

STOP SLAVERY BLUEPRINT

A Framework for
Tackling Modern
Slavery in Hotels



FOUNDATION

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Modern Slavery and Human Trafficking are illegal.

Yet, there are still an estimated 49.6 million people trapped in modern slavery around the world today.¹

1. How to use this Blueprint

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.



Supplementary Guidance

The Blueprint, along with the supplementary guidance, can be adapted by general managers and department heads as appropriate to better suit the nuances and needs of your hotel. 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.



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2. Introduction and Definitions

Modern Slavery Risks in the Hotel Industry

As of 2021, it's estimated that nearly **50 million people** worldwide live in modern slavery, making it **the fastest-growing illegal business globally with an annual profit exceeding £150 billion.**²

Despite the widespread nature of this issue, only about 17% of the estimated total of over 100,000 individuals subjected to modern slavery in the UK were recognised by authorities.³ The global demand for cheap labour fuels this illicit trade, and the hospitality sector is particularly at risk due to its substantial need for labour.

The UK hospitality sector, consisting of around 143,000 businesses employing approximately 1.8 million people, generated £40.4 billion in Gross Value Added in 2019.⁴

It has been identified as a **high-risk industry for modern slavery and exploitation**, requiring proactive efforts from businesses to address it. Hotels, in particular, face higher risks of exploitation. Not only can rooms be used for activities such as sexual exploitation, drug trafficking, and county lines operations, but systemic issues within the industry can also contribute to adverse outcomes for workers.

These issues include complex operating models that lead to a lack of accountability for worker welfare, market pressures resulting in unfair employment practices, and a high proportion of 'low-skilled' jobs attracting more vulnerable workers.⁵ To effectively combat modern slavery and exploitation, businesses in the hospitality sector must address these systemic challenges and take a proactive stance in safeguarding the well-being of their workforce.

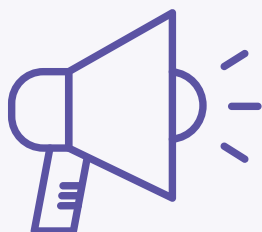


Definition in UK Law

For the purposes of this Blueprint, the definition of modern slavery, in keeping with the UK Modern Slavery Act 2015, includes⁶:



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.

Types of Modern Slavery

Modern slavery is an umbrella term covering many different types of human exploitation. Below are some of the different types of exploitation that may occur in and around hotels:⁷

Table 1

Type of Exploitation	Examples in Hotels
 <p>Forced labour: “refers to situations in which a person is coerced to work through the use of violence and/or psychological intimidation, such as accumulated debt, retention of ID, or threats of denunciation to the immigration authorities.”⁸</p>	<ul style="list-style-type: none"> • Where using third party recruitment agencies, the specific terms under which workers are employed could be exploitative. • Where outsourcing labour (such as for cleaning services), the specific terms under which workers are employed could be exploitative. • When wages are not set fairly within the hotel, employees could be working under exploitative conditions. • Workers who work with a supplier could be working under exploitative conditions.
 <p>Child slavery: “involves a person under the age of 18 being exploited”⁹</p>	<ul style="list-style-type: none"> • This is less likely where you have visibility of your employees but your 1st, 2nd or 3rd tier suppliers may be employing underage workers.
 <p>Sexual exploitation: “is any abuse of vulnerability for sexual purposes”¹⁰</p>	<ul style="list-style-type: none"> • Hotels rooms may be used for sexual exploitation by traffickers. • Bars or other nighttime venues may be used by people being exploited to work in the sex industry.
 <p>Forced criminality: “is where a person is forced into criminal activity for another’s gain”¹¹</p> <p>County lines: “is where illegal drugs are transported from one area to another... usually by children or vulnerable people who are coerced into it by gangs”¹²</p>	<ul style="list-style-type: none"> • Hotels rooms may be used for forced criminality, including stop overs or meetings for county lines. • Bars or other nighttime venues may be used for forced criminality, including stop overs or meetings for county lines.

Type of Exploitation (cont)

Examples in Hotels (cont)



Domestic servitude: “is a form of modern slavery where domestic workers – often maids,

housekeepers, cleaners, nannies, or those caring for the elderly, ill and inform – are forced to work for little or no pay, with restricted freedom and often with an element of sexual abuse”¹³

- Guests of the hotel may bring their domestic workers with them on their travels – some of these people may be working under exploitative conditions.



Human trafficking: the movement of people by means such as force, fraud, coercion, or

deception with the aim of exploiting them.

- Exploitation can happen in hotel rooms and they can also be used as temporary accommodation when transporting people for exploitation.



Note, throughout this Blueprint, the term modern slavery will refer to one or all forms of modern slavery listed above.

Aims of this Blueprint

The 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 regarding **statements, supply chain risks, labour risks, and reporting and remediation**. It also provides guidance on **how to work with others**, whether those are suppliers, business partners or local partner organisations. Finally, it provides **templates and supplementary guidance**, including a training package, that can be adapted for your own use.

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:

Table 2

Key Risk Area	Definition	Departments
Product Supply Chain	Within the product supply chain, there is a risk of modern slavery, which involves forced labour, human trafficking, and exploitative working conditions. This risk exists in the sourcing and manufacturing of products, such as food, linens, and other supplies, where unethical practices can occur.	<ul style="list-style-type: none"> • Procurement & Purchasing • Food & Beverage
Employees & Workers	<p>This can refer to the individuals who are directly employed by the hotel as well as those who are subcontracted to perform various tasks and services or those recruited via agencies. This includes employees working in departments such as housekeeping, food and beverage, maintenance, security, front office, spa and wellness facilities, and more.</p> <p>This risk of modern slavery can manifest in different ways, such as using unethical recruitment practices, withholding of wages, excessive working hours, and restrictions on freedom of movement.</p>	<ul style="list-style-type: none"> • Human Resources • Housekeeping • Food and beverage • Security • Front of House
Guest Usage	Refers to the various ways guests interact with and utilise hotel facilities and services during their stay. However, it is crucial to recognise the potential modern slavery risks associated with guest usage across different areas.	<ul style="list-style-type: none"> • Front of House • Food and Beverage • Security • Housekeeping

Refer to the relevant sections below for further information and guidance.

3. Modern Slavery Statement

Modern slavery statements (also referred to as Transparency in Supply Chains (TISC) statements) are important, usually public-facing, documents which outline the steps the business has taken during the financial year to ensure that slavery and human trafficking are not taking place in any of its supply chains and in any part of its own business.



While it is compulsory for all businesses with an annual turnover of over £36 million to publish a modern slavery statement (under section 54 of the Modern Slavery Act 2015) it is recommended that businesses that fall under this threshold, also publish a modern slavery statement as good practice.

Statements can be a powerful way to let staff, guests, partners and suppliers know about your commitment to tackling modern slavery. It can remind and inspire others to do the same while also serving as an accountability mechanism for your organisation.

What to include in your modern slavery statement:

- **Define your commitment:** Clearly state your business' commitment to tackling modern slavery, upholding human rights, responsible sourcing and ensuring ethical practices in your operations and supply chains.
- **Summarise business structure:** Provide an overview of your business structure and model including presence in other countries, number of offices, number of employees, corporate functions and operating model (franchisor, management, brand/boutique etc).
- **An assessment of your supply chains:** complete a risk assessment of your supply chains (starting with your tier-1 suppliers) to identify where modern slavery risks are present, where you have the most leverage and where to tackle your efforts. This section should make up the bulk of your modern slavery statement and should

directly address your suppliers, outline key risk areas for your business and outline specific and tangible steps to address these risks in the future.

