

Shiva Hotels Group LLP

# Modern Slavery Statement 19/20



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This statement has been published in pursuant to and accordance with the guidelines in Section 54 of the Modern Slavery Act (2015). It builds on our Shiva Hotels Group LLP's Modern Slavery Statement from 2018/19 and aims to avoid repetition where possible. To attain additional background information, where required, please see our 2018/19 Modern Slavery Statement [here](#).

We at Shiva Hotels Group LLP ("Shiva Hotels") pursue a zero tolerance approach to modern slavery and human trafficking and recognise our responsibility to prevent and protect against such acts within our business and supply chains through constructive partnerships. We continue to promote and respect human rights and worker rights and recognise the need to educate and support those who are most vulnerable to exploitation.

In 2012, we publicly committed to eradicating slavery, when we founded Shiva Foundation, a non-governmental organisation focused on addressing modern slavery in the UK. We also published a public statement - '[Shiva Hotels - Our Commitment on Human Trafficking and Modern Slavery](#)' in 2017 and it continues to sit in the form of a plaque in the lobby of every one of our hotels. Where facilities allow, there is also a link to the statement and additional information on guest room TV screens.

## Message from the Director

At Shiva Hotels, we are committed to improving our practices to combat slavery and human trafficking. As part of this, we set out a range of actions for ourselves within our 2018/19 statement, which we recognise was ambitious. We have made significant headway in some areas, however we have come across challenges and slower progress in other areas. In the interest of transparency, and to share our learning with other SMEs, we aim to offer honest consideration of our objectives and actions to date in this Modern Slavery Statement. We understand that this is an ongoing process and we are committed to learning and adapting our business processes as required to ensure our operations have no negative impact on the people who work to help us provide a good service to our customers.

We are determined to do everything we can to bring responsible sourcing practices to all stages of our supply and value chain.



**Rishi Sachdev**  
Director, Shiva Hotels

## a) Our structure, business and supply chains

Shiva Hotels is a UK-based business with operations across the country in the hotel industry. Our portfolio includes five operating properties in the UK and we employ nearly 500 staff and approximately 250 sub-contracted staff.

The hotel industry infrastructure can lead to increased risk, which we are aware of and aiming to address.

- 1 Layered nature of hotels:** Our hotels are franchises under the Hilton brand and we are responsible for their management. We have a strong relationship with Hilton and our learning and development programme includes the Hilton modern slavery training in addition to our own. We also co-founded the [Stop Slavery Hotel Industry Network](#) which brings together brands, owners, managers and labour suppliers to collectively address the issue.
- 2 Supply chains:** Our first-tier suppliers are primarily UK-based, however we recognise there may be higher risk countries further down the supply chain which we hope to uncover with additional mapping. 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. This means that we can focus our supplier engagement efforts.
- 3 Outsourced labour:** As is typical of the industry, nearly one quarter of our workers, primarily in housekeeping, are employed by a third-party. We also use agencies for short-term contracts. We have assessed the risks associated with this model and have set out how we aim to address them below (see Our Due Diligence Processes section).

Modern slavery is not restricted to one function within our business and therefore requires a cross-functional approach to address it. An Anti-Trafficking Committee, consisting of the Anti-Trafficking Champions from each hotel (General Managers unless otherwise specified), director-level representatives from Human Resources, Operations and Shiva Foundation are responsible for modern slavery risk and due diligence across the business. The Anti-Trafficking Committee meets bi-monthly to track progress and report any ongoing challenges, patterns or concerns.

## b) Our policies on modern slavery and human trafficking

Shiva Hotels identified key risk areas within the hotel industry which our policies and protocols address (see table below). The policies and protocols were developed over a number of years in collaboration with internal and external contacts. Initially the policies were piloted in one hotel as part of the [Stop Slavery Blueprint](#) (“Blueprint”) which is a wider set of guidance and principles related to modern slavery risk and the hotel industry. During this time, feedback was collected by the Anti-Trafficking Committee on how policies were being implemented and received. Feedback was also sought from external experts such as academics, NGOs, lawyers and the police. After being amended, the policies, protocols and the full Blueprint were then rolled out across the hotel group.

