



SHIVA HOTELS GROUP LLP

MODERN SLAVERY STATEMENT 18/19



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Shiva Hotels Group LLP (“Shiva Hotels”) operates a zero tolerance approach to modern slavery and human trafficking and recognises its responsibility to prevent and protect against such acts within its business and supply chains through constructive partnerships. As part of a growing collaborative effort, Shiva Hotels promotes and respects human rights and worker rights and recognises the need to educate and support those who are most vulnerable to exploitation. Shiva Hotels publicly committed to eradicating slavery in 2012, when we founded Shiva Foundation, an organisation focused on addressing modern slavery in the UK. Rishi Sachdev, Managing Director of Shiva Hotels, sits on the board of the Foundation and supports its anti-trafficking initiatives. We have shown commitment to addressing this issue not only within our own businesses and supply chains but also across the UK hotel and hospitality industry.

Our public statement - ‘Shiva Hotels - Our Commitment to Tackle Human Trafficking’ - appears on Shiva Hotels’ website at www.shiva.co.uk/modernslavery and is actively shared more broadly with business partners, corporate clients and interested parties. Additionally, it is displayed on a plaque in the lobbies of each of our hotels. Each hotel in our portfolio is required to ensure that a copy of this statement is accessible to staff on a daily basis and in other areas accessible to guests as appropriate (i.e. in public lifts and on guest room TV screens).

We are committed to improving our practices to combat slavery and human trafficking. This statement has been published in accordance to the guidelines in Section 54 of the Modern Slavery Act (2015).

Message from the Director

Shiva Hotels believes it is responsibility to ensure sound social and ethical practices within its own operations and within its supply chain in every market in which it operates. At Shiva Hotels, we acknowledge that every person deserves and is entitled to a safe working environment and fair remuneration. We understand when individuals are rightfully treated with respect and equality, both they and their companies benefit from increased commitment and productivity. We have therefore developed the Stop Slavery Blueprint (the “Blueprint”) which provides protocols and policies to strengthen our initiatives to fight and prevent modern slavery within our business and supply chains. These proactive steps will help to promote accountability and transparency, and ensure that as much as possible is done to safeguard against possible threats.

We are determined to do everything we can to bring responsible sourcing practices to all stages of our supply and value chain. We are taking proactive steps to ensure human trafficking and modern slavery are addressed within our operations and supply chains and wish to work with our suppliers to apply the same principles within theirs. Shiva Hotels is fully committed to implementing the Blueprint and all of its policies and protocols throughout the supply and value chain, working towards a target to source all critical products and services sustainably.

I believe that this isn't somebody else's responsibility, and that each and everyone one of us has a role to play in putting an end to this heinous crime. I believe that business must be involved in the eradication of modern slavery.



Rishi Sachdev,
Director, Shiva Hotels



a) Our Structure

Shiva Hotels is a UK-based business with operations across the country in the hotel, resort and conference centre industry. We are a dynamic, privately owned company focusing on three main areas in the UK hotel market – namely site acquisition and development, hotel acquisition, and hotel management. Our portfolio currently includes six properties (4 of which are operational) in the UK and we employ 473 staff and 150 sub-contracted staff.

From risk assessing our suppliers, we are aware that nearly half of our spend is on high risk sectors, however this is limited to a small number of suppliers. These sectors are food and beverage, housekeeping and cleaning and laundry and linen. Although a significant proportion of procurement is on high risk products, the small number of suppliers enables risk mitigation without extensive intervention. While we have risk mapped all of our first-tier suppliers, it is recommended that further mapping be conducted on our food and beverage supplies, which we plan to do as part of our increased engagement with suppliers over 2018 and beyond.



b) Our policies on modern slavery and human trafficking

Shiva Hotels is committed to upholding basic human rights and supports the United Nations Universal Declaration of Human Rights and the International Labour Organisation Core Conventions. The Shiva Hotels Stop Slavery Blueprint sets out the key principles that Shiva Hotels has been embedding into its hotels as part of its fight against modern slavery. It provides guidance and recommendations in the form of policies and practices, procedures and protocols, and training schedules. External experts such as Unseen, COMBAT, STOP THE TRAFFIK and Operation Makesafe were consulted throughout its development.