- **Describe your policies, procedures and practices:** describe all your business' policies, procedures and practices which embed your business' commitment into daily business practice. Some of these could include a supplier code of conduct, internal labour policies, procurement policies, human resources training guides etc.
- **Highlight partnerships and collaborations:** Highlight your efforts to collaborate with suppliers, industry peers, NGOs, and other stakeholders to promote transparency and improve supply chain practices. Using examples, emphasise any existing partnerships and/or collaborations and the good work already being done
- **Create an action plan:** Create a clear and actionable plan to address the identified risks and improve supply chain transparency. This plan should include specific objectives, timelines, responsibilities, and key performance indicators.
- **Review and update regularly:** Ensure that your modern slavery statement is reviewed and updated regularly to reflect changes in your organisation, supply chains, and best practices. This demonstrates your commitment to ongoing improvement.

A modern slavery statement is different from a general commitment to tackle modern slavery as it requires you to go further, outlining the specific steps you have taken over the past year and what you intend to do in the coming year. It is also public facing - organisations that fall under the legislation would be required to publish it on their websites.

Having a public commitment to tackle modern slavery also lends itself well to being able to share your work with others, internally or externally. This is an important part of addressing the issue. For example, having a poster or materials about your work displayed would not only allow staff to be able to see the commitment regularly but guests would also become aware of the organisation's efforts to address the problem. This is an important step in a world where guests are more and more interested in the social side of your business.

Some suggested uses of the public commitment are 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 updated.
- Display a summary of the statement publicly in the lobby areas.
- Display a summary of 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, for example in the staff room or as a summary on 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.
- Have a link to the modern slavery statement on your website.

Modern slavery statements provide an important anchor and accountability mechanism for you and your wider team. It is vital you ensure that creating and updating the statement is incorporated within the job responsibilities of the relevant person at your hotel.

ACTION:

Collaborate with your different departments to write your first Modern Slavery Statement.

FURTHER RESOURCES:

[Template: Modern Slavery Statement](#)

[Modern Slavery Statement Registry](#)

[Example: Co-op's Modern Slavery Statement](#)

[Example: IHG's Modern Slavery Statements](#)

[A Review of UK Modern Slavery Act Statements in the UK Hotel Sector](#)

4. Risk Mapping – Hotel Facilities and Guests

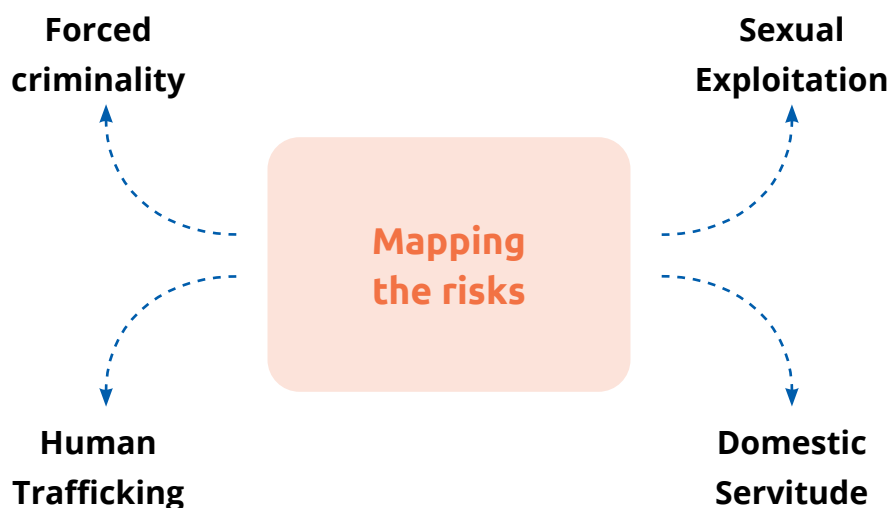
Mapping and understanding modern slavery risks within your hotel operations is a vital first step towards being able to ensure the safety, well-being, and integrity of your organisation and to tackling

modern slavery. **Risk-mapping, specifically looking at hotel facilities and guests, involves identifying and understanding risks that may arise as a result of guest behaviour and actions, as well as their use of your hotel facilities. These risks are often a result of factors unique to your hotel’s layout and location.**



The process of mapping the risks presented by your guests and the use of hotel facilities can be quite complex due to the hidden nature of the issue. Modern slavery can also manifest in several ways within your hotel, including:

- **Forced criminality** is “where a person is forced into criminal activity for another’s gain.”¹⁴ In this context, hotels may be used as the location for the criminal activity. The most relevant types of forced criminality for hotels at the time of writing is **county lines**, “where illegal drugs are transported from one area to another... usually by children or vulnerable people who are coerced into it by gangs.”¹⁵ Hotels may be used as sites for distributing and selling drugs to customers because the private nature of rooms allows for discreet transactions, making it harder to trace, particularly when room payments were made in cash with limited



identification. Additionally, the transient nature of hotels provides an environment where illicit activities can be conducted without detection.

- Another example of using hotel sites in modern slavery is **trafficking for sexual exploitation**, 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 may be required to go to rooms rented out by the customers (out-call).
- **Human trafficking** also happens for other reasons, such as labour exploitation. Victims may stay in hotels with their traffickers while moving to locations.
- **Domestic servitude** “is a form of modern slavery where domestic workers – often maids, housekeepers, cleaners, nannies, or those caring for the elderly, ill and inform – are forced to work for little or no pay, with restricted freedom and often with an element of sexual abuse.”¹⁶ This may show up in your property as guests visiting hotels may be accompanied by their domestic workers, whose conditions amount to modern slavery.

These are the types of modern slavery you need to keep in mind when assessing the risk at your hotel. In order to do this it is crucial to grasp both the enablers of different types of modern slavery and its corresponding indicators.

Enablers & Risks of Modern Slavery within Hotels

The root causes of modern slavery, also known as **drivers, can be complex and vary from one situation to another**. They often include factors such as poverty, lack of job opportunities, discrimination, conflict and instability, weak legal protections, and global supply chains. When these drivers are present, they create circumstances in which individuals are left vulnerable to exploitation.

Yet, modern slavery’s persistence doesn’t rely solely on these drivers; it thrives due to the presence of enablers. These **enablers are the practical mechanisms that make it possible for modern slavery to flourish**. Enablers refer to the underlying factors, conditions, or circumstances that contribute to the occurrence and persistence of different forms of modern slavery. These enablers can vary depending on the specific type of modern slavery and the context in which it occurs. Regardless of the type of modern slavery in question, these enablers create an environment conducive to exploitation.

In the context of hotels, these could be related to:



Hotel layout and facilities: hotel facilities and layouts could create an environment more conducive to exploitation. For example, hotels with large and intricate layouts, various hidden spaces, remote locations, and night-time economy venues (like private nightclubs) can heighten a hotel's vulnerability to forced criminality.



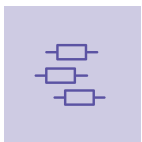
Guest demographic: hotels with many guests consisting of solo travellers, foreign nationals, vulnerable populations like migrant workers, and hotels housing migrant children, can heighten a hotel's susceptibility to sexual and labour exploitation. These factors create situations where individuals may be isolated, unfamiliar with local laws, or lacking support networks, making them easier targets for exploitation.