We are currently working with professor Alexandros Paraskevas from University of West London who is undertaking research with staff and general managers across our hotel portfolio to identify the systems that drive the effectiveness of such policies and practices.



### Hotel Usage



### Employees



### Supply Chains



### Executive Decision Making

|  |  |  |   |
|--|--|--|---|
| <p><b>Risk:</b> 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><b>Risk:</b> 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><b>Risk:</b> 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><b>Risk:</b> 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><b>Steps we are taking:</b> Our policy to tackle such risks is contained in the <a href="#">Shiva Hotels Hotel Use Policy</a> 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 <a href="#">internal incident reporting protocols</a> through discussion with the police and victim service providers, to ensure that the pathway for reporting incidents, is victim-centred, in line with national practice, and is clear and simple to follow. Along with the protocol, we have created an Incident Report Form specific to modern slavery incidents.</p> | <p><b>Steps we are taking:</b> 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 <a href="#">Shiva Hotels Best Practice Commitment on Employment and Human Rights</a> and <a href="#">Guidelines for Establishing Terms and Conditions with Recruitment Agencies</a>. *</p> | <p><b>Steps we are taking:</b> We developed a <a href="#">Shiva Hotels Supplier Code of Conduct</a> which defines both Shiva Hotels' minimum standards and the basic principles of cooperation that are expected from all of our suppliers. This is accompanied by a <a href="#">Message from the Director</a> and <a href="#">Principles of Implementation</a>. 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><b>Steps we are taking:</b> 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 <a href="#">Shiva Hotels Head Office Guidance on Human Trafficking</a> when making broader strategic decisions.</p> |
| <p><b>Implementation:</b></p> <ul style="list-style-type: none"> <li>• Made available to all staff as part of the Blueprint.</li> <li>• Incorporated in staff handbooks.</li> <li>• Made aware to staff during mandatory induction training.</li> </ul>  | <p><b>Implementation:</b></p> <ul style="list-style-type: none"> <li>• Made available to all staff as part of the Blueprint.</li> <li>• Incorporated in HR manuals.</li> <li>• Made aware to staff during mandatory induction training.</li> </ul>   | <p><b>Implementation:</b></p> <ul style="list-style-type: none"> <li>• Made available to all staff as part of the Blueprint.</li> <li>• Included with introductory communication to all suppliers asking for evidence of their modern slavery policies.</li> <li>• Repurposed as a questionnaire to be sent to suppliers in 2019.</li> </ul>   | <p><b>Implementation:</b></p> <ul style="list-style-type: none"> <li>• Made available to all staff as part of the Blueprint.</li> <li>• Displayed in Head Office.</li> <li>• Made aware to all staff, including Head Office staff, through mandatory training.</li> </ul>   |

\*Notable provisions set out in the employment policies include child labour, fair wages, discrimination and accommodation.

We recognise the positive impact our own practices can have on decreasing vulnerability to exploitation.



Shiva Hotels has also created a whistleblowing policy, which is an important mechanism for staff grievances and anonymous reporting.

Although all staff are required to have a certain level of English for employment with Shiva Hotels, we are implementing a poster that aims to help workers understand their rights in a number of different languages. These will feature in staff areas.

## c) Our due diligence processes

Acknowledging the risks our industry faces, we have taken action to mitigate some of the risks.

### 1. Hotel Usage

We have put in place a training programme that is continually updated to ensure that staff are aware of the signs of exploitation and how to report them (see Training section below). This also pertains to risk of labour exploitation as staff are trained on signs their colleagues could display if they were being exploited.

