

Stop Slavery Blueprint



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Slavery and human trafficking are illegal.

Yet, there are still an estimated

40.3 million

people trapped in modern slavery around the world today.



“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 (2015-2018)

How to use this toolkit

This toolkit is intended for the internal use of hotels and other stakeholders in the industry. It has been created as guidance with recommended action and templates 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.

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 292 million people worldwide (1 in 10 people globally) and contributes 10.2% of the global GDP. Hospitality has been identified as a sector at risk of modern slavery. Hospitality businesses need to take the lead in the fight against modern slavery and human trafficking (herein referred to as “modern slavery”).

This Stop Slavery Blueprint (the “Blueprint”) sets out the key principles to be embedded into a hotel as part of its fight against modern slavery. It provides guidance and recommendations in the form of:

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

These are meant to be adopted across hotels and across departments. The Blueprint provides further specific guidance for individual managers, department heads and teams where appropriate. The guidance focuses on the following key risk areas:



A. Hotel Usage

Individual sales
Check-in systems
Guest monitoring



B. Employees

Employment practices
Use of agencies
Supplier engagement



C. Supply Chains

Food and Beverage
Maintenance
Procurement
Company sales
Contractors and subcontractors



D. Executive Decision-Making

Investments
Partnerships
Travel

The Blueprint provides 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.

General Managers can familiarise themselves with this Blueprint and associated documents to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for any incidence of modern slavery is prevented.

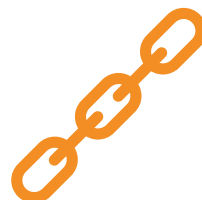
To demonstrate the organisation’s commitment to implementing the recommendations contained within this Blueprint, a statement can be included in company handbooks and staff reading materials as appropriate. See an example [Statement](#).

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.



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 themselves voluntarily.

Note, throughout this Blueprint, the terms human trafficking and modern slavery refer to 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.



Public Commitment

Having a public commitment to tackle modern slavery throughout a hotel's operations and supply chain is an important part of addressing the issue. Not only are staff able to see the commitment regularly, guests are aware of the organisation's efforts to address the problem. See an example statement: [Our **Commitment to Tackle Modern Slavery**](#).

Recommended use of the public commitment is to:

- Share the statement internally with all staff and include it as required reading, either at the beginning of their employment or when the statement is being implemented.
- Display the statement publicly in the lobby areas.
- Display the 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 the 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.
- Share information on the hotel's stance on modern slavery with prospective staff and new staff joining in their welcome package.

See relevant templates:

- [Example statement: Our Commitment to Tackle Modern Slavery](#)

- [Example Staff Room Poster](#)



Policies and Practices

The hotel's commitment to tackle modern slavery should be integrated throughout its policies, practices and decision-making procedures. By incorporating the position statement on modern slavery into each hotel's vision, mission, value statement and goals, the commitment will 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 can incorporate these into their internal policies and practices. Hotels should do this in a way that best integrates with their existing processes but adheres to the overall aim of the Blueprint.

Hotel Usage

Hotels can be subject to a particular risk of modern slavery when it comes to use of facilities. Specifically:

- 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 may stay in hotels with their traffickers while moving to locations.

An example **Hotel Use Policy** to tackle such risks can be found [here](#). This sets out guidance on how employees can ensure that property and services are appropriately used by others. Adhering to these principles helps maintain the respect and confidence of business partners and customers.

Recommended implementation of a hotel use policy is to:

- Share the policy internally with all staff and include it as required reading, either at the beginning of their employment or when the policy is being implemented.
- Ensure that a copy of the 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.

See relevant templates:

- [Example Hotel Use Policy](#)

Employees

All employees deserve basic human rights and employment rights, to be treated with dignity and respect, and to be provided a safe and healthy work environment. In addition to formal guidance, a culture that supports the well-being and inclusion of all employees and is committed to encouraging a positive working environment is key.

Incidence of labour exploitation can occur in hotels, notably as the employment structure of the industry is fragmented, and often includes labour providers for casual or outsourced workers for such services as housekeeping and cleaning. The industry relies heavily on low-skilled, migrant and outsourced workers, particularly for temporary and seasonal labour - these demographics are at particular risk of exploitation.

Five key risks to worker welfare in labour sourcing and recruitment include:



Charging recruitment fees:

Large recruitment fees, whether for recruitment itself, travel, visa or administration costs, can leave workers in situations of debt bondage. Lower-skilled migrant workers tend to pay a higher percentage of job-matching fees than high-skilled non workers.



Contract Deception:

Labor agencies may not provide written contracts of employment or may provide a contract to workers in a language other than their native language. Workers may find themselves in a different job or with a significantly lower salary than they were promised.



Wages and Benefits:

Current factors of labour exploitation include withholding of wages (notably if contract is terminated early), unreasonable pay deductions, wages not paid on time, worker bank accounts controlled by employer, and in-kind payments (e.g., bonds, manufactured goods, etc.).



Retention of Identification Documents:

Workers can be effectively bound to a job or employer when personal documents (e.g. passports), or any other valuables (e.g. wedding rings), are confiscated, destroyed, withheld, or otherwise denied to the worker, technically preventing them from leaving their job.



Worker living accommodations:

If the employer provides accommodation for workers to live, the housing must be safe, clean, and offered at a reasonable price. For migrant workers, there may be no other options of a place to live. As workers become more reliant upon the labour provider, risk of exploitation can increase.

EMPLOYEE PROTECTIONS:

- In the case of migrant workers, 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 modern slavery; it is important to encourage equality and eliminate unlawful discrimination on the basis of gender.
- Employees should be recruited 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.
- Of particular importance is working towards the elimination of forced labour, prison labour, indentured labour or exploited bonded labour and supporting freedom of association and the right to communicate their voice as an employee.

