

Anti-Slavery Action Checklist

Action Area	Action Required	When	Responsibility	Completed (Y/N)	Comments or Dates Completed
<u>Commitment to Tackle Modern Slavery</u>	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		
<u>Policies and Practices</u> <u>Hotel Usage Policy</u>	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		

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<u>Policies and Practices</u> <u>Hotel Usage Policy</u>	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		
<u>Policies and Practices</u> <u>Employee Policy</u>	Incorporate the <u>best practice commitments</u> 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		
	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 <u>relevant policy</u> containing these commitments.	During recruitment	General Manager/HR		
<u>Policies and Practices</u> <u>Supplier Code of Conduct</u>	Share this <u>code of conduct</u> 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		
	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		

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<u>Policies and Practices</u> <u>Supplier Code of Conduct</u>	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 <u>Principles of Implimentation</u> 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		
<u>Policies and Practices</u> <u>Head Office Guidance</u>	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		
<u>Procedures and Protocols</u> <u>Incident Reporting Protocol</u>	Share the details of <u>the protocols</u> and <u>guidelines for supporting at risk individuals</u> 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		
	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 <u>crisis management policies</u> , emergency policies, healthy and safety policies, job descriptions, staff handbook) as appropriate.	At implementation	General Manager/HR		

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Procedures and Protocols	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		

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<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 <u>general modern slavery training</u> 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 <u>indicator list</u> and <u>reporting protocols</u> .	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		
	<u>Assess knowledge retention</u> 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		