Price: hotels at different price-points may be at risk of different forms of modern slavery. Vulnerable individuals can be exploited at any type of hotel but there may be differences in how it manifests. For example, higher-priced might be more attractive to individuals exploiting domestic workers whereas it may be preferable to use lower-priced hotels for other forms of modern slavery due to their accessibility.



Location: hotels in close proximity to vulnerable communities, transit hubs like airports and ports, remote areas, phone line routes and red-light districts can intensify a hotel's vulnerability to exploitation. These settings offer criminal networks opportunities to exploit marginalised individuals, engage in trafficking, and perpetrate exploitative practices.



Hotel operations: hotels with inadequate staff training to identify signs, limited security measures (guards and CCTV), a majority of cash transactions for guest room payment, ineffective guest screening, and limited collaboration (with police, statutory services, support services etc) create gaps and contribute to a hotel's heightened vulnerability to modern slavery.

Identifying Enablers at your Hotel

Identifying and understanding these risks is essential for developing effective strategies to prevent and address modern slavery in its various forms. Use the table below to think about where your risks may lie.

Table 3

Enablers	Key questions to consider:
Hotel layout and facilities	<ol style="list-style-type: none"> 1. Does your hotel include nighttime economy venues like private nightclubs or bars? 2. Does your hotel have a large and intricate layout with various hidden spaces? 3. Are there areas within the hotel that are less frequented or hidden from view, such as storage rooms/cupboards, lifts or basements?
Guest demographic	<ol style="list-style-type: none"> 1. Do a significant number of your guests consist of solo travellers? 2. Do you often accommodate vulnerable populations like migrant workers/ individuals awaiting asylum decisions, who may lack support networks? 3. Have you been commissioned to accommodate large numbers of migrant children/individuals by the government? 4. Have you noticed frequent visits from young adults/underage guests? 5. Does your hotel attract guests seeking luxury experiences, which might contribute to higher risks of domestic servitude or exploitation?
Price	<ol style="list-style-type: none"> 1. Does your hotel offer significantly lower room rates compared to other hotels in the area?
Location	<ol style="list-style-type: none"> 1. Is your hotel located in a remote or isolated area where police presence might be limited? 2. Is your hotel situated in close proximity to areas known for vulnerable or marginalised communities? 3. Is your hotel located near major transit hubs, such as airports and ports? 4. Are there any indications that your hotel is situated in large cities or importing area, commonly associated with county lines? For example, London, West Midlands or along trainline routes coming from those areas? 5. Is your hotel located in or near red-light districts or areas associated with sex tourism?
Hotel operations	<ol style="list-style-type: none"> 1. Are security measures, such as CCTV and security guards, limited or not strongly enforced? 2. Have you provided comprehensive training to your staff on recognising and reporting potential signs of modern slavery, human trafficking, and exploitation? 3. Do your systems allow guests to pay for room bookings in cash? 4. Does your guest screening process involve identifying potential risks of modern slavery? 5. Do you have close and visible relationships with police, NGOs, or support services to address modern slavery risks?

Creating your Prevention and Action Plan

After you have identified your risk areas, you can work with each of your department's actions to tackle and prevent it in your operations. Use the table below for some guidance on where to start. You can also see the section on Reporting and Remediation in the Blueprint to start creating your prevention and action plan. For more information on how to utilise indicators to build your plan, see the next section.

Table 4

Preventative Actions	Description
Front of House	
Training	Provide thorough and tailored training to front-of-house staff on recognising indicators of modern slavery across the different typologies of modern slavery. Focus on the types identified as high risk by your assessment. For this department's training, include elements on guest check-in behaviour and screening processes. See chapter on Training for more information.
Guest Screening and Verification	Implement stringent guest screening procedures. In addition to verifying identities and age and checking for potential risks associated with drivers you have identified.
Providing Information	In cases when your hotel is being used to accommodate vulnerable communities (migrants, asylum seekers etc), it would be useful to provide information about local laws and regulations, access to support services, access to a member of your staff that speaks their language etc.
Engage with guests	Encourage and train staff to engage with solo travellers and particularly vulnerable guests ensuring they feel safe and supported. Where possible flag these individuals to security and other staff members to ensure they are kept visible safe throughout their stay.
Food and Beverage	
Training	Provide thorough and tailored training to food and beverage staff on recognising indicators of modern slavery across the different typologies of modern slavery identified by your risk assessment. For this department's training, include elements on risks associated with nighttime economy venues. See chapter on Training for more information.
Monitoring behaviour	Monitor and control access to nighttime economy venues like private nightclubs to prevent criminal activities. During opening hours of these venues, work with security to monitor guest behaviour including alcohol usage.

Preventative Actions (cont)

Description (cont)

Security

Training

Provide thorough and tailored training to security staff on recognising indicators of modern slavery across the different typologies of modern slavery identified by your risk assessment. For this department's training, include elements on surveillance and crisis management protocols. See chapter on Training for more information.

Enhancing security measures

Ensure you have adequate CCTV and security guards to cover the hotel grounds, as this deters perpetrators.

Collaboration

Collaborate with other departments and staff to ensure proper surveillance coverage of hidden spaces, corridors, and remote areas to deter potential criminal activities.

Access Control

Implement strict access control measures for restricted areas and elevators.

Security Audits

Regularly audit security protocols, CCTV, security guards and access control measures to identify and address operational gaps and vulnerabilities.

Crisis Management

Develop comprehensive crisis management plans that outline specific procedures for handling incidents related to modern slavery.

Housekeeping

Training

Provide thorough and tailored training to housekeeping staff on recognising indicators of modern slavery across the different typologies of modern slavery identified by your risk assessment. For this department's training, include elements on in-room inspections, the documentation of suspicious items and regular engagement with guests. See chapter on Training for more information.

Engage with guests

Train housekeeping staff to be watchful of solo travellers and particularly vulnerable guests ensuring they feel safe and supported. Where possible flag these individuals to security and other staff members to ensure they are kept visible and safe throughout their stay.

Sales and Marketing

Booking

Flag suspicious booking requests.

Consider reviewing use of 3rd Party distributors

In cases where there are frequent unusually suspicious booking requests from the same 3rd Party distributor, it might be worth reconsidering using them.

Educational Campaigns

Develop marketing campaigns that educate guests about the hotel's commitment to preventing modern slavery and encourage reporting.

Preventative Actions (cont)	Description (cont)
Collaborate with NGOs	Collaborate with NGOs and specialist service providers focused on preventing modern slavery to create joint campaigns and raise awareness. See the chapter on Wider Partnerships for more information.
Social Media Engagement	Engage with guests and followers on social media to provide information about the hotel's efforts to combat modern slavery and encourage responsible travel.
Head Office/Senior Management	
Collaboration with police and all other relevant agencies and organisations	Establish direct communication channels with police and other relevant agencies to report suspicious activities and collaborate on prevention efforts. See the chapter on Wider Partnerships for more information.
Preventative activities	Work with police and other relevant agencies and organisations to address potential risks associated with nearby vulnerable communities, transit hubs, or red-light districts. See the chapter on Wider Partnerships for more information.
Training	Ensure staff are trained to identify indicators of different forms of modern slavery across all price points and guest demographics.