Specific examples of employee protections are contained in the [Best Practice Commitment on Employment and Human Rights](#) and the [Guidelines for Establishing Terms and Conditions with Recruitment Agencies](#).

Subcontracted employees can also be vulnerable to exploitation and therefore employment agencies should be made familiar with the [Supplier Code of Conduct](#).

Recommended implementation of commitments on employment and human rights is to:

- 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 packs.
- Draw employees' attention to any changes made in policies and documents as a result of their incorporation and ensure such commitments are included as required reading, either at the beginning of staff employment or when the policies are being implemented.
- 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.

See relevant templates:

- [Example Best Practice Commitment on Employment and Human Rights](#)

- [Example Guidelines for Establishing Terms and Conditions with Recruitment Agencies](#)

Supply Chains

It is the hotel's responsibility to ensure sound social and ethical practices within its own operations and supply chains. Every individual supplying goods or services to the hotel deserves the right to live in dignity and in a safe environment. Moreover, when individuals are treated with respect, both they and their companies benefit from increased commitment and productivity. A method to address this, is to create a [Supplier Code of Conduct](#) which sets out a company's minimum standards and basic principles of cooperation that they expect from all suppliers.

REMINDER: Due to the complex nature of global supply chains, it would be impossible at this stage to monitor or control the working conditions of each and every individual who contributes to supplying a hotel. It is important to do what is possible to bring responsible sourcing practices to all stages of the supply and value chain.

Working with Suppliers

Improving social and ethical standards in the supply chain is a challenging process that requires the cooperation of employees, suppliers, business partners and other stakeholders. These example [Principles of Implementation](#) recognise this challenge and set out a process of continuous improvement with the ultimate objective of achieving compliance. Similar principles can be added to your [Supplier Code of Conduct](#). It is also important to demonstrate the senior level commitment in your engagement with suppliers. The [Message from the Director](#) is an example of how that commitment can be communicated.

TIP: A company can set out the internal criteria to consider when working with a supplier and determining when it is appropriate to terminate this relationship.

During engagement with suppliers, it is recommended to get formal acknowledgment of your principles and expectations. Further, it is good practice to invite the supplier to demonstrate their alignment with those principles by sharing their own policies and best practice. A constructive engagement around the sharing of best practice can be a good foundation for an open dialogue to identify potential risks and collaborate on continuous improvement throughout the course of the business relationship.

Recommended implementation of a supplier code of conduct is to:

- Share the 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 staff employment or when the code of conduct is being implemented.
- Ensure that a copy of the code of conduct is accessible to relevant staff on a daily basis.
- Follow an approved action plan on how to approach suppliers regarding the code of conduct.
- Provide a copy of the 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, acknowledge and/or sign a copy of the code of conduct.
- Carry out a yearly review of the code of conduct with each supplier to ensure the continuous improvement plan is underway and that all relevant documents remain in date.

The code of conduct would 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.

See relevant templates:

- [Example Supplier Code of Conduct](#)
- [Example Message from the Director](#)
- [Example Principles of Implementation](#)

Executive Decision-Making

It is important to align the business objectives with the hotel's commitment to preventing modern slavery within its work. One way of achieving this is by ensuring the head office team, when making broader strategic decisions, complies with [Head Office Guidance on Modern Slavery](#).

Recommended implementation of head office guidance is to:

- Share the guidance and the principles of this Blueprint internally with all employees at the executive level;
- Share the guidance and the principles of the Blueprint with any existing or potential business partners;
- Incorporate the principles of the Blueprint in the broader business objectives;
- Ensure that a copy of the guidance is accessible to employees at the head office on a daily basis;
- Follow the guidance and adhere to principles of implementation contained within any other policy on modern slavery.

REMINDER: No one can guarantee that all hotel operations are completely free of modern slavery. However they can promote best practice and put processes in place to adhere to it. Likewise, it can't be guaranteed that all of the practices of subcontractors are modern slavery free, but they can be required to adhere to the principles laid out in the Blueprint.

See relevant templates:

- [Example Head Office Guidance on Modern Slavery](#)



Procedures and Protocols

Having clear and straightforward protocols for when an incident is discovered is crucial to ensure that victims get appropriate support. Where employees identify a potential victim, they can follow a specific internal procedure in order to protect the safety of that individual.

Prevention Protocols

There are structural changes hotels can make to ensure staff are aware of any relevant reporting protocols and that modern slavery prevention is considered on a regular basis.

Anti-Slavery Champions

A hotel should appoint someone who can take on the role of monitoring areas of risk (as set out in the Blueprint) on a regular basis in line with the guidelines provided and report anything unusual to the Anti-Slavery Committee (see below) as appropriate via incident reporting protocols and regular meetings. General Managers are recommended for this position. Anti-Slavery Champions should be encouraged to take a proactive approach, in consultation with head office, to take corrective actions in order to mitigate any risks or broader impacts.

Anti-Slavery Committee

A cross-functional group consisting of key representatives from head office should be set up to meet regularly (i.e. twice a year) in order to report any ongoing challenges, patterns or concerns. Representatives from a relevant NGO or service provider should be an integral part of this committee. The committee should review the hotel reports on a case by case basis and determine if there are actions that can be taken to prevent similar cases from occurring in the future. They should also review industry benchmarks to recommend changes and improvements. General Managers and/or Anti-Slavery Champions should feed into the Anti-Slavery Committee through regular internal meetings.

Reporting Protocols

In order for protocols to be effective, it is vital that all employees become familiar with them.