The Blueprint also sets out operational guidance for:

- Transparency,
- Reporting,
- Performance measurement,
- Business partner engagement,
- Risk assessment,
- Business authentication, and
- Investigation and remediation.

Figure 1: Shows industry risks and how Shiva Hotels are taking steps to mitigate such risks.

HOTEL USAGE	EMPLOYEES	SUPPLY CHAINS	EXECUTIVE DECISION MAKING
 <p>RISK: Hotels can become unwitting hosts of sexual exploitation victims, who may be moved through the hotel when being trafficked, or kept in the hotel by trafficker who use the bedrooms as a base for sexual exploitation.</p>	 <p>RISK: Hotels frequently rely on labour providers to employ outsourced housekeeping and cleaning staff. The layered structure of hotels combined with multi-tier recruitment systems, can mean that unscrupulous practices are difficult to detect.</p>	 <p>RISK: Goods and services purchased by hotels can represent hidden risks in terms of worker welfare. Global supply chains can be multi-tiered and final products pass through a complex network of producers, distributors and vendors before being brought into hotels.</p>	 <p>RISK: Without senior level buy in, policies will not be effectively implemented. Likewise, it is important that anti-slavery initiatives are embedded within business objectives and communications with potential business partners.</p>
<p>STEPS WE ARE TAKING: Our policy to tackle such risks is contained in the Shiva Hotels Hotel Use Policy which sets out guidance on how employees can ensure that Shiva Hotels’ property and services are appropriately used by others.</p> <p>We have developed and implemented an Internal Incident Reporting Protocol through discussion with the police and victim service providers, to ensure that the pathway for reporting incidents, is victim-centred, in line with best practice, and is clear and simple to follow.</p>	<p>STEPS WE ARE TAKING: Shiva Hotels complies with local laws regarding work hours and payment, and ensures that employees have the ability to communicate their voice as an employee. Specific guidance is contained in the Shiva Hotels Best Practice Commitment on Employment and Human Rights and Guidelines for Establishing Terms and Conditions with Recruitment Agencies.</p>	<p>STEPS WE ARE TAKING: We developed a Shiva Hotels Supplier Code of Conduct which defines both Shiva Hotels’ minimum standards and the basic principles of cooperation that are expected from all of our suppliers. The principles set out in the Supplier Code of Conduct require all of our suppliers to ensure their facilities meet clear standards and that they apply the same principles within their own supply. Shiva Hotels is fully committed to implementing the Supplier Code of Conduct throughout the supply and value chain, working towards meeting a target to source all critical products and services sustainably and we shall require the support of all of our suppliers to achieve this goal.</p>	<p>STEPS WE ARE TAKING: Shiva Hotels’ business objectives also comply with our commitment to preventing modern slavery within our work. The head office team therefore, is required to comply with the Shiva Hotels Head Office Guidance on Human Trafficking when making broader strategic decisions.</p>

As outlined in figure 1 and addressed in the Blueprint, we have identified four key risk areas within the hotel industry which our policies and protocols address. We are committed to working towards embedding the following policies and guidance, as guided by UK employment law, into our existing policies and documents as appropriate.

Shiva Hotels' commitment to tackle modern slavery has been integrated throughout its policies, practices and decision-making procedures. The position statement on trafficking is being incorporated into each hotel's vision, mission, value statement and goals, and will be cascaded down into relevant policies and across each hotel and department. Individual hotels within our portfolio have incorporated these into their internal policies and practices. There is an autonomy to do this in a way that best integrates with their existing processes however they must adhere to the overall aim of the Blueprint.

A cross-functional Anti-Trafficking Committee, consisting of the Anti-Trafficking Champions from each hotel (General Managers unless otherwise specified) and director-level representatives Human Resources and Operations, as well as Executives, was formed to manage the implementation of the Blueprint and subsequent policies throughout the Shiva Hotels portfolio. The Anti-Trafficking Committee meets bi-monthly to track progress and report any ongoing challenges, patterns or concerns. Shiva Foundation is also a member of the committee that brings in its expertise on modern slavery. The Anti-Trafficking Committee is responsible for reviewing the annual self-assessment reports and industry benchmarks to recommend changes and improvements.