See the Section 5 and 6 of this Blueprint for further information on how to expand your plan further.

Using Indicators to Keep Track

Indicators of modern slavery are observable signs or patterns by guests that raise suspicion and suggest the presence of modern slavery, human trafficking or exploitation. These indicators serve as warning signs that prompt further investigation and possibly reporting. Identifying and understanding these indicators is crucial for hotel managers and all staff members to effectively tackle and prevent modern slavery occurring on site. Indicators of modern slavery can vary significantly across different departments within a hotel and are also influenced by the type of exploitation involved. It is essential for staff members to be familiar with department-specific indicators relevant to their roles. For example:

- **Front of House:** The Front of House department plays a crucial role in identifying indicators of modern slavery, as its staff members have a unique opportunity to detect signs as soon as potential victims enter a hotel. Given their frontline

position, the Front of House team is often the first point of contact with guests and may encounter individuals who exhibit suspicious behaviour. For instance, an indicator for Front of House staff could be an unusual request for room location, such as one at the end of a corridor, overlooking a car park, next to a fire exit, or near the lift, potentially signalling an abnormal pattern that warrants further investigation.

- **Food and Beverage:** The Food and Beverage department can play an important role in recognising indicators of modern slavery, given its direct interaction with guests during dining experiences or at the bar. Staff in this department have a unique opportunity to identify potential signs as they serve and engage with customers regularly. For instance, an indicator for Food and Beverage staff could be an unusual behaviour in restaurants and bars, such as persistent reluctance to make eye contact or signs of physical distress in customers.
- **Security:** The Security department plays a crucial role in identifying potential indicators of modern slavery across the entire hotel, especially in public areas. Although standard guest interactions may not be the main purpose of their role, security teams significantly contribute to prevention efforts. An example of an indicator which the Security department should be aware of could be suspicious behaviour close to or in lifts, and/or individuals avoiding eye contact, appearing disoriented, or displaying signs of distress. Their role involves monitoring and responding to security concerns, making them well-placed to detect suspicious activities or persons on the premises. By staying attentive to such indicators, the Security department plays a crucial part in deterring and addressing modern slavery, ensuring the safety and well-being of both guests and staff within the hotel environment.
- **Housekeeping and Maintenance/ Room Service:** The Housekeeping and Maintenance department, along with the team providing room service, plays a vital role in recognising indicators of modern slavery, particularly in observing guest behaviour within their assigned rooms. An example of an indicator for these staff members could be a prolonged use of the “Do Not Disturb” sign throughout the entire stay, coupled with numerous requests for towels and amenities. Room service indicators might include requests for alcohol where minors are present.
- **Sales and Marketing:** The Sales and Marketing department, although not in a frontline role, plays a pivotal part in recognising potential indicators of modern slavery through monitoring booking patterns. An example of an indicator for this department could be the identification of unusual block bookings from third-

party distributors. Despite not directly interacting with guests, the team's close attention to suspicious booking patterns and sales can serve as a robust form of prevention, deterring instances of modern slavery from entering the hotel in the first place.

- **Head Office/ Senior Management:** Head Office and Senior Management, though not directly involved in day-to-day operations, hold an important role in addressing modern slavery concerns within the hotel. Their primary focus lies in investigating indicators flagged by hotel staff and taking necessary steps to escalate when appropriate.

You can find a more comprehensive list of indicators for staff across several departments in our [supplementary guidance documents](#).

In addition to the wider team, managers play a crucial role in understanding not only department-specific indicators but also those associated with specific types of modern slavery. This comprehensive knowledge empowers managers to escalate concerns appropriately, ensuring a more effective response to potential instances of exploitation within the hotel environment. You can find a more comprehensive list of indicators for managers organised by modern slavery types in our [supplementary guidance documents](#).

ACTION:

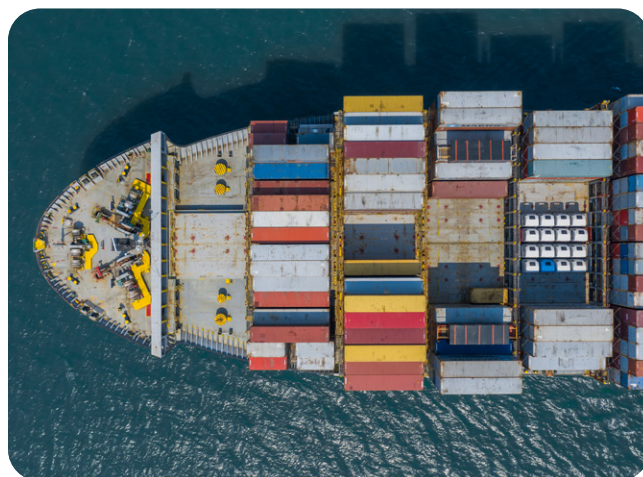
1. Use the questions in table 4 above and the list of enablers, you can self-assess where your risk of modern slavery lies. Once identified, tailor your response accordingly e.g. ensure your training covers these areas in particular.
2. Use the suggestions in table 4 above to start creating an initial prevention and action plan.
3. Build on this plan further using the other sections of this Blueprint.
4. Using the full list of indicators, you can identify and count the number of indicators you observe in your hotel over a specified period (it is recommended to do so over a week). Once you have been observing indicators for some time and gathered data to understand how modern slavery manifests in your hotel, you can use that to adapt your prevention and action plan.

FURTHER RESOURCES:

[Modern Slavery and Human Trafficking Indicator List – Guest Behaviour](#)
[Modern Slavery and Human Trafficking Indicator List for Managers – All Types](#)

5. Risk Mapping – Product Supply Chain

In the context of hotel supply chains, these are complex systems that enable the provision of goods and services essential for hotel operations. Hotel supply chains are often organised into various tiers, reflecting the different levels of suppliers and service providers. Tier 1 suppliers are those directly providing goods and services to the hotel, while Tier 2 suppliers may offer materials or services to Tier 1 suppliers. These tiers continue, creating a complex web of interconnected businesses and organisations within the hotel supply chain. Each supply chain component is crucial to ensure the seamless functioning of the hospitality industry.



When it comes to products in hotel supply chains, they involve the procurement and distribution of everything from linens and toiletries to food and beverages, all of which are essential for guests' comfort and satisfaction. The increased globalised nature of businesses enables products to be sourced from all corners of the world. This globalisation, while fostering accessibility, also presents significant risks for modern slavery, as exploitation can often go unnoticed within the layers of subcontracting, making it challenging to detect and eliminate. Mapping the risks in your product supply chain involves pinpointing areas of vulnerability and taking proactive measures to mitigate them.

You can follow the four steps below to help you carry out more detailed analysis of risk in the supply chain and plan your actions to address those risks better in your hotel.

Step One: Identifying organisations within the supply chain

Identify the organisations within your supply chain that supply your products, across each department. Depending on the size and complexity of the supply chain there may be several tiers involved in the provision of a product.

A database 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 database may contain information such as:

- Company name
- Address/contact details
- Key contacts
- Product/nature of service supplied/sector
- Position in supply chain
- Spend with each supplier
- 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 to identify and focus on those who represent the greatest risk.