As part of a culture of openness, honesty and integrity, 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. It is important to establish reporting protocols for employees who suspect a situation of modern slavery. The following are helpful considerations when devising your incident reporting protocols:

1. Consider common indicators that staff should be aware of (see an example [Indicator List](#)). Not all indicators will necessarily come with the same weight in terms of severity and therefore it's important to determine the threshold that must be met for an indicator to become an incident that requires action. The example Indicator List has a 3-indicator threshold.
2. Establish relationships with key stakeholders before an incident is ever reported. This includes the police to link up reporting protocols and a local victim's service provider to ensure the response is victim-centred. Other relationships, such as with a professional interpreting service for victims who don't have English as a first language, can be made as well.
3. Be aware that victims might disclose their own exploitation. This is not likely to happen often in hotels, but if it were to staff should be confident on how to respond. See [Guidelines for Supporting at Risk Individuals](#).
4. Ensure reporting protocols are not overly complex as that can confuse those meant to be implementing them. It is recommended that there is one person who all staff can report concerns to (i.e. the Anti-Slavery Champion) and that s/he has one clear line of reporting (i.e. to the police, hotline or victims service provider). A hotel might want to include modern slavery incidents on their standard Health & Safety reporting forms (see example [Incident Report](#)).
5. If a victim is identified, their safety should be of primary concern. Consider establishing relationships with nearby sister hotels where victims can be taken during an investigation to keep them out of harm's way.
6. Implement the reporting protocols with a training package to ensure staff fully understand and can retain the information. Classroom style training that covers the indicators, reporting protocols and example case studies is recommended. See [Training](#) for further information.

See example [Incident Reporting Protocols](#). If something less detailed is required and crisis management protocols are already in place, see an example [Crisis Management Flowchart](#).

Guests who stay in hotels may want to report something suspicious as well. It is recommended the key contact or Anti-Slavery Champion be listed on the [Public Statement](#) in lobbies.

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-Slavery 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.

TIP: It is important to establish links with the police and other key contacts that might be required before an incident takes place. Other contacts may include a professional interpreter service for translation and victim service providers.

Victim Services

If an investigation confirms probable incidents of slavery, Anti-Slavery 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). The hotel should work to ensure that victims of modern slavery can continue employment at the hotel where possible.

TIP: The police may not always be the first port of call for a variety of reasons. If the victim does not want the police to be called, there are confidential 24/7 options. It is recommended that the hotel establish a relationship with the reputable victim support provider in the area before an incident takes place. Advisable contacts for victim support in the UK are the Salvation Army (0300 303 8151) and the Modern Slavery Helpline (08000 121 700). It is important confidential numbers are made aware to staff in case they would like to make reports outside of the agreed reporting structure (i.e. if s/he is at risk or suspects a colleague is).

Root Cause Analysis

A root cause analysis for the incident can help determine why the incident involved the business, a supplier or employees. If applicable, and depending upon the severity of the incident, written warning notice or notice of termination may be given to the employee, supplier, contractor, or subcontractor that has violated the policy. If applicable, aim to make improvements that will prevent future incidents. The Anti-Slavery Committee should consider these cases and determine the best approach going forward. 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. See example [Principles of Implementation](#) which can accompany a [Supplier Code of Conduct](#) and set out provisions for reporting incidents.

PLEASE NOTE: The General Manager and/or Anti-Slavery Champion can monitor the progress of reports made and follow up where needed. However, it is not uncommon for a hotel to find out no further information about a report once it has been reported to the police.

Recommended implementation of reporting protocols is to:

- Share the details of the protocols internally with all staff and include it as required reading, either at the beginning of their employment or when the protocols are being implemented.
- 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.

See relevant templates:

- [Example Incident Reporting Protocols](#)
- [Example Guidelines for Supporting at Risk Individuals](#)
- [Example Incident Report](#)
- [Example Crisis Management Flowchart](#)



Identifying Risk

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

- **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 independent unions, social advisors and NGOs.
- **Measurable Change:** Develop verifiable KPIs to measure progress.

To carry out more detailed analysis of risk in the supply chain, four steps have been 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

Identify the organisations within your 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
- Acknowledgement of Supplier Code of Conduct
- Ethical trade competence
- Relevant required licences
- What processes are in place preventing illegal working
- What health and safety processes are in place
- Audit dates
- Improvement Action Plan

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: Identifying risk

Modern slavery risk for any supply chain can be analysed according to various criteria, such as country, commodity and characteristics of the industry. Outlined below are some ways in which you may start to assess risk with regards to your first tier suppliers. The below information was obtained through the analysis and input of [STOP THE TRAFFIK](#). There are external consultants who can help you with this piece of work should it be required.

- Contexts such as armed conflict, a weak rule of law, high incidence of corruption, and insufficient safeguarding of human rights and labour standards by the government may all increase the likelihood of workers being exploited in a particular country or region, and therefore increase the risk of exploitation being involved in the production of a particular product which passes through that region or country.
- Some commodities or commodity derivatives are known to be more or less likely to have been produced using forced labour. This can be closely linked to country risk, but the vulnerability of a specific worker demographic can also be a factor in whether or not products are likely to have been produced using exploitation.
- The following products and services, which are commonly used within the hotel industry, are considered to have higher risk.



Food and beverage

Agricultural work can involve a low skilled migrant workforce that work in often hazardous conditions and may be vulnerable to exploitation by labour contractors or unscrupulous employers.



Housekeeping, cleaning and laundry

The cleaning sector employs a high number of agency workers and subcontracted labour involving intermediaries which increases the risk of exploitation.



Uniform and bedding

The garment industry is high risk for modern slavery due to its long and complex supply chains which operate in countries where exploitative working conditions are prevalent.



