislation.
- 5.3.** Wages shall be paid directly to the workers in the form of cash or cheques or into a nominated bank account, at the agreed intervals and in full.²
- 5.4.** All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and provided with wage slips including the particulars of their wages for the pay period concerned each time that they are paid.
- 5.5.** Deductions from wages as a disciplinary measure shall not be permitted nor shall deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours and annual leave

- 6.1.** Working hours must comply with national laws and industry standards.
- 6.2.** Workers shall be provided with at least one day off for every seven day period on average.
- 6.3.** Overtime must be voluntary, must not average more than 12 hours per week, and must not be undertaken on a regular basis.
- 6.4.** Workers may refuse to work overtime without any disciplinary action being taken against them.
- 6.5.** Reasonable annual leave must be afforded to each employee, based on a clear, formal policy.

7. Discrimination

- 7.1.** Suppliers will fully comply with local laws regarding equality of employment opportunities.
- 7.2.** Subject only to local law, suppliers will practise no discrimination in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 7.3.** If the supplier feels that cultural or structural discrimination exists that is beyond its ability to control, then this should be recorded and reported to us. A collaborative approach will be taken to resolve the issue in a manner that is sensitive to the cultural and social context.

8. Regular employment

- 8.1.** Work performed must be on the basis of a recognised employment relationship established through national law and practice.
- 8.2.** Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
- 8.3.** Migrant, contract, part-time and home-workers must receive the same rights, benefits and opportunities for advancement as other workers performing similar activities.

² Where all possible, payment of wages in cash should be avoided as this can be an indicator of human trafficking.

9. Humane treatment

- 9.1.** Physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation shall be prohibited.
- 9.2.** Disciplinary actions must be fair, proportionate and fully compliant with local laws.
- 9.3.** All disciplinary actions must be recorded.
- 9.4.** Suppliers will record any incidence of harsh or inhumane treatment and develop action plans to prevent future violations.
- 9.5.** Suppliers will develop a whistle-blowing process for its workers.

10. Accommodations³

- 10.1.** Any accommodation facilities provided to employees must meet all local laws and regulations covering health, sanitation, electrical, mechanical, fire and structural safety.
- 10.2.** An evacuation plan must be prominently displayed at any accommodation facilities provided to employees.
- 10.3.** Accommodation facilities should have been designed and built for human habitation.
- 10.4.** Facilities should be away from main factory and production buildings.
- 10.5.** Charges for rent and food must be reasonable and benchmarked against local cost and wage levels.
- 10.6.** Each worker must be provided with an individual sleeping bed.
- 10.7.** Sleeping quarters should be segregated by gender, as appropriate.
- 10.8.** Workers must be provided with adequate and lockable storage space.
- 10.9.** Sleeping quarters must have adequate lighting.
- 10.10.** Appropriate quarters must be provided for couples.
- 10.11.** The living space per worker must be the minimum legal requirement or the local industry standard whichever is greater.
- 10.12.** Workers must be allowed to leave and enter freely during time off work subject to reasonable restrictions imposed based on considerations of safety.
- 10.13.** Accommodation must include access to potable water.
- 10.14.** Workers must be provided with adequate recreational facilities
- 10.15.** Adequate toilet and shower facilities must be provided, segregated by gender and maintained in a hygienic condition.

11. Ethical Corporate Practices

- 11.1.** All relevant national and international legal requirements must be complied with.
- 11.2.** [x hotel] must be informed of any serious breaches of compliance or investigations by authorities into potential breaches.
- 11.3.** Suppliers must not take part in:
 - 11.3.1.** Money laundering.
 - 11.3.2.** Insider trading.
 - 11.3.3.** Fraud, bribery and corruption and other improper payments or gifts.
 - 11.3.4.** Unauthorised access to personal and business information.
- 11.4.** Suppliers will adhere to the principle of free, prior and informed consent of local and indigenous communities where sourcing takes place, ensuring rights and access to land is not abused.
- 11.5.** Suppliers are required to act in accordance with the UK Bribery Act.

³ Accommodation can often be used as a mechanism to control exploited labourers.

Principles of Implementation

[x hotel] understands that improving social and ethical standards in the supply chain is a challenging process that requires the cooperation of its employees, suppliers, business partners and other stakeholders. We also recognise that compliance to the Supplier Code of Conduct may not be immediately achievable, but we are committed to working collaboratively towards this goal. The principles of implementation herewith recognise this challenge and set out a process of continuous improvement with the ultimate objective of achieving compliance to the Supplier Code of Conduct.

