Our business

We are a UK based hospitality company with a broad portfolio of hotel outlets, support centre and external catering contractors. We operate a portfolio of 26 hotels based throughout the UK and directly owned by our parent company LGH Hotels Management LTD with the business name being Hallmark Hotels LTD. Hallmark Hotels Ltd indirectly employs around 3,000 colleagues across our company entities who work across our Hotel outlets and Support Centre.

Our supply chain activities can be split into two broad categories – Support Centre supply chains and hotel supply chains. Our support centre supply chains cover procurement for our support centre offices. These are mainly focussed on items such as technology and professional services all of which are purchased through both global and UK based suppliers of goods and services. At the hotel level, supply chains cover procurement for all items required for running a hotel. These cover a wide range of items including food, linens, cleaning supplies and furniture. This procurement happens both at the local hotel level and, for some locations, via centralised purchasing arrangements that are available to our hotels. Our parent company will also have supply chains at different stages of their hotel’s life-cycle, for instance at the construction stage for new build hotels or modifications to current hotels within the group.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy. This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our suppliers

Hallmark Hotels LTD operates a supplier policy and maintains a preferred supplier list. We would always where possible conduct due diligence checks on these suppliers. Where our procurement process has been outsourced to a procurement broker we will always expect them to have completed the same acts of due diligence on our behalf. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage / national living wage
4. We may terminate the contract at any time should any instances of modern slavery come to light

Training

We regularly conduct training for our management teams and operational teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain along with modern slavery being covered within the company e-learning for relevant employees to protect our direct employees.

Our performance indicators
We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Working in partnership**

Modern slavery is complex and we believe strongly that working together with others being our suppliers, service providers and our teams to identify risks and best practice will be the most effective way to bring change in this area. We allow all team members the access and freedom to report any act that they feel may be an indication to Modern Slavery or Human Trafficking. These reports will always be investigated at an internal level and escalated to external parties should we find evidence to support this.

**Moving forwards**

We believe that increased transparency in the way businesses are addressing these risks is an important step in efforts to combat the abuses of modern slavery. We recognise the role that businesses including Hallmark Hotels Ltd can play in this. This area aligns fully with our values as being “The Home of Great Hospitality”, as well as our longstanding commitment to responsible business. Developing and enhancing our approach to human rights and combatting modern slavery will continue to be an important part of this.

This statement was correct at the time of publication and is subject to change and amendments where required.

Hallmark Hotels Ltd  
10 Queen Street Place, London, United Kingdom, EC4R 1AG  
01st February 2019
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