Agency staff

Risk of modern slavery incidence arising with the employment of seasonal agency workers can depend on the type of agency and its practices.

Step Three: Engaging with your suppliers

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](#) can be used as the basis to agree a standard with suppliers. The purpose is not to terminate all relationships when full compliance isn't immediately met. Instead having an open discussion about your principles and expectations with your suppliers is what best practice recommends. Allow time for suppliers to engage with your expectations and adapt their business practice accordingly.

Step Four: Ongoing management

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 can be held regularly between hotel and supplier to review progress.

Options for continuing the management process include:

- Formal review meetings held regularly between hotel and supplier to review progress.
- Regular compliance tracking of suppliers' policies, processes and performance against the company's supply chain expectations.
- Spot-checks on staff working in your hotel to ensure that the agency employing these workers are acting as agreed in the standard.
- Spot-checks by a third-party agency.

Auditing: Once due diligence is in place with a supplier, it is recommended that there are regular and ongoing audits that the agreed conditions are being met. See [Sedex](#), which is a global not-for-profit organisation which houses the world's largest collaborative platform sharing responsible sourcing data on supply chains. Sedex provides an Ethical Trading Audit (SMETA).

Identifying and assessing risk is an ongoing process.

See relevant templates:

- [Framework for Working with Suppliers](#)



Training

It is important that all employees are trained in order to increase their general awareness of modern slavery and the hotel industry and how to spot the signs. Training can also provide details on how to prevent risk of modern slavery in specific roles. See example [Training Powerpoint](#).

TIP: Modern slavery training sessions should be integrated into each hotel's training course schedule and training strategy. Regular training updates should be run as should yearly refresher trainings, as agreed with the head office. Training should run alongside Health & Safety.

It is recommended that training sessions be facilitated by experts, in consultation with managers, for individuals and departments throughout the business. This training should be designed to go beyond awareness raising in order to help each employee understand his or her role in tackling this issue. Training should 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 (see example [Indicator List](#)),
- Explanations of relevant policies and protocols,
- Practical examples and [Case Studies](#)¹, and
- Information on how to reassure staff when they've reported something, regardless of the outcome.

Employees should be encouraged to raise concerns during or after these sessions and should be given a disclaimer at the beginning to pre-empt any emotional triggers. It is important to ensure knowledge is retained after the training is completed and therefore it is recommended to use a [Quiz](#) to assess retained knowledge three months after the initial training. Short refreshers can also reinforce learning as and when required.

¹ The case studies used in the example training, which have been included in this document are from the COMBAT Toolkit. COMBAT is a project funded by the EC Directorate of Home Affairs under the Internal Security Fund's targeted call for Trafficking in Human Beings. The case studies included in the Stop Slavery Blueprint are part of a complete toolkit for the hospitality sector which can be found at: <https://www.brookes.ac.uk/microsites/combat-human-trafficking/the-toolkit/>

Senior level staff should also be trained, despite the fact that their roles are not operational. Aside from running a training specifically for them, any refreshers or updates can form part of the yearly AGMs. Where applicable, training of suppliers can also be provided.

It is recommended to send out a general briefing to all staff in advance of a large event as such events can often increase risk of modern slavery.

See relevant templates:

- [Example Training Powerpoint](#)
- [Example Indicator List](#)
- [Training Case Studies](#)
- [Example Knowledge Retention Quiz](#)

Reporting, Monitoring and Evaluation

Hotel executives and management teams should 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 and knowledge retention levels (see an example [Knowledge Retention Quiz](#)) which is recommended to track staff knowledge three months after training);
- Actions taken to strengthen supply chain auditing and verification;
- Steps taken to upskill high risk suppliers, and assessing their ability to detect and mitigate modern slavery risk in supply chains;
- Investigations undertaken into reports of modern slavery and remedial actions taken in response. See an example [Reporting Log](#) which can be used at the reception desk to track all reported indicators.

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 modern slavery. A checklist can be useful in ensuring evidence of Blueprint implementation is being tracked. See an example [Checklist](#). It is also helpful having materials displayed so staff can see where implementation is occurring. See example [Staff Room Poster](#).

See relevant templates:

- [See example Incident Reporting Log](#)

- [See example Checklist](#)

Templates and Examples:

Our Commitment to Tackle Modern Slavery

[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, 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 292 million people worldwide (1 in 10 people globally) and contributes 10.2% of the global GDP. Hospitality has been identified as a sector at risk of modern slavery. 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 modern slavery within our spheres of influence. However, we recognise that eliminating modern slavery 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 modern slavery not only puts our reputation at risk, but also has the potential to endanger our employees and guests.

If you see anything suspicious you would like to report or would like to assist us in this work, please contact [add in contact information for General Manager or Anti-Slavery Champion].

Tackling Modern Slavery: 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 modern slavery by making our commitment to tackling it both 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 modern slavery does not exist within our supply chains.
- Ensuring decisions made by our corporate teams are in line with this commitment.

WHAT WE DO:

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 modern slavery 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 modern slavery.

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 modern slavery in our region.

