SHIVA HOTELS ANTI-TRAFFICKING REPORTING PROTOCOLS
To incorporate into HR and Manager Manuals.

Outlined below are the protocols for reporting any suspicious activity that may relate to or be an instance of human trafficking or other types of modern slavery.

Reporting Protocols

Trafficking is often an organised crime and employees should not disclose any information beyond the avenues for reporting set out here in case they expose themselves and/or the victim(s) to harm.

If a hotel employee witnesses an indicator leading them to suspect human trafficking or other types of modern slavery, they must inform the head of department and senior manager on duty immediately, in order to submit an internal report.

The senior manager on duty will continue to observe the situation and when three indicators regarding the same person are reported or witnessed, the protocol for reporting incidents must be followed.

The senior manager on duty must, where possible, remain with the potential victim and not draw attention to the fact that the victim has sought assistance, for example, s/he must not keep the potential victim in view of those who may be controlling him/her or even those working alongside that person. S/he must complete an incident report and inform the general manager of the hotel and head office immediately.

The general manager of each hotel is automatically appointed as the Anti-Trafficking Champion for their hotel, unless otherwise agreed.

- On receiving a report of a potential incident of trafficking within the UK, the General Manager (or senior manager on duty in the General Manager’s absence) will contact the local police quoting “Operation MakeSafe” and will then follow police advice. S/he will call 999 if the victim is still on the premises, otherwise s/he will call the Modern Slavery Helpline (0800 121 700) who will provide further assistance and report to law enforcement as appropriate. S/he will follow the crisis manual procedures for reporting to head office.

- On receiving a report of a potential incident of trafficking outside of the UK, the Anti-Trafficking Committee may choose to report the incident to an anti-trafficking NGO or victim service provider in that country.

- HR Director and Director of Operations must inform Shiva Foundation and head office of the incident as soon as possible (ideally within 24 hours of the incident occurring) and advise on next steps, such as communications with the Modern Slavery Helpline (0800 0121 700) and their local victim support provider (i.e. the Salvation Army, 0300 3038 151). In situations when the victim does not want to report the incident to the police, the Modern Slavery helpline will signpost appropriately in keeping with the wishes of the victim.

- In emergencies, where there is immediate risk of harm, regardless of whether the victim is still on the premises, the General Manager must follow existing safety procedures and the local police must be contacted on 999 immediately.

- Additional findings or outcomes of reported incidents will be communicated to Shiva Foundation and head office by HR Director and Director of Operations.
On an ongoing basis, the General Manager should assess management of the protocol by tracking incidents, soliciting feedback, improving the protocols, and monitoring compliance. At least once a year, a confidential self-assessment report should be submitted to the Anti-Trafficking Committee (as defined below).

To the extent a hotel does not have an existing relationship with the local police or a local victim support provider, the General Manager, supported by head office and Shiva Foundation where necessary, must build such a relationship.

An Anti-Trafficking Committee, consisting of key representatives from head office and Shiva Foundation, will be formed and meet twice a year in order to report any ongoing challenges, patterns or concerns. Representatives from Shiva Foundation will chair this committee. The committee should review the annual self-assessment reports and industry benchmarks to recommend changes and improvements. General Managers and Anti-Trafficking Champions feed into the Anti-Trafficking Committee through regular Health and Safety meetings.

Members of the public or people not employed by us are encouraged to write, in confidence, to the head office to raise any concern, issue or suspicion of modern slavery in any part of our business or related supply chain. This information must be communicated to them by the hotel at the time of booking as well as through materials provided in the lobbies and bedrooms of each hotel.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under the above listed protocols, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Shiva Hotels will accept and take seriously concerns communicated. However, any claims or allegations made which are found to be malicious or vexatious may result in disciplinary action being taken against the individual by us.

Remedy Protocols

Investigation: Any investigation beyond the initial report should be performed by the 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. It is recommended that an investigation of a report made about staff be done in conjunction with the Company disciplinary procedures. 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 trafficking, Anti-Trafficking Champions should work in cooperation with a local specialist victim service provider, such as the Salvation Army, to ensure that the victim is protected. If the victim does not want the police to be called, the Salvation Army (0300 303 8151) and Modern Slavery Helpline (0800 0121 700) are good 24/7 options for advice regardless of location. Shiva Hotels will work to ensure that victims of trafficking can continue employment at the hotel where possible. Victims of trafficking should be made aware of all options for access to remedy (both judicial and nonjudicial).

Root Cause Analysis: Shiva Hotels, with Shiva Foundation, should work 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, Shiva Hotels should give written warning notice or notice of termination to employee, supplier, contractor, or subcontractor that has violated policy. If applicable, Shiva Hotels should make improvements that will prevent future incidents.