To lead in modern slavery risk mitigation within your supply chains, effective supply chain data management is essential. Consider the following practices:

- **Consolidating suppliers:** Organise data by supplier rather than purchase to reduce duplicate entries and enhance risk mapping efficiency.
- **Using unique identifiers:** Implement unique identifiers, such as company or VAT numbers, to make procurement data easily searchable.
- **Identifying procured supplies:** Add details to procurement data specifying the supplies obtained from each supplier to enhance granularity and address diverse product or service offerings.
- **Identifying supply chain sources:** Go beyond head office locations when identifying product supply chains. Pinpoint various factories involved to capture unique human rights risks that may not be evident with only the head office address.
- **Thinking about data storage and exporting:** Ensure data is easily accessible and downloadable with various fields and variables included. This streamlines risk assessment and overall supply chain management.

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 tier-1 suppliers to begin with. There are external consultants who can help you with a deeper analysis, 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.

- Some examples of **high-risk products** which are commonly used within the hotel industry are:
 - o Food and beverage
 - o Housekeeping, cleaning and laundry
 - o Uniform and bedding
 - o Electronics and technology
 - o Construction materials

Our supplementary guidance '[Supply Chain Risk Areas – Products](#)' provides further details on common high-risk products present in supply chains of hotels. You can use this to start thinking about where your risks lie.

Step Three: Prioritising Engagement

In effectively managing the risks within a hotel's supply chain, the emphasis lies on prioritising engagement, considering resource and access constraints when addressing the spectrum of potential modern slavery risks across the entire supply chain. Acknowledging these challenges, hotel managers and procurement teams are strongly encouraged to concentrate their efforts on engaging Tier-1 (primary) suppliers that:

- Fall within high-risk categories (as determined by step two above) and
- Constitutes a substantial portion of the procurement expenditure (spend).

Adopting this prioritisation strategy for suppliers not only enables direct engagement, given their position in the primary tier, but also directs efforts toward high-risk categories, allowing for a more impactful focus on mitigating risks. Concentrating on suppliers with significant expenditure or spend relates more to leveraging and influencing their business practices. This targeted approach maximises the potential for effective intervention and change within the supply chain, particularly in addressing high-risk areas upfront.

Step Four: Engaging with your suppliers

An open discussion should take place with each prioritised supplier in the supply chain to establish basic expectations and in order to understand the ability of that business to manage its workforce legally and ethically.

You can use our supplementary materials '[Supplier Code of Conduct on Modern Slavery](#)' as a starting point for what you want to agree with your suppliers. Note:

- The purpose is not to terminate all relationships when full compliance isn't immediately met.
- Instead, best practice recommends having an open discussion about your principles and expectations with your suppliers and then allowing them time to engage with and meet your expectations.
- Suppliers should, over the long term, seek to adapt their business practices to minimise the risk of modern slavery.
- Where suppliers are unwilling to engage or shift their practices, you can apply pressure and leverage your influence as a customer or explore alternative sourcing options.

The procurement department plays an important role in looking out for specific indicators in your supply chain. For example, they may keep track of which suppliers are lacking transparency in their supply chain or do not have any modern slavery statements. The role of procurement teams should involve scrutinising supplier practices to ensure ethical standards are met. See the supplementary materials '[Supply Chain Risk Areas – Products](#)' to find an indicator check list you can use to train your procurement department.

Step Five: Ongoing management and 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.

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.

Once due diligence is in place with a supplier, you can set up regular and ongoing audits to check that the agreed conditions are being met. For example, Sedex is a global not-for-profit organisation which houses the world's largest collaborative platform sharing responsible sourcing data on supply chains. It provides an Ethical Trading Audit (SMETA) to organisations looking to check their supply chains through a third party.

Lastly, it's vital to emphasise that the identification and assessment of risks remain an ongoing process. Hotel management and procurement departments should allocate dedicated time for regular risk assessments related to modern slavery to ensure safety and ethical integrity of their product supply chains, fostering responsible and sustainable practices.

ACTION:

Work through all four steps listed above to review and manage your product supply chain.

FURTHER RESOURCES:

[Supply Chain Risk Areas - Products](#)

[Template: Supplier Code of Conduct on Modern Slavery](#)

[STOP THE TRAFFIK](#)

[Sedex](#)

[SDS](#)

[Ulula](#)

6. Risk Mapping – Labour Supply Chain

The labour supply chain is a complex system, which sustains the operational capabilities of the hotel industry. It includes the workforce, ranging from the dedicated hotel staff to the various

suppliers engaged in important roles such as cleaning, maintenance, catering, and other essential services crucial to delivering a seamless guest experience. However, within this framework exists the possibility and current reality of labour exploitation, targeting the most vulnerable across the supply chain.



Incidence of labour exploitation can occur in hotels due to the fragmented employment structure, relying on labour providers for casual or outsourced workers for such various services. The industry relies heavily on migrant and outsourced workers, exposing these groups to heightened exploitation risks, especially in temporary or seasonal labour roles. Shifts in global events, notably Brexit and the COVID19 pandemic, have significantly altered the hospitality landscape. Labour shortages, reaching a staggering 83% higher than pre-pandemic levels, have strained the sector, further compounded by challenges in recruitment.¹⁷ While shortages in the labour market have skyrocketed, the demand for hospitality services have not, which means employers who are desperate to fill positions may be unwitting hosts of exploitation either directly or indirectly, through subcontracting elements of their business to organisations who engage in illegal labour practices.

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.

You can follow the four steps below to help you carry out more detailed analysis of risk in the labour supply chain and plan your actions to address those risks better in your hotel.

Step 1: Identifying your different pathways for recruitment

There are various ways a hotel can recruit into a business. All pathways have their own unique risk.

- **Outsourced labour agencies:** Hotels, especially larger hotels, often outsource entire operational functions such as cleaning or restaurant services to expert organisations, creating a potential risk for modern slavery and labour exploitation. As staff members will not be directly employed or managed by the hotel, hotel managers will have limited oversight over the operations and ethics of these organisations.
- **Third party recruitment agencies:** Hotels who are unable to directly recruit individual staff members might seek out recruitment agencies who have access to talent and resource. Hotels will likely not have visibility over the recruitment methods used by recruitment agencies who recruit individuals into businesses. Hiring recruitment agencies grants them significant control over the selection process. There exists a risk of modern slavery when agencies overlook proper vetting or due diligence in candidate sourcing.
- **Direct hiring:** When hotels directly recruit and manage staff, internal policies and practices take centre stage.

Prior to advancing to the next step, check which of these pathways apply to your hotel.

Step 2: Identifying risk

Risk areas of the pathways above can vary, while some risks overlap. Some examples of these include:

- Outsourced labour agencies:
 - o Limited visibility over recruitment and management of large cohort of staff
 - o Undisclosed salaries
 - o Potential recruitment fees imposed by outsourced partner organisations
 - o Contract deception
 - o Salary deductions
 - o Lack of training and support
 - o Retention of identification documents
 - o Worker-living arrangement
 - o Ineffective grievance mechanisms
 - o Outsourced partner organisation's own employment practices may be inconsistent with your own labour standard.

- Recruitment Agencies:
 - o Recruitment fees
 - o Misinformation
 - o Retention of identification documents
 - o Debt bondage

- Direct Hiring:
 - o Legal status used as a basis of discrimination
 - o Salary deductions means organisations end up unwillingly paying below minimum wage
 - o Discrimination based on 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.