Tackling Modern Slavery Call to Action

Modern Slavery incorporates:

- Human trafficking
- Debt bondage
- Forced labour
- Sexual exploitation
- Criminal exploitation
- Domestic servitude

Implications of modern slavery for the hotel industry:

- 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 modern slavery: guests

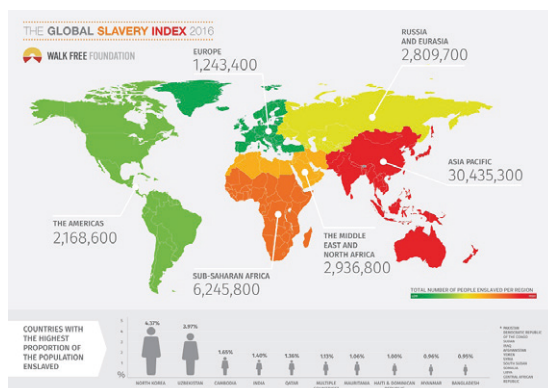
- A teenage girl uses cash to rent a room with an older man.
- An older man rents a room, with a young girl, and is always present when she has dealings with staff.
- A string of men enter and leave a particular room throughout the night, each staying for a short time.
- A group of young women enter 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 modern slavery: 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 modern slavery: 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 see anything suspicious you would like to report, please contact [add in contact information for General Manager or Anti-Slavery Champion].

Hotel Use Policy

To incorporate into Staff Handbooks.

In line with our commitment to tackle modern slavery wherever it might occur (see [Commitment to Tackle Modern Slavery](#)), [X Hotel] and its employees shall strictly comply with all applicable laws and regulations regarding the prevention of modern slavery, 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 modern slavery;
- 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 modern slavery; or
- facilitate any act or related act of modern slavery.

Employees must report all potential cases of modern slavery that come to their awareness in line with the procedures and protocols outlined in the 'Stop Slavery Blueprint' (see [Incident Reporting Protocols](#)).

Employees must be trained in order to identify any suspicious activity during the sales, check-in/check-out or guest assistance stages (see [Training Powerpoint](#)).

Best Practice Commitment on Employment and 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 Modern Slavery

To make available to suppliers.

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 accompanies the [Principles of Implementation](#) which detail 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 Organization (ILO) conventions, the ETI base code and the UN Guiding Principles on Business and Human Rights.

1. Employment

- 1.1.** There are no victims of modern slavery 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.³

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.

² N.B. Where all possible, payment of wages in cash should be avoided as this can be an indicator of modern slavery.

³ ILO Convention concerning Annual Holidays with Pay (Revised) 1970 states that for a one year term of service, paid annual leave shall not amount to less than three weeks.

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.

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 their workers.

10. Accommodations⁴

- 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.

⁴ Accommodation can often be used as a mechanism to control exploited labourers.

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.

Signed Declaration by Supplier

I declare that I have received and acknowledged 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]

Message from the Director

To make available to suppliers accompanying a [Supplier Code of Conduct](#)

[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.

x

Director

Hotel Logo Here

Principles of Implementation

To make available to suppliers accompanying a [Supplier Code of Conduct](#).

[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.

In addition, suppliers may 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.

Head Office Guidance on Modern Slavery

To display at Head Office.

Employees at the head office level are required to familiarise themselves with the [Stop Slavery Blueprint](#). Employees must consider the implications and effects of their decisions on modern slavery. 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 arrangements with any organisation which the employee has reason to believe participates in any way in modern slavery.



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 modern slavery.



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.

Incident Reporting Protocols

To incorporate into HR and Manager Manuals.

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

Reporting Protocols

Modern slavery 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-Slavery Champion or duty manager immediately, in order to submit an internal report. See [Indicator List](#).

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.” Staff are not to try to investigate the situations themselves.

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. See [Guidelines for Supporting at Risk Individuals](#). An incident form should also be completed as per company protocols. See [Incident Report](#).

- **The senior manager on duty** will move the victim to a safe space if possible (this can be a sister hotel with a pre-arranged relationship) and will record as much information as possible using notes, CCTV footage, staff testimony, etc.
- **On receiving a report of a potential incident of modern slavery within the UK**, the General Manager (or senior manager on duty in the General Manager’s absence) will contact the local victims services provider and/or local police and will then follow their advice. For calling the police, 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 modern slavery 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 follows 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, the General Manager should feedback on this assessment to the Anti-Slavery Committee (made up of head office staff).

If 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.

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 (see [Commitment to Tackle Modern Slavery](#)).

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.

Guidelines for 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.

The below are guidelines for speaking with an at risk individual. These do not replace the [Incident Reporting Protocols](#).

Some tips to keep in mind include:

If it is a victim who is making the report, listen carefully and nonjudgmentally. Assure them you are taking them seriously.

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

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

Do not promise complete confidentiality. Explain that you have to report this to a manager or someone else who will help with the individual's protection.

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 (move the individual to a sister hotel if required).

If you are unsure of how to respond to such incidents or do not want to call the police, call the Modern Slavery Helpline (08000 121 700).

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

Honour the wishes of the victim, but once the incident has been reported, the police should be notified - 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 line manager or General Manager.

Incident Report Form

To be part of crisis management procedures.

The company policy is to require all hotels to report all injuries, accidents, losses, damage, fires, near misses or any other incident that could result in a claim against the company. This also includes any issues of modern slavery. Reporting an incident or claim is the responsibility of the General Manager/Anti-Slavery Champion.

