



## MODERN SLAVERY POLICY

Modern slavery is a significant and growing problem in the UK. It is a criminal offence and a violation of fundamental human rights. Modern slavery can take many forms and encompasses slavery, servitude, forced and compulsory labour and human trafficking. Companies in the hospitality industry are recognised as being at greater risk due to the nature of the workforce and diversity of supply chains.

HSG recognises their responsibility to identify where the business is at risk and to put in place appropriate measures to ensure that the business is not at risk including extending the principles to its supply chains. This policy sets out the Company position and procedures.

### Introduction

Whilst the policy outlined is non-contractual, HSG Facilities Management expects its employees and workforce to comply with the provisions of this policy. The details may be amended or replaced by the Company at any time. This Policy applies to all employees, workers, and those working on behalf of the HSG Facilities Management.

### **Definitions (extracted from the Transparency in Supply Chains etc. A Practical Guide, from a UK publication from the Home Secretary)**

*Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking.*

*Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised.*

*Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.*

*Forced or compulsory labour involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily [as defined in international law by the ILO's Forced Labour Convention 29 and Protocol].*

*Human Trafficking is an offence that requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the*



*arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.*

## **Policy Statement**

Under the Modern Slavery Act 2015 modern slavery is a criminal offence.

HSG Facilities Management is committed to ensuring transparency in our approach to tackling modern slavery and to comply with disclosure obligations under the Modern Slavery Act 2015.

In employment of our own employees we prohibit modern slavery or the hiring of individuals that are under 16 years of age. We fully comply with legislation applicable to the hiring and protection of employees within the workplace and compensation for work undertaken including Health and Safety legislation and minimum wage.

HSG Facilities Management expects all suppliers, contractors and business partners to observe the same high standards and we will include in our contracts specific prohibitions against the use of forced, compulsory or trafficked labour, or any held in slavery or servitude. We will communicate our approach to all suppliers, contractors and business partners at the outset of our business relationship.

## **Key Principles**

- All employees must read, understand and comply with this policy.
- All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all employees, suppliers, or business partners over which we exercise control.
- Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.
- HSG Facilities Management encourages openness and will support anyone who raises genuine concerns in good faith under this policy.

## **Procedure**

1. Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage.
2. Any employee who believes or suspects a breach of this policy or the Modern Slavery Act 2015 has occurred or that it may occur must notify their line manager or



HR Department as soon as possible. Concerns may also be raised using the Whistleblowing Policy and Procedure.

3. Employees who are unsure about whether a particular act, the treatment of workers more generally, or working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery can raise it with their line manager or the HR Department.



## **Our Supply Chain**

Our supply chain includes the sourcing of materials, foods, consumables and labour related to the provision of services within the hotel industry.

We are committed to ensuring there is no modern slavery or human trafficking in our business or our supply chain and will act ethically and with integrity in all our business relationships to ensure we have effective systems and controls in place.

## **Our Supplier Procurement**

- HSG Facilities Management will take steps to ensure that our external supply chain remains compliant with this policy.
- Through self-assessment, suppliers are required to confirm agreement and compliance with this policy. In particular, we require suppliers to ensure they comply with current legislation in relation to the Equality Act 2010, Minimum Wage Regulations, Working Time Regulations, Health & Safety at Work Act and Modern Slavery Act.
- HSG Facilities Management will implement appropriate audits of any supplier on identification of potential risk(s).

## **Identifying Slavery**

There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support. However, the following key signs could indicate that someone may be a slavery or trafficking victim (this list is not exhaustive):

- The person is not in possession of their own passport, identification or travel documents;
- The person is acting as though they are being instructed or coached by someone else;
- They allow others to speak for them when spoken to directly;
- They are dropped off and collected from work;
- The person is withdrawn or they appear frightened;
- The person does not seem to be able to contact friends or family freely;
- The person has limited social interaction or contact with people outside their immediate environment.

Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances which may indicate something is not quite right.

## **Reporting Slavery**

If you have any concerns you should take action:

- If you think that someone is in immediate danger, dial 999;



- Otherwise, you should discuss your concerns with your line manager who will decide a course of action and provide any further advice;
- Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns before taking any action.

### **Our Reporting Statement**

HSG Facilities Management will provide an annual statement in compliance with the Modern Slavery Act 2015, following each financial year, pursuant to section 54 (1) of the Modern Slavery Act 2015. The statement will be published on the website and available on request.

### **Breach of this Policy**

Any employee who breaches this policy or the Modern Slavery Act 2015, subject to investigation, may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

HSG Facilities Management may terminate our relationship with any of our suppliers if they breach this policy or fail to allow appropriate audit/assessment access.

### **Grievances**

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 organisation or in any of our supply chains. Employees who believe they have suffered any detrimental treatment should inform their line manager or HR immediately following the Grievance Policy and Procedure.

### **Review**

HSG Facilities Management will regularly review our policies and practices to ensure that we keep up-to-date with best practice, including amending or responding to any relevant changes in legislation and/or case law.

### **Related Policies**

Recruitment Policy  
Whistleblowing Policy  
Disciplinary Policy and Procedure  
Grievance Policy and Procedure