Check out the supplementary material [‘Supply Chain Risk Areas – Labour’](#) to understand the risks associated with each of the pathways and identify where you have the highest risks.

Step 3: Creating an action plan based on your identified risk

After you have identified your labour risk areas, you can target each of these areas to mitigate the risk. Use the table below for some guidance on where to start.

Table 5

Preventative Action	Further Detail
Outsourced labour agencies	
Thorough due diligence	Perform thorough background checks on outsourced partners to ensure they adhere to labour standards and ethical practices.
Include standards in contracts or agreement	Explicitly outline labour standards, including fair wages/salaries, working conditions, and no recruitment fees in partnership agreements, contracts, or MOUs. Ensure these agreements reflect the hotel’s own ethical standards.
Establish oversight mechanism	Look into implementing regular audits or inspections to monitor outsourced partner operations, including periodic visits and assessments of staff working conditions. Require periodic reporting on employee wages, working hours, and grievances.
Transparency in employment practices	Encourage partners to openly share information on salaries, working conditions and employment terms of their staff with the hotel management.

Preventative Action (cont)	Further Detail (cont)
Ban recruitment fees	Ensure partners don't use recruitment fees. Possibly include clauses in contracts that clearly state the elimination of any form of fees for staff recruitment.
Contracts	Require that all agencies provide written contracts to all workers in a language they understand. Contracts must clearly detail job roles, salaries, working conditions, and any obligations from both (or all) parties.
Salary transparency	Regularly inquire about wage payments to check for any signs of withholding, unreasonable deductions, or delayed payments. Implement systems to flag and investigate any irregularities promptly. This should include systems to detect multiple salaries/wages being paid into the same bank account, which could indicate potential exploitation.
Document ownership	Ensure workers provided by the agency or labour provider retain possession of their personal documents (e.g., passports) to prevent any form of coercion or exploitation.
Accommodation standards	If the agency provides accommodation, ensure it meets safety and cleanliness standards. Regularly assess and monitor living conditions to prevent exploitation through inadequate housing. Where it is not feasible to conduct audits, set out this standard in the code of conduct and/or contract.
Training and support	If not already provided, work with partners to ensure their staff receives adequate training, including on labour rights, safety standards, and ethical practices.
Grievance mechanism	Require partners to establish accessible and effective grievance mechanisms for their employees. Ensure that these mechanisms are known and understood by all their staff members.
Dependency on subcontractors	Where reasonable, encourage partners to limit reliance on multiple layers of subcontractors, promoting direct engagement and recruitment of their staff members.
Third party recruitment agencies	
Supplier code of conduct	Ensure that all recruitment agencies have signed a Supplier Code of Conduct that explicitly prohibits charging recruitment fees to workers and requires them to uphold the same ethical standards as those employed at the hotel.
Ban recruitment fees	Ensure partners don't use recruitment fees. Possibly include clauses in contracts that clearly state the elimination of any form of fees for staff recruitment.

Preventative Action (cont)	Further Detail (cont)
Document ownership	Ensure workers provided by the agency or labour provider retain possession of their personal documents (e.g., passports) to prevent any form of coercion or exploitation.
Reducing reliance on labour providers/ agency	Assess the level of reliance on agencies/ labour providers for necessities. Explore alternative options to reduce dependency and vulnerability among workers, aiming for more autonomy and choices outside the agency's control.
Directly Hired	
Ensure policies are clear from the start	Develop comprehensive internal policies within the staff handbook, HR manuals, jobs descriptions and welcome packs explicitly outlining fair treatment, commitments to ethical employment practices and to set clear expectations from the start.
Ensure policies are easily accessible	Ensure easy access to these policies for all staff members, prominently placing them in areas like the staff room and making them readily available electronically for HR and recruitment teams. Implement regular training sessions to familiarise staff and management with these policies.
Compliance with global labour standards	Regularly review and align direct employment processes and policies with global labour standards, ensuring consistency across different locations, even if local regulations are less stringent.
National Minimum Wage compliance	Conduct regular audits and checks to ensure that no deductions for necessities (like uniforms) cause staff to fall below the minimum wage. Implement transparent accounting practices to clearly show how deductions are calculated.
Monitoring working hours	Implement systems to track and monitor working hours to prevent employees from being coerced or pressured into working beyond legal limits. Ensure fair compensation for any overtime worked and discourage excessive working hours.
Feedback and reporting mechanisms	Establish open channels for employees to voice concerns and report any potential exploitation without fear of retaliation. Create anonymous reporting systems to encourage honest feedback and address issues promptly.
Check salaries	Check bank accounts to ensure that wages go directly into employees bank accounts.

ACTION:

Work through all four steps listed above to review and manage your labour supply chain.

FURTHER RESOURCES:

[Supply Chain Risk Areas - Labour](#)

[Template: Supplier Code of Conduct on Modern Slavery](#)

[Best Practice Commitments on Employment and Human Rights](#)

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

[Verite's Fair Hiring Toolkit](#)

[IHRB's Briefing on Recruitment Fees](#)

[IHRB's Six Steps to Responsible Recruitment](#)

[Association of Labour Providers](#)

[Stronger Together No Recruitment Fees Policy Template](#)

[Stronger Together Employer Implementation Checklist](#)

[Just Good Work](#)

7. Working with Suppliers

Improving social and ethical standards in the supply chain, whether it's product or labour-related, is a challenging process that requires the cooperation of employees, suppliers, business partners and other stakeholders. We must also recognise

that compliance to a supplier code of conduct and other goals may not be immediately achievable, but it is important you remain committed to working collaboratively towards these goals. You can both recognise the challenge and set out a process of continuous improvement.



One way to uphold this might be to come up with principles or “ways of working” that your teams can adhere to. These can even be added to your Supplier Code of Conduct to share with others. Principles like this are also one way to demonstrate the senior level commitment in your engagement with suppliers. Another would be to ensure that your senior leaders are actively discussing your commitment to tackle modern slavery with senior leaders of your suppliers and other stakeholders.

Your **principles** may include a commitment to:

- Work to fair, transparent and mutually agreed terms and conditions.
- Make payments for services provided on time and in full.
- Work collaboratively with suppliers to improve social and ethical standards where our support is needed and is appropriate.
- Acknowledge specific national, regional or cultural challenges.
- Protect the confidentiality of information entrusted to us.
- Recognise suppliers’ own standards where they are comparable to our own.
- Ensure that all relevant employees are aware of our commitments.
- Include transparent environmental, social and ethical performance criteria in our supplier selection processes.
- Cease trading with suppliers demonstrating persistent disregard for this Supplier Code of Conduct.
- Give appropriate consideration to the impact of ceasing trading on suppliers and the communities in which they operate.
- Comply with the UK Bribery Act Legislation.

- Work to integrate the UN Guiding Principles on Business and Human Rights throughout our supply chain and in our own operations.

Other **internal actions** that may support these commitments include:

- Allocate the appropriate resources required to fully implement the Supplier Code of Conduct and/or any other commitments.
- Communicate the Supplier Code of Conduct and/or any other commitments to all relevant employees.
- Assign responsibility for the implementation of the Supplier Code of Conduct and/or any other commitments to specific individuals who will provide the Board, suppliers and other stakeholders with compliance updates and implementation performance as required.
- 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.
- Provide appropriate training and key performance measures to all employees with specific sourcing and business partner responsibilities to enable them to support the implementation of the Supplier Code of Conduct and/or any other commitments.
- Communicate the Supplier Code of Conduct and/or any other commitment to all suppliers and seek formal acceptance and commitment to its implementation.
- Require all suppliers to report their level of compliance to the Supplier Code of Conduct and/or any other commitments, and the corrective actions being taken towards improvement.
- Create and follow an approved action plan on how to approach suppliers regarding the code of conduct.
- Maintain an internal system to record and monitor the level of compliance to the Supplier Code of Conduct and/or any other commitments.