| SEND THIS COMPLETED REPORT TO: | |
|---|--|
| Head Office: [specific contact] Via email: [x email address] | Second contact: [specific contact] And cc email to: [x email address] |

| | | | |
|------------------------------------|--|-------------------------|--------------|
| Hotel | | Hotel telephone | |
| Full address of hotel | | | |
| Manager dealing with this incident | | Direct contact tel. no. | Today's date |

| PERSON INVOLVED | | | | | | | |
|---|-------|--|---------|--|-------|--|------------|
| Full name | | | | | | | |
| Private address | | | | | | | |
| Job title (for employee only, if employee is the person involved) | | | | | | | |
| For others, give status | Guest | | Visitor | | Staff | | Contractor |

| THE INCIDENT | | | |
|-------------------------------|--|-------------------------|--|
| Serious? | | Minor? | |
| Name of person reporting | | Date/time of incident | |
| Specific location of incident | | Accident Book entry no. | |

| TYPE OF INCIDENT | | | | | |
|---------------------|--|--------------------------------------|--|----------------------|--|
| Slip, trip or fall | | Fire/explosion (inc false alarm) | | Vehicle damage | |
| Fall from height | | Contact with fixed/stationary object | | Security incident | |
| Lifting or carrying | | Struck by vehicle or moving object | | Theft | |
| Burn or scald | | Drowning or near drowning | | Sexual assault/rape | |
| Cut or laceration | | Food injury, illness or complaint | | Enforcement activity | |

| TYPE OF INCIDENT | | | | | |
|-----------------------------------|--|-------------------|--|--------------------|--|
| Contact with electricity | | Medical condition | | Press/media report | |
| Contact with hazardous substances | | Property damage | | Sudden death | |
| Modern slavery | | | | | |
| Other: (Please specify) | | | | | |

| |
|---|
| NATURE OF INJURY SUSTAINED (please specify) |
| |

| |
|--|
| DETAILS OF THE INCIDENT (Include a clear description of what took place, where the incident happened, the materials, equipment and people involved, and list of any witnesses. Continue on a separate page if necessary) |
| |

| NAME/ADDRESS OF WITNESSES | |
|---------------------------|--|
| 1. | |
| 2. | |
| 3. | |

| ACTION TAKEN BY HOTEL | | | | | |
|-----------------------------------|--|---------------------------------------|--|---|--|
| Develop/revise written procedures | | Improve job training/retraining | | Provide additional instruction/supervision | |
| Complete/review Risk Assessment | | Increase maintenance schedule | | Provide inspections/observations | |
| Initiate/revise/enforce rules | | Install/replace/adjust machine guards | | Provide/monitor use of protective equipment | |
| Improve emergency procedures | | Modify/replace tools/equipment | | Rearrange equipment/area | |
| Improve housekeeping in area | | Provide additional employees | | Other (describe below) | |
| None of the above: | | | | | |

| REPORTING | | | | |
|--|-----|--|------|--|
| Who has been notified of the incident? (e.g. Emergency services, General Manager, Director etc.): | | | | |
| Emergency Services (Please Specify): | | | | |
| Is the incident reportable to the Environmental Health Officers, Local Authorities under RIDDOR | Yes | | No | |
| If yes, has the incident been reported to the relevant Environmental Health Officers, Local Authority | Yes | | No | |
| If the incident is in relation to modern slavery, is this reportable to the police? | Yes | | No | |
| If yes, has the incident been reported to the police/Modern Slavery Helpline, Tel: 999/0800 012 1700 using the information overleaf? Please include incident number and full details in your report. | Yes | | No | |
| Report completed by | | | Date | |

Modern slavery incident

Questions police may ask at time of reporting:

| |
|--|
| What is the current location of the suspects and victim? (ie: hotel room number, area of hotel, etc) |
| Concise description of both the suspect and the victim. |
| If known, names and date of birth of both suspect and victim. |
| Any vehicles involved: colour, make, model and vehicle registration. |
| What are the specific reasons for concern? |
| If suitable please give scene preservation advice. |

| | |
|----------------------------|--|
| Time and date of reporting | |
| Police incident number | |
| Name of police officer | |

Crisis Management Flowchart

What to do for a potential incident of modern slavery

Ensure that modern slavery incident reporting processes are embedded as part of a company's crisis management procedures before an incident occurs.

1. **Staff Member** witnesses an indicator of possible modern slavery.

- 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-Slavery Champion/duty manager.

2. **Anti-Slavery 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-Slavery 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-Slavery Champion/duty manager** follows up with the staff member who first reported the indicator.

- Ensure that s/he is commended 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.

NOTE: It is important to agree a process with your suppliers which includes steps for the notification, response and follow up action for any incident.

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.

I 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

Combating Human Trafficking

Case Study Four

Victims: Estella, 35-years old and Angelica, 22-years, both
Filippino

Type of Trafficking: domestic and sexual exploitation



Estella's Story:

I was born in the northern Philippines and I have a diploma in nursing. I left three of my five children in my village three years ago to work in Malaysia as a domestic worker. My two older children also work as domestic servants for some families in our province but their schooling is paid for by their employers so they receive less than \$20 per month. I miss them but am happy that they go to school.

I am very good friends with the younger girl that I am travelling with, Angelica who is 22, because we both now work for the same Saudi prince. We have been on the road, travelling the world for some time now. As I am not allowed to contact my family she has become very close to me. Being quite a bit older than her, I have so far been lucky not to have been sexually abused by the prince but I know that this has not been the case for Angelica. She has told me her story many times – how she began working as a domestic servant in the Philippines and how after a few years was recruited by an agency which sent her to Malaysia to work for Saudi princes. The agent turned out to be a trafficker. When she arrived in Kuala Lumpur her passport and mobile phone were taken from her. She talks about having lost all her sense of her own identity and the links with her beloved family at home. Even worse – she was sold 11 times to different Saudi Arabian employers who took her all over the world with them.

This is what happened to us in London before we were finally saved. The Prince booked an entire floor of a luxury hotel for his family and us 'maids' (as he liked to call us) as he always did. Once we had unpacked the entire luggage of the family I asked for some hours off because I had seen a church near the hotel. I hadn't prayed for so long and was desperate to feel the lovely atmosphere of a church again –away from all my troubles. The Prince was offended with my request and beat me whilst he shouted "After Allah, here I am your God!". I knew he had hurt Angelica before but to now also beat me! This was really enough; I didn't care anymore about anything I just knew I had to get away from him and his bullying family.