Hotel employees are asked to report violations of two policies in particular: Hotel Usage Policy and Best Practice Commitment on Employment and Human Rights. Hotel employees are encouraged to report if there is a violation in terms of guests using the premises for human trafficking and modern slavery and in terms of a fellow staff member being exploited. If a staff member witnesses an event that leads them to suspect an instance of modern slavery they are to inform their head of department or manager on duty immediately who in turn will have been trained on how to handle such cases as per the Blueprint guidelines. Shiva Hotels operates a victim centric reporting

protocol making their safety and wellbeing paramount through any internal procedure.

c) Our due diligence and risk assessment processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk in the short term, hotels adopt the following control measures:

- a. Relationships:** where possible, build and maintain long standing relationships with local and trusted suppliers.
- b. Employment:** Where possible, recruit, vet and employ employees directly, following clear company policies and guidelines.
- c. Compliance:** Ensure compliance with current legislation and guidelines by embedding both into general hotel operations. This includes relevant human resources provisions in law, such as Working Time Regulations and the National Minimum Wage.
- d. Knowledge:** Improve knowledge base by collecting relevant data and improving transparency within the business and down its supply chain.
- e. Feedback:** Promote a company culture whereby the reporting of concerns and the protection of informants is encouraged.
- f. Third party engagement:** Build strategic alliances with independence unions, social advisors and NGOs.
- g. Measurable change:** Develop verifiable indicators to measure progress.

Anti-Trafficking Champions monitor areas of risk on a regular basis in line with the guidelines provided and report anything unusual to the Anti-Trafficking Committee as appropriate via incident reporting protocols and regular General Manager meetings.

Due Diligence Process

Step one: Defining our standard

Shiva Hotels has developed a Supplier Code of Conduct which defines both Shiva Hotel’s minimum standards and the basic principles of cooperation that we expect from all of our suppliers, whether they supply goods, services or people. The principles set out in this policy require our suppliers to ensure their facilities meet the standards as defined in this policy and that they apply the same principles within their own supply chain.

Step two: Identifying risk

In terms of risk within the supply chain, Shiva Hotels worked with Shiva Foundation and STOP THE TRAFFIK to carry out detailed risk mapping of its supply chain. The exercise covered suppliers across the hotel group and categorised them into 14 types of supplier. High and medium risk ranked suppliers were highlighted by looking at various criteria, such as country of operations, type of product or service and individual business criteria (transparency, current governance structure, etc.). Food and Beverage, Housekeeping, Cleaning and Laundry, Uniforms and Bedding, and

Agency Staff were raised as high-risk areas of focus (see figure 2).

For longer term adherence to a risk assessment process, the Anti-Trafficking Committee is exploring how they may carry out a similar activity with all tier one suppliers at 18-month intervals in order to ascertain risk based on any external factors. In between these 18-month intervals, a risk assessment will be carried out on an informal and ad hoc basis with any new suppliers.

Step three: Risk mapping

The information gathered from the activity of identifying risk is then reconciled with our list of suppliers. The information can be used to assess the potential risk of each supplier, from first tier and down 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. While we consider certain factors in order to prioritise for engagement purposes, all suppliers are eventually engaged.

Figure 2: Identified modern slavery risks within hospitality and explanation

 FOOD AND BEVERAGE	 HOUSEKEEPING, CLEANING, AND LAUNDRY	 UNIFORMS AND BEDDING	 AGENCY STAFF
<p>RISK: Agricultural work can be hazardous, employing harsh methods and chemicals, and requiring a large-scale seasonal labour force. This can involve a low-skilled migrant workforce that may be vulnerable to exploitation by labour contractors or unscrupulous employers.</p>	<p>RISK: The cleaning sector employs a high number of agency workers and subcontracted labour involving intermediaries which increases the risk of exploitation.</p> <p>These services typically require entry-level positions with low skills requirements meaning the individuals might be less aware of their rights and more vulnerable to abuse.</p>	<p>RISK: The garment industry is high risk for modern slavery due to its long and complex supply chains which operate in countries where exploitative working conditions are prevalent. Cotton is one of the goods that can be produced using forced or child labour.</p>	<p>RISK: Risk of modern slavery incidence arising with the employment of seasonal agency workers can depend on the type of agency and its practices.</p>

