Introduction

This statement is made pursuant to s54 of the Modern Slavery Act 2015 for the financial year ending 29 November 2018, and sets out the steps that Hand Picked Hotels Limited (“HPH”) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within its business or supply chain.

The Modern Slavery Act 2015 creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking (“Modern Slavery”). HPH are committed to combatting all forms of Modern Slavery.

HPH is committed to operating with integrity and accountability, both within its organisation and in all relationships with suppliers and other partners.

About Hand Picked Hotels Limited

HPH is a privately owned company owning and operating hotel businesses and which has its head office in Sevenoaks, England.

The group consists of 19 hotels in the UK, Jersey, and Guernsey. The business relies on the services of around 2000 people. As a full service hotel operator, its activities cover, food and beverage production and service, guest reception services, housekeeping, health club and spa services delivery, administrative and accounting functions. The supply chain covers both central supply chains fully administered centrally, and hotel based supply chains which are overseen from the centre.

HPH recognises that Modern Slavery includes the risks that arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas.

Policies and procedures

The existing policies and procedures of HPH which assist in combatting Modern Slavery include:

Modern Slavery Policy – This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains

Code of conduct for Suppliers - issued to all suppliers and contractors, the Code requires positive confirmation of compliance

Recruitment – HPH conducts robust checks on any new employee including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will

Whistleblowing Policy – HPH has a whistleblowing policy so that all employees can raise any concerns that
they might have without fear of reprisals.

Central register of recruitment agents and supplier contracts.

Due Diligence

HPH will only work with suppliers who formally confirm full compliance with its policies and exhibit due diligence in monitoring their own supply chains. The demonstration of this compliance is of extreme importance, and is verified by risk assessment through random visits to supplier premises, and regular review of suppliers, their policies and by monitoring their on-line and media reputations.

Key Performance Indicators

Number of incidents or complaints of slavery and human trafficking reported under HPH’s Whistleblowing Policy or otherwise

Number of staff trained on Anti-Slavery and Whistleblowing Policies

Remedial actions required as a consequence of incidents or complaints recorded

Training for Staff

Training is conducted for team members to ensure an understanding of the signs of modern slavery and to explain whistleblowing. All senior managers attend a Health and Safety for Managers course which provides additional training. The topic is reviewed during regular HR team conference calls.

HPH has a dedicated compliance team, which consists of involvement from the following departments:

• Legal/Commercial
• Human Resources
• Procurement

HPH works with the Shiva Foundation to provide an additional specialist source of best practice, training, and compliance updates.

Future Steps

In the forthcoming year, HPH intends to take further additional steps including:

Expanding due diligence on contractors, subcontractors and suppliers

Additional Modern Slavery training across the group through the development of additional on-line and face to face dedicated training courses

Regular reviews to monitor the effectiveness of the compliance programme

This statement was approved by the Board of Directors on 28 May 2019
For all 0845 numbers calls will be charged at 5p per minute plus your telephone provider’s access charge.

**Fees are inclusive of VAT (except in the Channel Islands. VAT does not apply in Guernsey for St Pierre Park Hotel, Spa & Golf Resort and GST is charged at L’Horizon Beach Hotel & Spa & Grand Jersey Hotel & Spa in Jersey).