### 2. Employees

Employees are encouraged to learn about and engage with the issue of modern slavery, as well as other human rights issues:

- Staff are encouraged to engage with the Blueprint and its materials and those that demonstrate an interest are able to get involved with training and act as an ambassador.
- All hotels take part in two awareness raising days each year to engage the public on the topic of modern slavery.
- Staff are also encouraged to suggest fundraisers or activities or events in support of other causes that are near their hearts, such as health, poverty and the environment.

### *Sophie Hayes Foundation*

We at Shiva Hotels have been working with the Sophie Hayes Foundation to offer placements to survivors of human trafficking. The partnership was created in February 2018 with a pilot in one property and has now expanded to additional hotels within our portfolio offering placements in departments such as Kitchen, Food and Beverage, Housekeeping and Front Office.

### 3. Supply chains

One of the highest risk supplies we source is housekeeping. We have been working quite closely with our labour supplier who have taken on modern slavery as a cause they wish to fight. They are a member of ETI and sit on the Stop Slavery Hotel Industry Network. We have moved all of our housekeeping services to be provided by them and have partnered with them on the production of their staff awareness training.

We recognise the positive impact our own practices can have on decreasing vulnerability to exploitation. For example, we understand the risk of overtime and underpayment that can happen if productivity rates for housekeeping contracts are ill-advised. We use a time-in-motion trial to set productivity rates with our labour suppliers and are firm that productivity is never to be traded for the offer of a lower fee. We believe in allowing reasonable time for housekeeping staff to clean a room and in return they are able to deliver high quality service.

We at Shiva Hotels continue to work proactively with all of our suppliers to help them establish their own anti-slavery initiatives. We continue to investigate options for managing supplier relationships, focusing on our priority suppliers first. Some options include:

- 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.

We are a founding member of the [Stop Slavery Hotel Industry Network](#), which brings together various organisations within the industry from brands, to owners, to management companies. The Network runs a resource hub with guidance that helps the industry tackling modern slavery and it has produced the first-of-its-kind Framework for Working with Suppliers, based on the experience and good practice of members. The Blueprint was an important example from which the Framework drew good practice.

In the interest of transparency, and to share our learning with other SMEs, we aim to offer honest consideration of our objectives and actions to date in this Modern Slavery Statement.





**Incidents**

To date, there have been no instances where we have had to take action with regards to our supply chains, however we anticipate that any instance will be an opportunity to further develop our processes in taking appropriate action against modern slavery. Conversely, we have faced a number of incidents on the premises of our hotels. Over 2018 there were a total of 1045 indicators reported by staff across the hotels (indicators are individual signs which when coupled with other indicators can become an “incident”). There have also been four incidents reported to the police, and whilst no incident was taken any further, each one has later fed back into our training. One of our hotels was subject to a spot check by the police and passed.

**d) Our risk assessment and mitigation processes**

In 2017, Shiva Hotels worked with Shiva Foundation and Stop the Traffik to carry out detailed risk mapping of our tier-one suppliers, amounting to just under 1000. The exercised covered suppliers across the hotel group and categorised them into 14 types of supply. 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. Please see our [2018/19 modern slavery statement](#) to get greater detail about these risk areas.

Some of the objectives in relation to addressing these risk that we had set in our 2018/19 statement have changed over the past year:

| 2018/19 statement objective  | Changes made   |
|--|--|
| <p>We were looking at carrying out a similar risk assessment activity every 18 months.</p>   | <p>Over 18 months from the first risk assessment, the supplier base hadn't had any significant changes and the priority risks remained the same. Instead of a full-scale risk assessment, Shiva Foundation has created and will regularly update an information sheet on higher risk products and higher risk countries to help Shiva Hotels incorporate risk assessments into reviews of suppliers and decisions about new suppliers. We have yet to decide on an appropriate time to redo the full in-depth assessment and will monitor supplier changes to help decide this in the future.</p>  |
| <p>After our initial communication asking suppliers to supply evidence of their anti-slavery processes, over 2018 we had intended to send out a detailed questionnaire to each to obtain evidence of compliance with the criteria set out in our Supplier Code of Conduct.</p>       | <p>After a large amount of varying responses to our initial communication, we realised we didn't have the capacity to manage supplier engagement and that our engagement plan would take longer than originally predicted.</p> <p>Over 2018, Shiva Hotels moved to an online tracking system to help map and engage with our suppliers on various themes from modern slavery to food safety. From 2019, the system is helping us to analyse the responses we have already received from our suppliers, to track where there are gaps in responses, and to start mapping our tier-two suppliers. Appointing an external platform has helped make this process more manageable and will enable us to go deeper into our supply chains with our investigations.</p> |
| <p>We intended to follow our plan for when suppliers don't adhere to, or provide evidence of adherence to, the provisions in the Supplier Code of Conduct. The plan being communication, capacity building, and termination of relationship if criminal activity is in question.</p> | <p>While this plan is still in place, we haven't been able to initiate as much of it as we would have liked. We have learned that as an SME, our leverage is far smaller than that of a large company. Instead we decided to focus our efforts on the suppliers that we deemed a priority. This list was determined by looking at our biggest suppliers, our highest risk suppliers and those we felt we had a strong enough relationship with for it to be used as leverage. One such group is our labour suppliers who we have been working closely with to mutually strengthen our anti-slavery activities.</p>   |

Hotel workers 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.



## e) Effectiveness of addressing modern slavery and performance indicators

The annual Shiva Hotels modern slavery statement acts as an opportunity for us to review our actions against the previous year's statement and to set out objectives for the company and each individual hotel. These objectives are then monitored at the regular Anti-Trafficking Committee meetings where we are able to assess steps taken, challenges faced and innovative ideas for going forward. We draft and review six-monthly action plans.

During the Committee meetings we also assess reporting rates, and whether they are consistent or whether there is a drastic dip that signifies that further training might be needed. With the help of the Metropolitan police, we analyse indicators and incidents reported and try to identify trends or areas where further intervention might be necessary. All of these learnings are then fed back into training. We also allow a space for external experts to feed in about new initiatives or changes in national policy.

Based on the learning we took from last year, over the next 12 months, we are prioritising strengthening our engagement with our priority suppliers and analysing all tier-one suppliers with the view to map tier-two. We will continue to update our policies, processes and training as required and will continue to monitor their effectiveness.

## f) Training on slavery and human trafficking

In accordance with the Blueprint, initial and regular interval awareness training is embedded into our learning and development strategy. The training has been created in consultation with a variety of external experts and has been adapted after a pilot roll out. 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. We continue to update the training as is relevant; for example we have included new indicators and case studies based on staff experience as well as a section on Domestic Servitude, another risk area for hotels, with support from Kalayaan.

Hotel workers 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.

All staff across Shiva Hotels, including outsourced staff via our labour suppliers, have received training on modern slavery indicators and how to report an incident that may occur. As part of each hotel's programme, refresher training is provided annually. The refresher training is currently being adapted in partnership with Flow, a technology-driven learning and development platform for the hospitality and tourism sector. The result will be an online version of the training tailored to the hotel industry. We are including a safeguarding module as part of the hotel crisis manuals and as part of induction training for duty managers to help them operate in a victim-centric way and to provide them with the tools should someone disclose their exploitation.

We continue to track knowledge gained, how the training is received, knowledge retained and trust in reporting protocols from those that complete the training (see our 2018/19 Modern Slavery Statement for further information on how we do this). While we have had one live scenario conducted by the police, we are setting up additional live scenarios for each hotel as another way of assessing training effectiveness.

This Modern Slavery Statement was created by Shiva Hotels with support from Shiva Foundation. It was approved by the Shiva Hotels Board of Directors on 15 March 2019.



**Rishi Sachdev**  
Director, Shiva Hotels

Shiva Hotels Group LLP

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[www.shiva.co.uk/modernslavery](http://www.shiva.co.uk/modernslavery)