Step four: Engaging with suppliers

Shiva Hotels has been sharing our policies regarding modern slavery to our suppliers to ensure our values run in parallel. Suppliers are asked to agree to the standard therein and to complete a questionnaire to help us understand their position on modern slavery. We have informed all of our tier one suppliers of our commitment and requested that they reply with details regarding their own efforts to address modern slavery. In 2018, we will be circulating a questionnaire to all suppliers requesting evidence of compliance with the criteria set out in the Supplier Code of Conduct. For new suppliers, their response to the questionnaire is considered before signing any contract.

Shiva Hotels is currently working proactively with suppliers to help them establish their own anti-slavery initiatives. For example, we have started working in partnership with one of our biggest suppliers, on awareness training and we are in the process of planning Action Learning Groups which would allow suppliers to attend an initial series of workshops and trainings to get them started on their own work to tackle modern slavery.

In relation to recruitment agencies, Shiva Hotels has its own Guidelines for Establishing Terms and Conditions with Recruitment Agencies, additionally Shiva Hotels' suppliers are requested to provide evidence of internal measures to combat modern slavery and promote human rights.

External Scrutiny

We work closely with Shiva Foundation and use the foundation team's knowledge so that we can build a response that fits this complex issue. Through the Foundation, we liaise with several other leading anti-trafficking charities in the UK. More specifically, we work closely with:

- The COMBAT human trafficking team, by which we continue to learn best practice from the step by step guidance. Combat helped us assess staff views of modern slavery across our hotels and was particularly instrumental in the development of our awareness training and with setting up the Stop Slavery Hotel Industry Network, of which Shiva Hotels is a founding member.

- We work closely with other stakeholders in the industry (i.e. employment agencies, brands, hotel management companies, other hotel groups and construction membership bodies) through the Stop Slavery Hotel Industry Network to ensure that we learn new practices and do everything we can as a sector on the subject. In this spirit, the Network has been informing us on our monitoring and auditing procedures regarding our suppliers.
- We have also engaged with STOP THE TRAFFIK, a global coalition dedicated to ending modern slavery, to conduct a risk mapping exercise of our first-tier suppliers along with recommendations of steps to be taken with prioritised organisations.
- We have developed key stakeholder relationships, including creating strong partnerships with a dedicated police unit working to tackle child sexual exploitation (Operation Makesafe) for each hotel to strengthen our protocols for spotting incidents and reporting accordingly.

d) Risk management and Assessment

Our Supplier Code of Conduct defines Shiva Hotels' minimum standards and basic principles of cooperation that we expect from our suppliers, this in turn requires our suppliers to establish pertinent codes of conduct with sub-contractors and sub-suppliers. Shiva Hotels Supplier Code of Conduct is to be shared with all business partners with our portfolio and is to be read and signed by their suppliers.

Shiva Hotels understands that improving social and ethical standards in the supply chain is a challenging process that requires cooperation from all of its employees, suppliers, business partners and other stakeholders. We also recognise that compliance to the Supplier Code of Conduct may not be immediately achievable but we are committed to working collaboratively towards this goal. For suppliers who do not adhere to, or provide evidence of adherence to, the provisions in the Supplier Code of Conduct, we have a draft plan of action that starts with communication, includes capacity building and will result in termination of the relationship if criminal activity is in question. To date, there have been no instances where we have had to take action, however we anticipate that any instance will be an opportunity to further develop our operations in taking appropriate action against modern slavery.

Shiva Hotels is currently working proactively with suppliers to help them establish their own anti-slavery initiatives. For example, we are working to develop sector and role specific training and a plan for labour supply chain mapping with one of our biggest suppliers.