- Actively engage with all suppliers to support continuous improvement towards compliance with the Supplier Code of Conduct and/or any other commitments.
- Annually communicate the progress towards compliance with the Supplier Code of Conduct and/or any other commitments to our employers, suppliers and public.
- Review the Supplier Code of Conduct and/or any other commitments on an annual basis and whenever necessary and appropriate.
- Set out the internal criteria to consider when working with a supplier to determine when it is appropriate to terminate the relationship where there is little or no compliance or engagement over a longer period of time.
- Tracking suspicious signs that may indicate exploitation, such as:
 - o Suppliers having unrealistically low prices.
 - o Suppliers lacking transparency in supply chain/don't possess modern slavery or TISC statement.
 - o Suppliers not having or being able to show evidence of labour practices/ standards.
 - o Suppliers are reluctant to allow audits/resist your auditing processes.
 - o Suppliers excessively subcontracting to other suppliers.
 - o Suppliers showing evidence of their workers living on their site.
 - o Supplier premises showing evidence of being unsafe.
 - o Suppliers having a history of human rights violations.
 - o Suppliers showing evidence of using recruitment fees

See the supplementary materials for more information on indicators.

During engagement with suppliers, it is recommended to get formal acknowledgment of your expectations. It is also good practice to invite the supplier to demonstrate their alignment with those 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.

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.

ACTION:

Use the guidance to create your own set of principles for how you want to work with suppliers. Make sure the relevant people in your team are aware of how to implement these.

FURTHER RESOURCES:

More information on working with suppliers can be found in the [Framework for Working with Suppliers](#) produced by the Stop Slavery Hotel Industry Network.

8. Prevention, Reporting and Follow Up 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 to protect the safety of that individual. Hotels will likely already have their own crisis or emergency protocols which can be adapted to include actions to tackle modern slavery. Below you will find some suggestions on how to do this.



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. See chapter on Embedding the Blueprint for more guidance.

Anti-Slavery Lead

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 Leads 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 (for example, monthly or quarterly) 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 Lead should feed into the Anti-Slavery Committee through regular internal meetings.

Reporting Protocols

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 the supplementary materials). 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, for example you could have a 3-indicator threshold where the reporting protocol is triggered after 3 indicators are recorded.
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 in hotels, but if it were to, staff should be confident on how to respond. See the supplementary material '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 Lead) 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.
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, and reporting protocols. See Section 11 of this Blueprint for further information.

Follow Up Actions

After an incident has been reported, there are various key steps that can be taken to ensure you have addressed any underlying concerns within your hotel.

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 Lead, in order to protect the victim(s), employee(s), and the business. It is recommended that an investigation of a report made about staff be done in conjunction with the internal disciplinary procedure. For example, confidentiality should be maintained, and the staff may be suspended while the report is being investigated.

Victim Services

If an investigation confirms probable incidents of slavery, Anti-Slavery Leads 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).



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.

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 the section on working with suppliers which outlines how to implement a supplier code of conduct.**

PLEASE NOTE:

The General Manager and/or Anti-Slavery Lead 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:

- o 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.
- o Ensure that a copy of these protocols is accessible to staff on a daily basis, for example on the staff room notice boards.
- o 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.

ACTION:

Use the guidance above to check your existing prevention, reporting and follow up protocols – update as needed.

FURTHER RESOURCES:

[**Example Guidelines for Supporting at Risk Individuals**](#)

9. 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 the supplementary materials '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.

You can also work towards publicly reporting on your policies and procedures, goals and targets, investigations, key risk areas and overall performance related to eradicating modern slavery. It is also helpful having materials displayed so staff can see where implementation is occurring. For example, a staff room poster.

ACTION:

Ensure you set realistic and tangible KPIs that can move you towards effectively tackling modern slavery in your business.

FURTHER RESOURCES:

[Template: Knowledge Retention Quiz](#)

10. Wider Partnerships

Hotels have a unique opportunity to address modern slavery by engaging with their wider communities. This three-part section looks at the importance of three ways you can do this:



1. Engaging with business collaborations and investment partners
2. Joining networks and alliances
3. Working with specialist service providers and building community partnerships.

By actively participating in local networks and forming alliances, hotels gain access to valuable resources, expertise, and best practices to bolster their efforts against modern slavery and contribute to the sector. Moreover, investing in and collaborating with local charities and community partners allow hotels to directly support survivors of modern slavery and contribute to their rehabilitation and reintegration into society. Through these proactive and collaborative measures, hotels not only fulfil their social responsibility but also create a more impactful approach in tackling modern slavery.

Business Collaborations & Investments

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 that your partners (business partners, professional advisors etc.) and organisations you might invest in are also seeking to tackle modern slavery within their organisations.

No one can guarantee that all hotel operations are completely free of modern slavery. Likewise, it can't be guaranteed that all the practices of business partners and organisations you invest in are modern slavery free, but you can begin conversations with them based on the principles laid out in the Blueprint. More importantly, as a client or investor, you will have the leverage to ask some of the difficult questions.

Table 6

Partners	Examples	Key questions/things to think about:
Business Partners	Consultants Lawyers Accountants Bookkeepers	<ul style="list-style-type: none"> • Are your business partners aware of modern slavery and/or do they have a modern slavery statement? • Are you aware of their labour practices? • Are their labour practices consistent with your organisation's labour practices? • How, if at all, have you had conversations around ethical business practices (including, but not limited to, modern slavery)? • Have you shared this framework and/or its principles with these business partners?
Investment Partners	Companies you invest in	<ul style="list-style-type: none"> • Are you aware of the companies you have invested in? • Are you aware of modern slavery and/or have a modern slavery statement? • How, if at all, have you had conversations around ethical business practices (including, but not limited to, modern slavery)? • By investing in these companies, can you be sure that your organisation's funds, property or personnel would not be used to further support modern slavery in any way? • Are they committed to ensuring their investment chain is as ethical as possible? • How have you fostered conversations around ethical investment practices with your investment portfolio organisations? • Have you shared this framework and/or its principles with these organisations?

Networks & Alliances

Hotel businesses have a unique opportunity to play a pivotal and more strategic role in the fight against modern slavery by plugging into and joining local networks and alliances. These networks, comprising of other hotels or hospitality businesses/ organisations, offer an ideal platform to pool resources, share best practices, and collectively address this pressing issue. By collaborating with local initiatives, hotels can gain valuable insights into the specific challenges faced by their sector and tailor their efforts accordingly. Networks and alliances, such as [**The Stop Slavery Hotel Industry Network**](#) (no longer active), [**UK Hospitality**](#) and [**The Sustainable Hospitality Alliance**](#), provide opportunities to foster cross-sector partnerships that can amplify the impact of anti-slavery initiatives. Embracing a proactive approach, hotels can take the lead in spearheading strategic projects and innovative programmes to combat modern slavery.