The staff at the hotel seemed so nice. They had even made a point of talking to us as if we were guests and not servants. We seemed like real people to them! I took Angelica with me on the day that the family were due to shop in Knightsbridge and went to see the person who seemed to be in charge of room cleaning – 'the housekeeper' - I had worked out that this woman was probably the person in charge of the nice girls who cleaned the bedroom suites. We told her, "We have been forced to work for the Prince and his family! We have been beaten and abused! We can't return home because he has our passports and is controlling our families and children. Please help us!"

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.

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.

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 (see Housekeeping and Maintenance).
- 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.

Modern Slavery and Human Trafficking Indicator List

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 (e.g.: 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: e.g.: 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.

Domestic Servitude

- Someone living with and working for a family staying in the hotel.
- Their passports or other identity documents are being withheld.
- The domestic worker doesn't eat with the rest of the family.
- They may appear malnourished and/or unkempt. They may display signs of abuse.
- The room doesn't have sufficient sleeping space for family members and the domestic worker.
- They are forced to work excessive hours.
- Their movements are restricted/not allowed to do anything without the employer.

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

- Do Not Disturb sign for duration of stay but lots of requests for towels and amenities.
- 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 Do Not Disturb sign.
- 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 you wouldn't usually see guests.

Modern Slavery Training Follow up Quiz

To be circulated three months after training.

The purpose of this quiz is to measure the retention of knowledge within the team following their training.

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. Modern slavery 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 Do No Disturb sign. |

7. Which of the following behaviours or signs might a victim of modern slavery 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 modern slavery, 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 apply.

- 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.

12. Read through the following case study and fill in the answers below.

Osama, a 35 year old Bangladeshi man, heard from a good friend that a businessman he knew was recruiting men to work for a hotel in Scotland. The businessman requested a deposit of £18,000 in exchange for a job as a chef and a good salary. By using his savings and taking out a loan from the businessman in Bangladesh, Osama was able to pay for the deposit and a plane ticket to Scotland.

As soon as Osama arrived, he was sent to the hotel but the agency working with the businessman was telling him what to do. He was forced to work really long hours at the hotel – sometimes starting at 5am and not finishing until after midnight. He was extremely badly paid – sometimes not even at all. All of his pay went to the agency. He had to live in a broken caravan provided by the agency with four or five other men. There was no water or heating and it was damp as the window was broken. Osama wasn't making much headway in clearing his debt because of his meagre salary. As a result, the businessman was threatening to remove one of his kidneys to sell for cash as a repayment. Osama was unsurprisingly very scared and felt trapped.

List 5 indicators of modern slavery:

- 1.
- 2.
- 3.
- 4.
- 5.

As a colleague of Osama, you one day notice that he looks tired and scared. You suspect he might be a potential victim of modern slavery, what would your next step be?

- a. Do nothing - there is likely to be no real issue and you don't want to cause any embarrassment.
- b. Try and approach the 'victim' to ask if he needs help.
- c. Confront the trafficker.
- d. Call the police.
- e. Contact the most senior manager on duty.
- f. Contact the 24/7 Modern Slavery Helpline.

Anti-Slavery Action Checklist

| Action Area | Action Required | When | Responsibility | Completed (Y/N) | Comments or Dates Completed |
|--|---|---|--------------------------------------|-----------------|-----------------------------|
| Commitment to Tackle Modern Slavery | Incorporate up-to-date versions of the statement into the hotel's website and annual report. | At implementation | Head Office | | |
| | Share up-to-date versions of the statement with business partners as appropriate. | At implementation or when working with a new business partner | Head Office | | |
| | Share the statement internally with all staff and include it as required reading. | At the beginning of their employment or when the statement is being implemented | General Manager/HR | | |
| | Display this statement publicly in the lobby areas. | At implementation | General Manager | | |
| | Display this statement in bedrooms either as part of the printed information packs, on the TV screens or using another appropriate method. | At implementation | General Manager | | |
| | 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 the Staff Room Poster. | Ongoing | General Manager | | |
| | Incorporate the statement into the hotel's vision, mission, value statement, departmental goals and any other relevant strategic documents as appropriate. | At implementation | General Manager/Heads of Departments | | |
| | Share information on the hotel's stance on modern slavery with prospective staff and new staff joining in their welcome package. | Ongoing | General Manager/HR | | |
| | Share the policy internally with all staff and include it as required reading. | At the beginning of their employment or when the policy is being implemented | General Manager/HR | | |
| | 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. | At implementation | General Manager | | |
| Policies and Practices - Hotel Usage | | | | | |

| Action Area | Action Required | When | Responsibility | Completed (Y/N) | Comments or Dates Completed |
|--|---|---|--|-----------------|-----------------------------|
| Policies and Practices - Hotel Usage | 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. | At implementation | General Manager/Heads of Departments | | |
| | 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. | At implementation | General Manager/HR | | |
| | 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. | At the beginning of their employment or when the policies are being implemented | General Manager/HR | | |
| Policies and Practices - Hotel Usage | 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. | At implementation | General Manager | | |
| | Ensure that any indirect and direct employment is carried out in line with the relevant policy containing these commitments. | During recruitment | General Manager/HR | | |
| | Share this code of conduct internally with staff members who deal with procurement at any level and include it as required reading. | At the beginning of their employment or when the code of conduct is being implemented | Head Office/General Manager/Heads of Departments | | |
| Policies and Practices - Hotel Usage | Ensure that a copy of this code of conduct is accessible to relevant staff on a daily basis. | At implementation | Head Office/General Manager/Heads of Departments | | |
| | Follow an approved action plan on how to approach suppliers regarding this code of conduct. | At implementation | Procurement Staff | | |
| | Provide a copy of this code of conduct to each individual supplier and business partner that enters into a contract with the hotel. | When entering into a new contract | Head Office/Procurement Staff | | |