With the understanding that a continuous improvement approach is best for promoting joint ownership of corrective action plans and the raising of standards, Shiva Hotels is determining the process for managing supplier relationships. While we are not yet at this stage, we are investigating options such as:

- Formal review meetings held regularly between organisations and supplier to review progress.
- Standard tracking to regularly check that policies and processes are maintained and updated record accordingly.
- Spot-checks on staff working in hotels to ensure that the agency employing these workers are acting as agreed in the standard.
- Spot-checks by a third-party agency.

In accordance with the Blueprint, initial and regular interval awareness training is embedded into our training strategy. The training has been created in consultation with the police, COMBAT Modern Slavery Helpline and other victim service providers such as NWG Network. The training includes familiarisation with the incident reporting protocol and all staff are given a flowchart which indicates how to handle incidents of suspected human trafficking and modern slavery with emphasis on victim centric processes.

If an incident is reported, remedy involves three key steps which are outlined below.

- **Investigation:** Any investigation beyond the initial report should be performed by local police and victim service providers, with the full support of head office and the Anti-Trafficking Champion, in order to protect the victim(s), employee(s), and the business.
- **Victim Services:** If an investigation confirms probable incidents of trafficking, Anti-Trafficking Champions should work in cooperation with a local specialist victim service provider to ensure that



Figure 3: Staff Wanted Initiative Poster

the victim is protected and aware of all options for access to remedy (judicial and non-judicial). Our hotels will work to ensure that victims of trafficking can continue their employment at the hotel where possible. If the victim does not want the police to be called, there are confidential 24/7 options which are promoted through the Blueprint and training materials.

- **Root Cause Analysis:** Our hotels endeavour to analyse the root causes for the incident and why the incident involved the business or employees. If applicable, and depending upon the severity of the incident, our hotel may give written warning notice or notice of termination to employee, supplier, contractor, or subcontractor that has violated policy. If applicable, we aim to make improvements that will prevent future incidents.

e) Effectiveness of addressing modern slavery, and performance indicators

The Shiva Hotels public commitment - “Our Commitment to Tackle Human Trafficking” is placed in all hotel lobbies and in rooms to raise awareness of human trafficking and modern slavery to guests and staff, and to inform them of our commitment. Additional



posters are available in staff areas that have information about indicators, the internal protocols for reporting a potential incident, and the Modern Slavery Helpline number. We have also posted the Staff Wanted Initiative posters that aims to help workers understand their rights and is in 10 different languages (figure 3).

Prior to the implementation of the Blueprint across the organisation, modern slavery training was delivered to staff as part of a pilot in one of Shiva Hotels' properties. Initial feedback was requested from attending staff members which was then reviewed at Anti-Trafficking Committee meetings. Knowledge retention quizzes were taken three months after training to ensure that training was effective. Additionally, Shiva Hotels is reviewing the number and types of indicators that are reported by all staff both independently and with the Metropolitan police to identify key trends that may inform more effective training in the future. The training is continuously updated in line with external good practice (see section f).

In terms of performance of staff, Shiva Hotels includes commitment to preventing modern slavery as an integral part of every role, and as such has been informally reviewed as part of the values and behaviours we expect every employee to demonstrate. All job descriptions are being updated to have a KPI of 'social responsibility' which includes a commitment to modern slavery within this KPI. Job descriptions are reviewed at annual appraisal and twice yearly job chats. Materials indicating our ambition to tackle modern slavery are given to every job applicant through information in the job advert and welcome letters. We also state our expectation of employees in demonstrating their commitment to our values through these means. New staff are given mandatory training awareness training within six weeks of commencement. There have been a number of indicators reported since the Blueprint was embedded, which demonstrates

an increased level of knowledge in staff and effective reporting processes. When indicators have reached the required threshold for police involvement, we engage with the Metropolitan police to assess our process and their response on the case in question.

f) Training on slavery and human trafficking

All staff across Shiva Hotels has received training on modern slavery indicators and how to report an incident that may occur. All employees from our Hilton branded hotels also participate in an online training course about child sexual exploitation. Head Office and key senior members of staff also receive training to raise awareness about corporate responsibilities. Part of Head Office's role is to attend the mandatory training and adhere to principles of implementation contained within all modern slavery policies.