- A. To drive continuous improvement, we commit to the following principles:
 - a. Work to fair, transparent and mutually agreed terms and conditions.
 - b. Make payments for services provided on time and in full.
 - c. Work collaboratively with suppliers to improve social and ethical standards where our support is needed and is appropriate.
 - d. Acknowledge specific national, regional or cultural challenges.
 - e. Protect the confidentiality of information entrusted to us.
 - f. Recognise suppliers' own standards where they are comparable to our own.
 - g. Ensure that all relevant employees are aware of the Business Partner Code of Conduct.
 - h. Include transparent environmental, social and ethical performance criteria in our supplier selection processes.
 - i. Cease trading with suppliers demonstrating persistent disregard for this Supplier Code of Conduct.
 - j. Give appropriate consideration to the impact of ceasing trading on suppliers and the communities in which they operate.
 - k. Comply with the UK Bribery Act Legislation.
 - l. Work to integrate the UN Guiding Principles on Business and Human Rights throughout our supply chain and in our own operations.
- B. In conjunction with the principles of implementation, we will:
 - a. Allocate the resources required in order to fully implement the Supplier Code of Conduct.
 - b. Communicate the Supplier Code of Conduct to all relevant employees.
 - c. Assign responsibility for the implementation of this Supplier Code of Conduct to specific individuals who will provide the Board, suppliers and other stakeholders with compliance updates and implementation performance as required.
 - d. Provide appropriate training and key performance measures to all employees with specific sourcing and business partner responsibilities in order to enable them to support the implementation of the Supplier Code of Conduct.
 - e. Communicate this Supplier Code of Conduct to all suppliers and seek formal acceptance and commitment to its implementation.
 - f. Require all suppliers to report their level of compliance to this Supplier Code of Conduct and the corrective actions being taken towards improvement.
 - g. Maintain an internal system to record and monitor the level of compliance to this Supplier Code of Conduct
 - h. Actively engage with all suppliers to support continuous improvement towards compliance with this Supplier Code of Conduct.
 - i. Annually communicate the progress towards compliance with this Supplier Code of Conduct to our employers, suppliers and public.
 - j. Review the Supplier Code of Conduct on an annual basis and whenever necessary and appropriate.

- C. [x hotel] requires its suppliers to advise and keep us updated on all suppliers used for the production and processing of our hotel goods and services and, further, to commit to:
- a. Communicate the Supplier Code of Conduct to all employees, suppliers, sub-contractors, home workers, and temporary and contract staff engaged in their supply chain.
 - b. Ensure this Supplier Code of Conduct complies with all applicable laws in the countries in which they operate and all relevant ILO conventions, UN Guiding Principles on Business and Human Rights and the UK Bribery Act. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
 - c. Establish management systems for delivering compliance with this Supplier Code of Conduct.
 - d. Maintain records demonstrating compliance. An individual in a senior management position should be given responsibility for compliance with the Supplier Code of Conduct.
 - e. Train relevant staff on social, ethical, environmental and human rights standards to support compliance with this Supplier Code of Conduct.
 - f. Allow hotel representatives access to documentation, management and workers to determine progress against compliance with this Supplier Code of Conduct.
 - g. Report any serious breaches of this Supplier Code of Conduct to the relevant hotel representative.

Suppliers may in addition be required to comply with additional sub-policies or standards relevant to the products that we source from that supplier and specific risks or issues associated.

Signed Declaration by Supplier

I declare that I have received and acknowledge in full the Supplier Code of Conduct and agree to work with [x hotel] to work towards full compliance abiding by the Principles of Implementation.

Signed:

Title: (Company representative)

Date:

On behalf of: (Company name)

ANTI-TRAFFICKING REPORTING PROTOCOLS

Outlined below are the protocols for reporting any suspicious activity that may relate to or be an instance of human trafficking or other types of modern slavery.

Reporting Protocols

Trafficking is often an organised crime and employees should not disclose any information beyond the avenues for reporting set out here in case they expose themselves and/or the victim(s) to harm.

If a hotel employee witnesses an indicator leading them to suspect human trafficking or other types of modern slavery, they must inform the Anti-Trafficking Champion or duty manager immediately, in order to submit an internal report.

The senior manager on duty will continue to observe the situation. When the indicators reach the pre-agreed level of severity, it is deemed an “incident.”

The senior manager on duty must, where possible, remain with the potential victim and not draw attention to the fact that the victim has sought assistance, for example, s/he must not keep the potential victim in view of those who may be controlling him/her or even those working alongside that person. An incident form should also be completed as per company protocols.