Table 7

Partners	Examples	Key questions/things to think about:
<p>Networks and alliances</p>	<p>UK Hospitality</p> <p>The Sustainable Hospitality Alliance</p>	<ul style="list-style-type: none"> • Have we identified relevant industry alliances and networks focused on addressing modern slavery? • What resources and expertise can we contribute to these alliances and networks to support their efforts in combating modern slavery? • How can we actively participate in meetings, events, and working groups organised by these alliances to stay updated on the latest developments and best practices? • Are there opportunities to collaborate with other hotels or stakeholders within these networks to collectively address modern slavery challenges in our region? • Are there any shared data or research initiatives within these networks that can enhance our understanding of modern slavery issues and inform our strategies? • How can we leverage our corporate social responsibility or environmental social governance programmes to support projects initiated by these alliances and networks aimed at eradicating modern slavery? • Are there any opportunities for joint advocacy campaigns within these alliances to influence policy changes and promote stronger anti-slavery legislation? • Are there any innovative technologies or solutions being explored within these networks that we can adopt to strengthen our approach to combat modern slavery? • How can we share our successes and lessons learned with other hotels and organisations within these alliances to inspire broader action and knowledge sharing on this critical issue?

Specialist Service Providers and Community Partnerships

Charities and other civil society organisations hold a wealth of information on modern slavery issues and are crucial partners in helping to shape anti-slavery strategies. Your business should work to build relationships with charities and civil society organisations that specialise in tackling modern slavery. For example, [Electronic Watch](#), monitors global electronics supply chains at all tiers to tackle labour abuses all over the world. It is recommended that you plug into relevant networks and organisations who have the resources and expertise to support your organisation's efforts and achieve a greater impact than you can do alone. In addition to charities, your business could strive to work with public sector bodies in your region too such as the police, social care and other local authority professionals.

Hotels also have a significant opportunity to make a positive impact in the fight against modern slavery by investing in and collaborating with local charities. Hotels can forge partnerships with organisations to implement targeted programmes that empower and support survivors of modern slavery. One such organisation is the [Sophie Hayes Foundation](#) who you could collaborate with to offer survivors a chance to gain hands-on experience in various hotel operations, from front office to housekeeping and food and beverage departments. Such initiatives play a crucial role in aiding survivors' reintegration into the workforce, providing them with invaluable employment skills and building their confidence for future success. There may be other local organisations in your area that do similar work you could support. By investing in these collaborations, hotels not only contribute to the rehabilitation and empowerment of survivors but also set a precedent for the industry's commitment to eradicating modern slavery. Hotels can invest and collaborate with local charities and community organisations by:

- Providing financial support directly or through sponsored programmes and events
- Collaborating with charities to co-create and implement programmes
- Providing in-kind donations (through good and services)
- Implementing an employee volunteer program
- Co-organising fundraising events such as charity dinners, auctions or charity runs
- Skill development workshops for survivors supported by the charity

Table 8

Partners	Examples	Key questions/things to think about:
<p>Local and sector-specific community partners</p>	<p>Victim support services</p> <p>Police</p> <p>Local authorities and other statutory services</p>	<p>Questions on engaging with charities and specialist service providers to support survivors of modern slavery:</p> <ul style="list-style-type: none"> • Are you aware of any NGOs/victim support services/specialist services? • Have you established communication channels with the police, public sector, local charities, or organisations that specialise in supporting survivors of modern slavery to ensure a prompt and coordinated response if you encounter such cases? • Have you cultivated close relationships with these stakeholders? • Are there established protocols in place to report any suspicions or incidents of modern slavery to the relevant authorities and the partnering charities for immediate support? • Does your follow up protocol involve these services in a victim-centric way? • How can you collaborate with partnering charities to ensure survivors' ongoing support and well-being after their stay at our hotel (if relevant)? • How can you continually improve and enhance our collaboration with charities to better support survivors and combat modern slavery effectively?

Partners (cont)	Examples	Key questions/things to think about:
	<p>Modern slavery NGOs</p> <p>Specialist service providers</p> <p>Anti-Slavery Groups</p>	<p>Questions on engaging with charities and community groups to support anti-slavery efforts across the community and wider sector:</p> <ul style="list-style-type: none"> • Have you identified local charities and community groups focused on combatting modern slavery that align with our values and objectives? • How have you initiated contact and built relationships with these charities and community groups to explore potential collaboration opportunities? • What specific financial support mechanisms can you offer to assist these organisations in their efforts to combat modern slavery? • Are there in-kind donations or services that you can provide to support the charity's operations and programmes? • How can you involve your employees in volunteering opportunities with these charities to contribute their time and skills to combat modern slavery? • What programmes or initiatives can we co-create with the charities and community groups to directly address the needs of survivors of modern slavery? • How can you utilise the hotel's resources, facilities, and expertise to enhance the impact of the charity's programmes? • Have you developed a long-term commitment plan to support these charities and community groups consistently, ensuring ongoing impact? • How can you communicate our collaboration efforts with these charities to your wider stakeholders and guests to raise awareness and encourage broader support for the cause?

ACTION:

Use the questions in the above tables to determine what wider partnerships will be helpful for your business in its journey to address modern slavery.

FURTHER RESOURCES:

- [UK Hospitality](#)
- [Sustainable Hospitality Alliance](#)
- [Stop Slavery Hotel Industry Network](#) (no longer active)
- [Electronics Watch](#)
- [Sophie Hayes Foundation](#)

11. 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.
- provide details on how to prevent risk of modern slavery in specific roles.



See the supplementary materials 'Training Pack'.

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.



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.

ACTION:

Review the template training pack and decide how best to incorporate it into your team training schedule.

FURTHER RESOURCES:

[Template: Training Pack](#)

12. Summary & Conclusion

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:

- **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.
- **Measurable Change:** Develop verifiable KPIs to measure progress.
- **Relationships:** Where possible, build and maintain longstanding relationships with local and trusted suppliers, making clear our expectations of business behaviour.

Taking a holistic approach will put you in the best place to effectively tackle modern slavery. The supplementary materials provided with this Blueprint are also a good starting point.

Thank you for using this Blueprint. If you have any questions or feedback, please email info@shivafoundation.org.uk.

Endnotes

- 1 International Labour Organisation (2022) Global Estimates of Modern Slavery: Forced Labour and Forced Marriage: https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm
- 2 Walk Free, Global Findings and International Labour Organisation
- 3 National Referral Mechanism, end of year summary 2022
- 4 Hospitality strategy: reopening, recovery, resilience - GOV.UK (www.gov.uk)
- 5 Shiva Foundation on Hospitality: A high-risk industry for labour exploitation
- 6 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.
- 7 There are other forms of modern slavery that may not be directly relevant to modern slavery such as forced marriage and organ harvesting.
- 8 https://www.antislaverycommissioner.co.uk/media/1282/the-passage-modern-slavery-handbook_v3.pdf
- 9 ibid
- 10 ibid
- 11 ibid
- 12 <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>
- 13 https://www.antislaverycommissioner.co.uk/media/1282/the-passage-modern-slavery-handbook_v3.pdf
- 14 Cit. 4
- 15 Cit. 4
- 16 https://www.antislaverycommissioner.co.uk/media/1282/the-passage-modern-slavery-handbook_v3.pdf
- 17 <https://committees.parliament.uk/writtenevidence/109891/pdf/>

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