We have run the awareness raising training, which includes reporting protocols and indicator lists, for all of the employees within all Shiva Hotels properties. The training, approved and run by the Anti-Trafficking Committee members in order to ensure correct level and tone as well as consistency, has been embedded within each hotel's training strategy. An online questionnaire for training participants is carried out three months after their training to assess retention of knowledge. As part of each hotel's programme, re-training is provided annually.

Training will also be offered to select suppliers. This would be adapted for the supplier's needs and based on the Shiva Hotels awareness training. This training is currently being developed with the view to roll out to regional, area and cluster managers of one of our cleaning agency staff suppliers with an e-learning version for all other staff. The purpose of the training is to equip staff with the knowledge of how to identify incidents of modern slavery, in particular sexual exploitation and labour exploitation, and how to adequately report such incidents.

The next phase of our training development is to launch a module for duty managers in order to further develop a victim-centred approach to crisis management and to provide them with the tools should someone disclose exploitation to them or their staff. There will also be third module launched next year with more insight on



risk mapping with suppliers and within supply chains to build on the knowledge of procurement staff.

There are a number of indicators we use to assess the effectiveness of the training:

- **Knowledge gained:** We ask participants to rate their level of knowledge on the subject before and after training to assess the knowledge gained over the course of the training.
- **Retention of knowledge:** We circulate a post-training questionnaire three months after training with questions to assess level of knowledge in staff on indicators and reporting protocols. We are developing a cue card which will be circulated to remind staff of modern slavery indicators and reporting protocols and to further strengthen retention of knowledge.
- **Trust in reporting protocols:** Participants are also asked whether they agree with the reporting protocols and whether they have confidence in them.
- **Number of reports:** We track the number of indicators and incidents that are reported and analyse the response on a monthly basis. As part of reporting protocols, staff are trained to raise any indicator of modern slavery they spot. Once

the agreed threshold (as assessed and approved by external experts) is reached, the situation is escalated to the police and/or modern slavery helpline as appropriate. Every three months we also review any reports with the police to assess our protocols and the police's response.

- **How the training is received:** Part of ensuring staff are able to learn from the training is ensuring the methods are appropriate and well received. To ensure that we are continuously improving our efforts to tackle modern slavery and that training is effective, we ask for general feedback which monitors the effectiveness of the training and its content.
- **Performance in live scenarios:** We are in the process of setting up spot-checks with the Metropolitan police to see the response when staff are faced with a real-life situation.

When it comes to reporting an incident protocol, the General Manager assesses management of the protocol by tracking incidents, soliciting feedback, improving the protocols, and monitoring compliance on an ongoing basis.

Our continued commitment

The process of developing our anti-slavery policies and practices has informed our sustained efforts to address modern slavery and human trafficking. In the coming year, we plan to develop and deepen our engagement with our tier one suppliers, with a particular focus on auditing and providing practical support to suppliers to enable them to establish and maintain their own initiatives. Priority will be placed on mapping the food and beverage sector to assess specific risks.

We are continuing to embed the statement on trafficking in each hotel's vision, mission, value statement and goals. Shiva Hotels, with the support of Shiva Foundation, will continue to refine our awareness training based on external best practice and internal feedback.

Additionally, we are currently working with the Sophie Hayes Foundation to offer placements to survivors of human trafficking in one of our hotels with the view to expand this partnership across the portfolio in the coming year. As a founding member of the Stop Slavery Hotel Industry Network, we will continue to be involved as we explore new directions and encourage other businesses in the industry to join the call to action. Collaborative action is intrinsic to our mission to eliminate modern slavery from the hospitality sector. Shiva Hotels welcomes suggestions for collaboration with leaders and innovators in this area.

The Shiva Hotels Modern Slavery Statement was generated by Shiva Foundation and approved by the Shiva Hotels Board of Directors on 8 March 2018.