- **On receiving a report of a potential incident of trafficking within the UK**, the General Manager (or senior manager on duty in the General Manager's absence) will contact the local police quoting “Operation MakeSafe” and will then follow police advice. S/he will call 999 if the victim is still on the premises, otherwise s/he will call 101
- **On receiving a report of a potential incident of trafficking outside of the UK** the General Manager (or senior manager on duty in the General Manager's absence) and crisis team enact the incident management process considering elements like whether the person in question is in immediate risk or harm or whether s/he is still on the premises. The General Manager contacts the police and/or relevant victims services provider as appropriate and follow the process as part of the general management procedure.
- **In emergencies**, where there is immediate risk of harm, regardless of whether the victim is still on the premises, the General Manager must follow existing safety procedures and the local police must be contacted on 999 immediately.
- **Follow up with relevant staff** may be needed. It is important to reassure the person who made the report and ensure that they are supported.
- **The crisis team** will inform head office and other contacts identified in the crisis management procedure as soon as possible. Records should also be kept as well as the police case number in case there is any follow up.
- **On an ongoing basis**, the General Manager should assess management of the protocol by tracking incidents, soliciting feedback, improving the protocols, and monitoring compliance. At least once a year, a confidential self-assessment report should be submitted to the Anti-Trafficking Committee (as defined below).

To the extent a hotel does not have an existing relationship with the local police or a local victim support provider, the General Manager must build such a relationship.

Supporting at risk individuals

[X hotel] operates a victim-centric approach to incidents of human trafficking and modern slavery to ensure the protection and support of suspected victims. When dealing with a potential victim, our primary responsibility is to ensure their safety and welfare.

Some tips to keep in mind include:

Protect the identity of the suspected victim of trafficking as well as the identity of employee or person reporting so that s/he will not suffer any harm.

If the victim or witness is in immediate danger, call the police immediately and ensure the individual is in a safe place until authorities arrive.

If you are unsure of how to respond to such incidents call the Modern Slavery Helpline for advice.

If it is a victim who is making the report, listen carefully and nonjudgmentally.

Provide reassurance, look after their welfare (i.e. offer food and water), and try to build rapport and trust.

If an interpreter is required, use a professional service instead of a friend or colleague is strongly discouraged.

Honour the wishes of the victim, but reporting the incident to the police is a must - modern slavery is a crime. If the victim wants to leave with the trafficker or doesn't want their name used when reporting the incident to the authorities, respect these wishes.

Ensure that staff know they can report directly to Crimestoppers, which offers an anonymous hotline (0800 555 111) if they don't feel comfortable reporting to their manager or General Manager.

Members of the public or people not employed by us are encouraged to write, in confidence, to the head office to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain. This information must be communicated to them by the hotel at the time of booking as well as through materials provided in the lobbies and bedrooms of each hotel.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under the above listed protocols, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. [x hotel] will accept and take seriously concerns communicated. However, any claims or allegations made which are found to be malicious or vexatious may result in disciplinary action being taken against the individual by us.

Remedy Protocols

Investigation: Any investigation beyond the initial report should be performed by local police and victim service providers, with the full support of head office and the Anti-Trafficking Champion, in collaboration with local police and victim service providers in order to protect the victim(s), employee(s), and the business. It is recommended that an investigation of a report made about staff be done in conjunction with the internal disciplinary procedure. For example, confidentiality should be maintained and the staff may be suspended while the report is being investigated.

Victim Services: If an investigation confirms probable incidents of trafficking, Anti-Trafficking Champions should work in cooperation with a local specialist victim service provider to ensure that the victim is protected and aware of all options for access to remedy (judicial and non-judicial). Our hotels will work to ensure that victims of trafficking can continue employment at the hotel where possible.

Advisable contacts for victim support are the Salvation Army (0300 303 8151) and the Modern Slavery Helpline (08000 0121 7000).

Root Cause Analysis: Our hotels endeavor to analyse the root causes for the incident and why the incident involved the business or employees. If applicable, and depending upon the severity of the incident, our hotel may give written warning notice or notice of termination to employee, supplier, contractor, or subcontractor that has violated policy. If applicable, we aim to make improvements that will prevent future incidents. Where an incident is reported by a supplier, hotels are encouraged to have a plan in place to address the root cause within a certain timeframe. The plan may include having a meeting with the relevant supplier making clear what steps should be taken to rectify any outstanding concerns.

HEAD OFFICE GUIDANCE ON HUMAN TRAFFICKING

To display at Head Office.

Employees at the head office level are required to familiarise themselves with the '**Stop Slavery Blueprint**'.

Employees must consider of the implications and effects of their decisions on human trafficking. This includes:

- **Partnership and joint venture decisions:** Employees must not enter into, on behalf of [x hotel], or otherwise, any business relationships or any other arrangement with any organisation which the employee has reason to believe participates in any way in human trafficking.
- **Investment decisions:** Under no circumstances may [x hotel's] funds, property (including electronic devices and the Company's supported technology) or personnel be used to further or support human trafficking.
- **Community engagement decisions:** Any local community engagement work should be undertaken in line with this Blueprint.
- **Management decisions:** Employees must support the broader objectives of this Blueprint by being aware of its content and their obligations under it.

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.