| Action Area | Action Required | When | Responsibility | Completed (Y/N) | Comments or Dates Completed |
|--|--|--|--------------------------------|-----------------|-----------------------------|
| Policies and Practices - Hotel Usage | Require each individual supplier that enters into a contract with the hotel to read, acknowledge and/or sign a copy of the code of conduct. | When implementing the policy or when entering into a new contract | Head Office/ Procurement Staff | | |
| | Commit to adhering to the Principles of Implementation that accompany the code of conduct. | At implementation | Head Office | | |
| | Carry out a review of the code of conduct with each supplier to ensure the continuous improvement plan is underway and that all relevant documents remain in date. | Yearly | Procurement Staff | | |
| Policies and Practices - Hotel Usage | Share the guidance and the principles of this Blueprint internally with all employees at the executive level. | At implementation | Head Office | | |
| | Share the guidance and the principles of the Blueprint with any existing or potential business partners. | At implementation or when working with a new business partner | Head Office | | |
| | Incorporate the principles of this Blueprint in the broader business objectives. | At implementation | Head Office | | |
| | Ensure that a copy of this guidance is accessible to employees at the head office on a daily basis. | At implementation | Head Office | | |
| | Follow the guidance and adhere to principles of implementation contained within any other policy on modern slavery. | Ongoing | Head Office | | |
| | Share the details of the protocols and guidelines for supporting at risk individuals internally with all staff and include it as required reading. | At the beginning of their employment or when the protocols are being implemented | General Manager | | |
| Procedures and Protocols | Ensure that a copy of these protocols and guidelines is accessible to staff on a daily basis, for example on the staff room notice boards. | At implementation | General Manager | | |
| | Incorporate the protocols into the hotel's existing procedures and documents (such as crisis management policies, emergency policies, healthy and safety policies, job descriptions, staff handbook) as appropriate. | At implementation | General Manager/HR | | |

| Action Area | Action Required | When | Responsibility | Completed (Y/N) | Comments or Dates Completed |
|---|--|-------------------------|---|-----------------|-----------------------------|
| <p style="text-align: center;"><u>Procedures</u> and <u>Protocols</u></p> | Appoint an Anti-Slavery Champion (General Manager, unless otherwise agreed) within the hotel and inform the Anti-Slavery Committee who this is, including direct contact details. | At implementation | Head Office/ Anti-Slavery Committee | | |
| | Formalise an Anti-Slavery Committee and communicate contact details and meeting details to each hotel Anti-Slavery Champion. Ensure a representative of a relevant NGO is part of the Anti-Slavery Committee. | At implementation | Head Office | | |
| | Monitor areas of risk as set out in the Blueprint on a regular basis in line with the guidelines provided and report anything unusual to the Anti-Slavery Committee as appropriate. | Ongoing | General Manager/ Anti-Slavery Committee | | |
| | Establish relationships with key stakeholders, such as police and victim's service providers, before an incident occurs. Other relationships, such as with a professional interpreting service, can be made as well. | At implementation | General Manager | | |
| | Establish relationships with nearby sister hotels where victims can be taken during an investigation to keep them out of harm's way. | At implementation | General Manager | | |
| | Create and distribute a list of indicators for staff to become familiar with. | Prior to training | HR/Anti-Slavery Committee | | |
| | Communicate reporting procedure set out to members of the public at the time of booking as well as through materials provided in the lobbies and bedrooms of each hotel. | At implementation | General Manager | | |
| | Conduct root cause analyses for any incidents to determine why the incident involved the business, a supplier or employees. Follow up with the agreed response after discussion with the Anti-Slavery Committee. | When an incident occurs | Anti-Slavery Committee/ General Manager/ Procurement Staff | | |

| Action Area | Action Required | When | Responsibility | Completed (Y/N) | Comments or Dates Completed |
|---|---|--|--------------------|-----------------|-----------------------------|
| <u>Identifying Risk</u> | Work with relevant partners to carry out more detailed analysis of risk in the supply chain, which will include the four steps outlined in the Blueprint. | At implementation | Head Office | | |
| | Determine approach to regular audits to ensure agreed conditions with suppliers are being adhered to. | Once due diligence is in place with a supplier | Procurement Staff | | |
| <u>Training</u> | Provide in class general modern slavery training to all staff. Provide role-specific training as appropriate. | At the beginning of their employment or when the training is being implemented | General Manager/HR | | |
| | Provide all staff materials to accompany the training, such as an indicator list and reporting protocols. | During training | General Manager/HR | | |
| | Integrate modern slavery training sessions into each hotel's training course schedule and training strategy. Ensure it runs alongside Health & Safety. | At implementation | General Manager/HR | | |
| | Assess knowledge retention in all staff who have completed the training. | 3 months after training | General Manager/HR | | |
| | Provide refresher training to all staff who have completed the initial in class training. | 6 months after initial training | General Manager/HR | | |
| | Send a reminder to all staff about times of heightened risk. | Prior to a large event | General Manager | | |
| <u>Reporting, Monitoring and Evaluation</u> | Work to outline specific, measurable and clear KPIs in order to review progress across each area outlined in the Blueprint | At implementation | Head Office | | |

Stop Slavery Blueprint

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.



Stop Slavery Blueprint. Compiled and created by Shiva Foundation. For more information, please visit www.shivafoundation.org.uk/blueprint